

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

COGMEDIA LLC,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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CIVIL ACTION NO. 1:25-cv-12127

**PLAINTIFF’S PRELIMINARY INFRINGEMENT CONTENTIONS
AND ACCOMPANYING DOCUMENT PRODUCTION**

Plaintiff Cogmedia LLC (“Plaintiff” or “Cogmedia”) hereby provides the following preliminary infringement contentions as to Defendant Meta Platforms, Inc. (“Defendant” of “Meta”), and accompanying document production pursuant to Local Rule 16.6.

Plaintiff undertook reasonable efforts to prepare these preliminary infringement contentions based on publicly available information. The period for discovery has just begun, Defendant has not yet made any document productions (including any technical document production), and as such, Plaintiff reserves the right to amend its infringement contentions based on material identified and/or produced during discovery or as the litigation progresses. Plaintiff expressly reserves the right to supplement and/or amend its contentions after a full review of Defendant’s initial technical document production as set forth in the Local Rules and in accordance with the Schedule to be entered by the Court in this matter. Plaintiff further reserves the right to amend its preliminary infringement contentions in response to claim construction proceedings and this Court’s claim construction rulings.

In addition, the evidence cited in support of the disclosures herein is necessarily exemplary and is therefore illustrative and not exhaustive. Plaintiff anticipates that relevant facts and evidence

are uniquely within the possession, custody, or control of Defendant. Plaintiff reserves the right to supplement, amend, or modify the information contained herein and to use and introduce at trial such information and any subsequently identified or discovered information.

**PRELIMINARY IDENTIFICATION OF INFRINGED CLAIMS
LOCAL RULE 16.6(d)(1)(A)(ii)**

These preliminary infringement contentions are directed towards United States Patent Nos. 11,036,371 (“the ‘371 Patent”), 9,817,562 (“the ‘562 Patent”), and 10,664,141 (“the ‘141 Patent”), (collectively, “the Asserted Patents” or “the Patents-in-Suit”). Plaintiff makes the following preliminary identification of the infringed Asserted Claims:

U.S. Patent No.	Asserted Claims
‘371 Patent	Claims 1-29
‘562 Patent	Claims 1, 2, 3, 5, 7, 8, 11, 12, 13, 14, 15, 17, 18
‘141 Patent	Claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 17, 18, 19, 20, 21, 22

**PRELIMINARY IDENTIFICATION OF
ACCUSED PRODUCTS, SYSTEMS, METHODS AND/OR SERVICES
LOCAL RULE 16.6(d)(1)(A)(i)**

The Asserted Claims are directed towards computer-implemented methods. Defendant makes, sells, uses, offers for sale, sells, tests, markets and/or imports into the United States systems and instrumentalities that, when used, infringe the claims of the Asserted Patents. More specifically, Defendant owns and operates a web site accessible at <http://facebook.com>, as well as software applications and/or mobile applications that allow users to access a mobile version of Facebook.com. As is set forth in more detail in the attached preliminary claim charts, Defendant

practices the claimed computer implemented method and therefore infringes the Accused Claims in at least two scenarios. In the first scenario, Defendant provides a mobile application which contains software resident on a user's device. This can include applications resident on a range of consumer electronic devices, including but not limited to smartphones, tablets, desktop computers, and laptops. In the second scenario, Defendant allows access to its Facebook website platform via a browser. Defendant's website platform is similarly accessible via the web browser of a range of consumer electronic devices including but not limited to smartphones, tablets, computers, laptops, and smart tv's. Defendant also practices the claimed computer implemented method steps via its in-house testing of the Accused Products. *See, e.g.,* Complaint at ¶¶ 9-10, 17.

Herein, the term "Accused Products" refers to all products manufactured, used, tested, imported, offered for sale, or sold by or on behalf of Defendant practicing the claims of the Patents-in-Suit and all processes employed by Defendant that practice the claims of the Patents-in-Suit, consisting of at least Defendant's "Wall", "Timeline", "Profile", "Feed", and/or "Newsfeed" features and functionality that is accessible via, and provided through, Defendant's Facebook website platform and/or software/mobile application versions of Facebook.com. The Accused Products include all other products made, used, imported, sold or offered for sale by Defendant that includes the same or similar infringing functionality and all past, present, and future generations of the infringing design, as well as any successor products or later-released products that utilize the same or similar infringing design.

**PRELIMINARY CHARTS SETTING FORTH AN ELEMENT-BY-ELEMENT
DESCRIPTION OF WHERE AND HOW EACH ELEMENT OF EACH ASSERTED
CLAIM IS FOUND IN EACH ACCUSED PRODUCT OR METHOD
LOCAL RULE 16.6(d)(1)(A)(iii)**

Subject to ongoing discovery and investigation, Plaintiff provides preliminary claim charts pertaining to the Patents-in-Suit and Defendant's Accused Products attached hereto as Exhibits A

through C. These preliminary infringement contentions serve as a notice function and are not required to, and therefore do not, present every possible permutation or theory of Plaintiff's case.

**PRELIMINARY IDENTIFICATION OF EACH MEANS-PLUS-FUNCTION TERM
LOCAL RULE 16.6(d)(1)(A)(iv)**

At this time, Plaintiff contends that no term and/or phrase within the Asserted Claims should be governed by 35 U.S.C. § 112 or treated as a means-plus-function term. To the extent Defendant identifies any term and/or phrase it believes should be afforded Section 112 means-plus-function treatment, Plaintiff expressly reserves the right to object to such treatment, or in the alternative, to offer competing identification of function and corresponding structure at the appropriate time (including during the claim construction process).

**LITERAL INFRINGEMENT
AND INFRINGEMENT UNDER THE DOCTRINE OF EQUIVALENTS
LOCAL RULE 16.6(d)(1)(A)(v)**

Plaintiff contends that Defendant literally infringes the Asserted Claims of the Patents-in-Suit as more specifically explained in the preliminary claim charts attached hereto as Exhibits A through C. Plaintiff also asserts infringement under the doctrine of equivalents, and reserves the right to argue infringement under the doctrine of equivalents to the extent that the difference between any claim element and any component of any product or system, and any step of any service, method, and/or process, is insubstantial. Given that discovery has only just begun, and that Defendant to date has not identified any limitation that it believes is not literally infringed, Plaintiff expressly reserves the right to supplement and/or amend its theory of infringement under the doctrine of equivalents as discovery progresses, or at such time Defendant specifically identifies any claim element that it contends is not met literally.

**PRELIMINARY IDENTIFICATION OF APPLICABLE 35 U.S.C. § 271 SUBSECTIONS
LOCAL RULE 16.6(d)(1)(A)(vi)**

Defendant has, under 35 U.S.C. § 271(a), directly infringed literally and/or under the doctrine of equivalents, the Asserted Claims. To the extent discovery bears evidence of Defendant's infringement under additional subsections of 35 U.S.C. § 271, Plaintiff expressly reserves the right to amend or supplement its identification of subsections.

**IF ANY ALLEGED INFRINGEMENT IS BASED ON THE ACTS OF MULTIPLE
PARTIES, THE ROLE OF EACH SUCH PARTY IN THE INFRINGEMENT
LOCAL RULE 16.6(d)(1)(A)(vii)**

Plaintiff is not alleging joint infringement. As stated in the attached claim charts, and in Plaintiff's Opposition to Defendant's Motion to Dismiss (herein incorporated by reference), Defendant is liable for direct infringement of each Asserted Claim. As set forth in further detail therein, in certain scenarios of infringement each and every claimed method step may take place on Defendant's own backend server equipment. And under controlling precedent set forth in the *Sirf* holding, the Federal Circuit has explicitly allowed the pleading of direct infringement of a software method claim against a software manufacturer even where, as here, certain steps in other scenarios may automatically occur on an end user device. *Sirf Tech., Inc. v. Int'l Trade Comm'n*, 601 F.3d 1319 (Fed. Cir. 2010). The Court's Order denying Defendant's Motion to Dismiss confirms as such. *See* Dkt. No. 55.

**ACCOMPANYING DOCUMENT PRODUCTION
LOCAL RULE 16.6(d)(1)(B)-(D)**

Plaintiff is producing concurrently herewith copies of documents responsive to the information listed in Local Rule 16.6(d)(1)(B)-(D). Because a protective order has not yet been entered by the Court, and until such a case-specific protective order is entered, the Court's default protective order shall govern the handling of any information produced by Plaintiff that has been

designated as “confidential.” See Local Rule 16.6(d)(6). Specifically, any document designated as “confidential” shall only be accessed by the parties’ outside counsel, the Court, and their personnel.

Date: February 4, 2026

Respectfully submitted,

/s/ Michael T. Cooke

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on the 4^h day of February 2026, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court for the District of Massachusetts using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

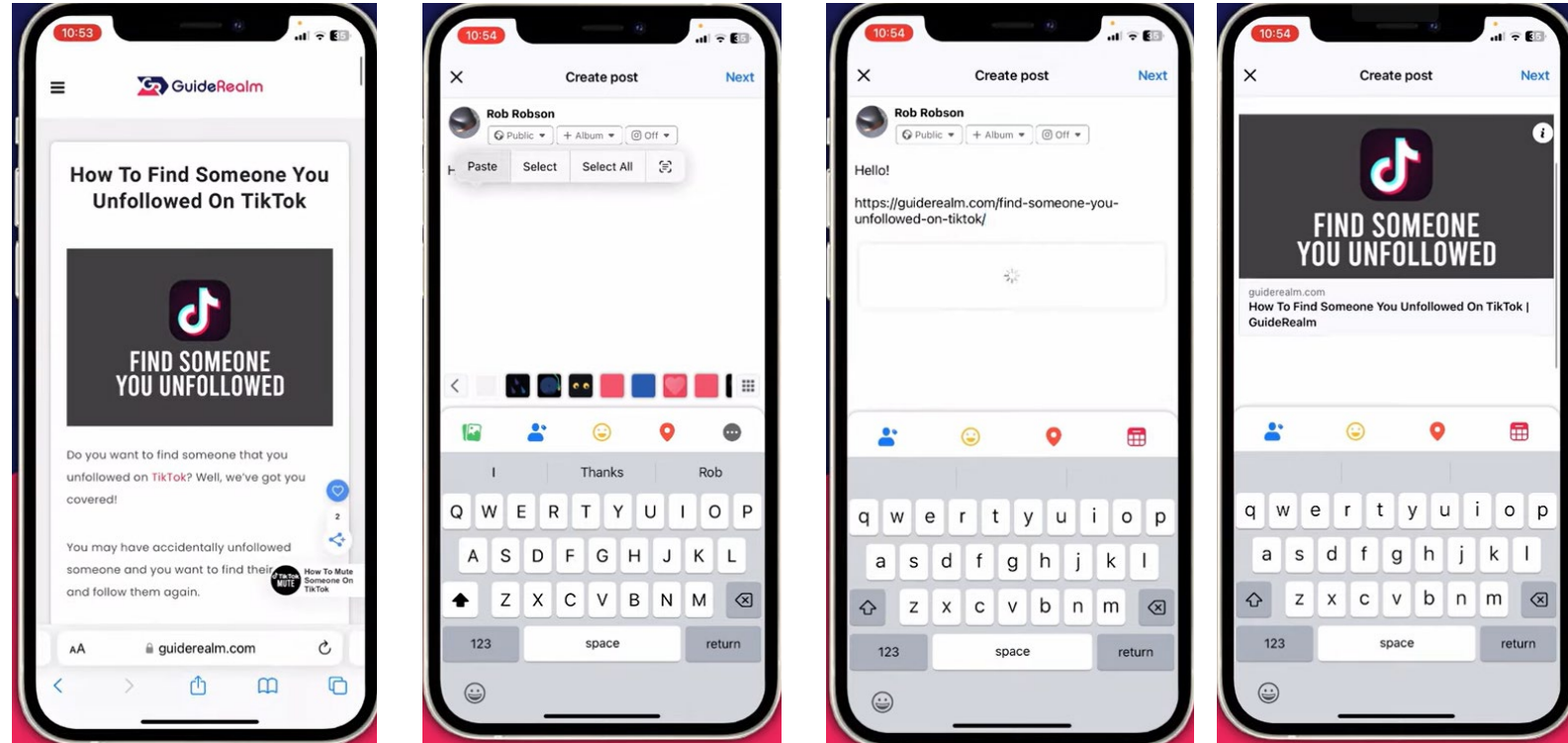
/s/ Michael T. Cooke

Plaintiff's Preliminary Infringement Contentions
Exhibit A

U.S. Pat. No. 11,036,371
Methods and Apparatus for Managing and Exchanging Information
Using Information Objects

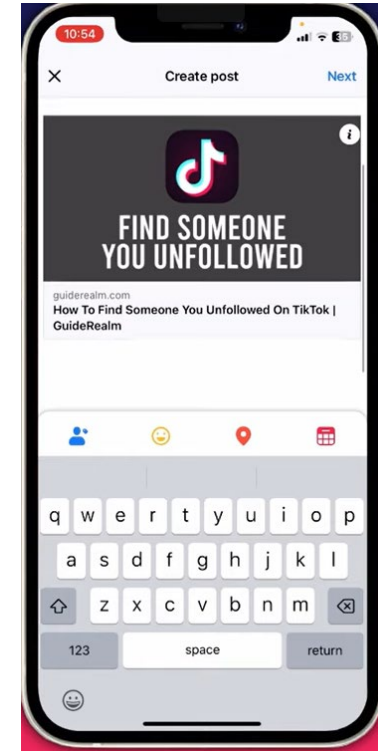
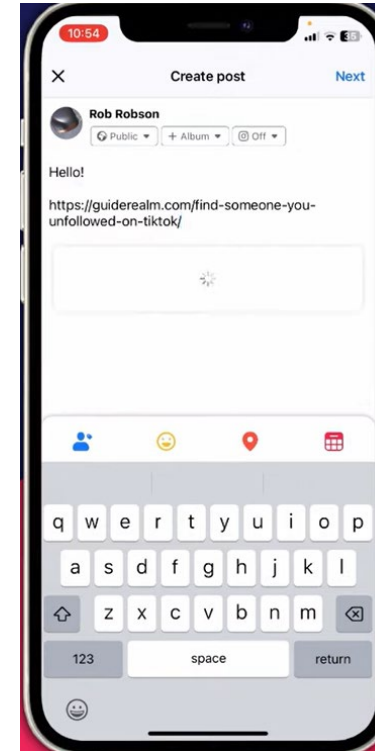
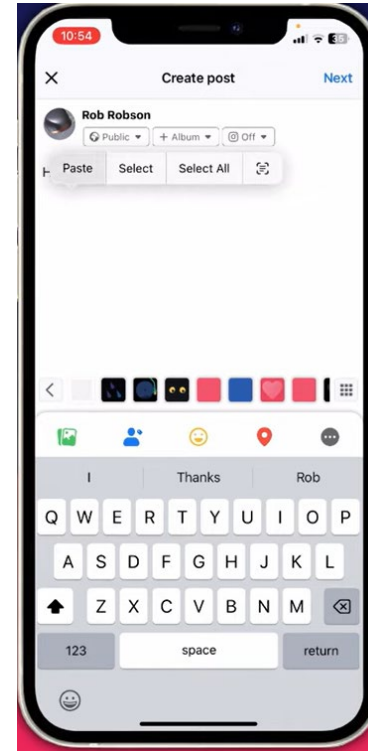
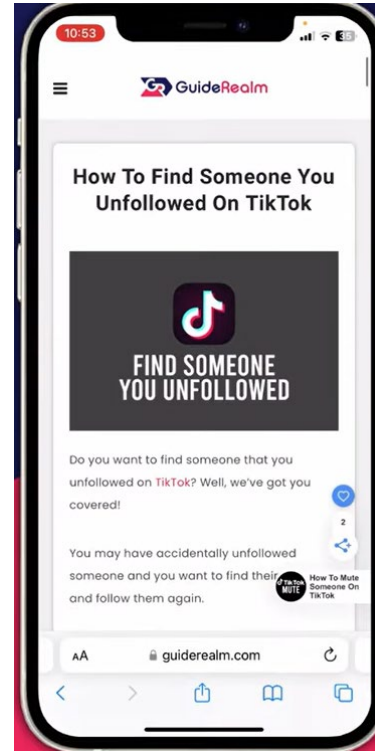
1. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the at least one source being external to the at least one computer, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method. Defendant infringes the accused method in at least two scenarios.
- In the first scenario, Defendant provides a mobile application which contains software resident on a user's device. This can include applications resident on a range of consumer electronic devices, including but not limited to smartphones, tablets, desktop computers, and laptops.
- In the second scenario, Defendant allows access to its Facebook website platform via a browser or other website interface. Defendant's website platform is similarly accessible via the web browser application of a range of consumer electronic devices including but not limited to smartphones, tablets, computers, laptops, and smart tv's. This resident application software allows access to, and interacts with, Defendant's Facebook platform.
- Under both scenarios, Defendant practices (in whole or in part) the claimed method through execution of software instructions on its backend servers of its Facebook platform as explained further below.
- The infringing methodology set forth by this claim chart applies equally to both scenarios unless otherwise indicated. To be clear, the use of an exemplary photo showing infringement under the first or second scenario would equally apply to infringement under the other scenario.



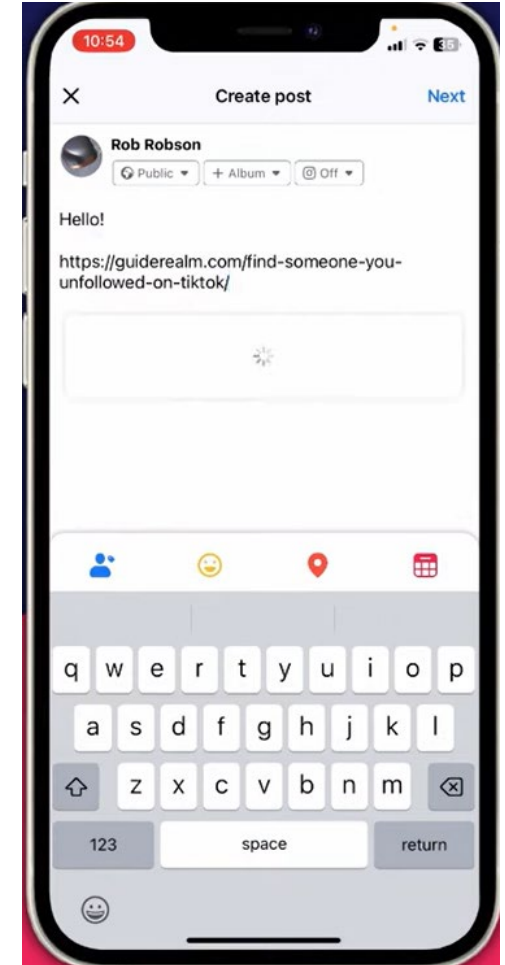
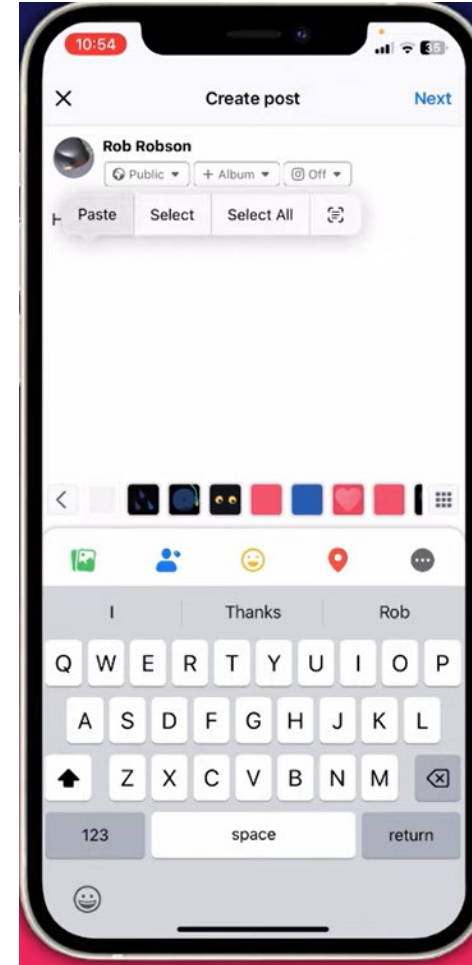
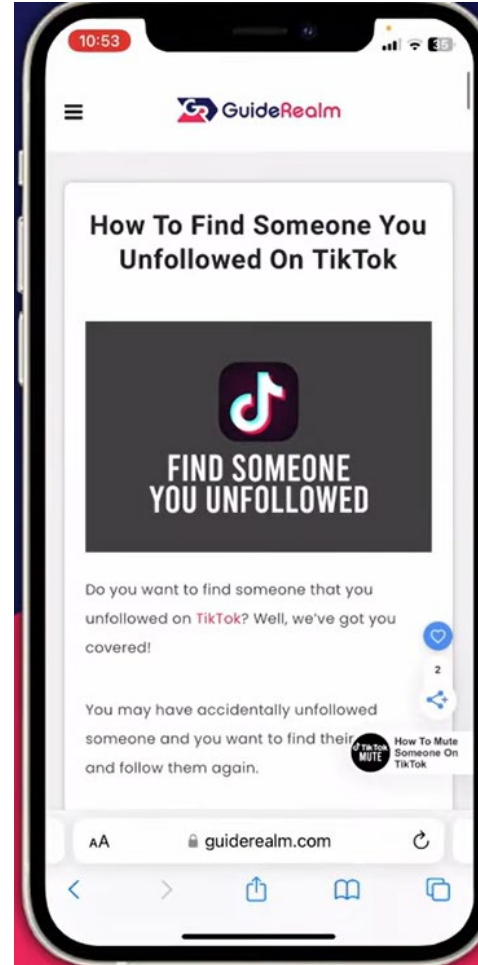
1. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the at least one source being external to the at least one computer, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, wherein the at least one source is external to the computer.
- The first photo represents a data item obtained from a source that is external to the at least one computer. In this example, the data item corresponds to an article hosted via a third-party website, namely, an article titled How to Find Someone You Unfollowed on TikTok via the website guiderealm.com.
- Photographs 2-4 represent the method whereby Defendant interacts with at least one data item obtained from at least one external source.



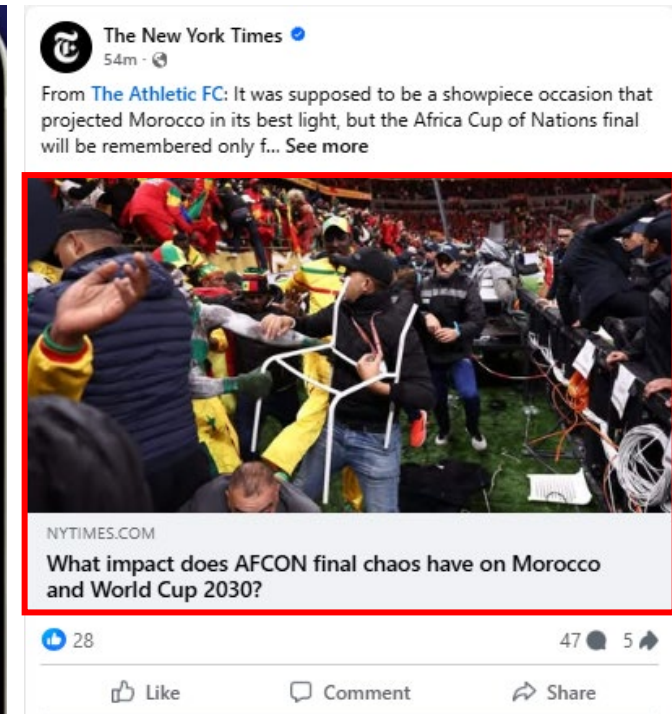
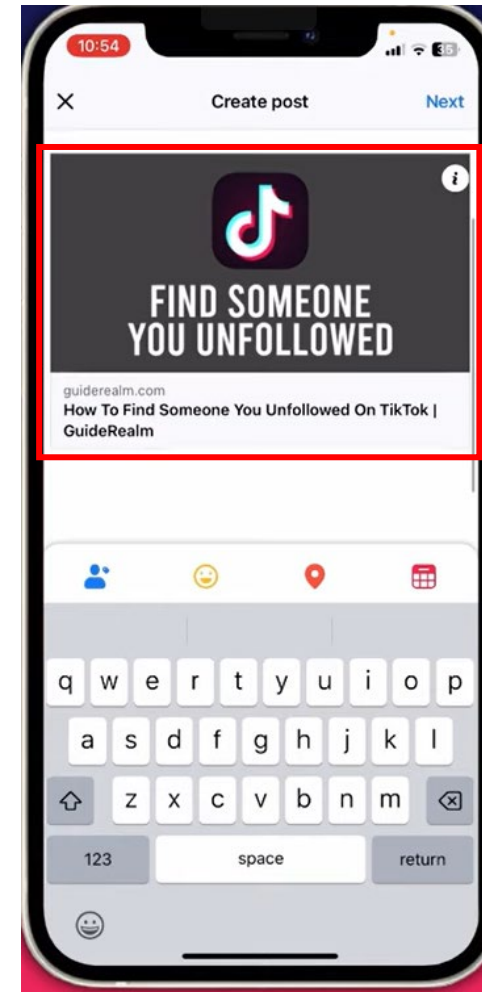
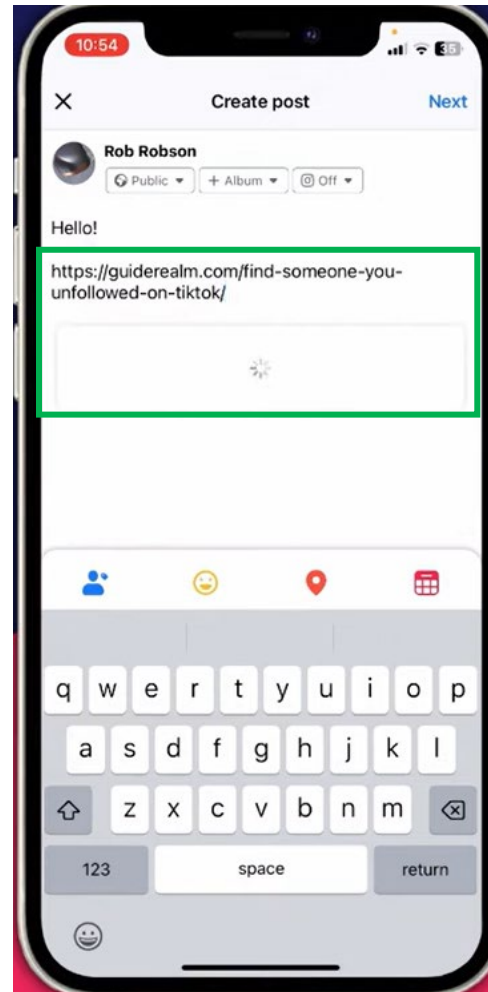
(a) responsive to a user selection of the at least one data item:

- Users may make a selection of a data item. In this example, the data item is the third-party web article entitled How to Find Someone You Unfollowed on TikTok.
- Defendant performs a series of steps in response to the user selection of the at least one data item.
- While users select data items, Plaintiff notes the user's selection is not an affirmative step of the claim. Instead, the claim's focus is on Defendant's actions "responsive to" the user selection.



(a)(1) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture and a heading, and causing storing of data corresponding to each of the information objects, including a link to the at least one data item, in a database;

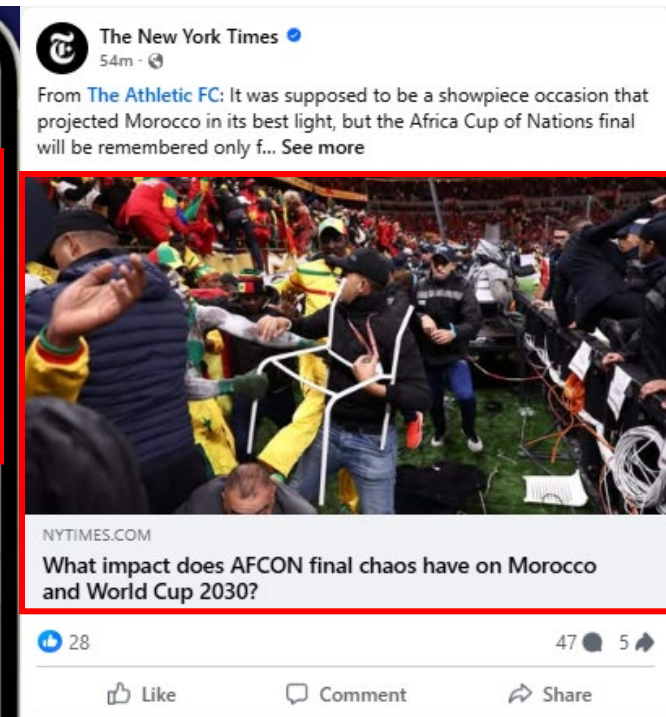
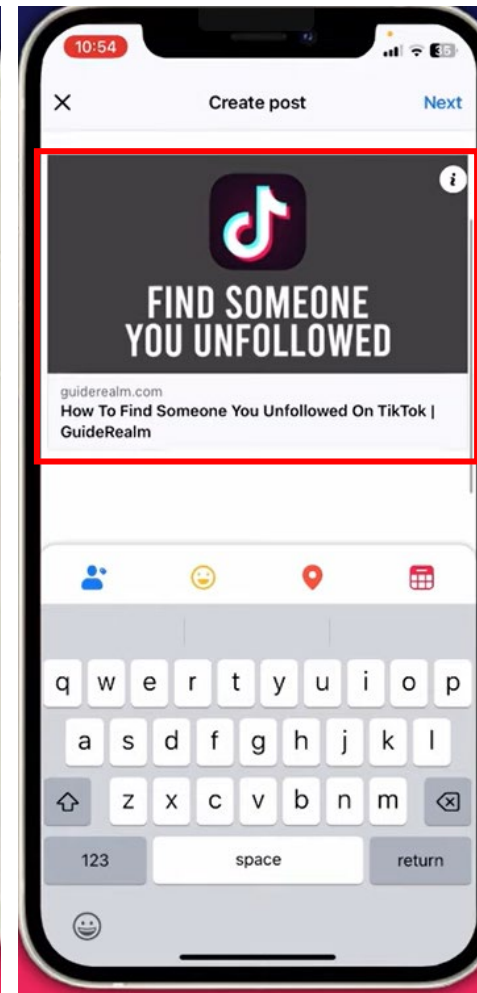
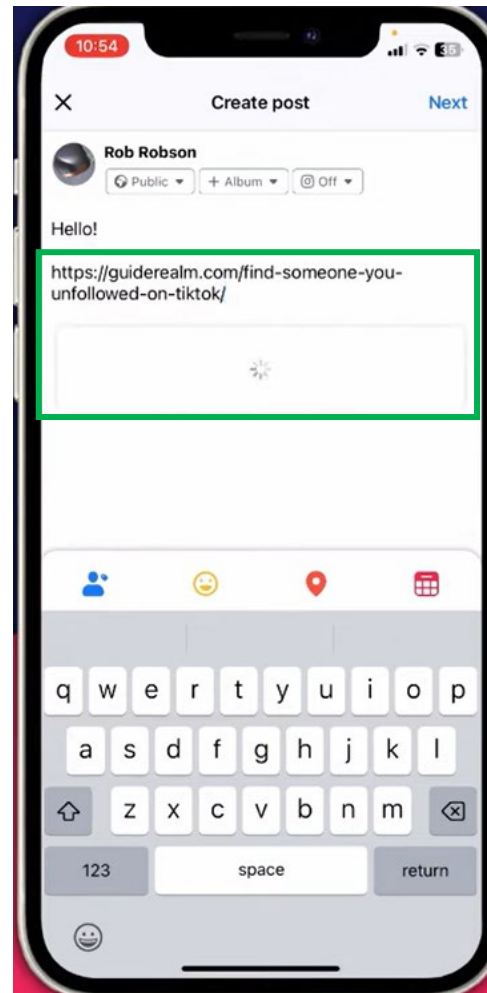
- Defendant causes configuring of each data item into a distinct information object by extracting from each data item extracted data including a picture and a heading, and causes storing of data corresponding to each information object, including a link to the at least one data item in a database. Upon information and belief, the storing occurs in Defendant's database through its backend servers or local software application.
- Responsive to the user pasting a link to an external source (Image 1), Defendant causes the configuring of a data item into a distinct information object (Image 2) by extracting from said data item extracted data including a picture and a heading, and causes storing of data corresponding to the information objects including a link to the data item in a database.
- In the second image, the distinct information object and its corresponding picture and heading are shown.
- Defendant causes storing of data corresponding to each of the information objects, including a link to the data item in the database of the Facebook platform.
- In the third image, Defendant further causes storage of data corresponding to each information object in the database of the Facebook platform.



See <https://www.facebook.com/nytimes/>

See [How To Add Clickable Link On Facebook Post - Full Guide](#)

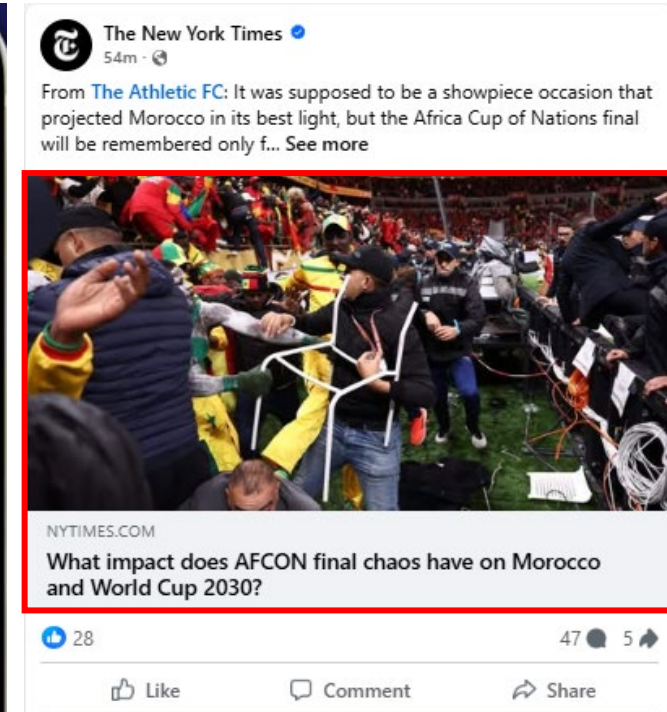
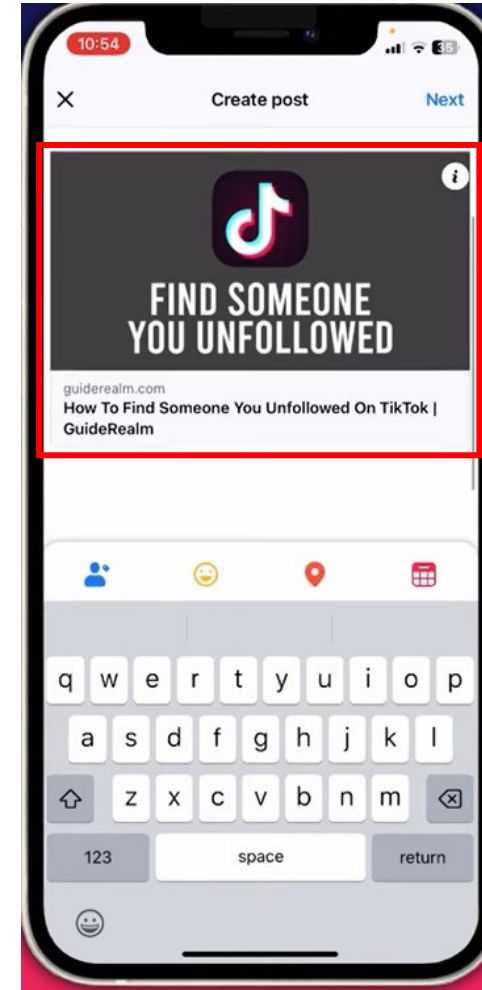
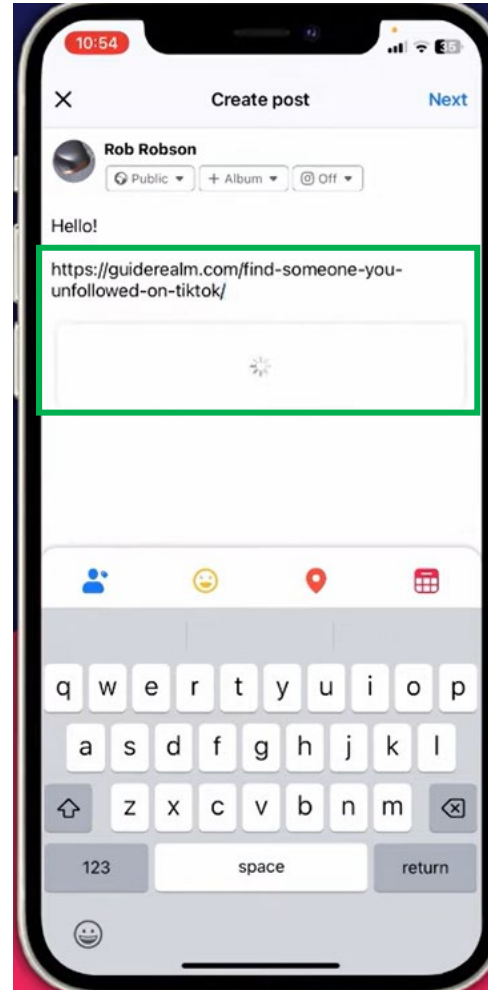
- (a)(1) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture and a heading, and causing storing of data corresponding to each of the information objects, including a link to the at least one data item, in a database;
- In the first scenario of infringement (App Scenario), Defendant's software resident on the user's device works in concert with Defendant's Facebook platform (e.g. its backend servers) to practice the limitations of the Asserted Claims.
 - This resident software is found within the Facebook application which previously has been downloaded to the user device.
 - On information and belief, the user device executes aspects of the application software in response to input from end users, which cause it to communicate to Defendant's backend servers.
 - In this environment, the extracting of data comprising an image, heading, and/or link for a shared article may be performed by Defendant's application software and Defendant's backend servers.
 - In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user's device, those steps are performed automatically by Defendant. See Plaintiff's briefing on Defendant's motion to dismiss.
 - These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant's backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



See <https://www.facebook.com/nytimes/>

(a)(1) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture and a heading, and causing storing of data corresponding to each of the information objects, including a link to the at least one data item, in a database;

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook platform, e.g., backend servers to configure each of the data items into a distinct information object.
- On information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend does all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.

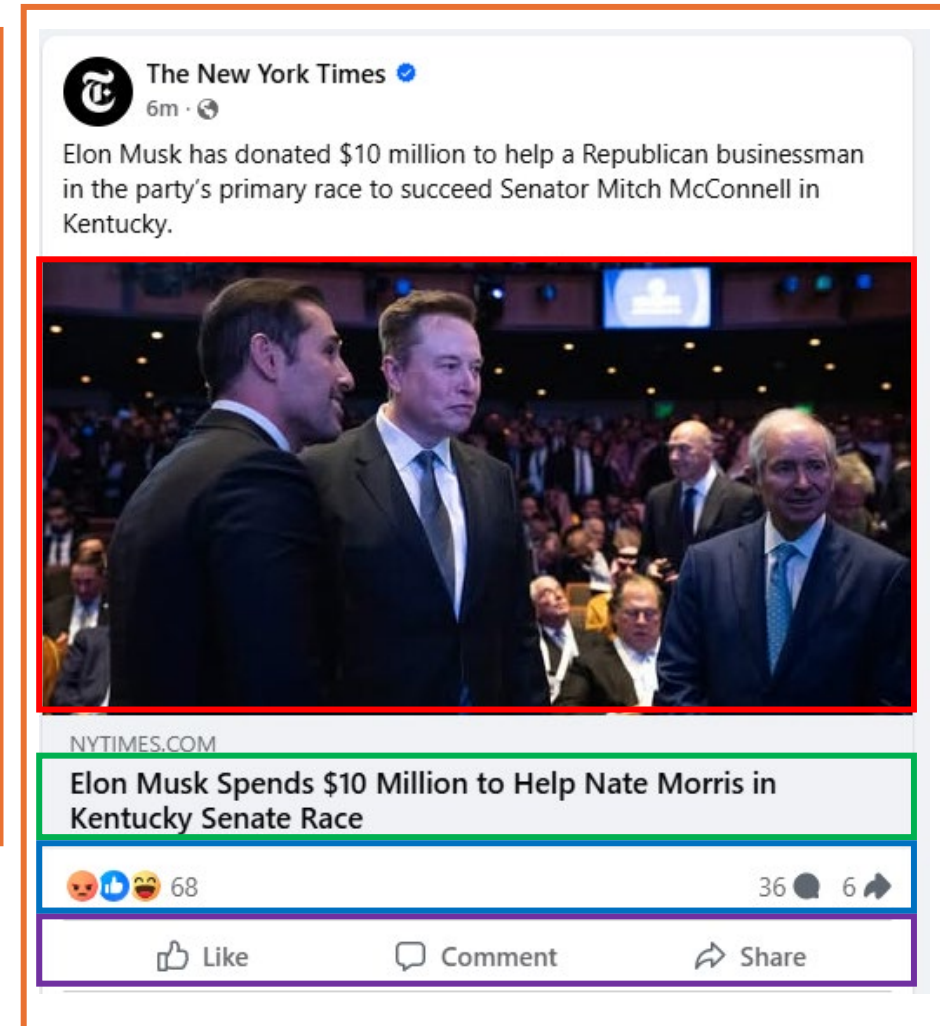
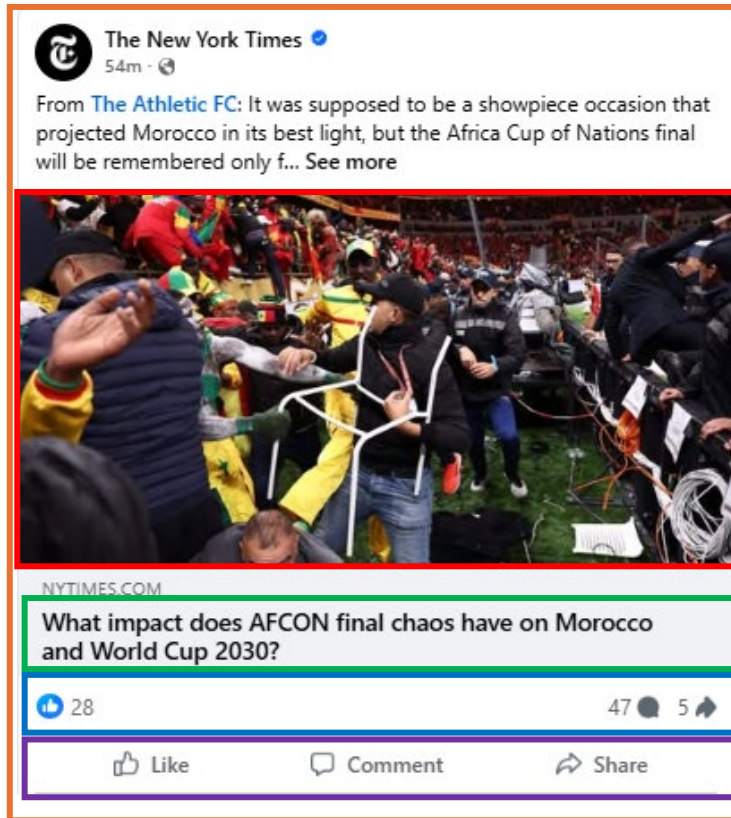


See <https://www.facebook.com/nytimes/>

See [How To Add Clickable Link On Facebook Post - Full Guide](#)

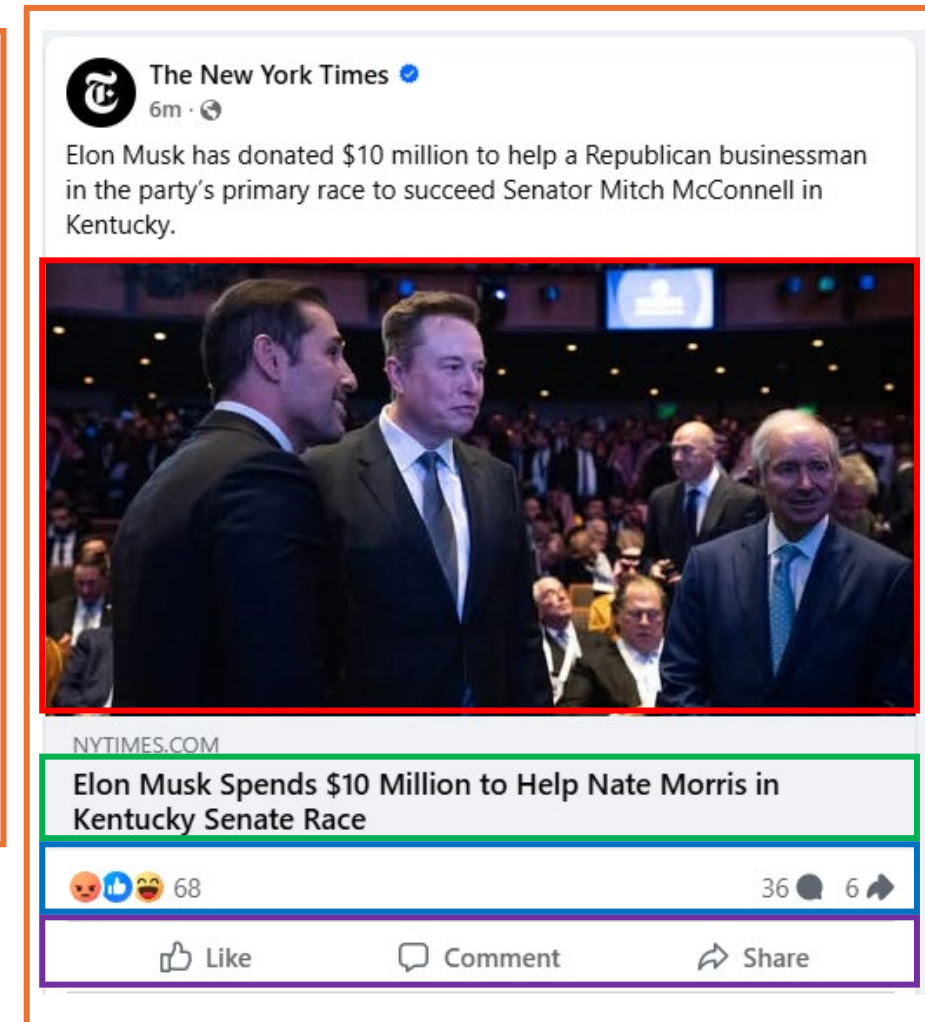
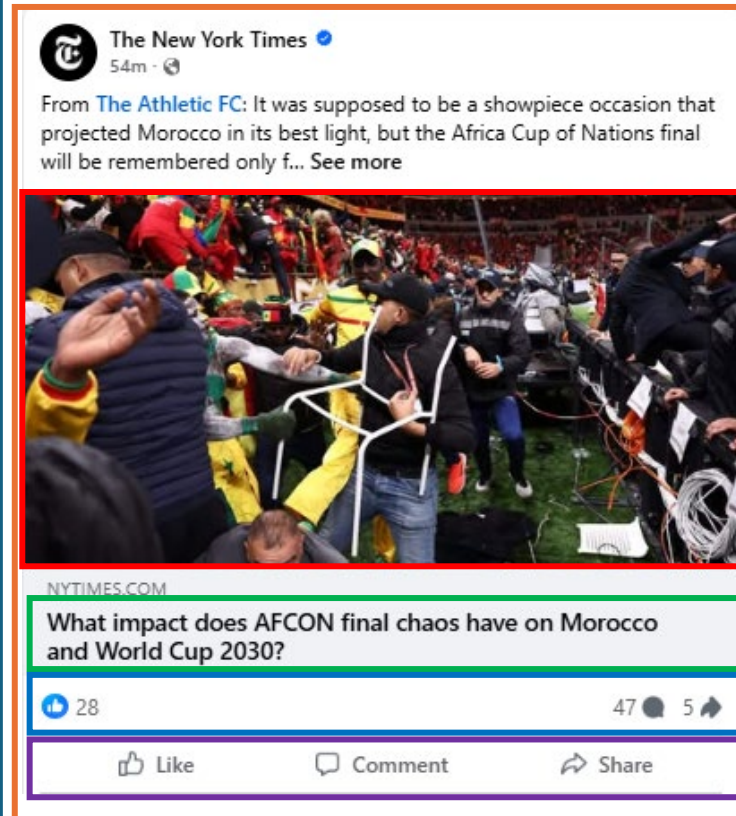
(a)(2) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Defendant displays a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof the picture, the heading, a set of indicators, and a set of graphically accessible functions.
- Defendant's "Wall", "Timeline", "Profile", "Feed", and/or "Newsfeed" features display each of at least two information objects by the same or different users in the database system. For example, Defendant displays New York Times' Facebook wall which contains representations of two or more information objects in Defendant's database system. Both images are exemplary representations of information objects shown on the New York Times' Facebook wall and are in uniform format.



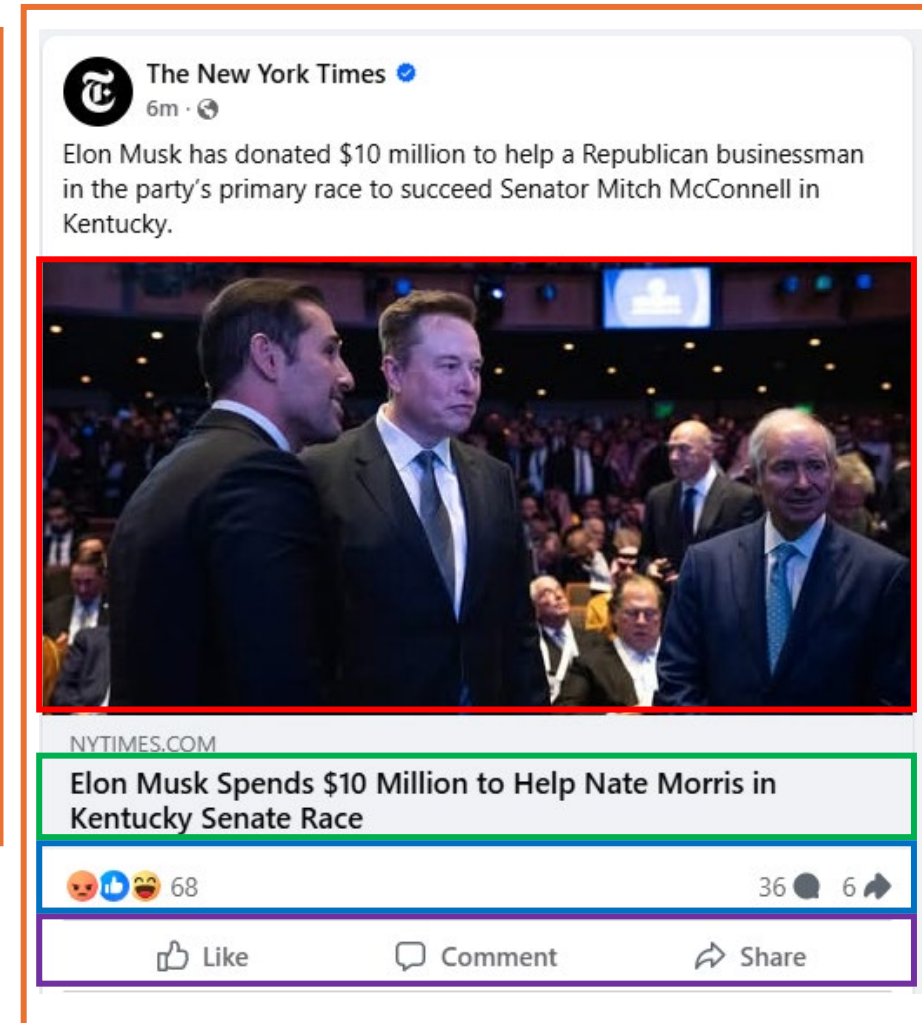
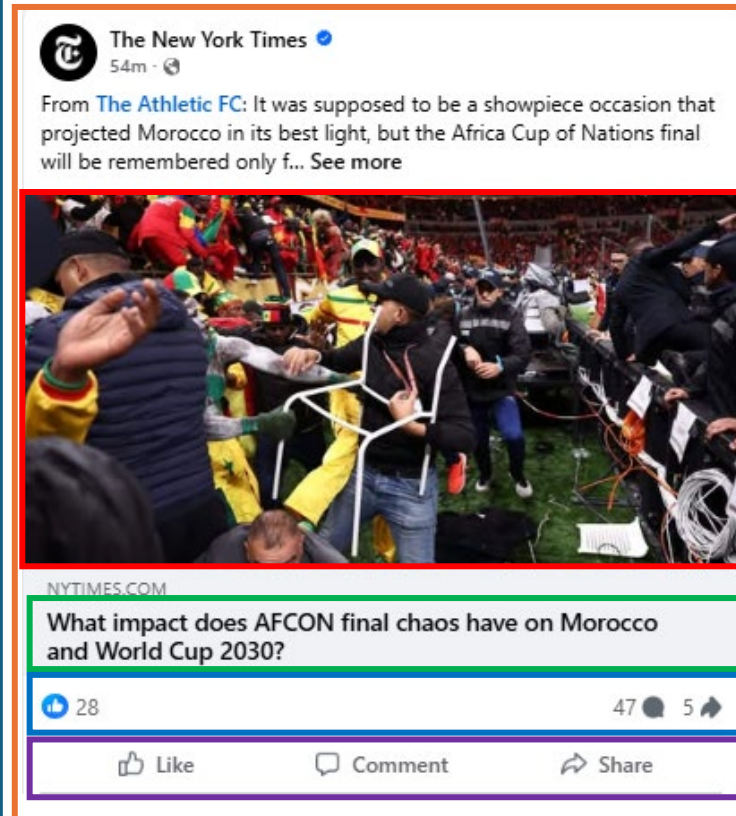
(a)(2) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Under the first scenario of infringement (App scenario), the claimed “displaying a representation” may also be performed in part on the user’s device through the execution of the local application software. The backend server network operates to store variable data for use by the application software to cause display of the representation.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. See Plaintiff’s briefing on Defendant’s motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant’s backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



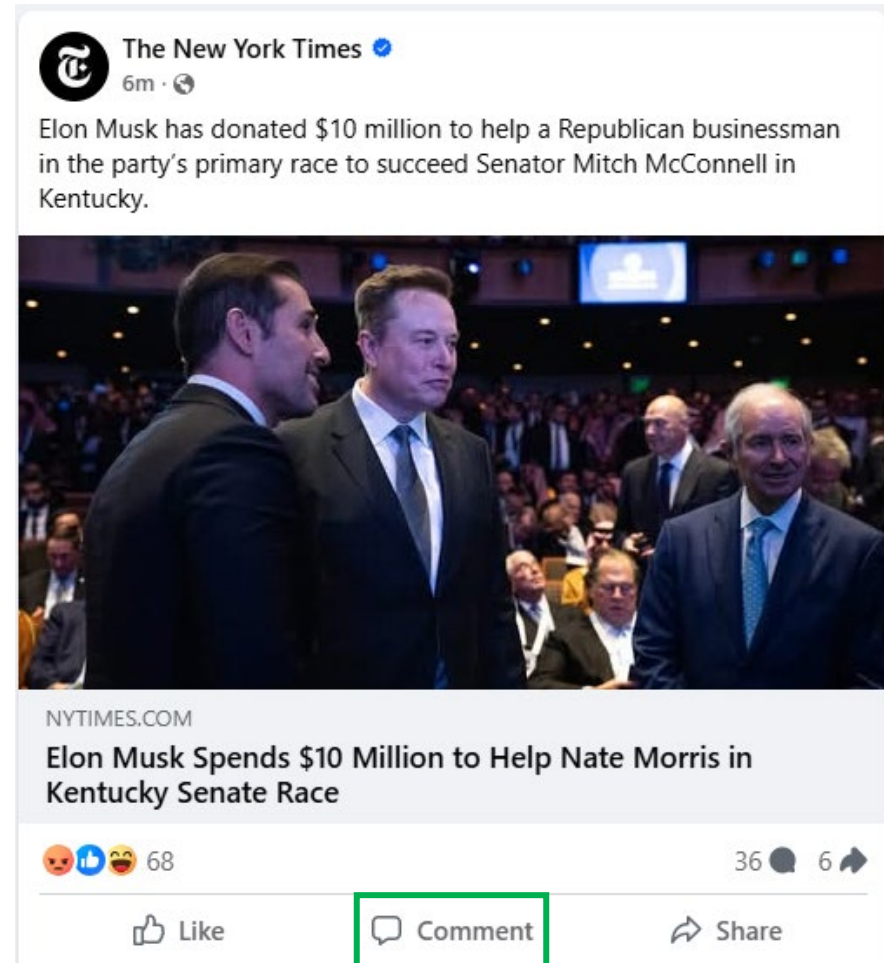
(a)(2) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook backend to display a representation of at least two of the information objects in the database system.
- Upon information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend does all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.



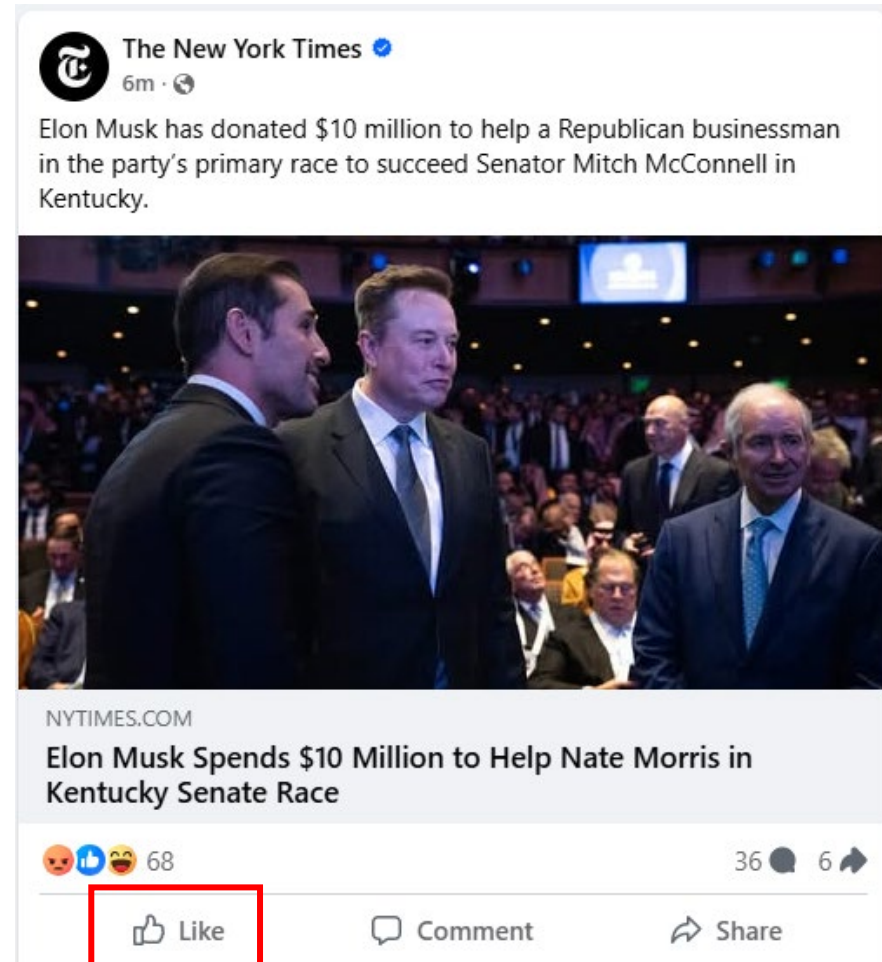
(a)(2)(i) a **comment function**, by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card;

- One of Defendant's graphical functions of is a **comment** function by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card.
- Defendant practices this limitation by providing a comment function in a uniform location of the card which allows for comments associated with the information object.



(a)(2)(ii) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- One of Defendant's graphical functions is a vote function, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card.
- Defendant practices this limitation by providing its "Like" button which facilitates users' voting for the card with such votes being associated with the information object represented by the card.



(a)(2)(ii) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- Defendant further provides users with the opportunity to react to cards which facilitates users' voting for the card with such reactions or votes being associated with the information object represented by the card.
- As explained by Defendant's public literature, Defendant provides users having access to cards the opportunity to react to the information object represented by the card by allowing them to hover over Defendant's like button and select their desired reaction or vote.

Liking tells your friends that you enjoyed their post or comment, while reacting allows you to specify your response. You can only leave one reaction per post or comment.

To react to a post or comment:

- Go to the post or comment you want to react to.
- Hover over **Like** and choose a reaction. The most popular reactions appear below the post or comment as icons (example:   ).



Like



Love



Haha



Wow



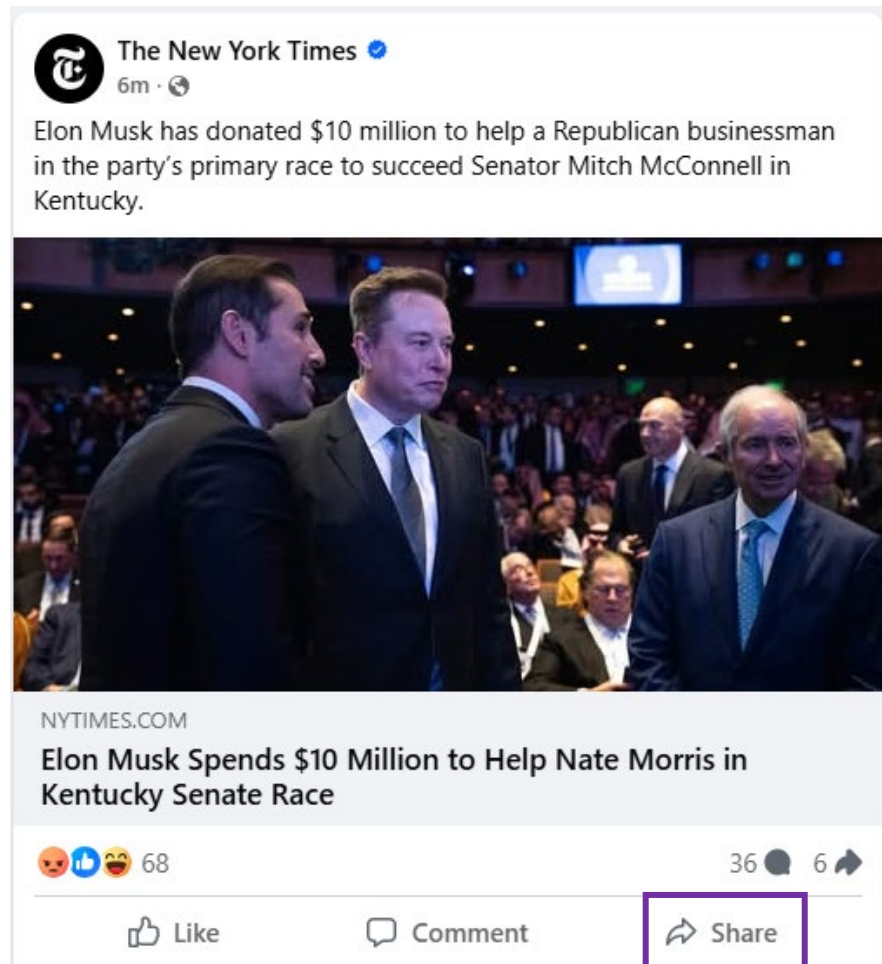
Sad



Angry

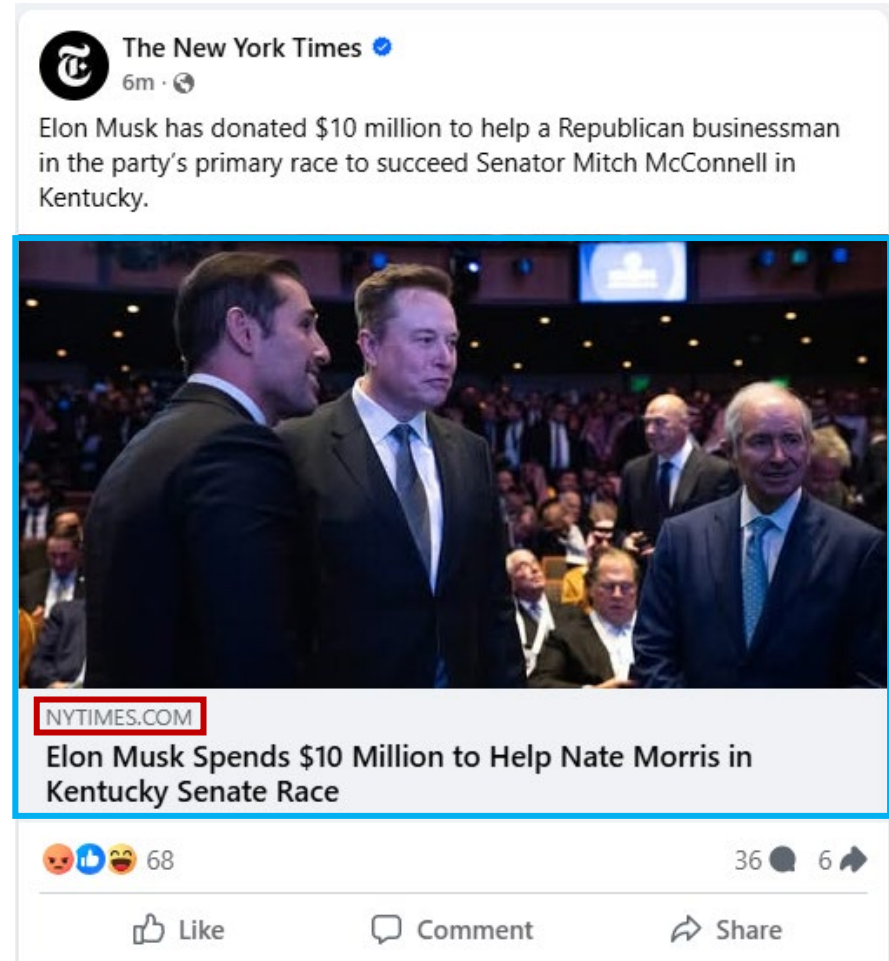
(a)(2)(iii) a copy function, by which users having access to the card copy function in a first collection of cards of a first user can cause the card to appear in a second collection of cards of a second user; and

- One of Defendant's graphical functions is a copy function, in this example a "Share" button, by which users having access to the card copy function in a first collection of cards of a first user can cause the card to appear in a second collection of cards of a second user.
- For example, when a user views the displayed post on The New York Times' Facebook timeline, that card appears in a first collection of a first user, namely the New York Times' card collection.
- Defendant's Share button is a copy function which can be used to cause a card to appear in a second user's card collection.



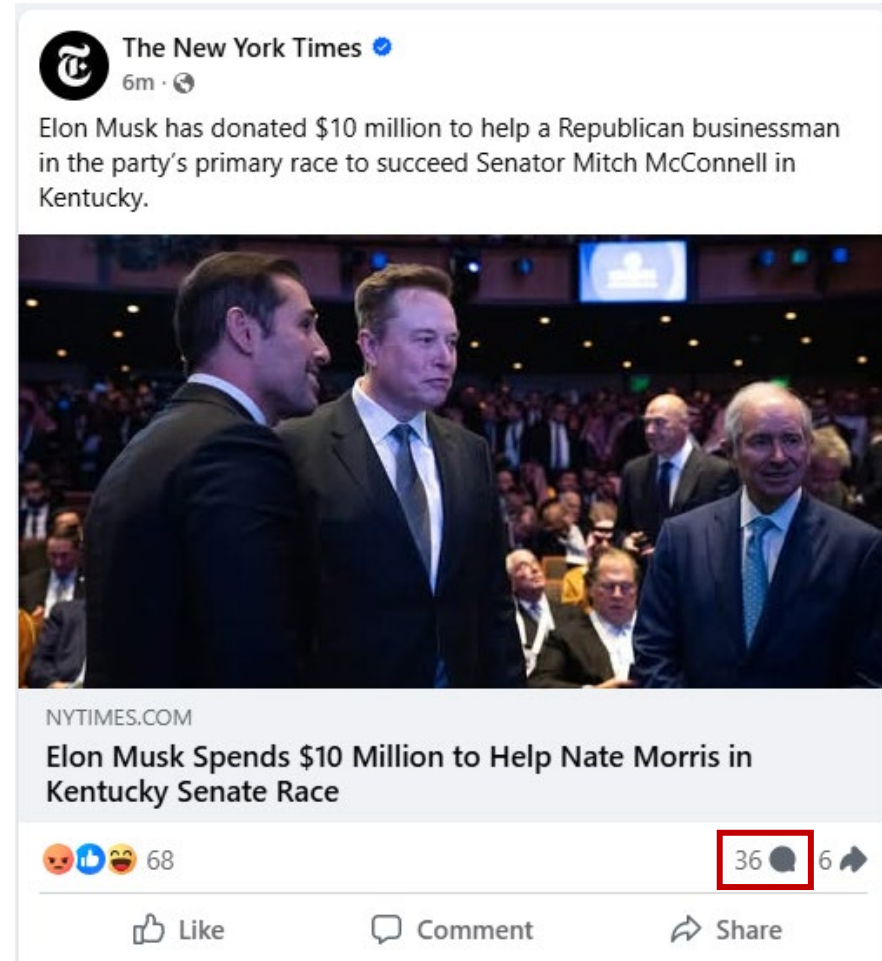
(a)(2)(iv) a link function, by which users having access to the card link function can invoke the link to the data item;

- One of Defendant's graphical functions is a link function, by which users having access to the card link function can invoke the link to the data item.
- Defendant embeds the link to the data item into the image and heading portions of the card. In this way, a user is able to invoke the link by clicking on the uniform formatting. Defendant further provides a shortened preview of the link right above the header.



(a)(2)(v) and wherein the set of indicators includes:
an **indicator reflecting commenting activity**
associated with the card; and

- Defendant's set of indicators includes an indicator reflecting commenting activity associated with the card.
- Defendant's indicator shows the number of comments that have been posted that are associated with the card.



(b) wherein the database system has been configured to allow

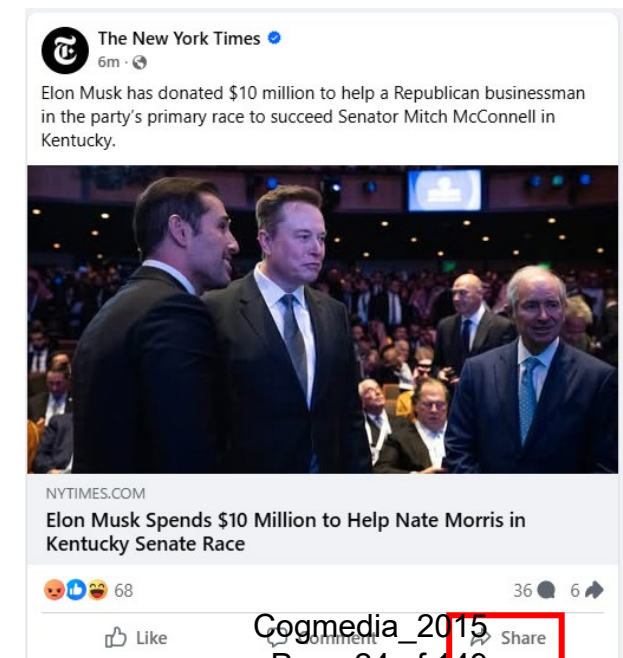
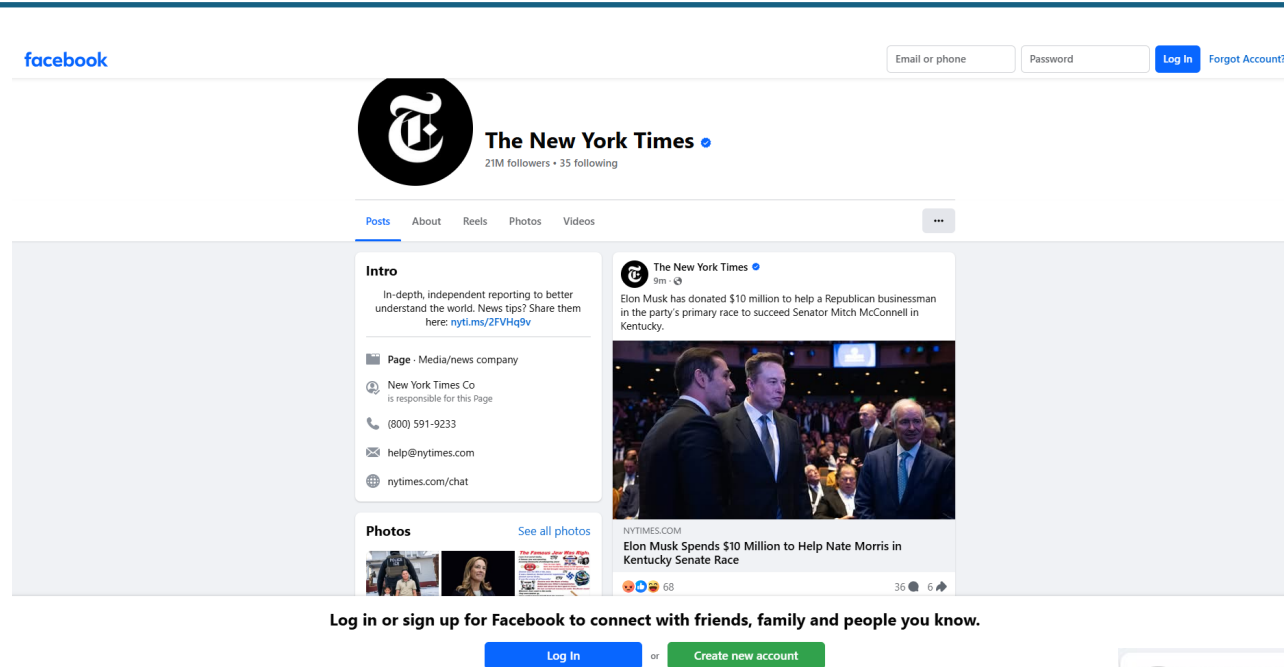
(b)(i) each user to have at least one user-selected collection of cards representing information objects in the database system and

(b)(ii) cards, regardless of the collections in which they may have first appeared, to be made accessible and copyable across card collections of different users.

- Defendant configures its database system to allow each user to have at least one user-selected collection of cards representing information objects in the database system and cards, regardless of the collections in which they have first appeared, to be made accessible and copyable across card collections of different users. Note, Defendant's "database system" may be made up of multiple databases or otherwise arranged in a distributed database.

- Defendant practices this limitation by allowing users such as the New York Times to maintain a user-selected collection of cards representing information objects. For example, the New York Times maintains its collection at: <https://www.facebook.com/nytimes/>. These collections are stored in Defendant's database system.

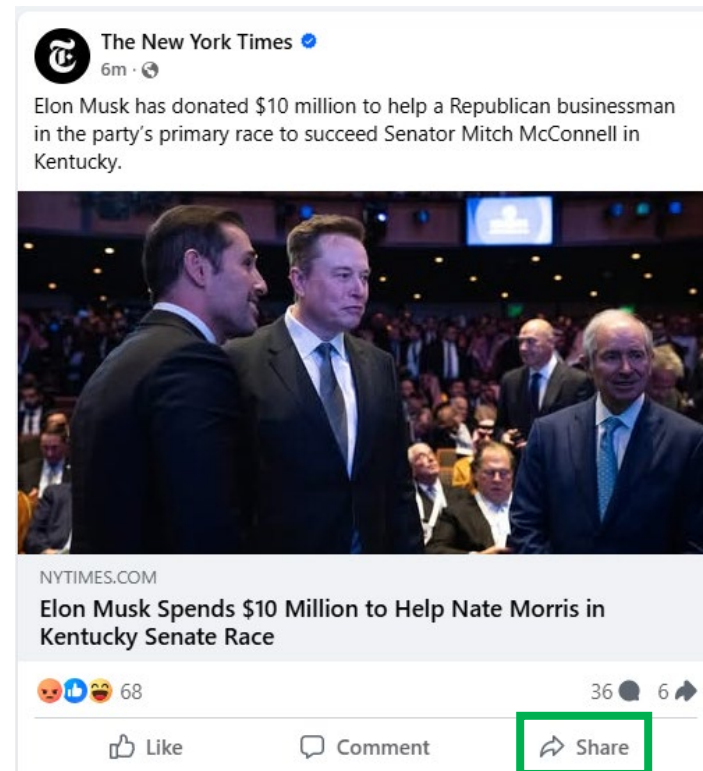
- Although the cards are maintained in their user-selected collection, the cards may be made accessible and copyable across card collections (including collections of a second user) in part due to Defendant's Share button which allows for the cards to be copyable across collections of different users.



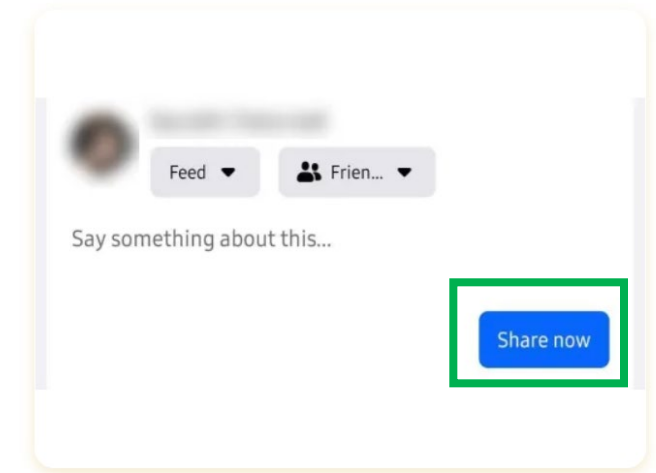
See <https://www.facebook.com/nytimes/>

2. A method according to claim 1, the computer processes further comprising: displaying a graphical button, which, when invoked while content is being displayed, causes the displayed content to be handled as one of the data items, namely, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.

- Defendant provides a user interface having a graphical button which when invoked while content is being displayed causes the displayed content to be handled as one of the data items, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.
- Defendant displays graphical buttons, namely Defendant's "Share" and "Share now" buttons which when invoked configure the displayed content as a new information object and makes a representation of the new information object available for display in the uniform format. Defendant's "Share now" button becomes available upon a user's selection of Defendant's copy function or Share button and when invoked configures the displayed content as a new information object available for display in the uniform format.



- If you want to reshare the post without making any changes, select **Share Now**.

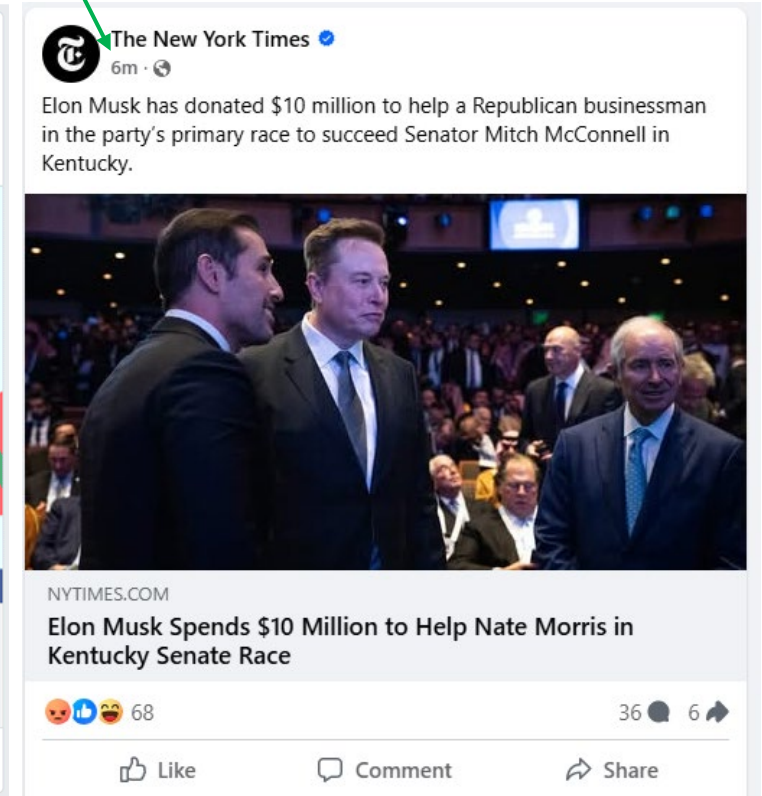


<https://recurpost.com/blog/how-to-repost-on-facebook/>

See <https://www.facebook.com/nytimes/>

3. A method according to claim 1, wherein the format includes within the card **an indication of a date of creation.**

- Defendant's computer-implemented method further comprises a format which includes within the card an indication of a date of creation as exemplified on the right.
- Defendant updates the time between the date of creation of a card and the present. Briefly after a card has been created, Defendant includes within the card an indication of the date of creation by referencing that the card was made a certain number of seconds, minutes, hours, or days ago. Further after a card has been created, Defendant includes within the card a specific date and time of the card's creation.
- For example, the Business Rocks Women card contains an indicator it was created on June 3rd at 2:20 AM and The New York Times card indicates that it was posted just 6 minutes ago.

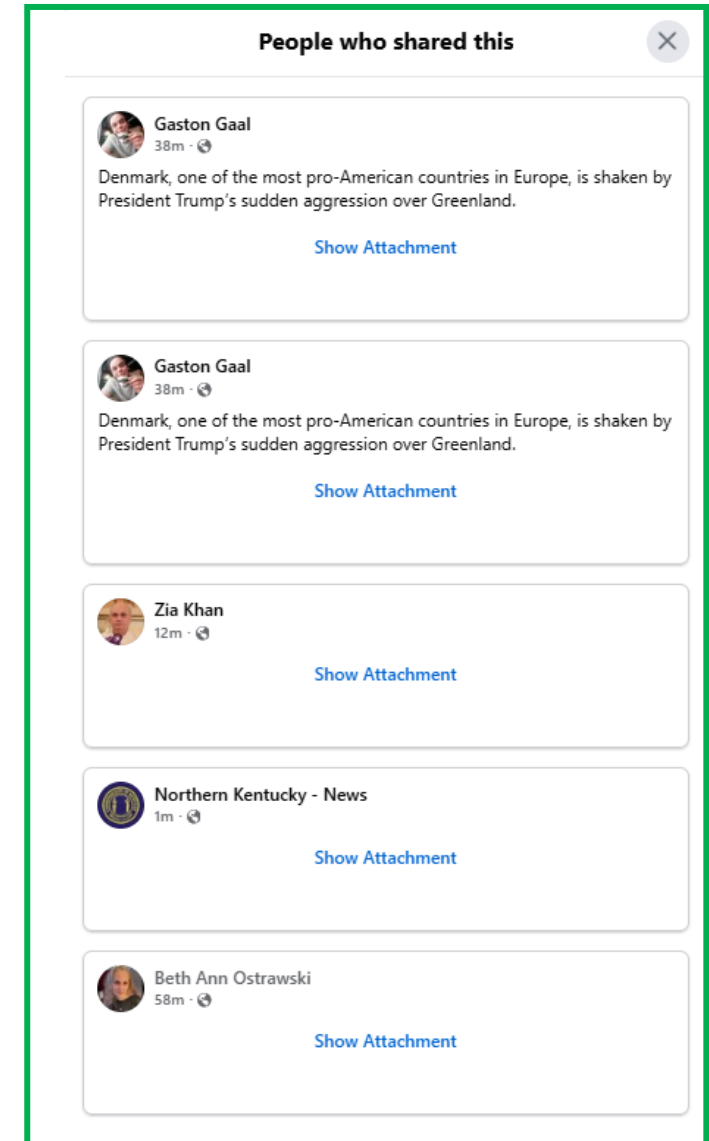
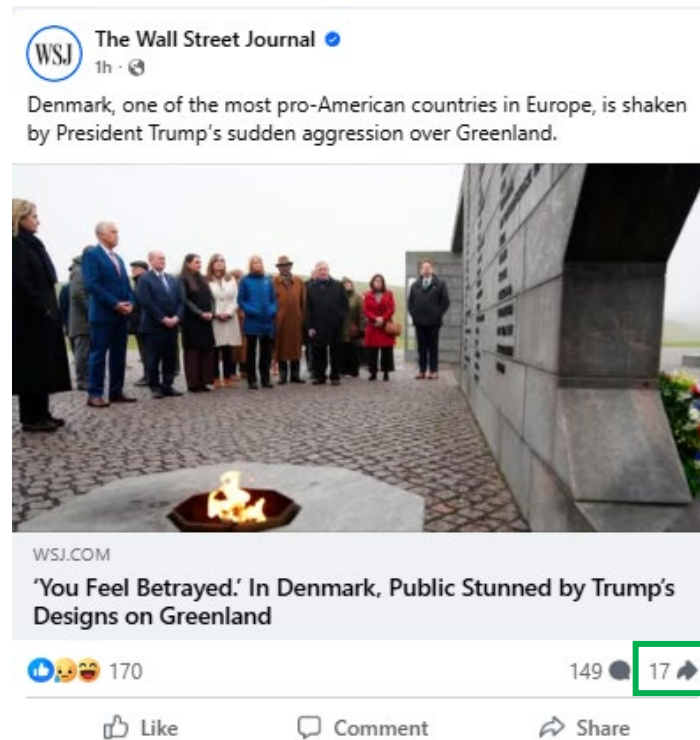


See <https://louisem.com/2541/post-link-on-facebook>

See <https://www.facebook.com/nytimes/>

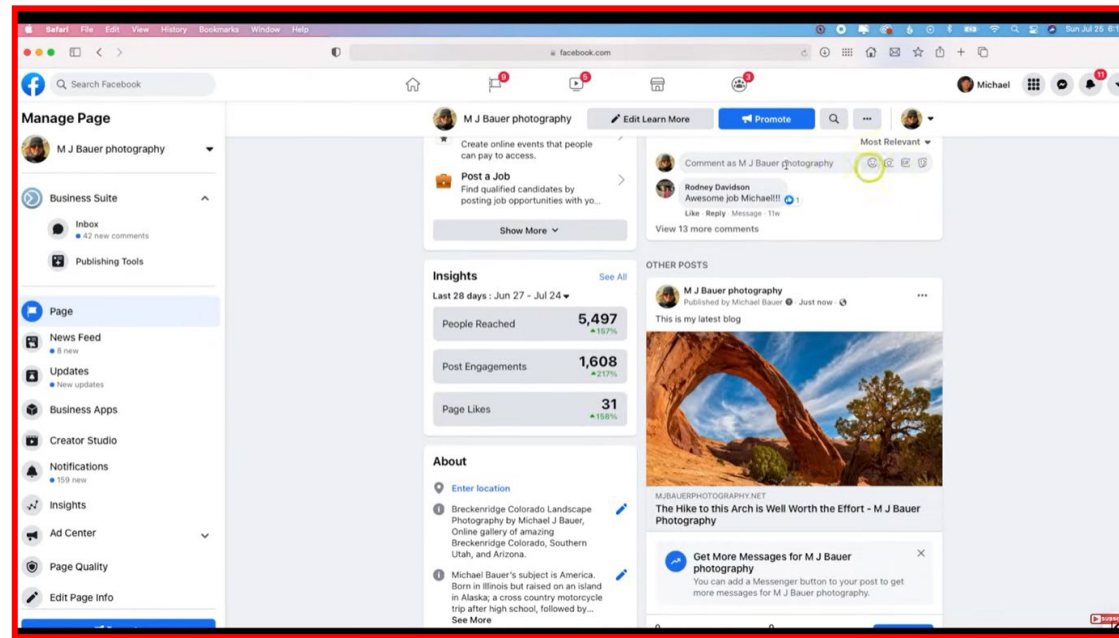
4. A method according to claim 1, wherein the format includes a user-accessible report relating to users who copied the information object.

- Defendant's computer-implemented method further comprises a format which includes a user-accessible report relating to users who copied the information object.
- Defendant practices this limitation in part by displaying within the format of the card an indicator showing the number of users who have copied or shared the information object. Defendant further practices this limitation by displaying a list labeled as "People who shared this" which identifies different users who copied the information object.



5. A method according to claim 1, further comprising: displaying in a computing device of a first user, a **first view of a first set of cards that constitute a first collection of the first user**; and also displaying in the computing device of the first user, a **second view of a second set of cards that constitute a collection of a second user**.

- Defendant displays in a computing device a first view of a first set of cards that constitute a first collection of the first user. For example, each user has a timeline or wall that consists of cards posted to the first user's wall as shown by the first image.
- Defendant also displays in the computing device of the first user a second view of a second set of cards that constitutes a collection of a second user. For example, the client computing device also can access another user's collection of cards as shown by the second image. In this example, Defendant provides to the first user a view of the Wall Street Journal's collection of cards.



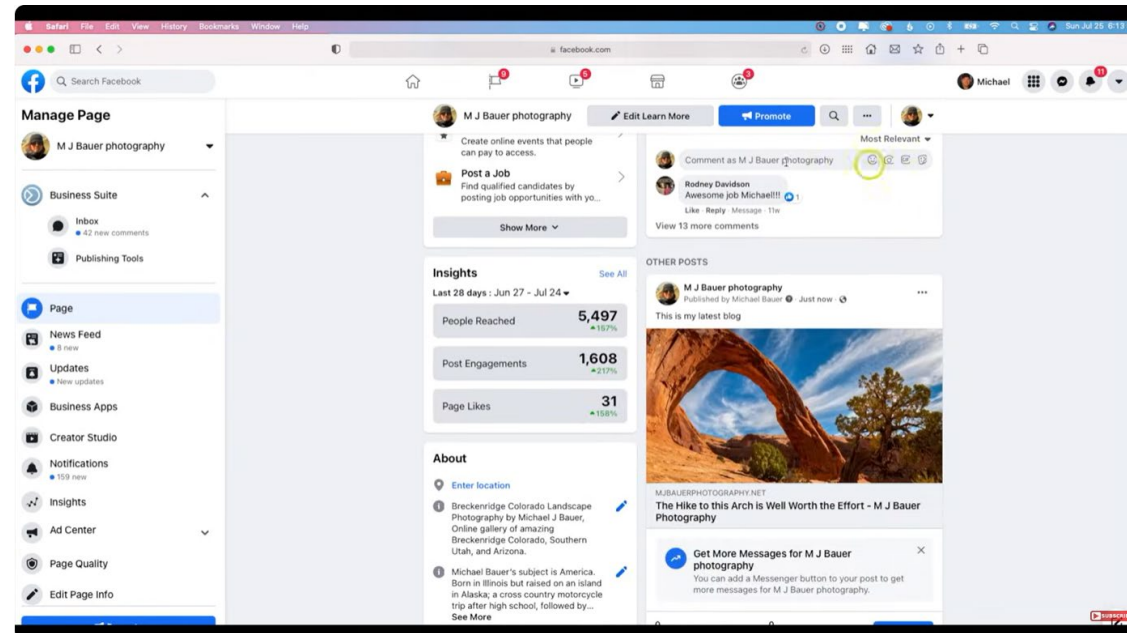
See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>



6. A method according to claim 5, further comprising: responsive to (i) a graphical selection, by the first user, of a card in the second view and (ii) a copy command that has been graphically entered by the first user, causing the selected card to be copied from the second view to the first view, so that the selected card in the collection of the second user appears in the first collection of the first user.

- Defendant responds to a first user's graphical selection of a card in the second view and a copy command by that user by causing the selected card to be copied from the second view to the first view, so that the selected card in the collection of the second user appears in the first collection of the first user.
- For example, responsive to a first user's graphical selection and copy command, a Wall Street Journal article is able to be copied from the Wall Street Journal's card collection to a first user's card collection. In other words, the first user will now have in its card collection, a card from the Wall Street Journal's collection.
- In this way, Defendant causes a selected card to be copied from a second collection in a second view to a first collection of the first user in a first view.

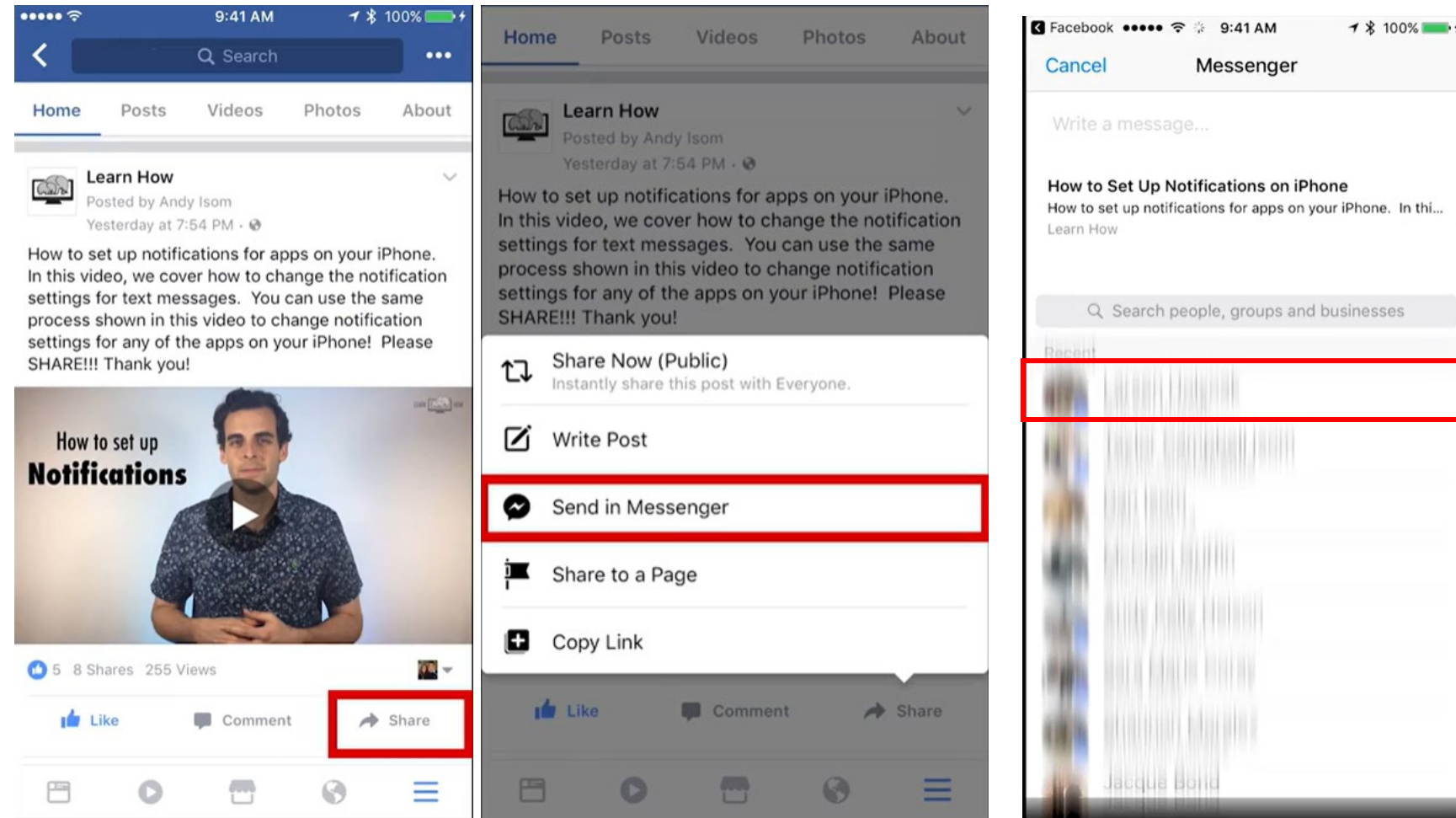


See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>

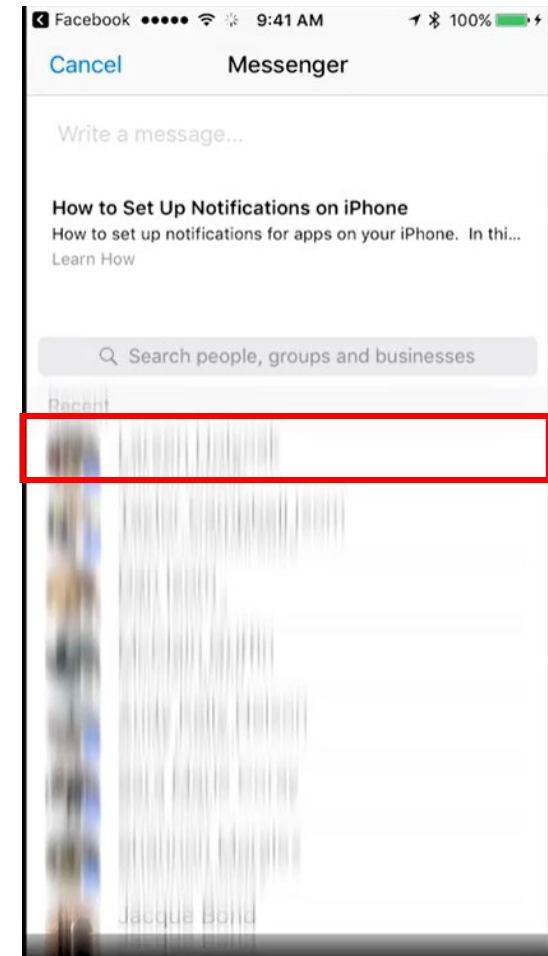
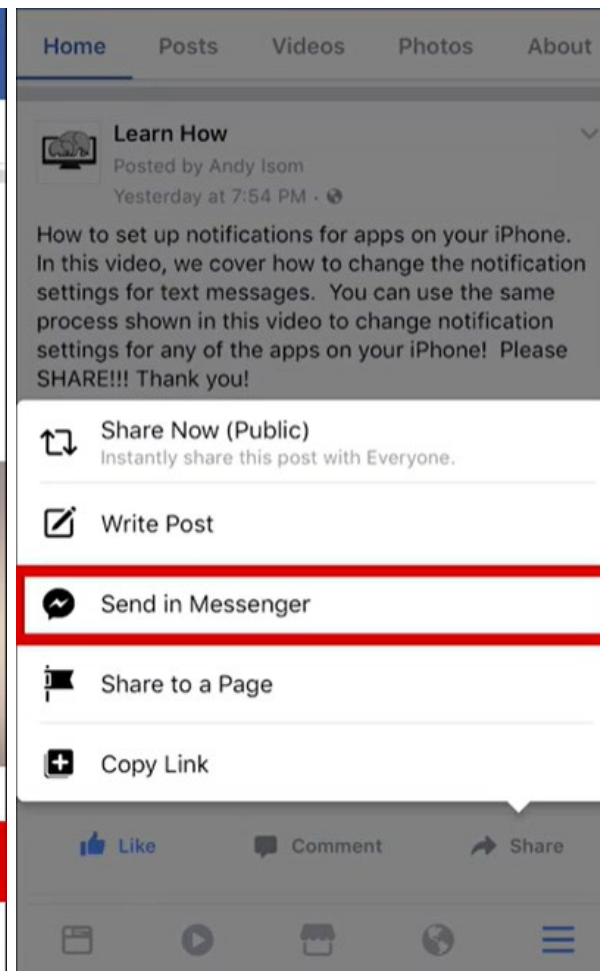
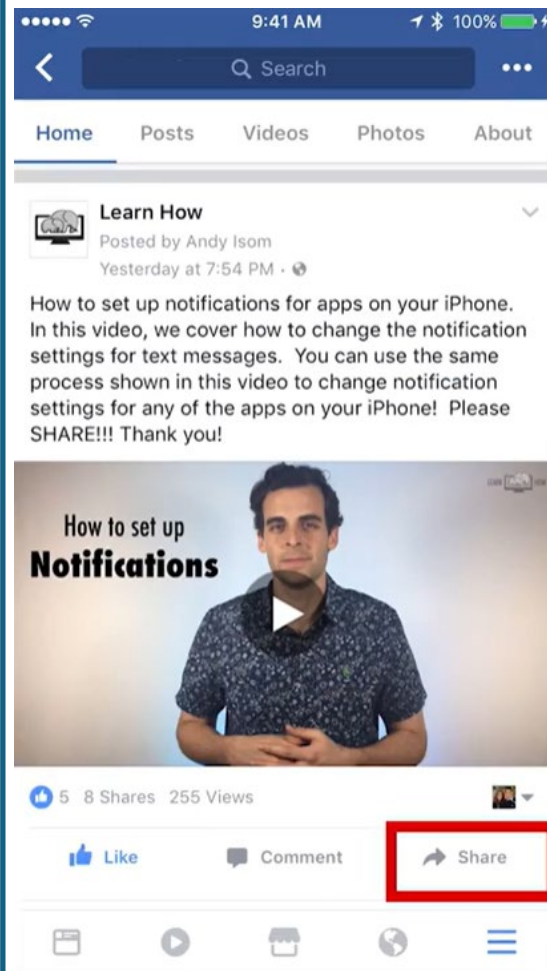
7. A method according to claim 5, further comprising: responsive to (i) a graphical selection, by the first user, of a card in the first view and (ii) a send command that has been graphically entered by the first user, causing the selected card to be sent to the second user, so that the selected card in the collection of the first user is made available to the second user to be included in the collection of the second user.

- Defendant responds to a first user's graphical selection of a card in the first view and sends a command that has been graphically entered by the first user which causes the selected card to be sent to the second user, so that the selected card in the collection of the first user is made available to the second user to be included in the collection of the second user.
- Upon a graphical selection by the first user of a card in the first view and their entering of a send command, Defendant causes the selected card in the collection of the first user to be made available to the second user to be included in the collection of the second user.



8. A method according to claim 1, further comprising:
on a user- entered command, causing a card to be
shared with another user when the card and the other
user have been graphically selected.

- On a user-entered command, Defendant causes a card to be shared with another user when the card and the other user have been graphically selected.
- Upon a user selecting the share and send in messenger buttons, a user is able to select another user with whom the user wishes to share the selected card. Upon such a user-entered command, Defendant causes the card to be shared with the other user.



9. A method according to claim 1, further comprising:
on a user-entered command, causing a card to be
shared with another user via an instant message sent
through an integrated instant messaging system as a
result of graphical selection by a first user.
- Defendant maintains at least one integrated instant
messaging system which it refers to as Facebook
Messenger.



Overview for the Messenger Platform

The Messenger Platform Overview details how the platform works and what you need to successfully implement the platform.

Messenger from Meta is a messaging service that allows a business' Facebook Page or Instagram Professional account to respond to people who are interested in your business or social media. Conversations between a person and your account must be initiated by the person.

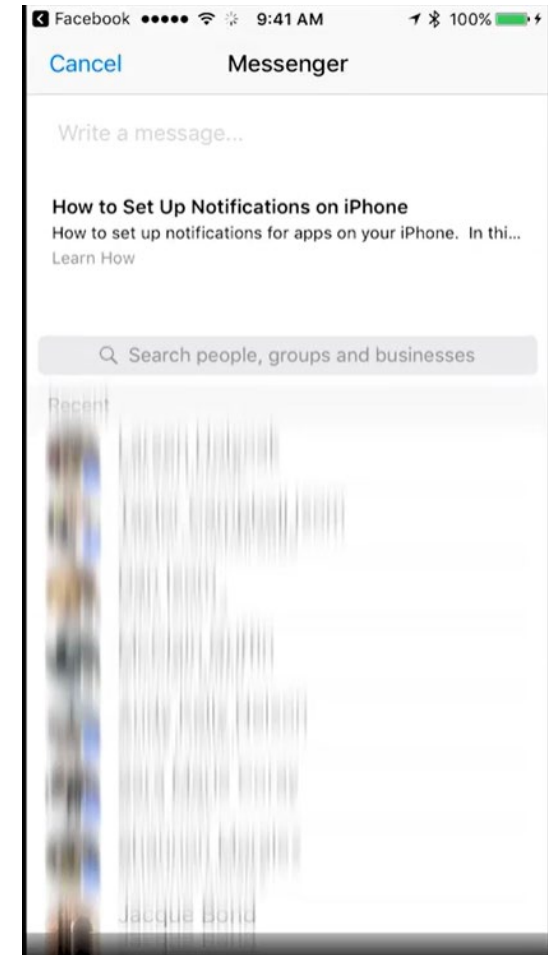
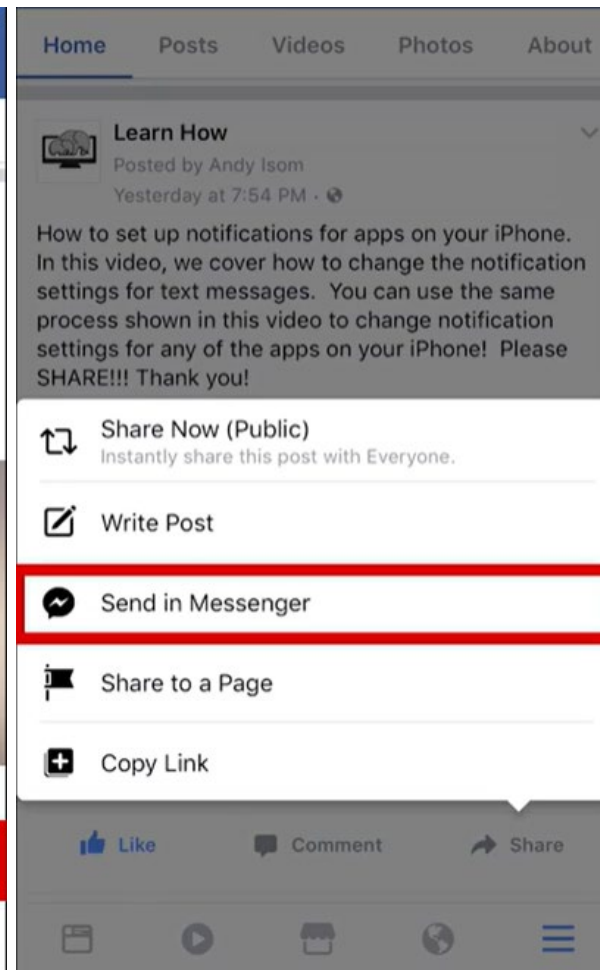
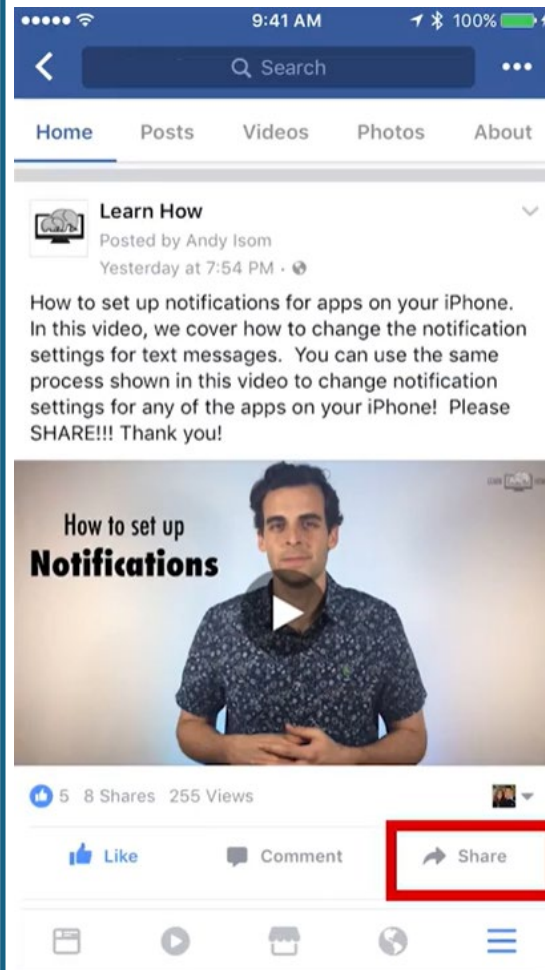
The Messenger Platform is free for you to use.

A place for
meaningful
conversations

Messenger helps you connect with your Facebook friends and family, build your community, and deepen your interests.

9. A method according to claim 1, further comprising:
on a user-entered command, causing a card to be
shared with another user via an instant message sent
through an integrated instant messaging system as a
result of graphical selection by a first user.

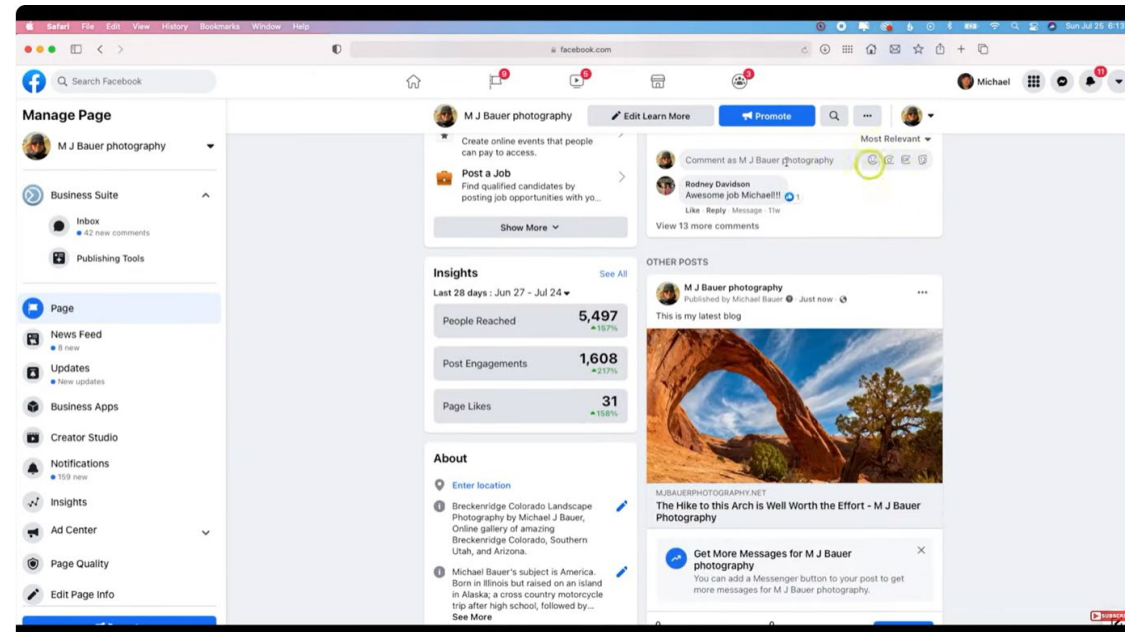
- On a user entered command, Defendant causes a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.
- Defendant practices this limitation by causing a card to be shared with another use via Facebook Messenger which is an integrated instant messaging system in response to a graphical selection by a first user.



10. A method according to claim 1, further comprising: displaying in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user; also displaying in the computing device of the first user, a second view of a second set of cards, outside of the first collection, wherein any given member of the second set of cards is both included in a collection of another user and the other user has been selected by the first user; and wherein each of the cards in the second view can, on a user-entered command, be caused to be copied to the first view.

- Defendant displays in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user; and also displays in the computing device of the first user, a second view of a second set of cards, outside of the first collection, wherein any given member of the second set of cards is both included in a collection of another user and the other user has been selected by the first user, and wherein each of the cards in the second view can, on a user-entered command, be caused to be copied to the first view.

- Defendant practices this limitation by providing users with a first view of their timeline or wall and a second view of another user's wall and also providing its "Share" button which allows any of the cards in the second view to be copied to the first view.



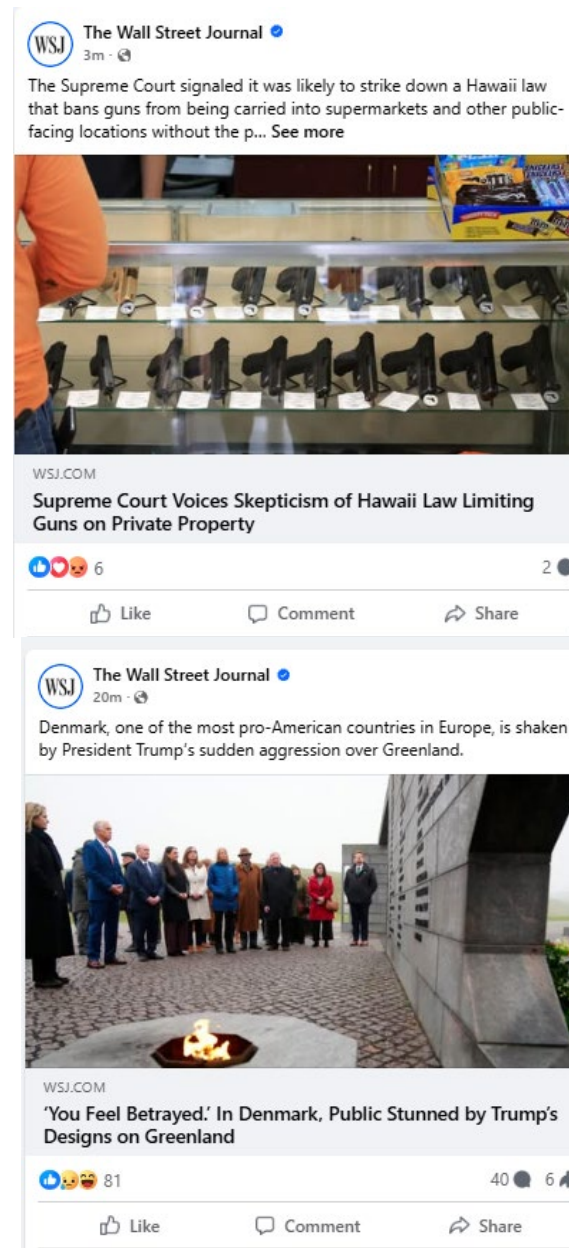
See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>



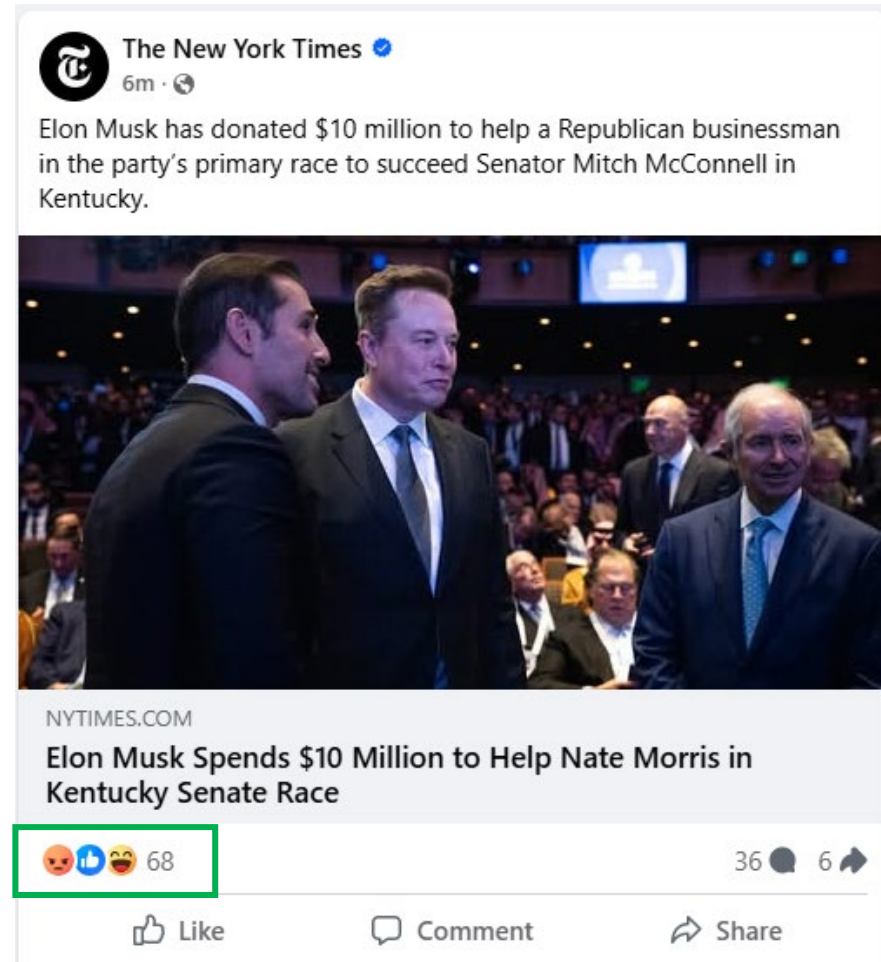
11. A method according to claim 10, wherein each of the cards in the second view is displayed in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.

- Defendant's method displays cards in the second view in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.
- Defendant practices this limitation at least by displaying cards in the second view in order of the information object's creation time. For example, when viewing The Wall Street Journal's page, Defendant displays the cards in order of the information object's creation time and intentionally places the most recent posts at the top of the second view.



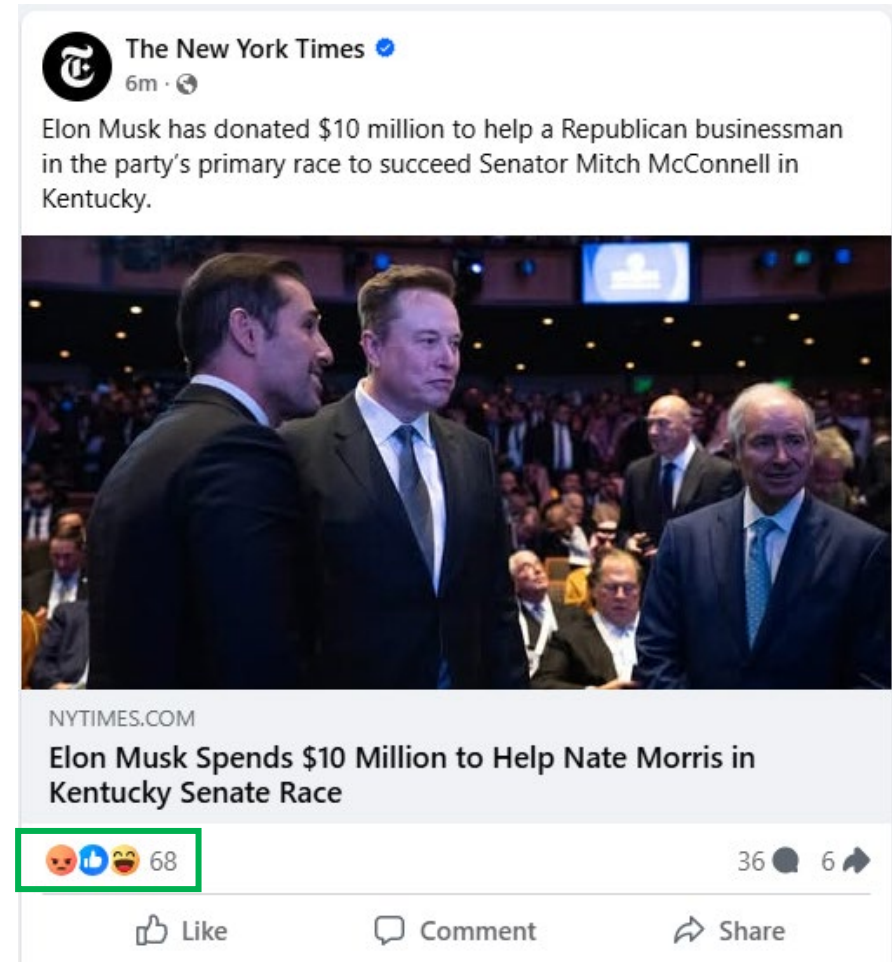
12. A method according to claim 1, wherein the set of indicators includes: **an indicator reflecting voting activity associated with the card.**

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting voting activity associated with the card.
- Defendant practices this limitation by providing an indicator reflecting the number of people who have liked, reacted, or otherwise voted on information associated with the card.



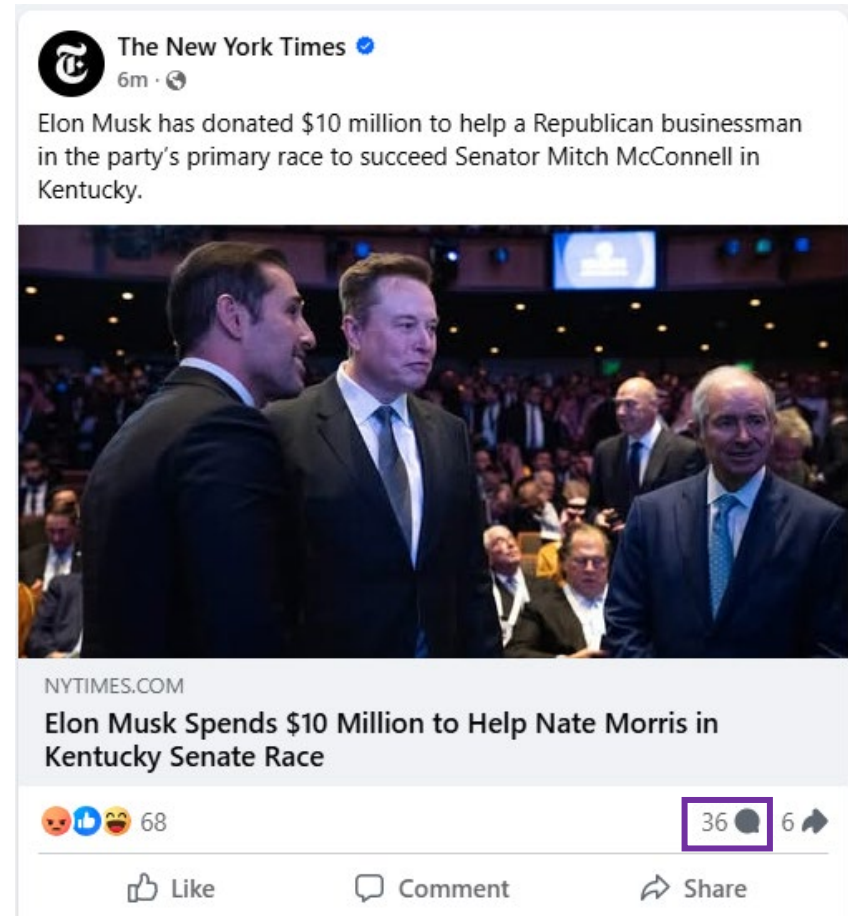
13. A method according to claim 12, wherein the indicator reflecting voting activity associated with the card provides a numeric count of the voting activity.

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting voting activity wherein the indicator provides a numeric count of the voting activity.
- Defendant practices this limitation by providing an indicator which provides a numeric count of the users who have liked, reacted, or otherwise voted on information associated with the card.



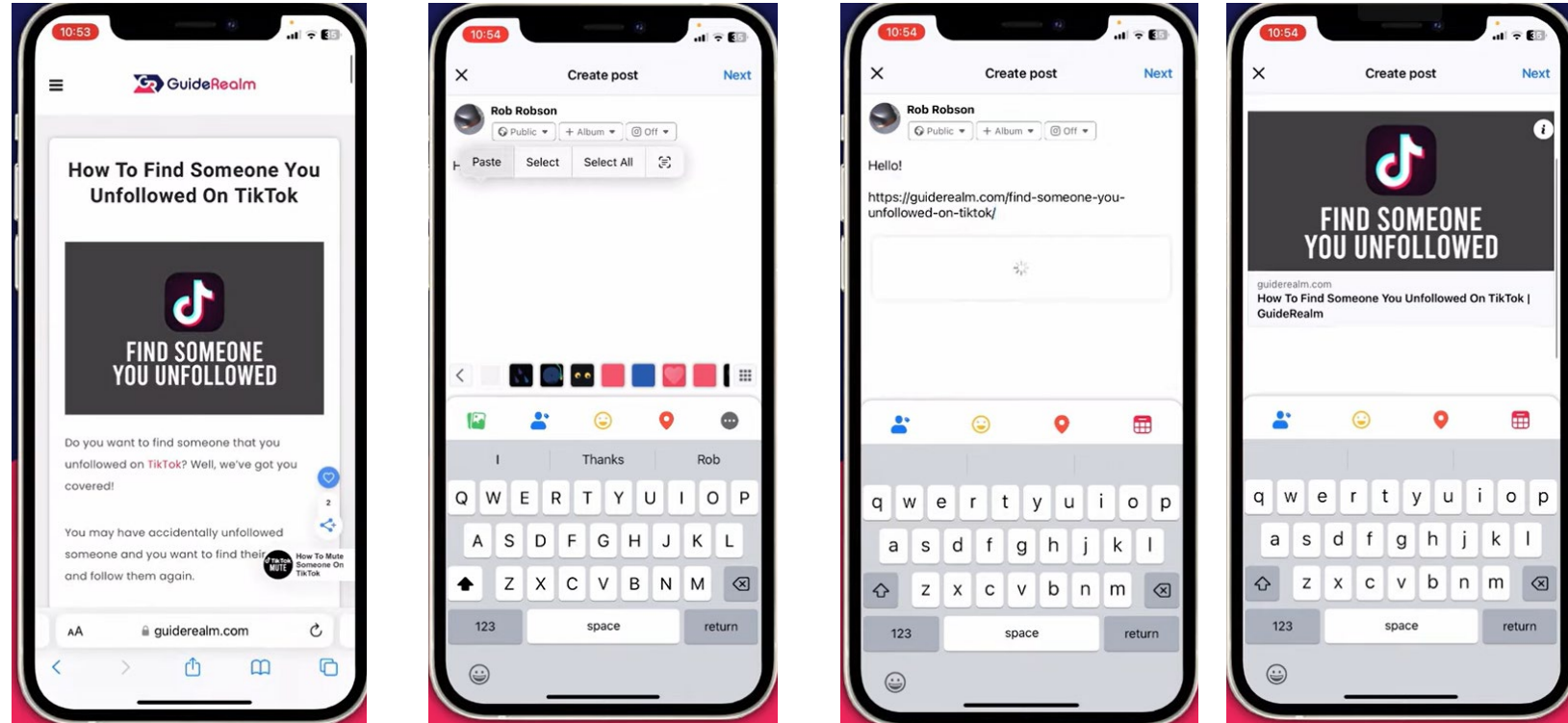
14. A method according to claim 1, wherein the indicator reflecting commenting activity associated with the card provides a numeric count of the commenting activity.

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting commenting activity associated with the card which provides a numeric count of the commenting activity.
- Defendant practices this limitation by providing an indicator reflecting the numeric count of the commenting activity on a given card.



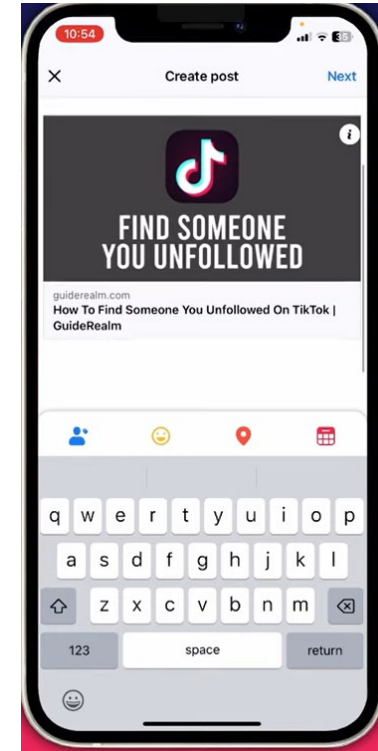
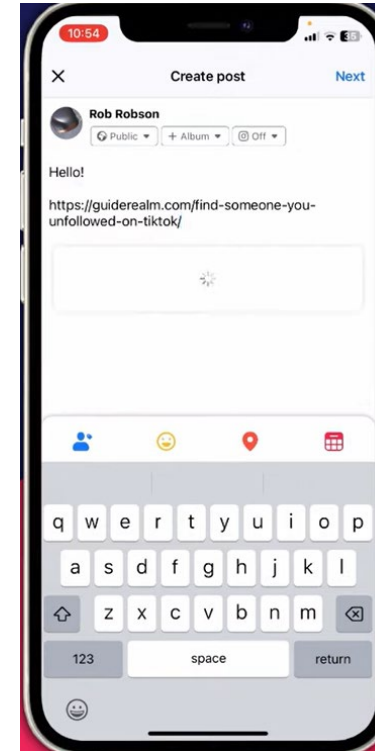
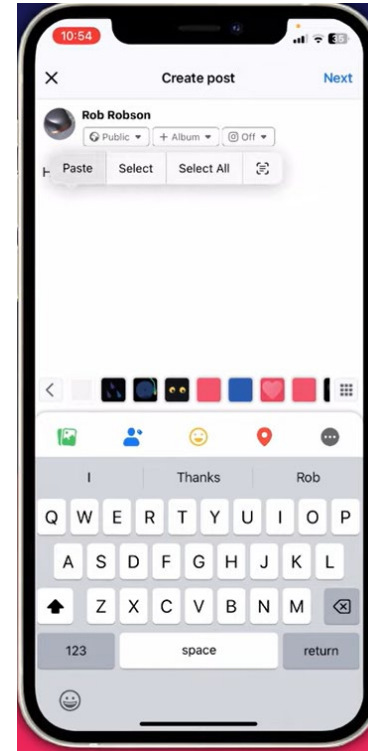
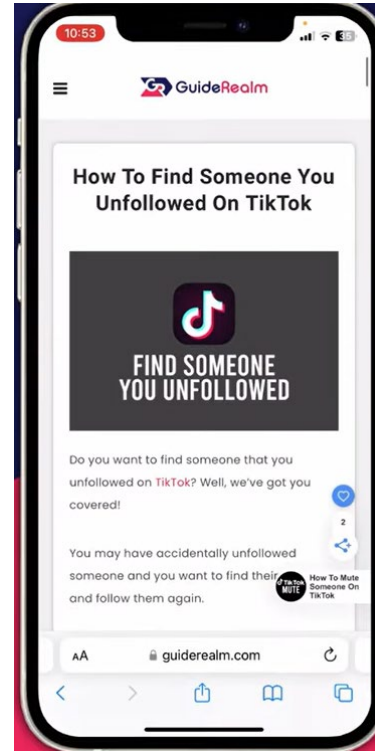
15. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the at least one source being external to the at least one computer, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method. Defendant infringes the accused method in at least two scenarios.
- In the first scenario, Defendant provides a mobile application which contains software resident on a user's device. This can include applications resident on a range of consumer electronic devices, including but not limited to smartphones, tablets, desktop computers, and laptops.
- In the second scenario, Defendant allows access to its Facebook website platform via a browser or other website interface. Defendant's website platform is similarly accessible via the web browser application of a range of consumer electronic devices including but not limited to smartphones, tablets, computers, laptops, and smart tv's. This resident application software allows access to, and interacts with, Defendant's Facebook platform.
- Under both scenarios, Defendant practices (in whole or in part) the claimed method through execution of software instructions on its backend servers of its Facebook platform as explained further below.
- The infringing methodology set forth by this claim chart applies equally to both scenarios unless otherwise indicated. To be clear, the use of an exemplary photo showing infringement under the first or second scenario would equally apply to infringement under the other scenario.



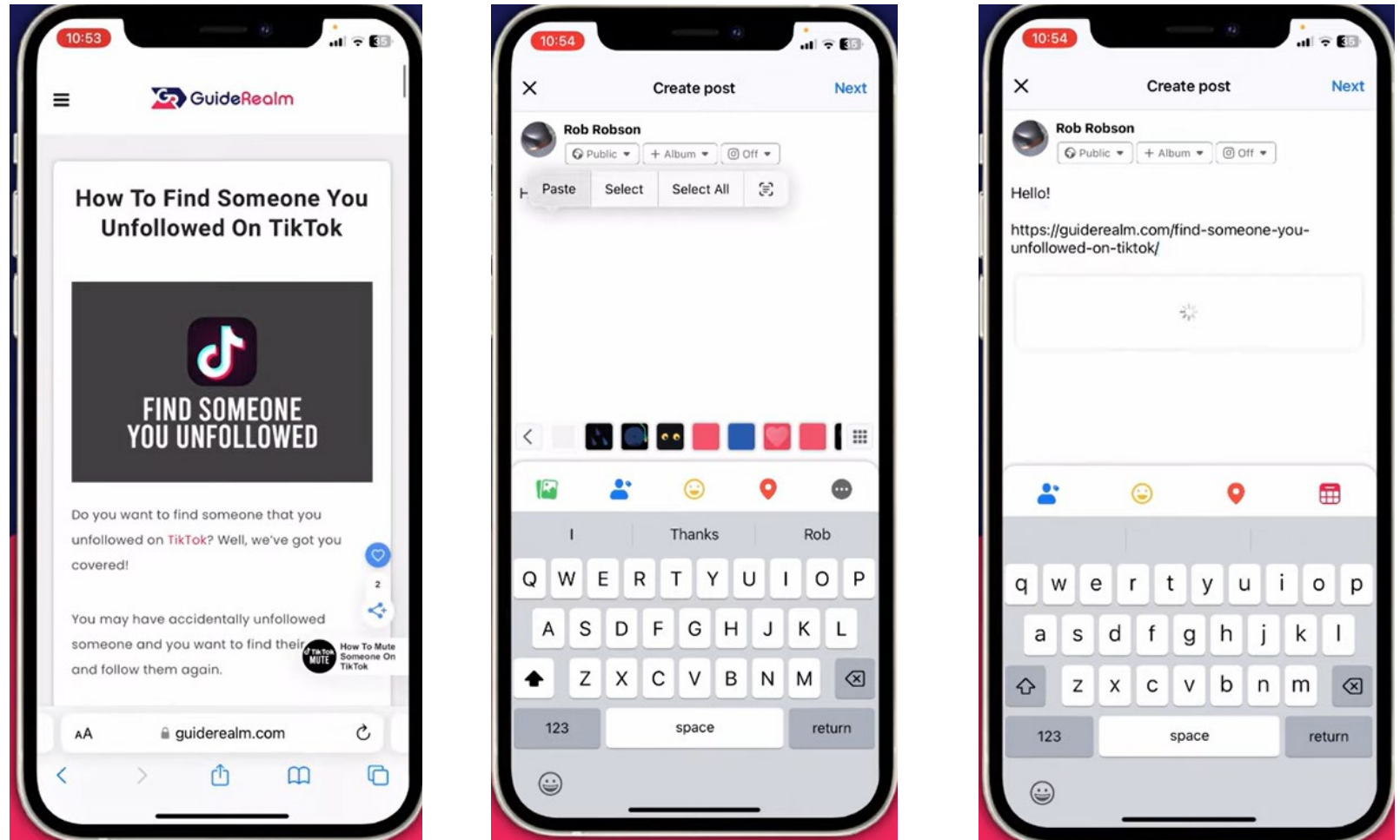
15. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the at least one source being external to the at least one computer, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, wherein the at least one source is external to the computer.
- The first photo represents a data item obtained from a source that is external to the at least one computer. In this example, the data item corresponds to an article hosted via a third-party website, namely, an article titled How to Find Someone You Unfollowed on TikTok via the website guiderealm.com.
- Photographs 2-4 represent the method whereby Defendant interacts with at least one data item obtained from at least one external source.



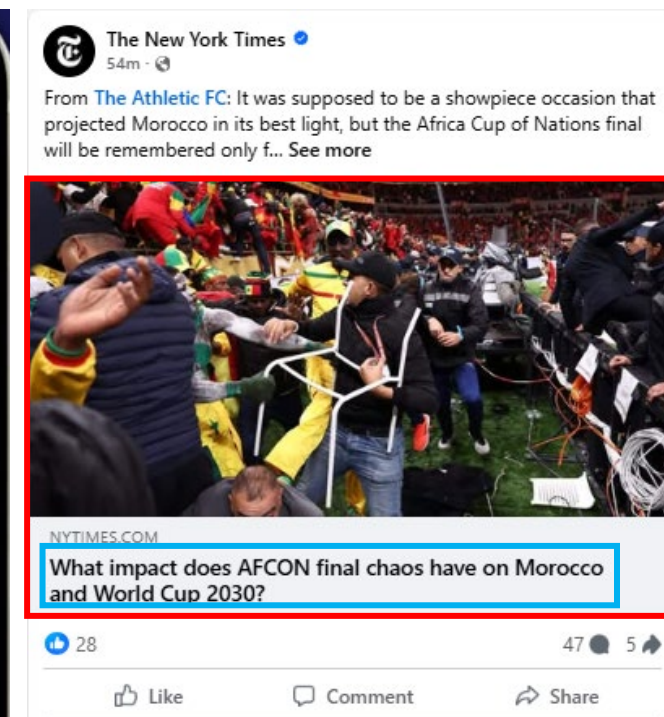
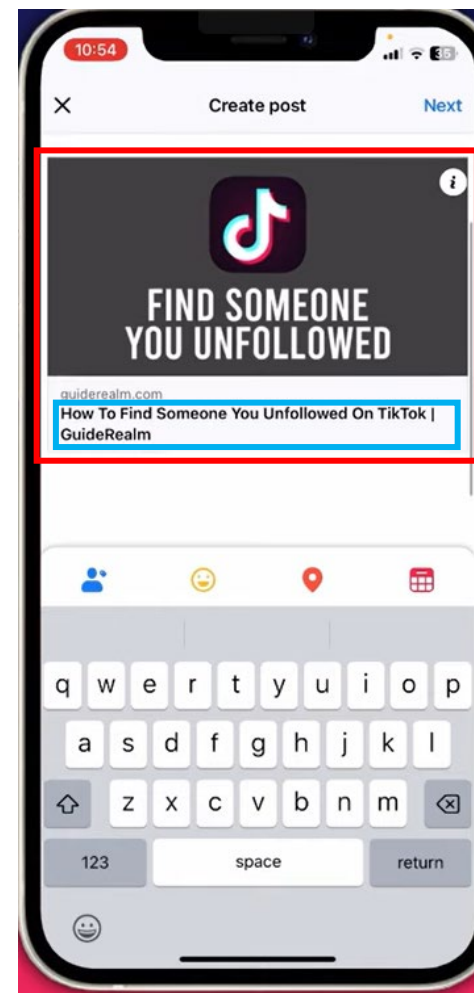
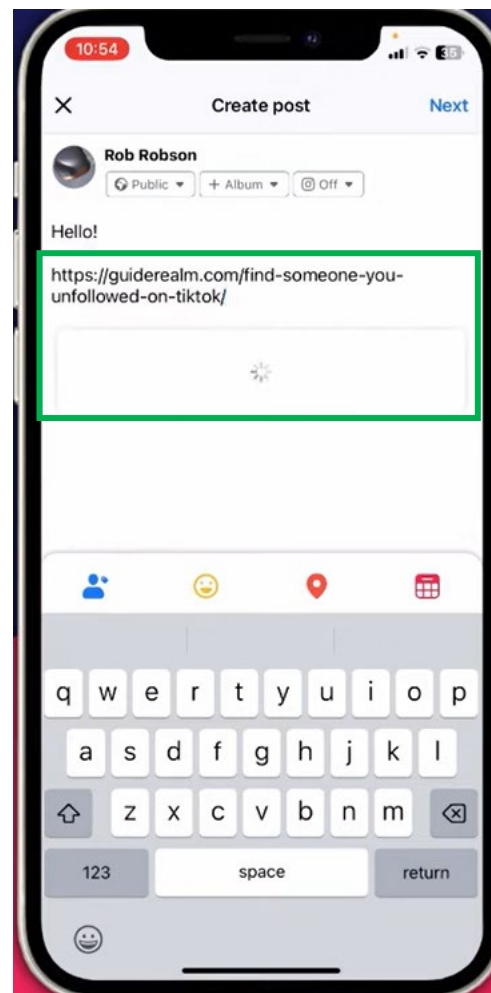
(a) responsive to a user selection of the at least one data item:

- Users may make a selection of a data item. In this example, the data item is the third-party web article entitled How to Find Someone You Unfollowed on TikTok.
- Defendant performs a series of steps in response to the user selection of the at least one data item.
- While users select data items, Plaintiff notes the user's selection is not an affirmative step of the claim. Instead, the claim's focus is on Defendant's actions "responsive to" the user selection.



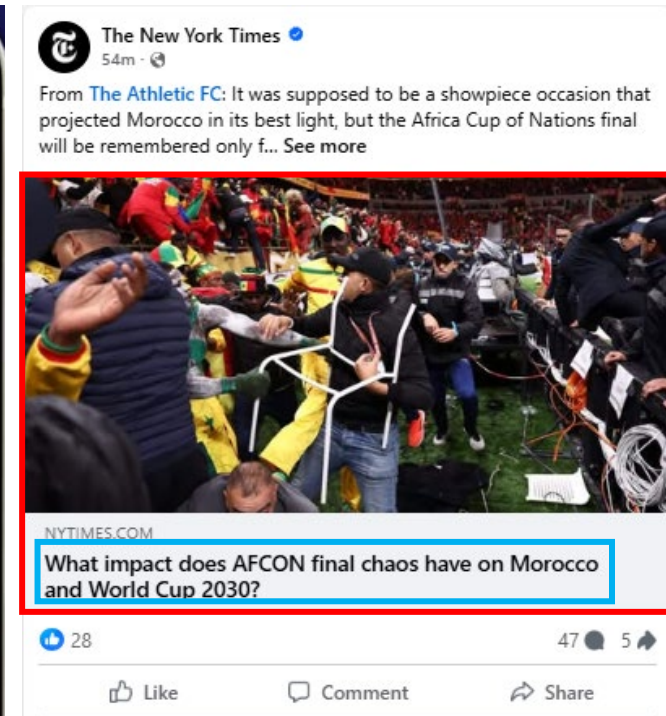
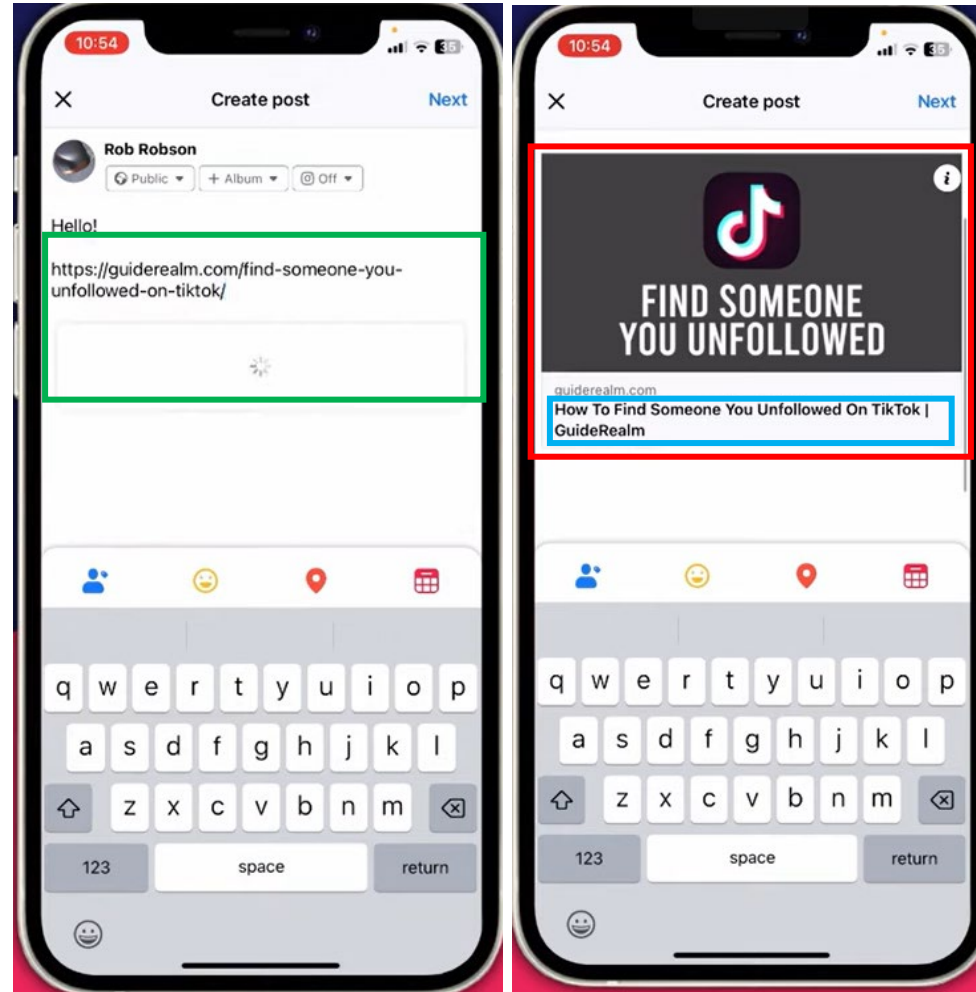
(a)(1) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture and a heading, and causing storing of data corresponding to each of the information objects in a database system;

- Defendant causes configuring of each data item into a distinct information object by extracting from each data item extracted data including a picture and a heading, and causes storing of data corresponding to each information object, including a link to the at least one data item in a database. Upon information and belief, the storing occurs in Defendant's database through its backend servers or local software application.
- Responsive to the user pasting a link to an external source (Image 1), Defendant causes the configuring of a data item into a distinct information object (Image 2) by extracting from said data item extracted data including a picture and a heading, and causes storing of data corresponding to the information objects including a link to the data item in a database.
- In the second image, the distinct information object and its corresponding picture and heading are shown.
- Defendant causes storing of data corresponding to each of the information objects, including a link to the data item in the database system of the Facebook platform.
- In the third image, Defendant further causes storage of data corresponding to each information object in the database system of the Facebook platform.



(a)(1) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture and a heading, and causing storing of data corresponding to each of the information objects in a database system;

- In the first scenario of infringement (App Scenario), Defendant's software resident on the user's device works in concert with Defendant's Facebook platform (e.g. its backend servers) to practice the limitations of the Asserted Claims.
- This resident software is found within the Facebook application which previously has been downloaded to the user device.
- On information and belief, the user device executes aspects of the application software in response to input from end users, which cause it to communicate to Defendant's backend servers.
- In this environment, the extracting of data comprising an image, heading, and/or link for a shared article may be performed by Defendant's application software and Defendant's backend servers.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user's device, those steps are performed automatically by Defendant. See Plaintiff's briefing on Defendant's motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant's backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.

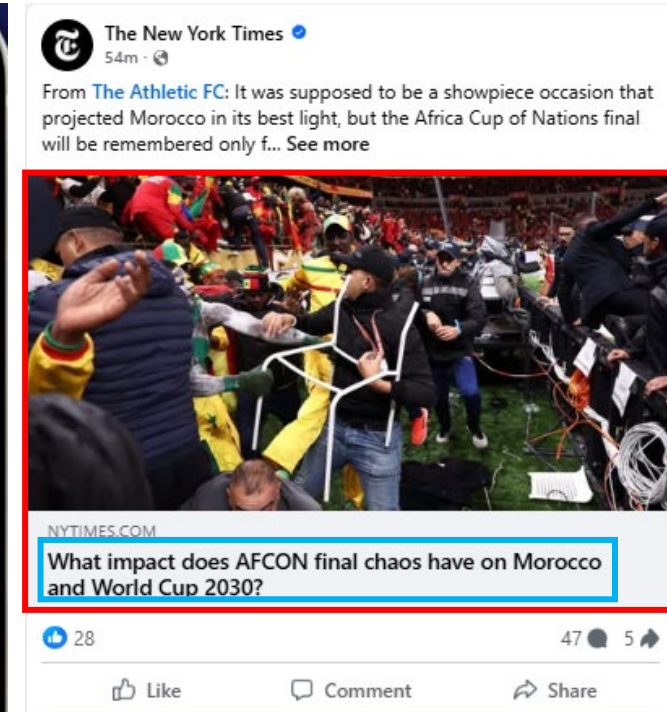
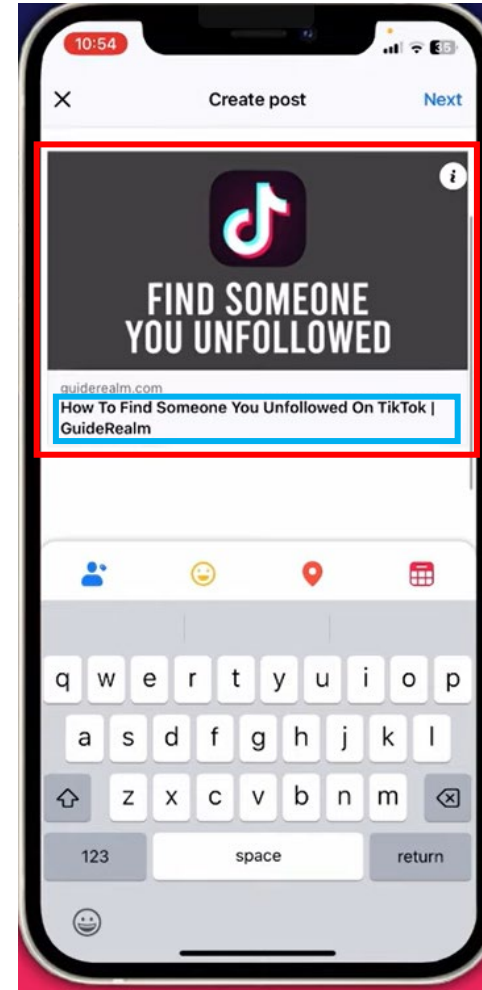
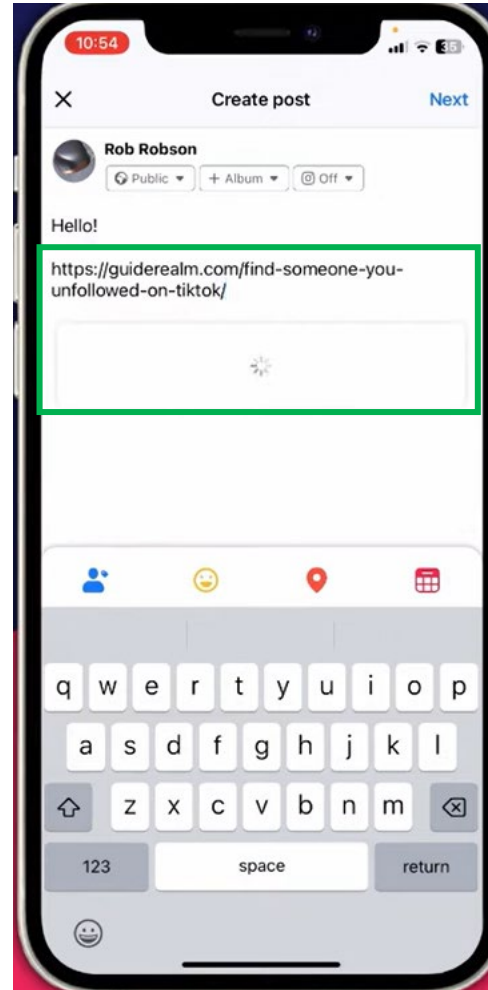


See <https://www.facebook.com/nytimes/>

See [How To Add Clickable Link On Facebook Post - Full Guide](#)

(a)(1) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture and a heading, and causing storing of data corresponding to each of the information objects in a database system;

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook, platform, e.g., backend servers to configure each of the data items into a distinct information object.
- Upon information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend servers do all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.

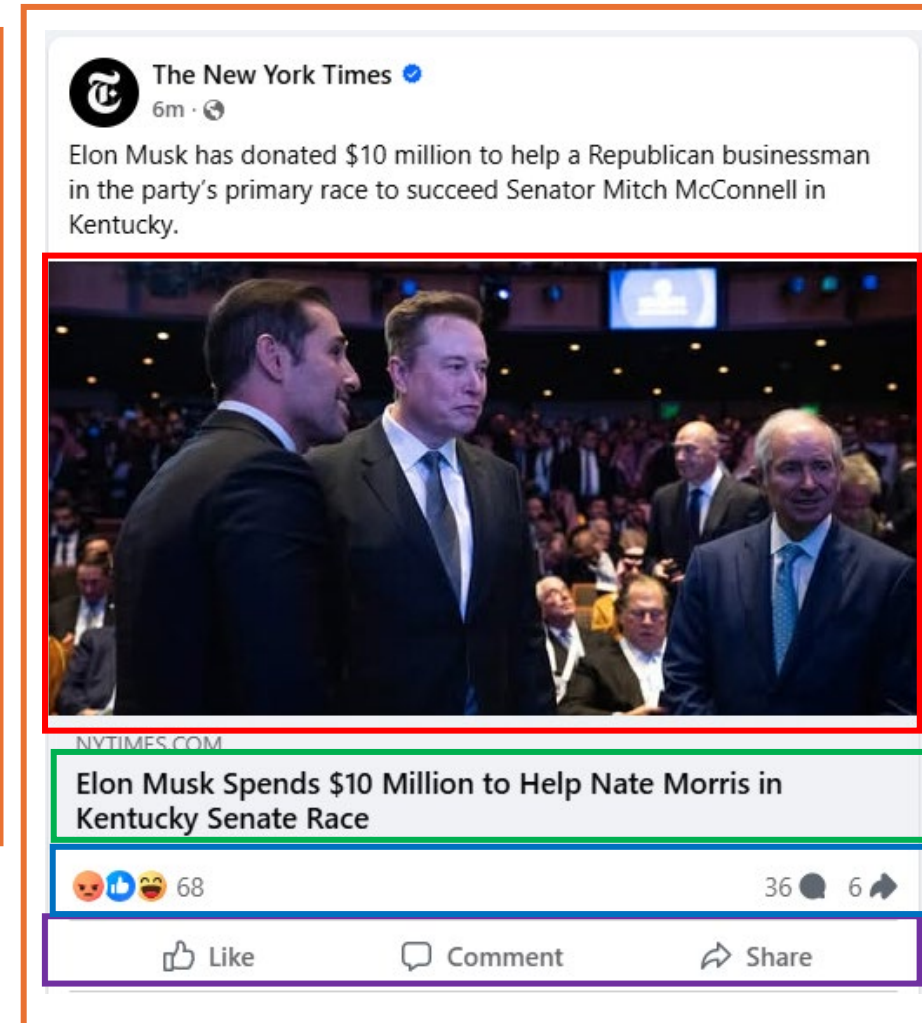
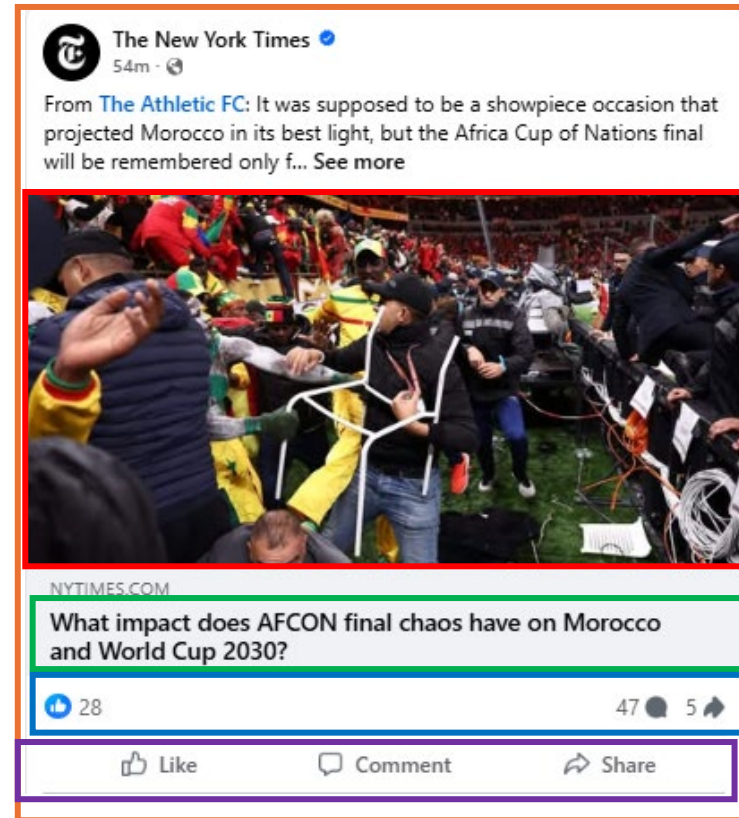


See [How To Add Clickable Link On Facebook Post - Full Guide](#)

See <https://www.facebook.com/nytimes/>

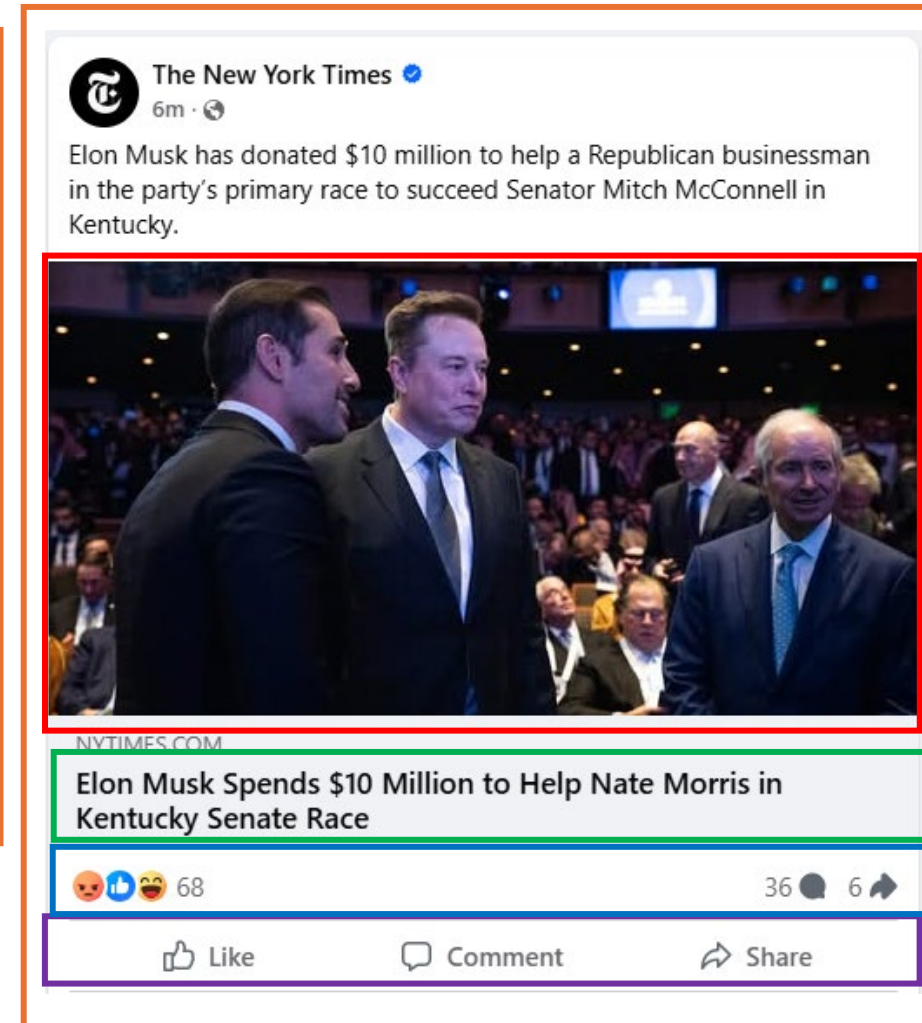
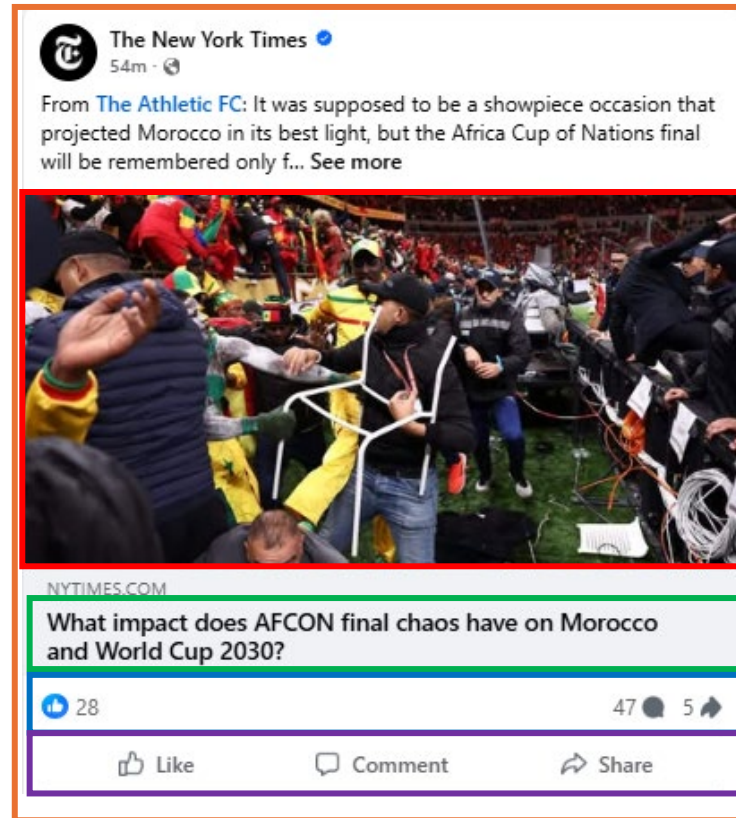
(a)(2) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Defendant causes displaying of a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof the picture, the heading, a set of indicators, and a set of graphically accessible functions.
- Defendant's "Wall", "Timeline", "Profile", "Feed", and/or "Newsfeed" features display each of at least two information objects by the same or different users in the database system. For example, Defendant displays New York Times' Facebook wall which contains representations of two or more information objects in Defendant's database system. Both images are exemplary representations of information objects shown on the New York Times' Facebook wall and are in uniform format.



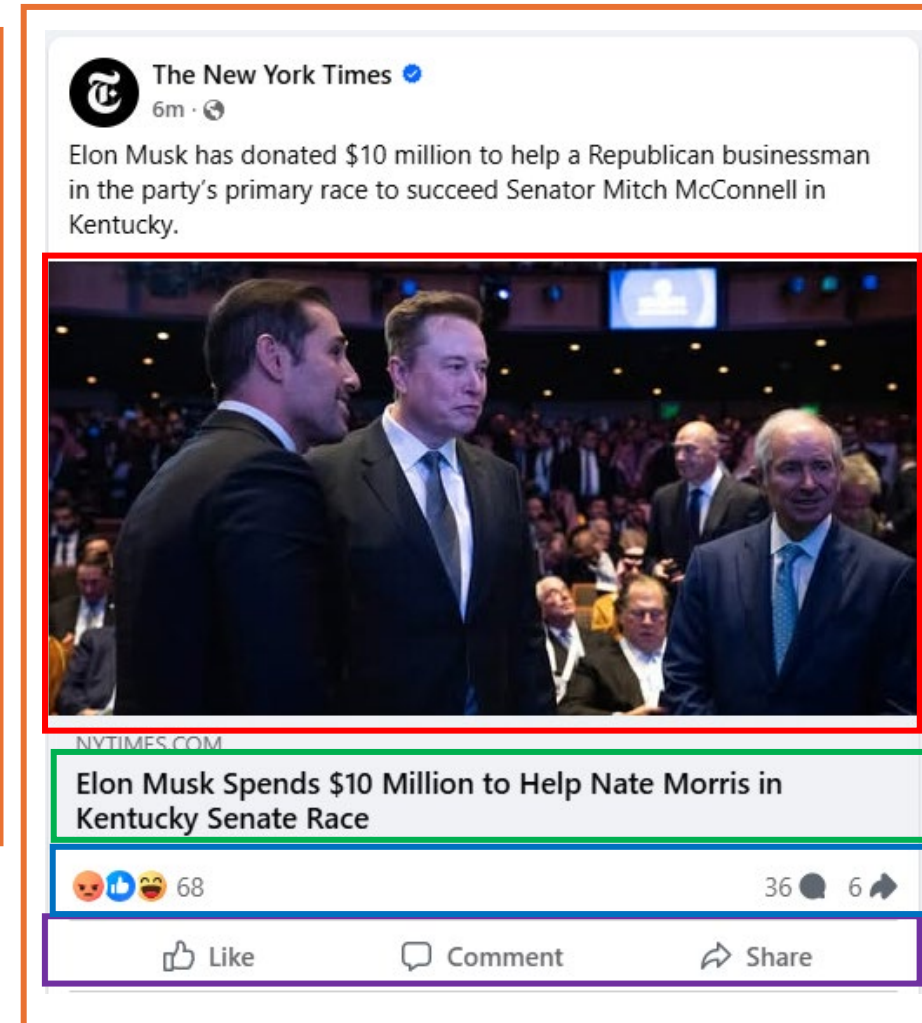
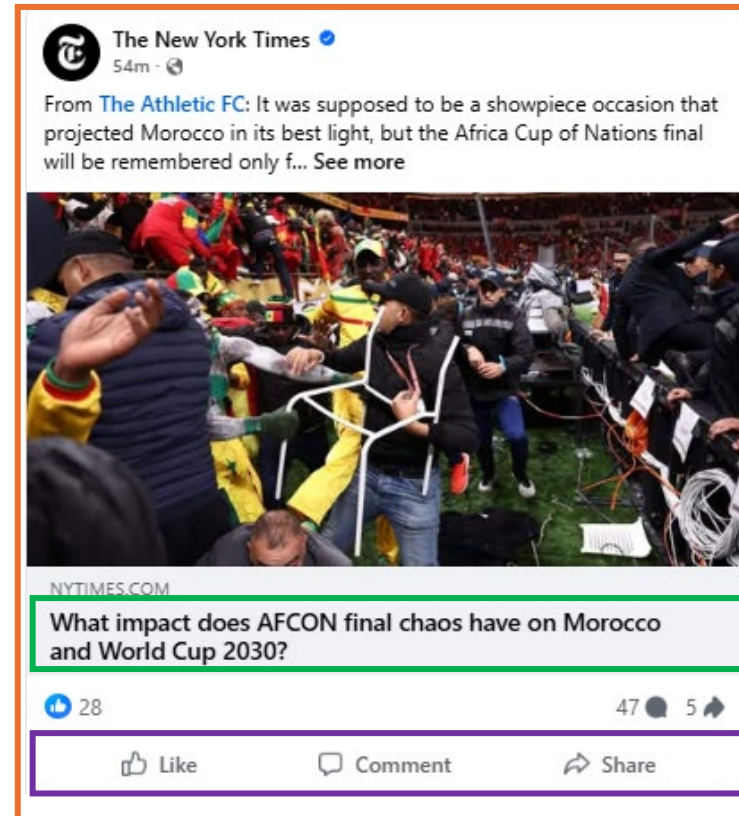
(a)(2) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Under the first scenario of infringement (App scenario), the claimed “displaying a representation” may also be performed in part on the user’s device through the execution of the local application software. The backend server network operates to store variable data for use by the application software to cause display of the representation.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user’s device, those steps are performed automatically by Defendant. *See* Plaintiff’s briefing on Defendant’s motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant’s backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



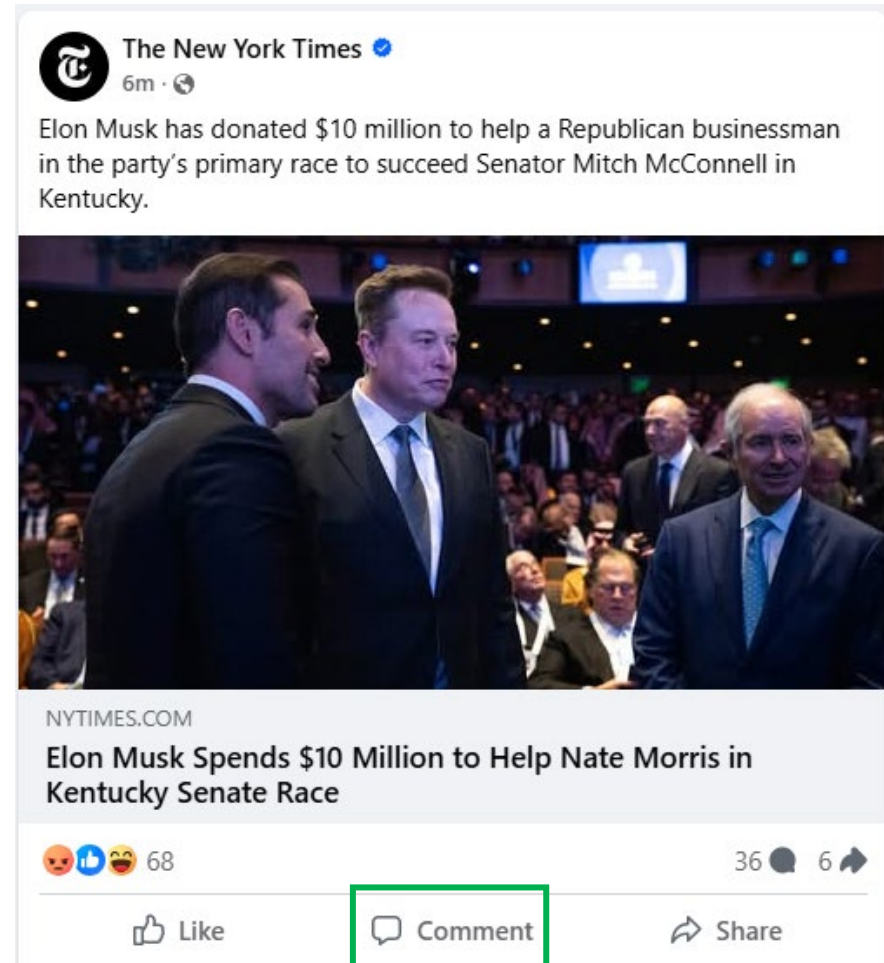
(a)(2) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook backend to display a representation of at least two of the information objects in the database system.
- Upon information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend does all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.



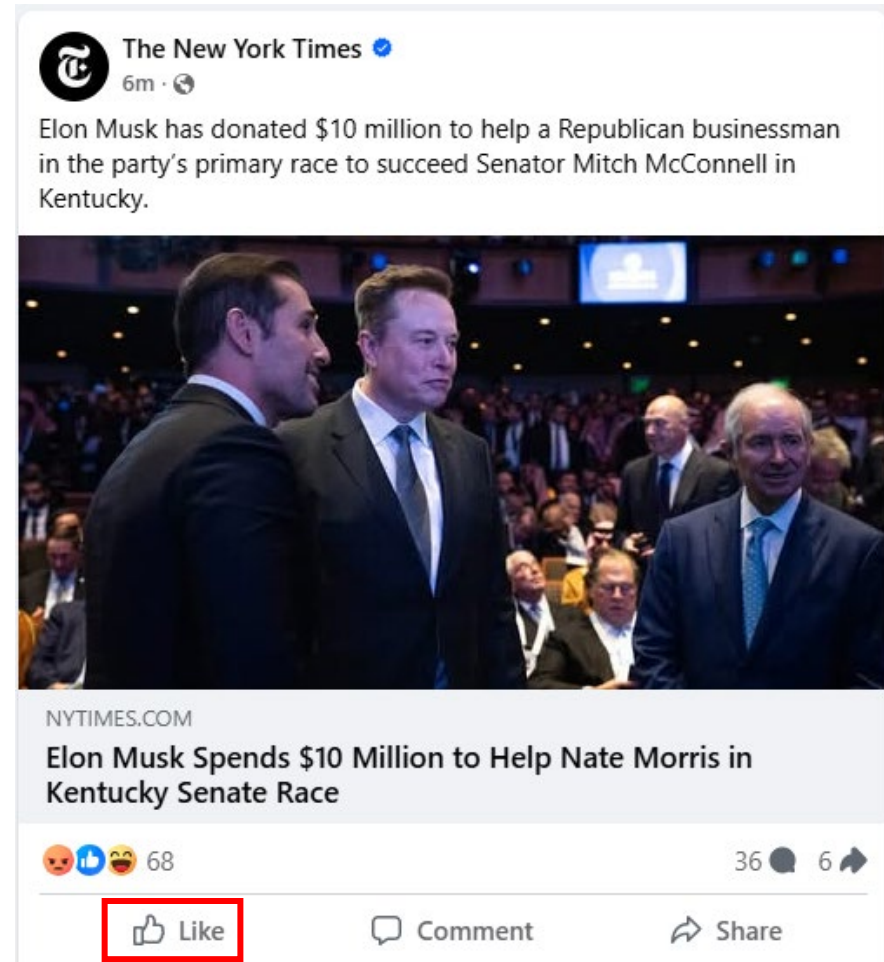
(a)(2)(i) a comment function, by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card;

- One of Defendant's graphical functions of is a comment function by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card.
- Defendant practices this limitation by providing a comment function in a uniform location of the card which allows for comments associated with the information object.



(a)(2)(ii) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- One of Defendant's graphical functions is a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card.
- Defendant practices this limitation by providing its "Like" button which facilitates users' voting for the card with such votes being associated with the information object represented by the card.



(a)(2)(ii) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- Defendant further provides users with the opportunity to react to cards which facilitates users' voting for the card with such reactions or votes being associated with the information object represented by the card.
- As explained by Defendant's public literature, Defendant provides users having access to cards the opportunity to react to the information object represented by the card by allowing them to hover over Defendant's like button and select their desired reaction or vote.

Liking tells your friends that you enjoyed their post or comment, while reacting allows you to specify your response. You can only leave one reaction per post or comment.

To react to a post or comment:

- Go to the post or comment you want to react to.
- Hover over **Like** and choose a reaction. The most popular reactions appear below the post or comment as icons (example:   ).



Like



Love



Haha



Wow



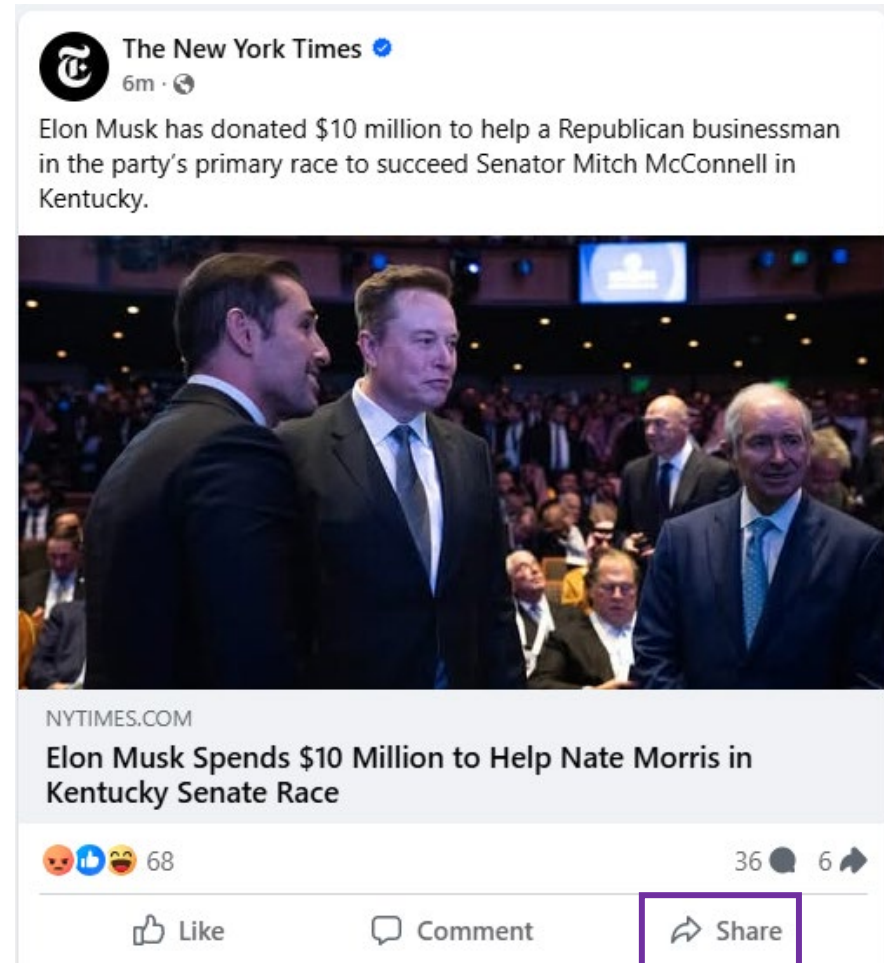
Sad



Angry

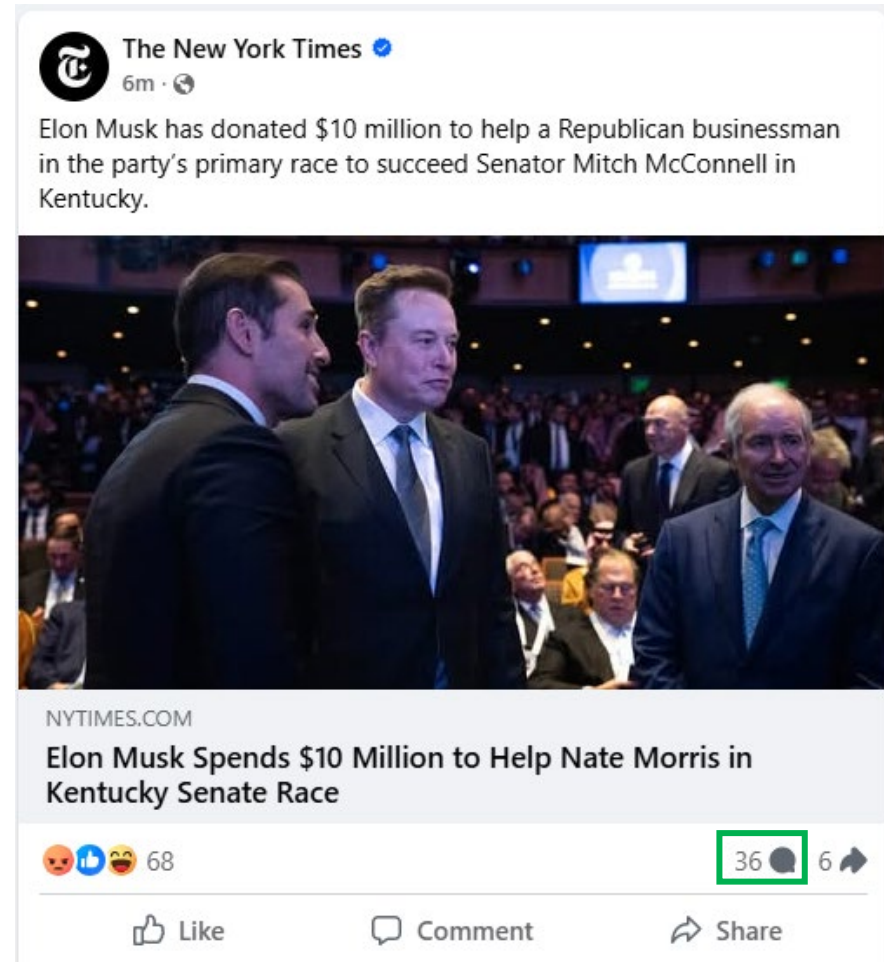
(a)(2)(iii) a **copy function**, by which users having access to the card copy function in a first collection of cards of a first user can cause the card to appear in a second collection of cards of a second user; and

- One of Defendant's graphical functions is a **copy function**, in this example a "Share" button, by which users having access to the card copy function in a first collection of cards of a first user can cause the card to appear in a second collection of cards of a second user.
- For example, when a user views the displayed post on The New York Times' Facebook timeline, that card appears in a first collection of a first user, namely the New York Times' card collection.
- Defendant Share button is a copy function which can be used to cause a card to appear in a second user's card collection.



(a)(2)(iv) wherein the set of indicators includes: an indicator reflecting commenting activity associated with the card; and

- Defendant's set of indicators includes an indicator reflecting commenting activity associated with the card.
- Defendant's indicator shows the number of comments that have been posted that are associated with the card.



(b) wherein the database system has been configured to allow

(b)(i) each user to have at least one user-selected collection of cards representing information objects in the database system and

(b)(ii) cards, regardless of the collections in which they may have first appeared, to be made accessible and copyable across card collections of different users.

- Defendant configures its database system to allow each user to have at least one user-selected collection of cards representing information objects in the database system and cards, regardless of the collections in which they have first appeared, to be made accessible and copyable across card collections of different users. Note, Defendant's "database system" may be made up of multiple databases or otherwise arranged in a distributed database.

- Defendant practices this limitation by allowing users such as the New York Times to maintain a user-selected collection of cards representing information objects. For example, the New York Times maintains its collection at: <https://www.facebook.com/nytimes/>. These collections are stored in Defendant's database system.

- Although the cards are maintained in their user-selected collection, the cards may be made accessible and copyable across card collections (including collections of a second user) in part due to Defendant's Share button which allows for the cards to be copyable across collections of different users.

facebook

Email or phone

Password

Log In

Forgot Account?



The New York Times

21M followers • 35 following

[Posts](#)
[About](#)
[Reels](#)
[Photos](#)
[Videos](#)

Intro

In-depth, independent reporting to better understand the world. News tips? Share them here: nytl.ms/2FVHq9v

Page · Media/news company

New York Times Co
is responsible for this Page

(800) 591-9233

help@nytimes.com

nytimes.com/chat

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9m ·

Elon Musk has donated \$10 million to help a Republican businessman in the party's primary race to succeed Senator Mitch McConnell in Kentucky.



NYTIMES.COM

Elon Musk Spends \$10 Million to Help Nate Morris in Kentucky Senate Race

68

36 · 6

Log in or sign up for Facebook to connect with friends, family and people you know.

Log In

or

Create new account



The New York Times

6m ·

Elon Musk has donated \$10 million to help a Republican businessman in the party's primary race to succeed Senator Mitch McConnell in Kentucky.



NYTIMES.COM

Elon Musk Spends \$10 Million to Help Nate Morris in Kentucky Senate Race

68

36 · 6

Like

Cogmedia_2015

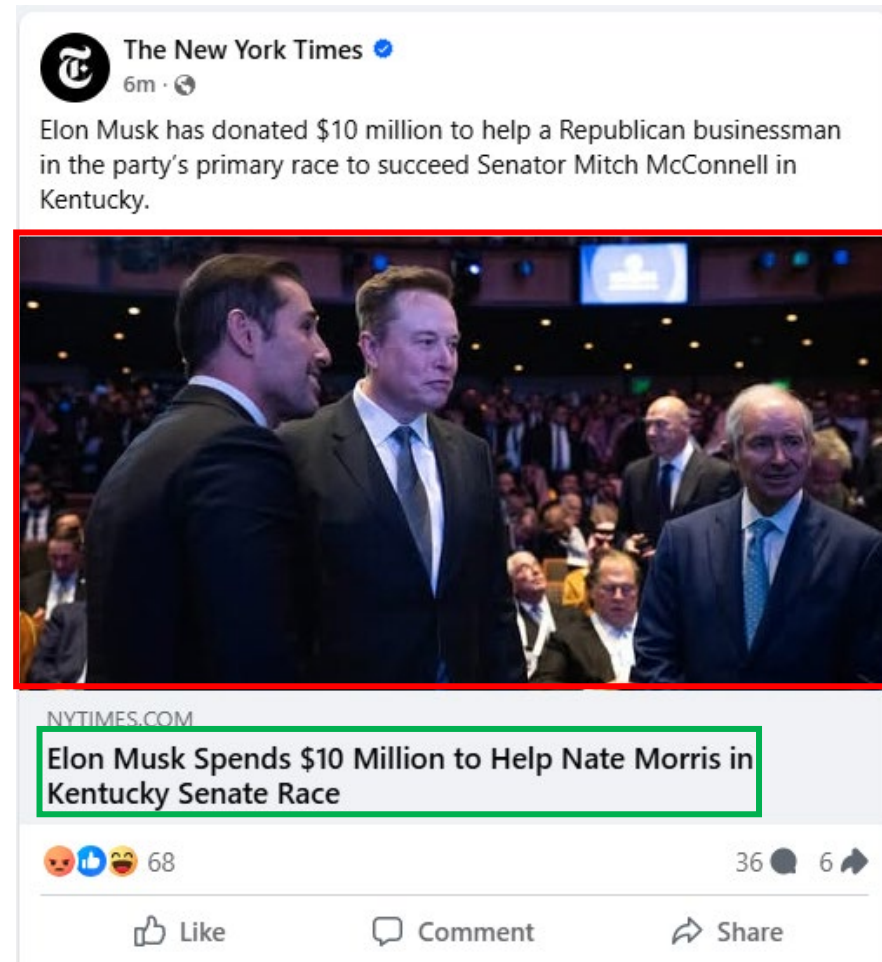
Page 53 of 149

Share

See <https://www.facebook.com/nytimes/>

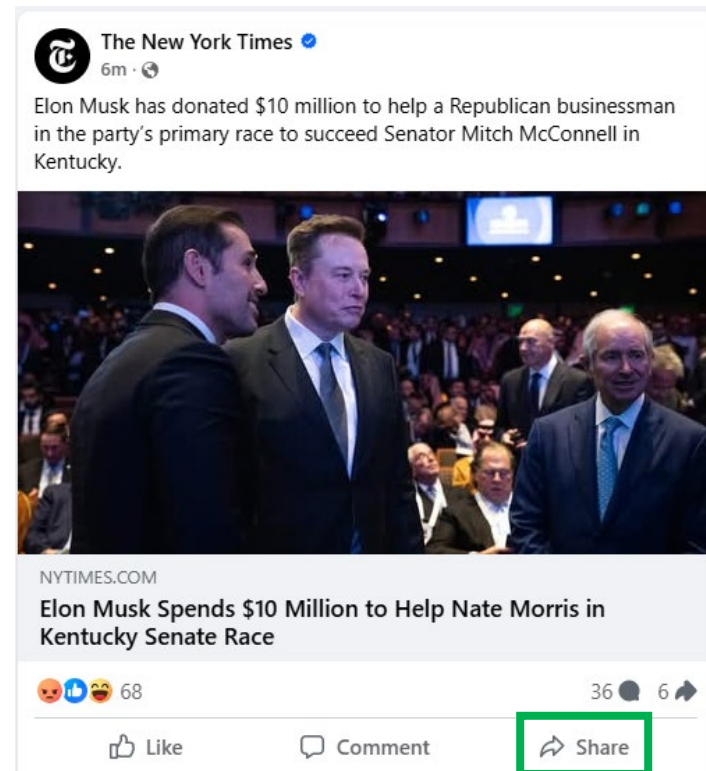
16. A method according to claim 15, wherein the extracted data from each data item includes at least the **picture** and the **heading** and wherein the heading is included within the card.

- As can be seen in the exemplary image, Defendant routinely configures data items to include at least an extracted **picture** and **heading** wherein the heading is included within the card.

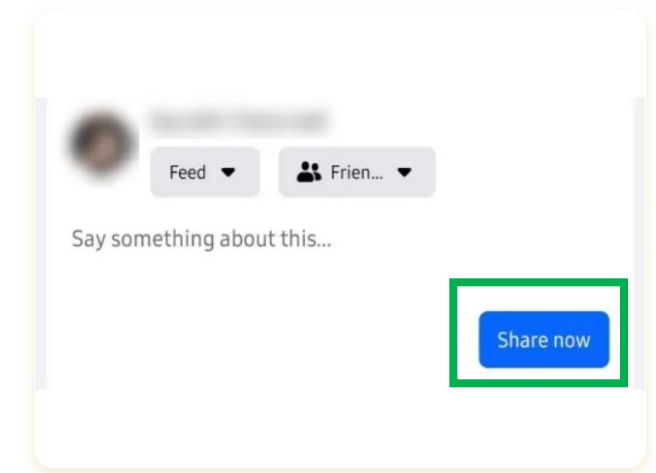


17. A method according to claim 15, the computer processes further comprising: displaying a graphical button, which, when invoked while content is being displayed, causes the displayed content to be handled as one of the data items, namely, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.

- Defendant provides a user interface having a graphical button which when invoked while content is being displayed causes the displayed content to be handled as one of the data items, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.
- Defendant displays graphical buttons, namely Defendant's "Share" and "Share now" buttons which when invoked configure the displayed content as a new information object and makes a representation of the new information object available for display in the uniform format. Defendant's "Share now" button becomes available upon a user's selection of Defendant's copy function or Share button and when invoked configures the displayed content as a new information object available for display in the uniform format.



- If you want to reshare the post without making any changes, select **Share Now**.

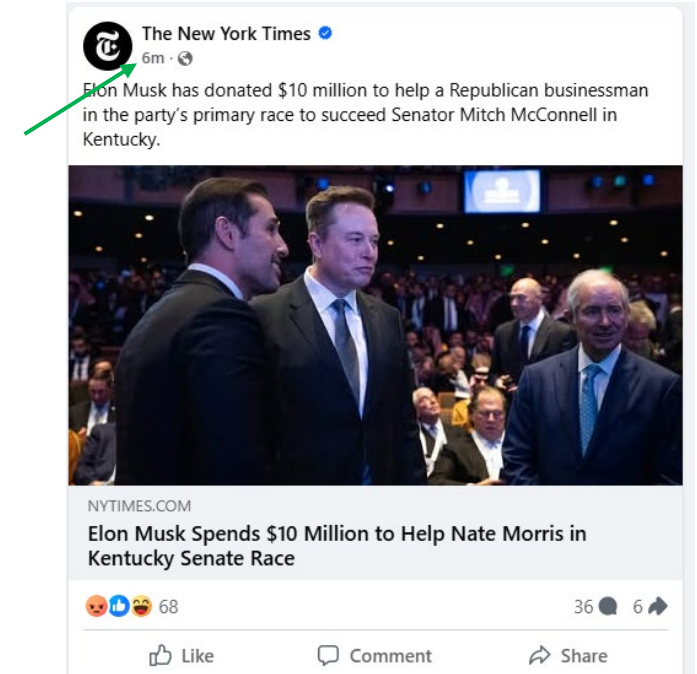


<https://recurpost.com/blog/how-to-repost-on-facebook/>

See <https://www.facebook.com/nytimes/>

18. A method according to claim 15, wherein the format includes within the card an indication of a date of creation.

- Defendant's computer-implemented method further comprises a format which includes within the card an indication of a date of creation as exemplified on the right.
- Defendant updates the time between the date of creation of a card and the present. Briefly after a card has been created, Defendant includes within the card an indication of the date of creation by referencing that the card was made a certain number of seconds, minutes, hours, or days ago. Further after a card has been created, Defendant includes within the card a specific date and time of the card's creation.
- For example, the Business Rocks Women card contains an indicator it was created on June 3rd at 2:20 AM and The New York Times card indicates that it was posted just 6 minutes ago.

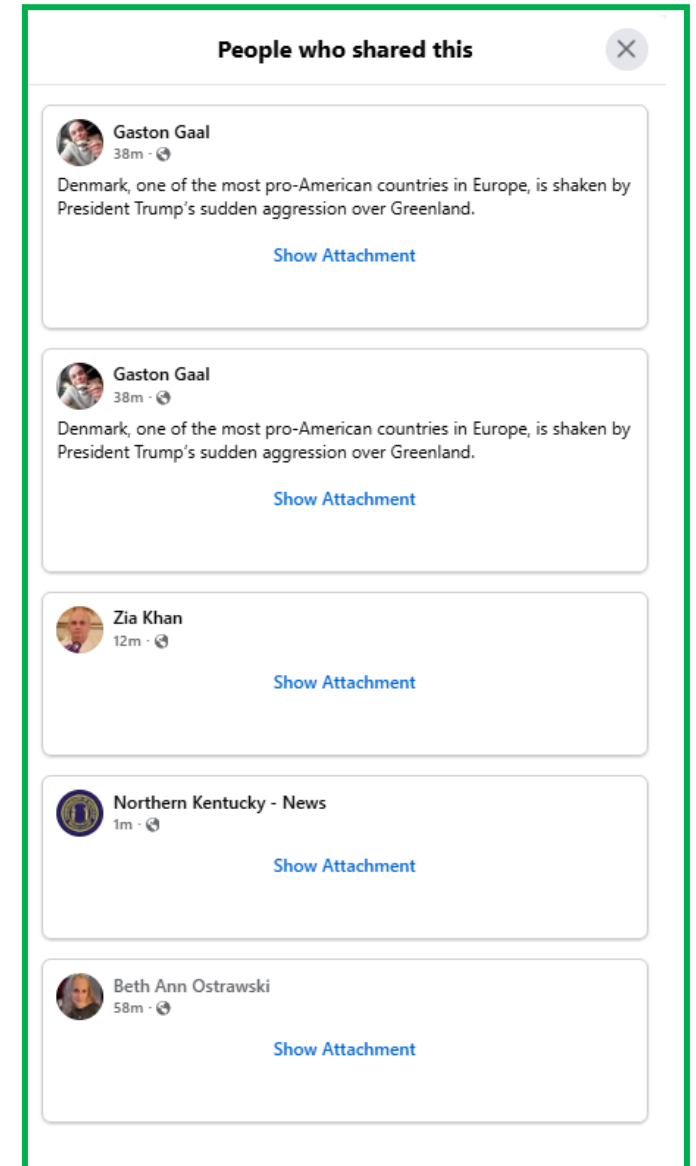
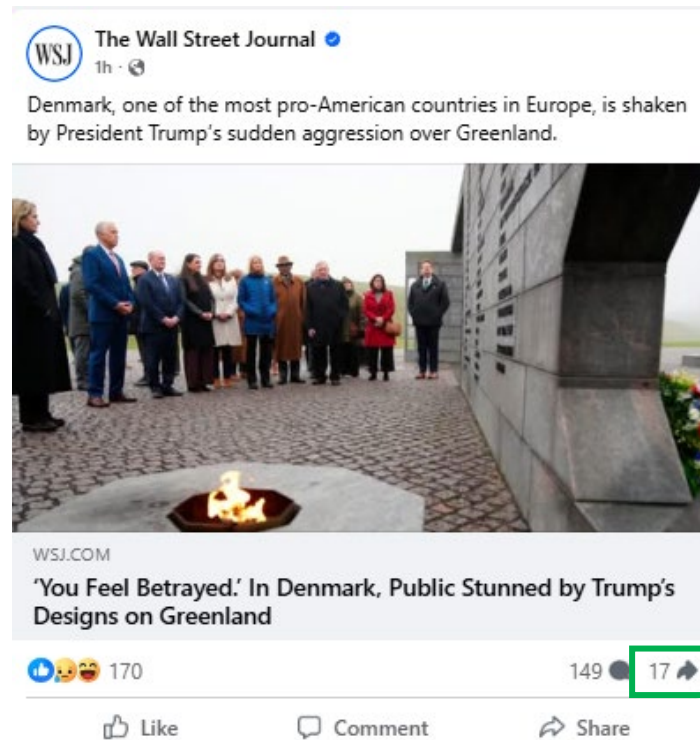


See <https://louisem.com/2541/post-link-on-facebook>

See <https://www.facebook.com/nytimes/>

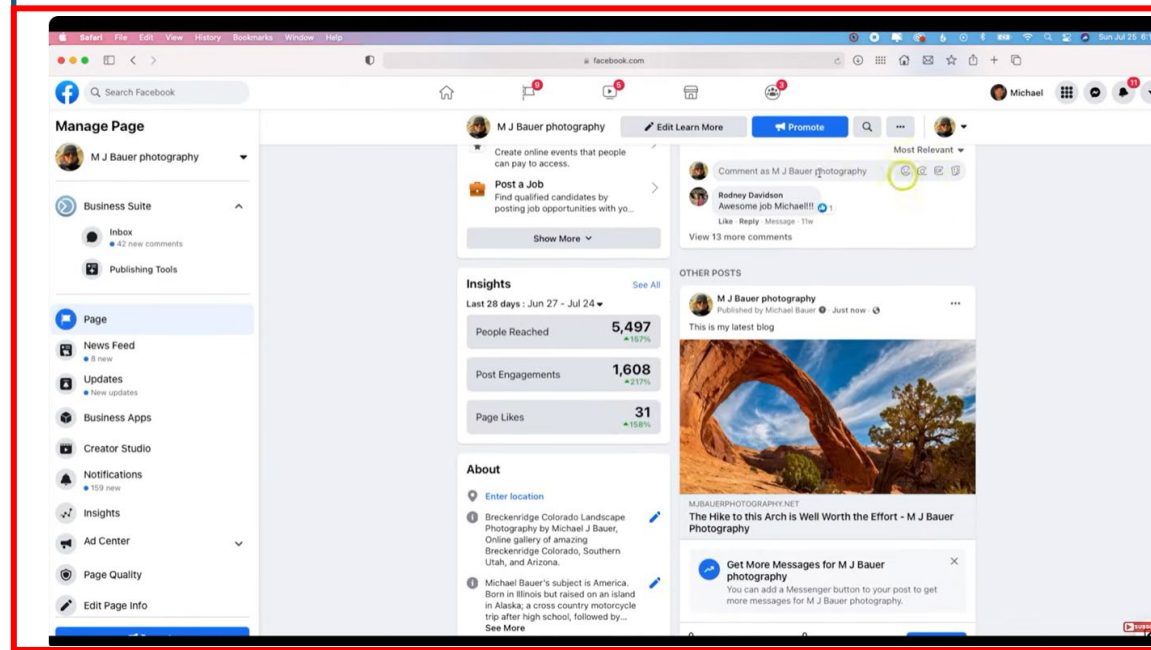
19. A method according to claim 15, wherein the format includes a user-accessible report relating to users who copied the information object.

- Defendant's computer-implemented method further comprises a format which includes a user-accessible report relating to users who copied the information object.
- Defendant practices this limitation in part by displaying within the format of the card an indicator showing the number of users who have copied or shared the information object. Defendant further practices this limitation by displaying a list labeled as "People who shared this" which identifies different users who copied the information object.



20. A method according to claim 15, further comprising: displaying in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user; and also displaying in the computing device of the first user, a second view of a second set of cards that constitute a collection of a second user.

- Defendant displays in a computing device a first view of a first set of cards that constitute a first collection of the first user. For example, each user has a timeline or wall that consists of cards posted to the first user's wall as shown by the first image.
- Defendant also displays in the computing device of the first user a second view of a second set of cards that constitutes a collection of a second user. For example, the client computing device also can access another user's collection of cards as shown by the second image. In this example, Defendant provides to the first user a view of the Wall Street Journal's collection of cards.

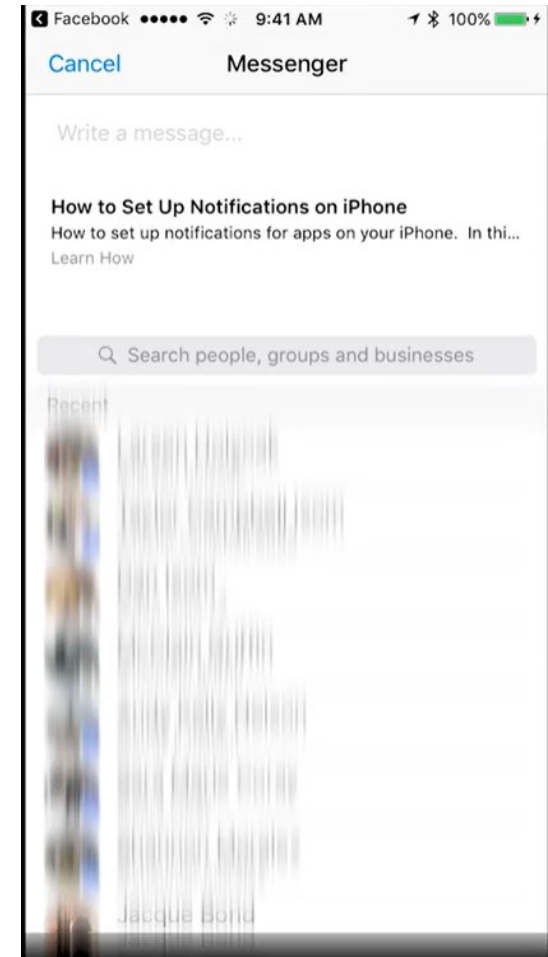
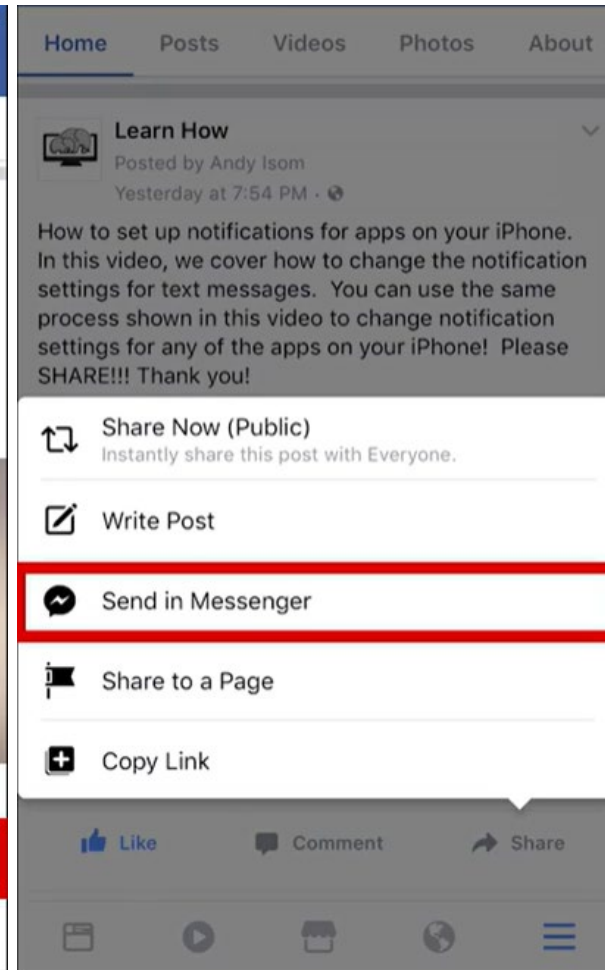
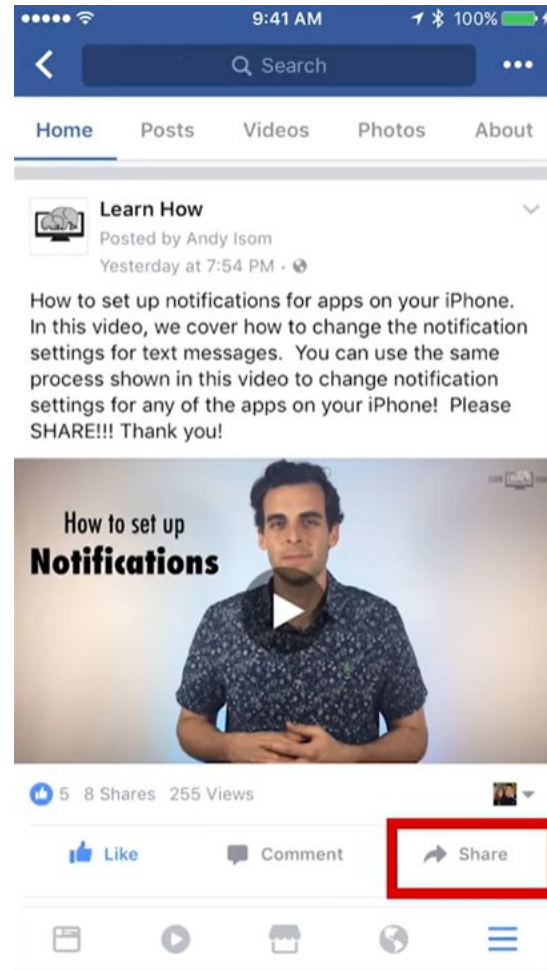


See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>

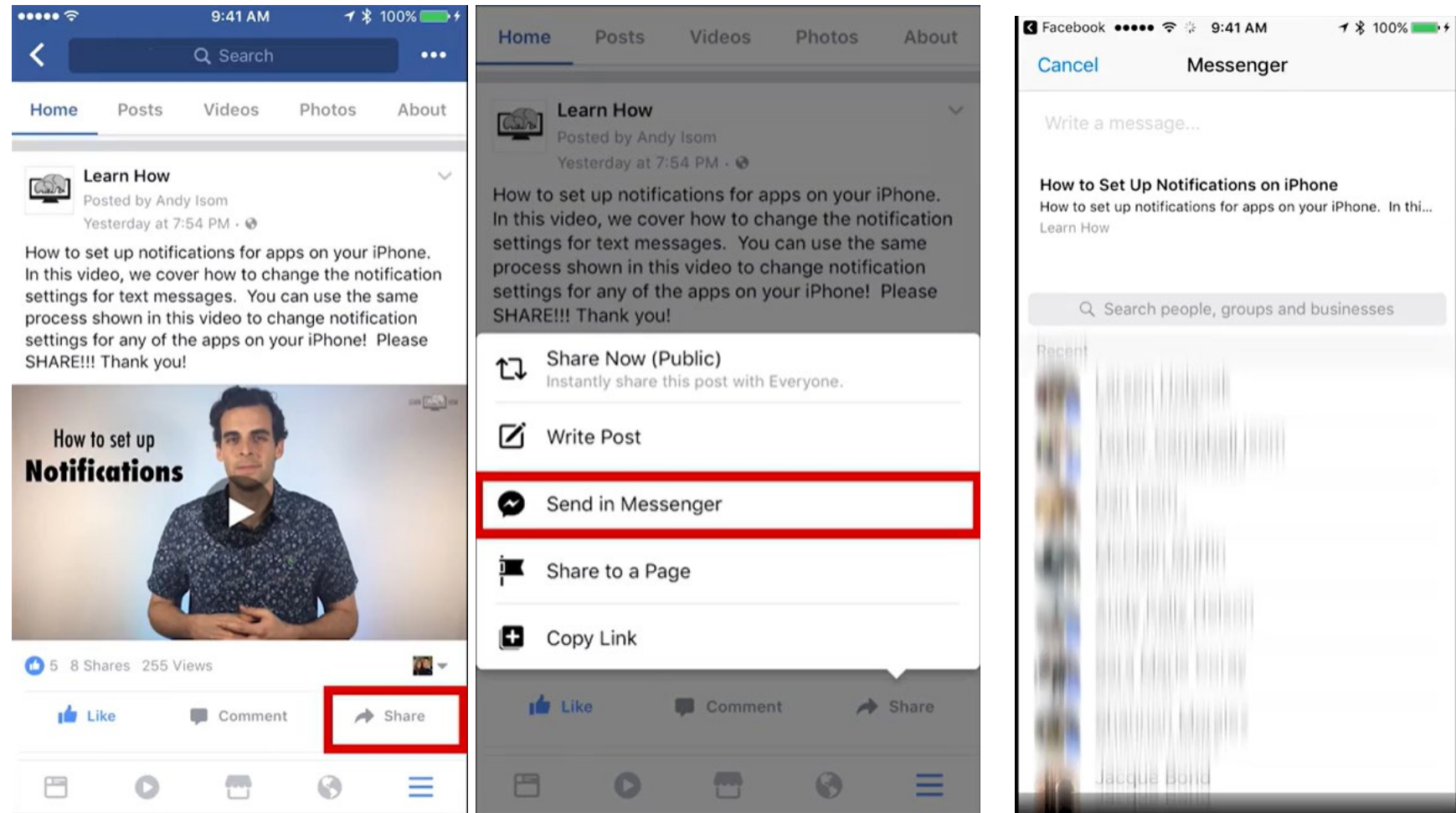
21. A method according to claim 20, further comprising: responsive to (i) a graphical selection, by the first user, of a card in the second view and (ii) a copy command that has been graphically entered by the first user, causing the selected card to be copied from the second view to the first view, so that the selected card in the collection of the second user appears in the first collection of the first user.

- Defendant responds to a first user's graphical selection of a card in the first view and sends a command that has been graphically entered by the first user which causes the selected card to be sent to the second user, so that the selected card in the collection of the first user is made available to the second user to be included in the collection of the second user.
- Upon a graphical selection by the first user of a card in the first view and their entering of a send command, Defendant causes the selected card in the collection of the first user to be made available to the second user to be included in the collection of the second user.



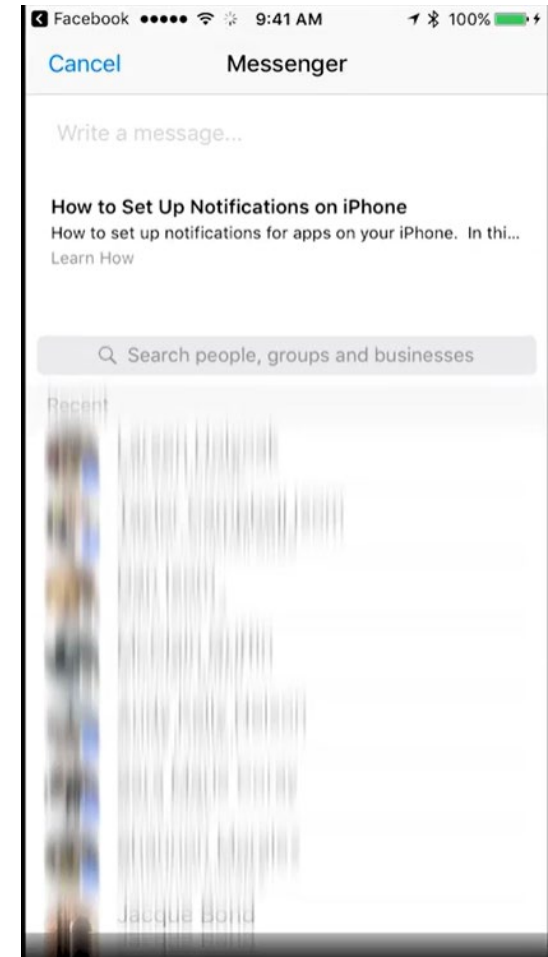
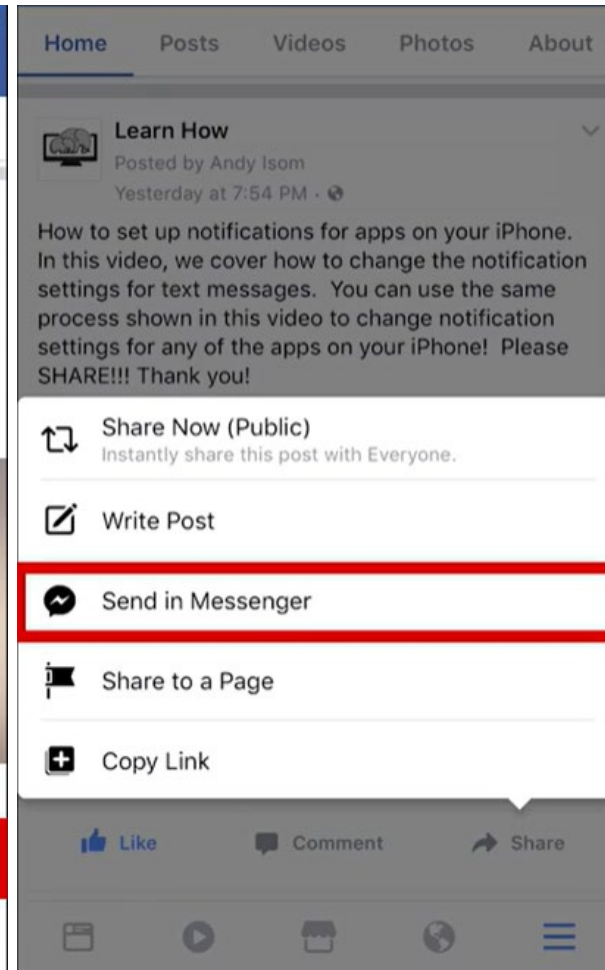
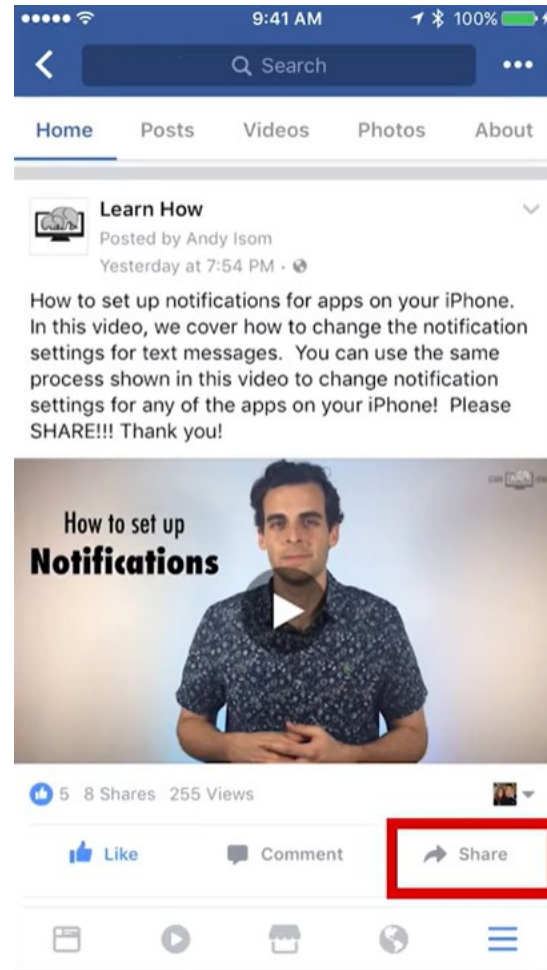
22. A method according to claim 20, further comprising: responsive to (i) a graphical selection, by the first user, of a card in the first view and (ii) a send command that has been graphically entered by the first user, causing the selected card to be sent to the second user, so that the selected card in the collection of the first user is made available to the second user to be included in the collection of the second user.

- On a user-entered command, Defendant causes a card to be shared with another user when the card and the other user have been graphically selected.
- Upon a user selecting the share and send in messenger buttons, a user is able to select another user with whom the user wishes to share the selected card. Upon such a user-entered command, Defendant causes the card to be shared with the other user.



23. A method according to claim 15, further comprising: on a user-entered command, causing a card to be shared with another user when the card and the other user have been graphically selected.

- On a user-entered command, Defendant causes a card to be shared with another user when the card and the other user have been graphically selected.
- Defendant practices this limitation through the use of its “Share” and “Messenger” functionality wherein Defendant shares a card with another user upon a user-entered command.



24. A method according to claim 15, further comprising: on a user-entered command, causing a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.

- Defendant maintains at least one integrated instant messaging system which it refers to as Facebook Messenger.



Overview for the Messenger Platform

The Messenger Platform Overview details how the platform works and what you need to successfully implement the platform.

Messenger from Meta is a messaging service that allows a business' Facebook Page or Instagram Professional account to respond to people who are interested in your business or social media. Conversations between a person and your account must be initiated by the person.

The Messenger Platform is free for you to use.

A place for meaningful conversations

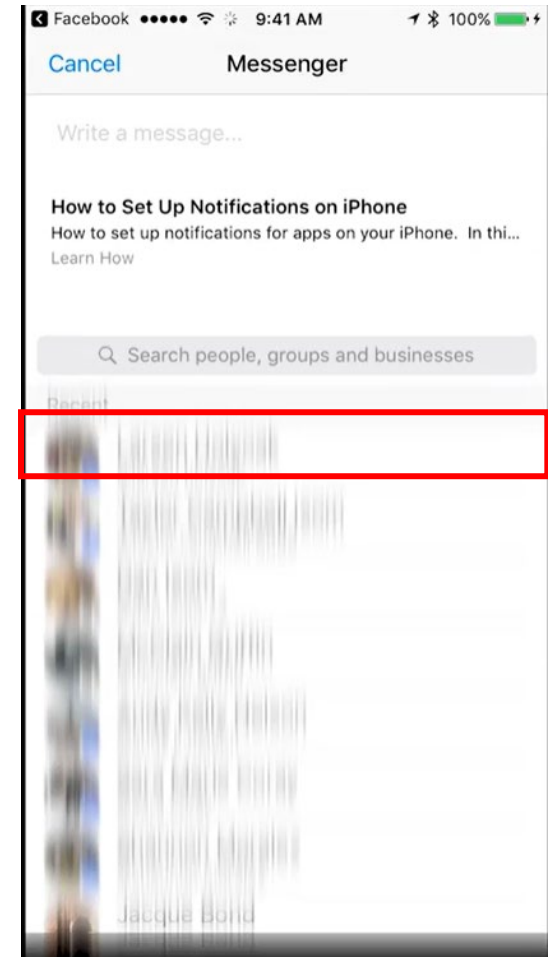
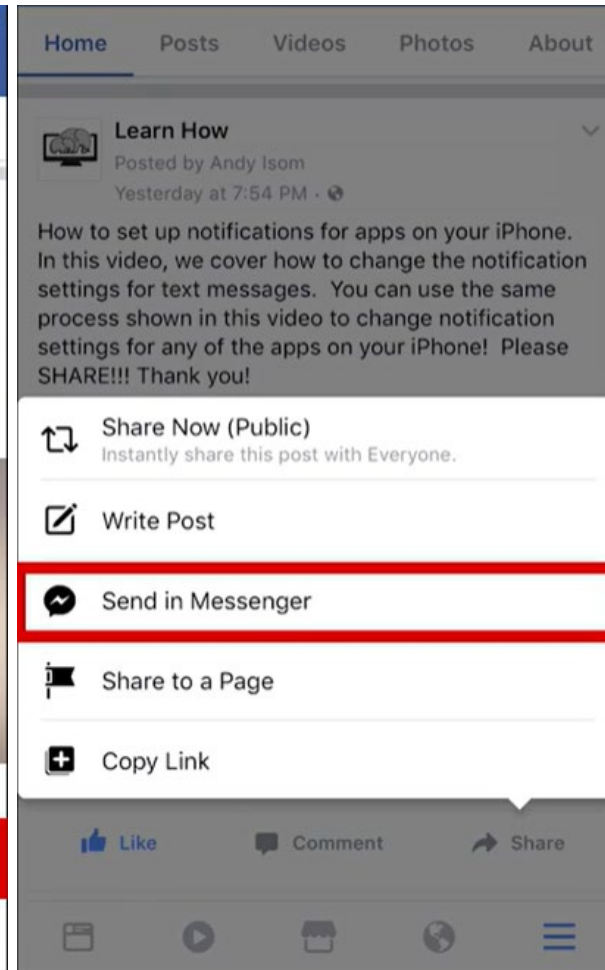
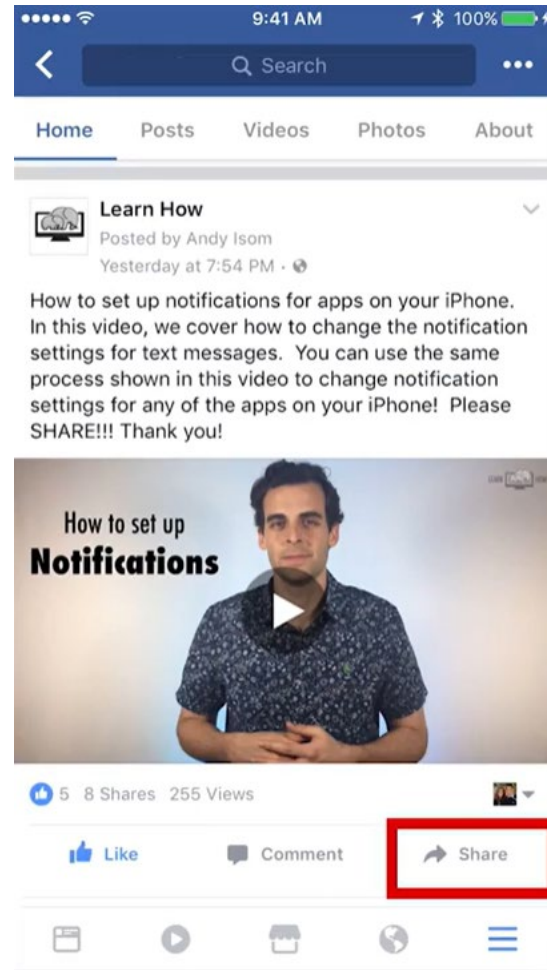
Messenger helps you connect with your Facebook friends and family, build your community, and deepen your interests.

<https://developers.facebook.com/docs/messenger-platform/overview>

https://www.messenger.com/?locale=en_US

24. A method according to claim 15, further comprising: on a user-entered command, causing a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.

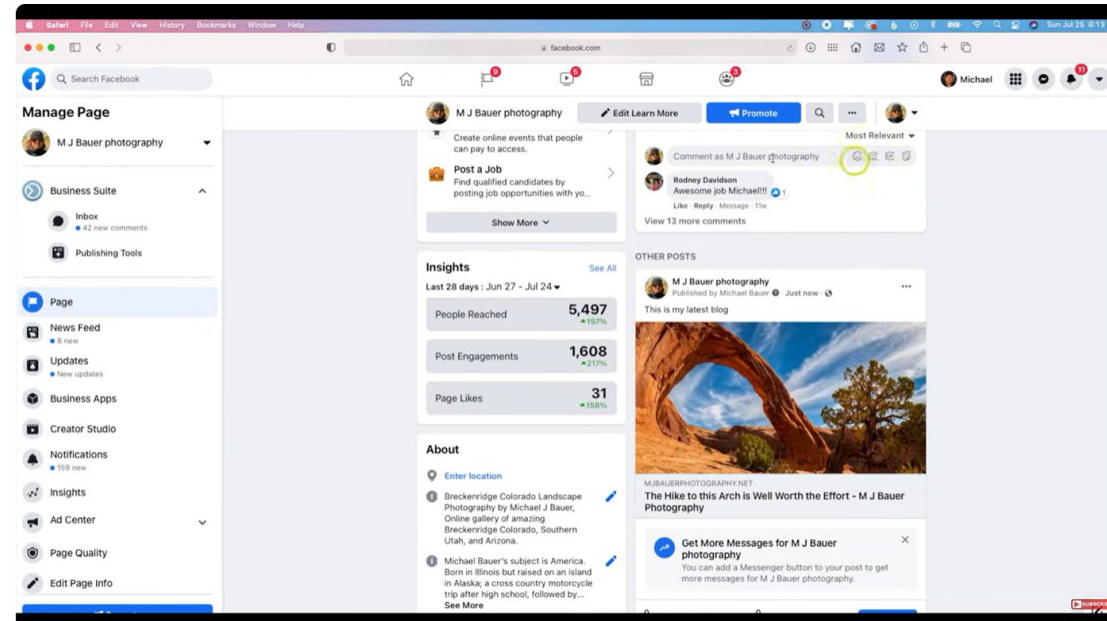
- On a user entered command, Defendant causes a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.
- Defendant practices this limitation by causing a card to be shared with another use via Facebook Messenger which is an integrated instant messaging system in response to a graphical selection by a first user.



25. A method according to claim 15, further comprising: displaying in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user; also displaying in the computing device of the first user, a second view of a second set of cards, outside of the first collection, wherein any given member of the second set of cards is both included in a collection of another user and the other user has been selected by the first user; and wherein each of the cards in the second view can, on a user-entered command, be caused to be copied to the first view.

- Defendant displays in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user and also displays in that computing device a second view of a second set of cards outside of the first collection wherein any given member of the second set of cards is both included in a collection of another user and the other user has been selected by the first user and wherein each of the cards in the second view can, on a user-entered command be caused to be copied to the first view.

- Defendant practices this limitation by providing users with a first view of their timeline or wall and a second view of another user's wall and also providing the "Share" button which allows for any given member of the second set of information objects to be copied onto the first user's wall.



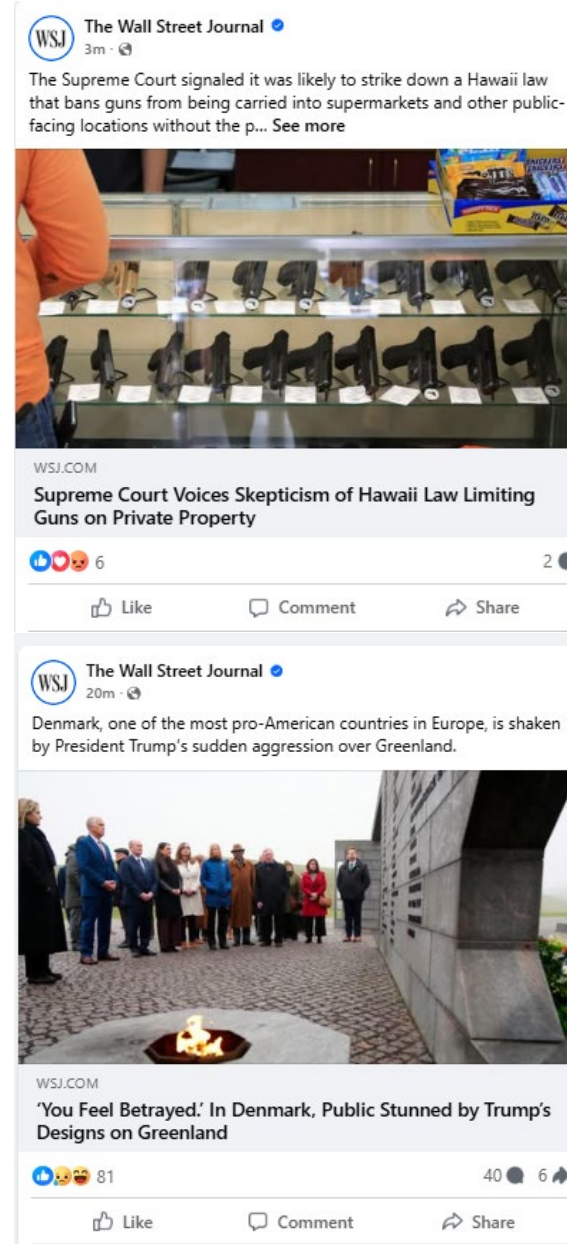
See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>



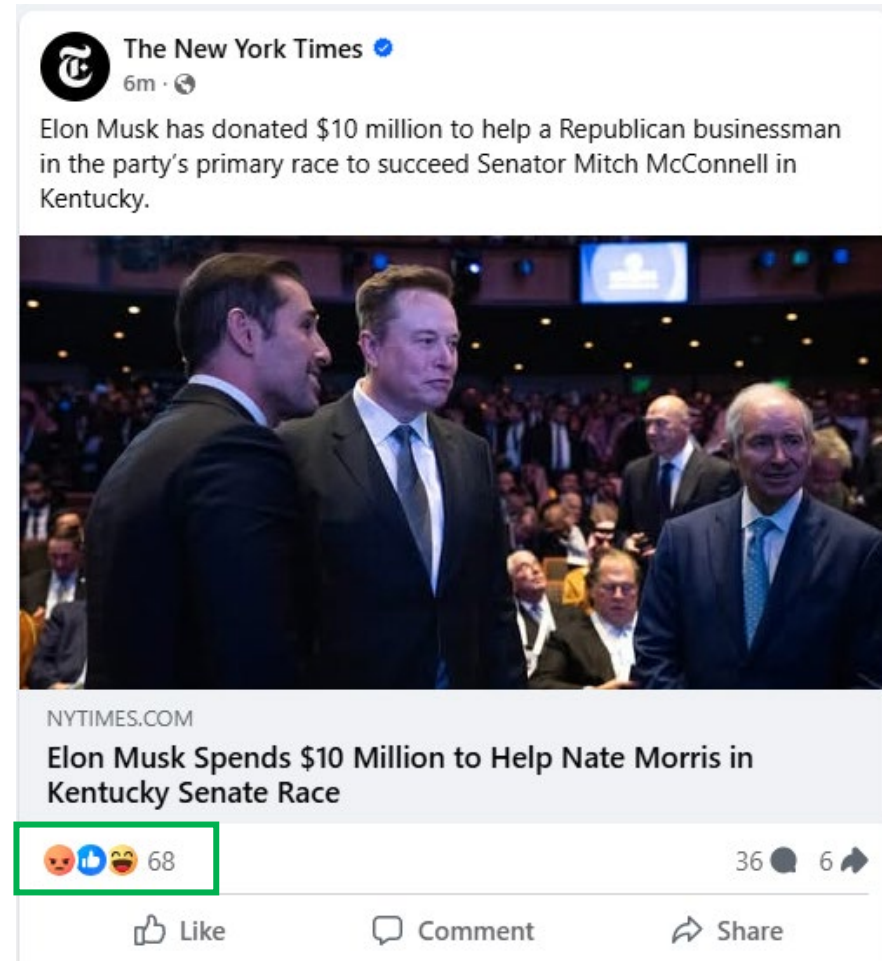
26. A method according to claim 25, wherein each of the cards in the second view is displayed in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.

- Defendant's method displays cards in the second view in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.
- Defendant practices this limitation at least by displaying cards in the second view in order of the information object's creation time. For example, when viewing The Wall Street Journal's page, Defendant displays the cards in order of the information object's creation time and intentionally places the most recent posts at the top of the second view.



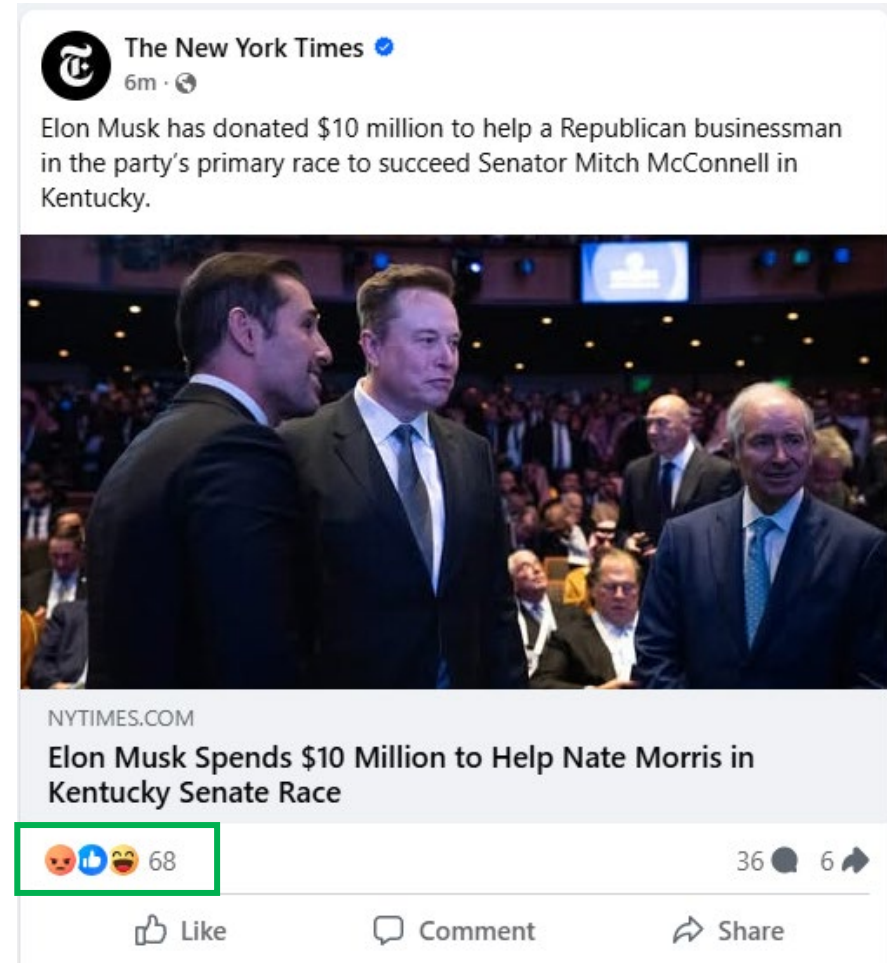
27. A method according to claim 15, wherein the set of indicators includes: an indicator reflecting voting activity associated with the card.

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting voting activity associated with the card.
- Defendant practices this limitation by providing an indicator reflecting the number of people who have liked, reacted, or otherwise voted on information associated with the card.



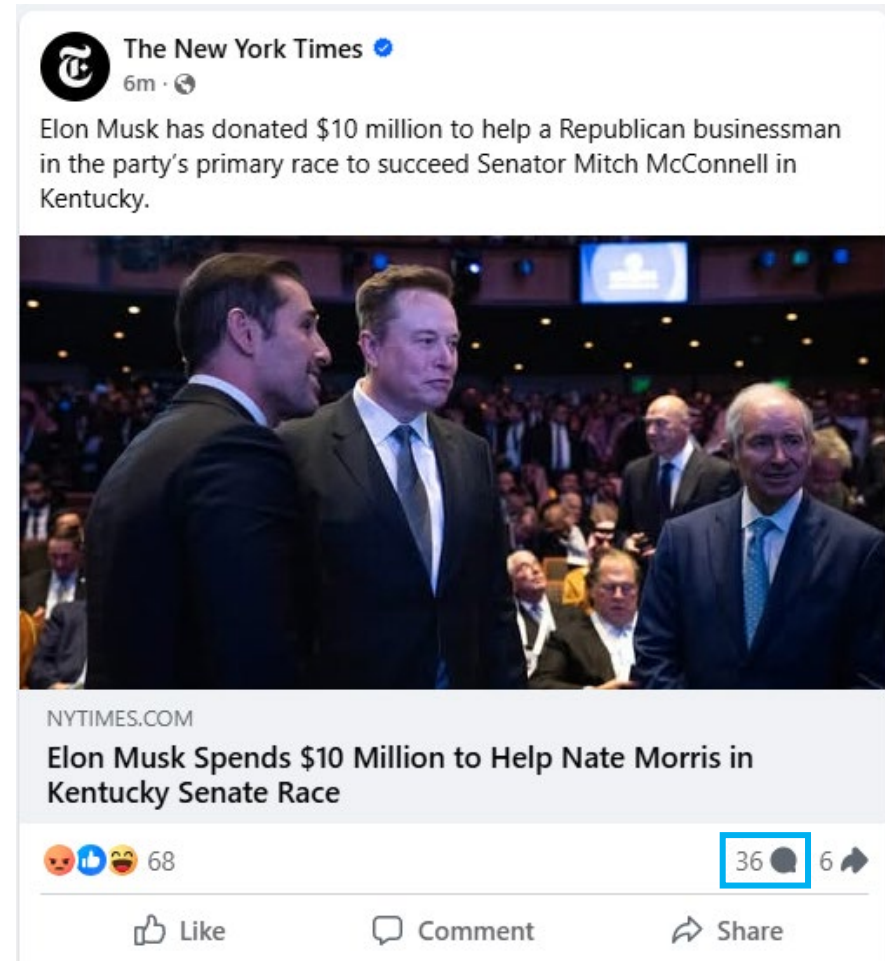
28. A method according to claim 27, wherein the indicator reflecting voting activity associated with the card provides a numeric count of the voting activity.

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting voting activity wherein the indicator provides a numeric count of the voting activity.
- Defendant practices this limitation by providing an indicator which provides a numeric count of the users who have liked, reacted, or otherwise voted on information associated with the card.



29. A method according to claim 15, wherein the indicator reflecting commenting activity associated with the card provides a numeric count of the commenting activity.

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting commenting activity associated with the card which provides a numeric count of the commenting activity.
- Defendant practices this limitation by providing an indicator reflecting the numeric count of the commenting activity on a given card.

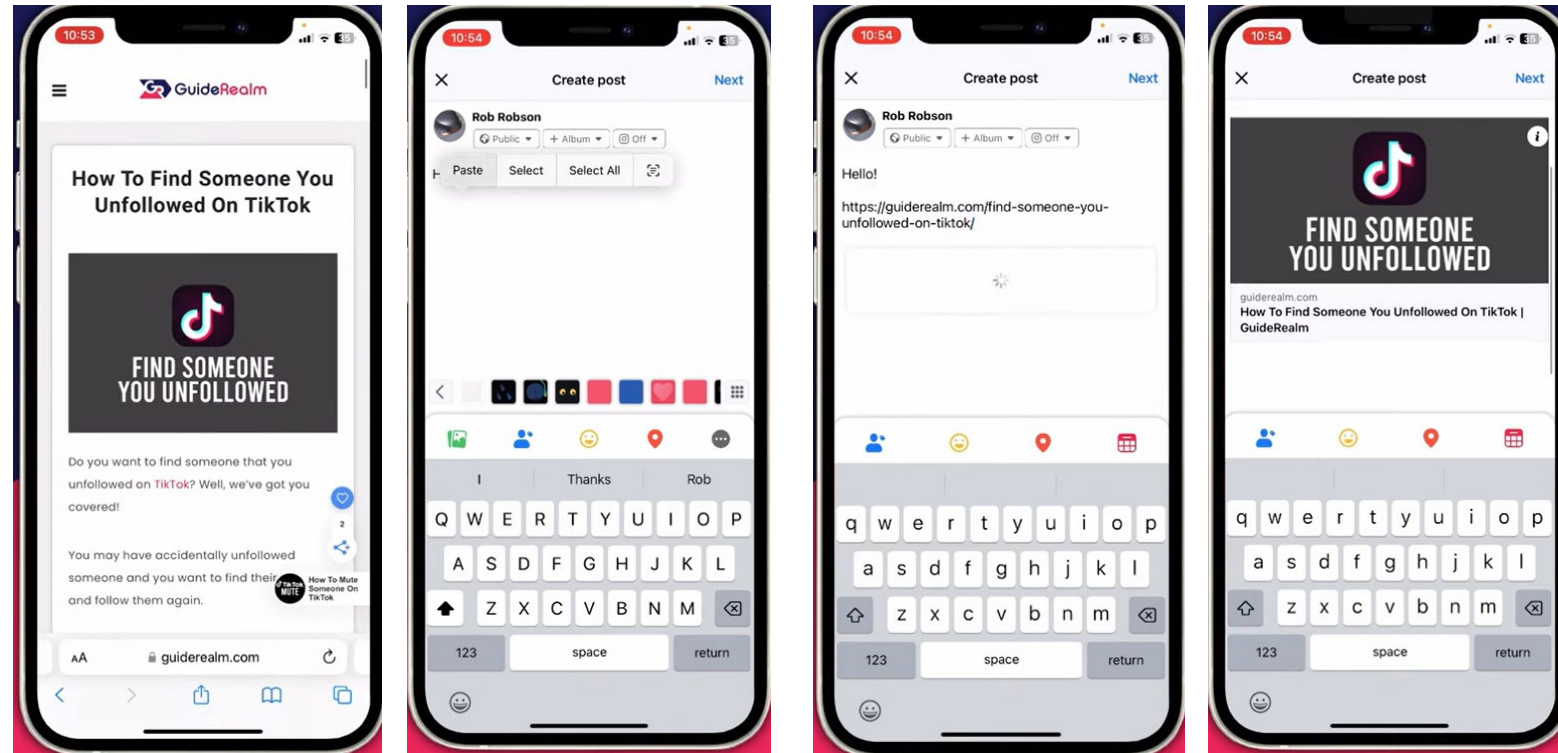


Plaintiff's Preliminary Infringement Contentions
Exhibit B

U.S. Pat. No. 9,817,562
Methods and Apparatus for Managing and Exchanging Information
Using Information Objects

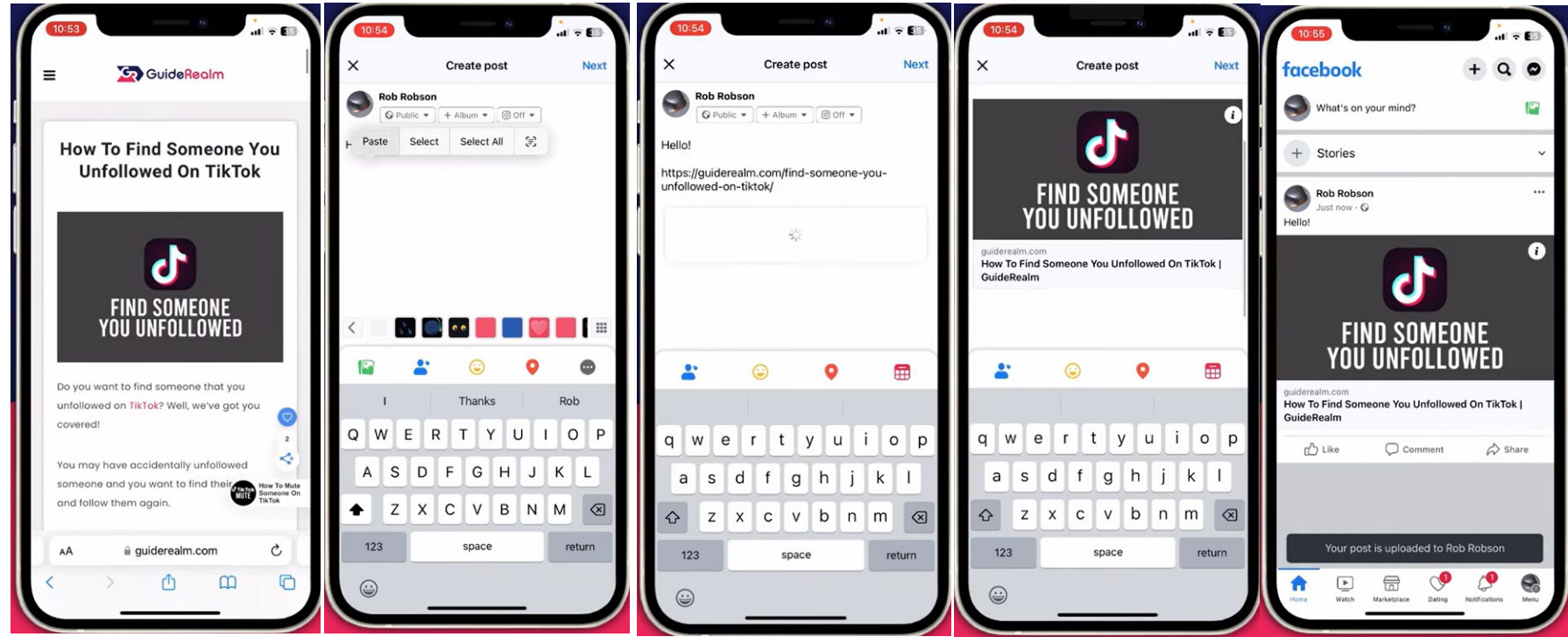
1. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source and rendering the at least one data item accessible from a database system, wherein the at least one source is external to the database system, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method. Defendant infringes the accused method in at least two scenarios.
- In the first scenario, Defendant provides a mobile application which contains software resident on a user's device. This can include applications resident on a range of consumer electronic devices, including but not limited to smartphones, tablets, desktop computers, and laptops.
- In the second scenario, Defendant allows access to its Facebook website platform via a browser or other website interface. Defendant's website platform is similarly accessible via the web browser application of a range of consumer electronic devices including but not limited to smartphones, tablets, computers, laptops, and smart tv's. This resident application software allows access to, and interacts with, Defendant's Facebook platform.
- Under both scenarios, Defendant practices (in whole or in part) the claimed method through execution of software instructions on its backend servers of its Facebook platform as explained further below.
- The infringing methodology set forth by this claim chart applies equally to both scenarios unless otherwise indicated. To be clear, the use of an exemplary photo showing infringement under the first or second scenario would equally apply to infringement under the other scenario.



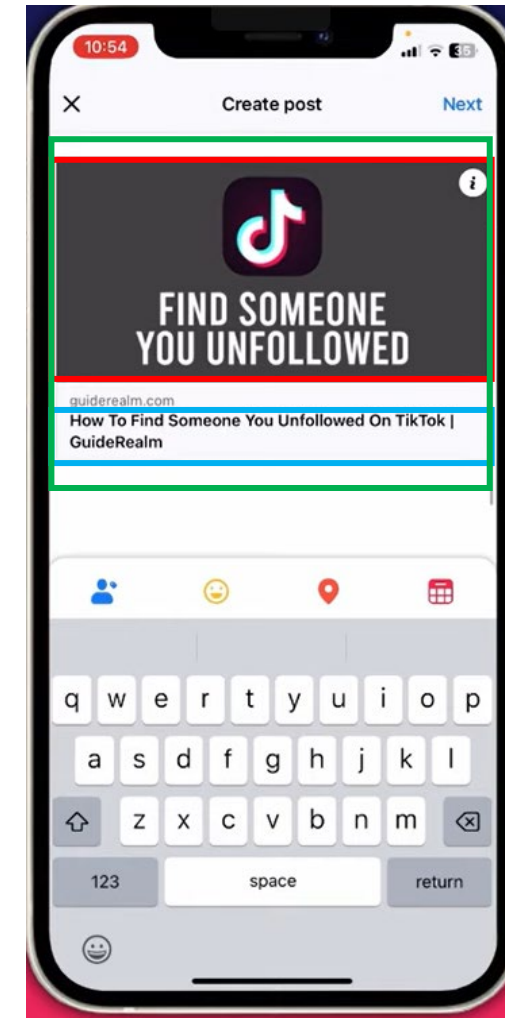
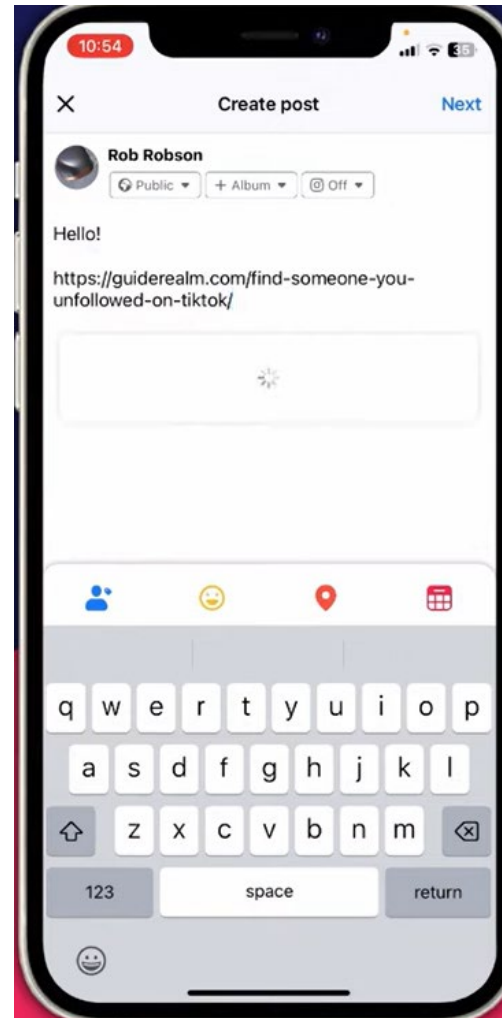
1. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source and rendering the at least one data item accessible from a database system, wherein the at least one source is external to the database system, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source and rendering the at least one data item accessible from a database system wherein the at least one source is external to the database system.
- The first photo represents a data item obtained from a source that is external to the at least one computer. In this example, the data item corresponds to an article hosted via a third-party website, namely, an article titled How to Find Someone You Unfollowed on TikTok via the website guiderealm.com.
- Photographs 2-5 represent the method whereby Defendant interacts with at least one data item obtained from at least one external source and renders the data item accessible from Defendant's database system.



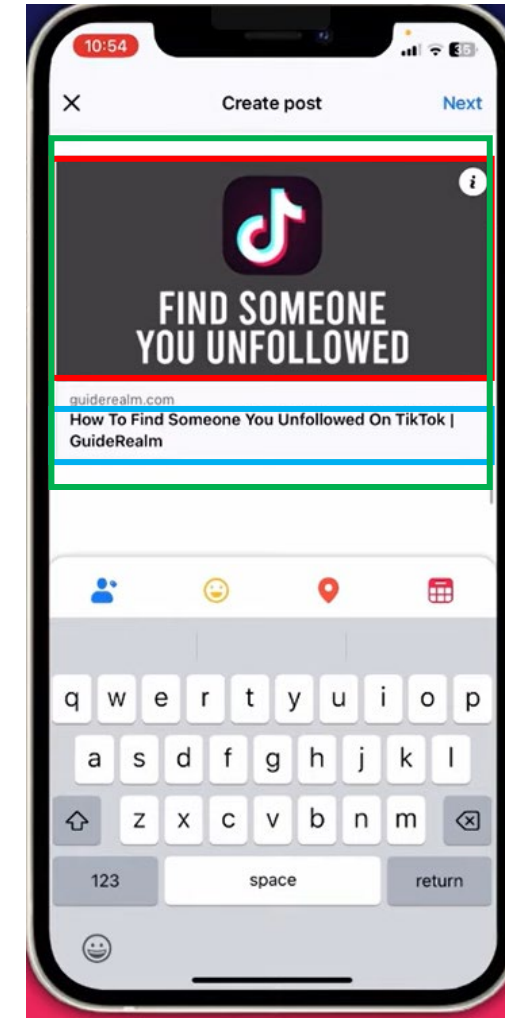
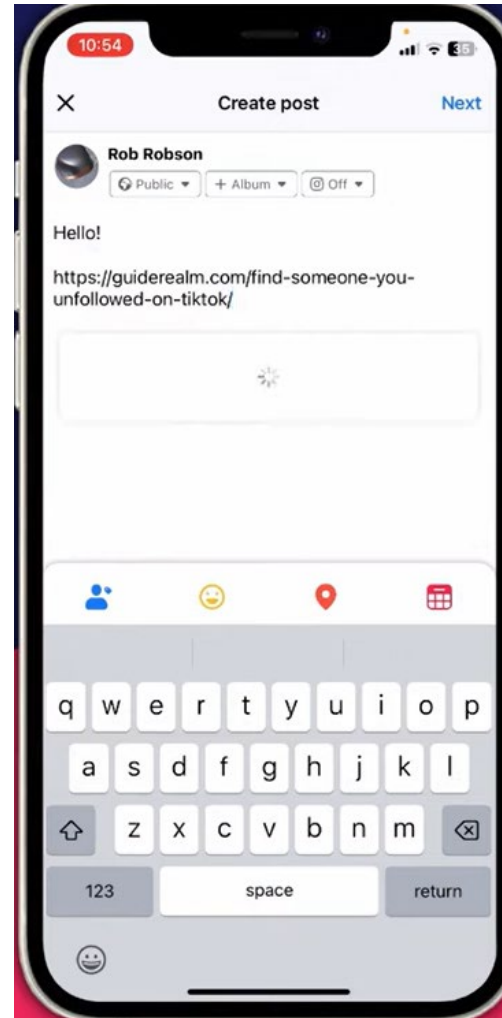
(a) configuring each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item;

- Defendant configures data items into distinct information objects by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item.
- Responsive to the user pasting a link to an external source (Image 1), Defendant configures a given data item into a distinct information object (Image 2) by extracting from each data item, extracted data including a picture, a heading and a link to the data item.
- In the second image, the distinct information object and its corresponding picture, heading, and link are shown. Defendant embeds the link to the data item into the image and heading portions of the card.
- While users select data items, Plaintiff notes the user's selection is not an affirmative step of the claim. Instead, the claim's focus is on Defendant's configuring of the data items.



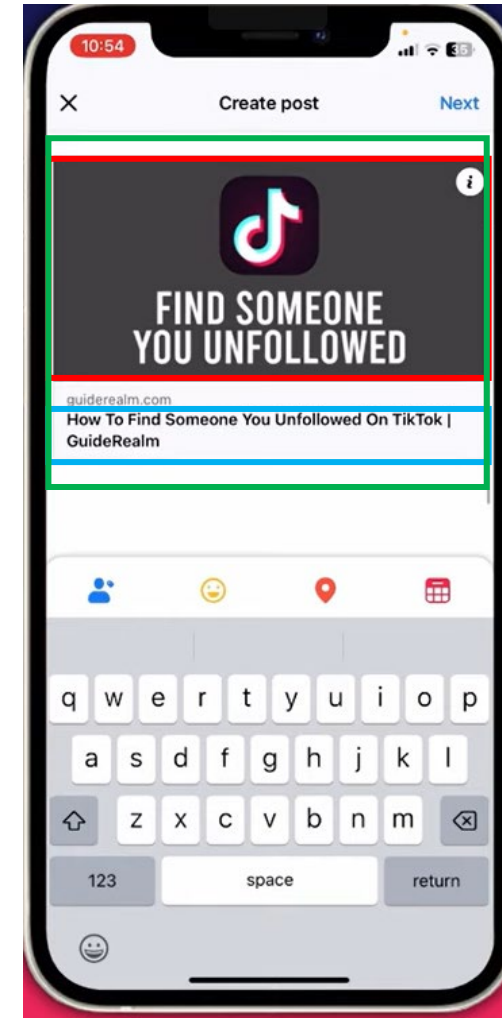
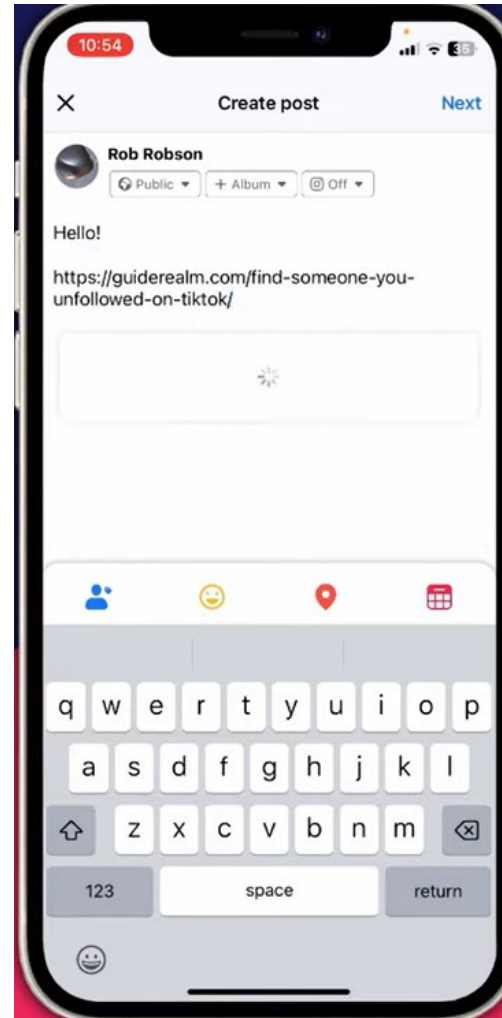
(a) configuring each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item;

- In the first scenario of infringement (App Scenario), Defendant's software resident on the user's device works in concert with Defendant's backend network to practice the limitations of the Asserted Claims.
- This resident software is found within the Facebook application which has previously been downloaded to the user device.
- On information and belief, the user device executes aspects of the application software in response to input from end users, which cause it to communicate to Defendant's backend servers.
- In this environment, the extracting of data comprising an image, heading, and/or link for a shared article may be performed by Defendant's application software and Defendant's backend servers.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user's device, those steps are performed automatically by Defendant. See Plaintiff's briefing on Defendant's motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant's backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



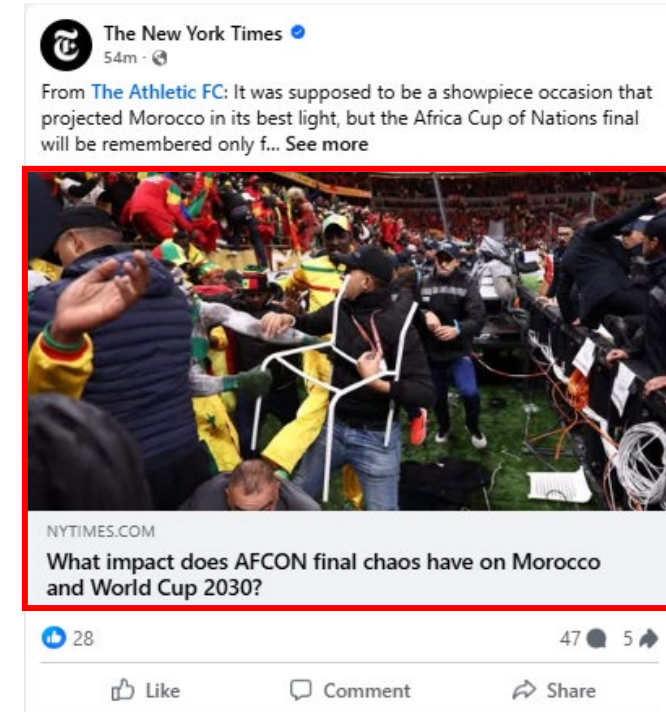
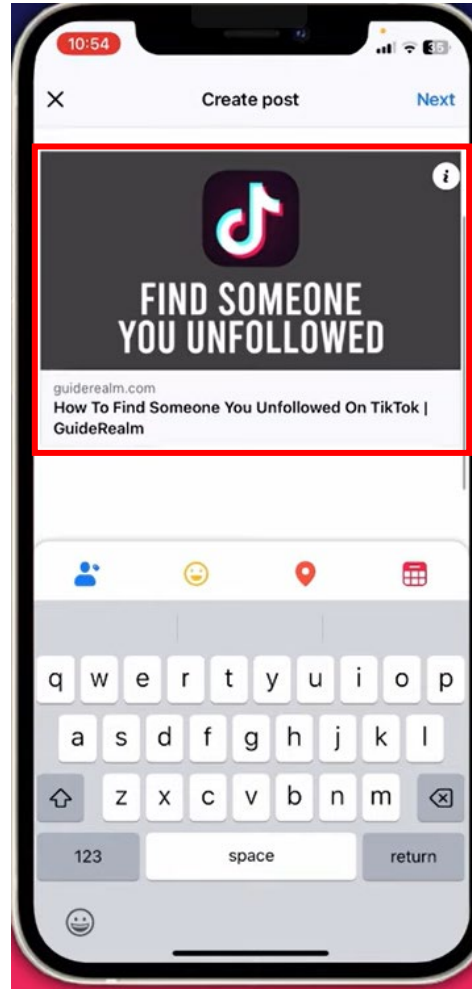
(a) configuring each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item;

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook platform, e.g., backend servers to configure each of the data items into a distinct information object.
- Upon information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend servers do all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set fort by *Sirf* and its progeny.



(b) storing data corresponding to each of the information objects in the database system;

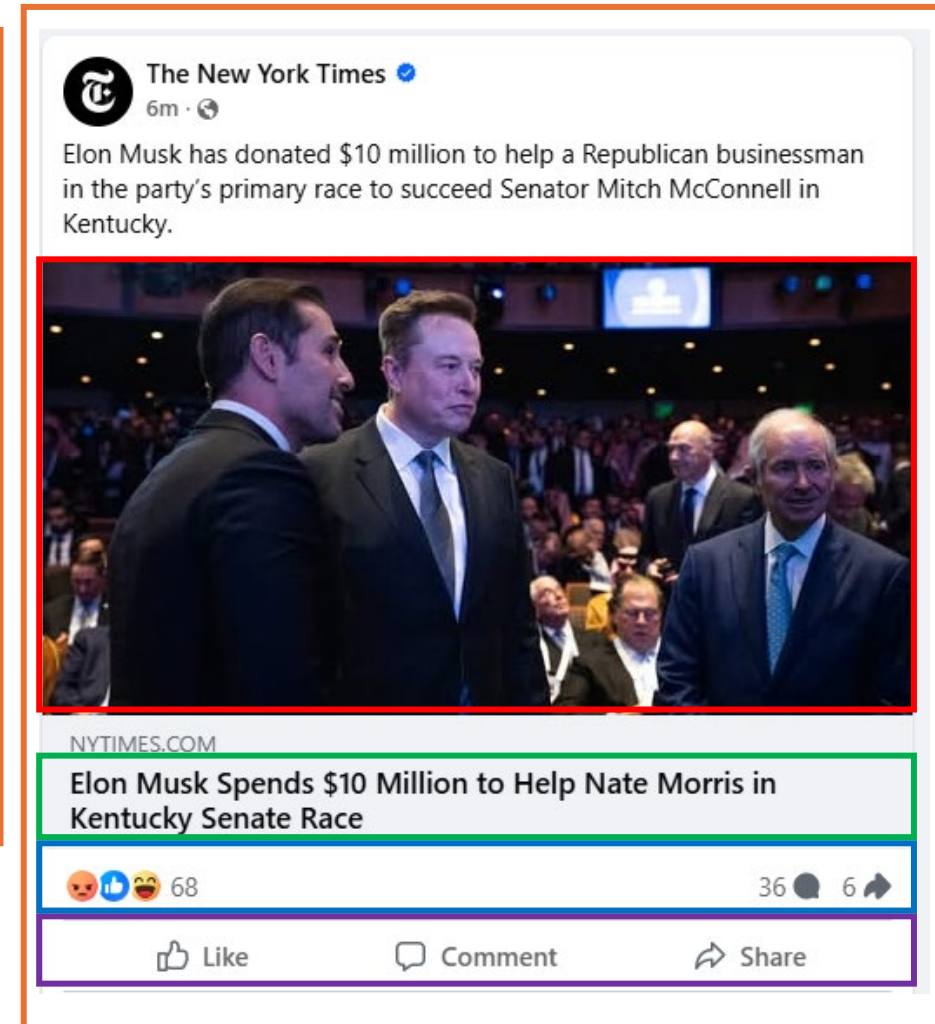
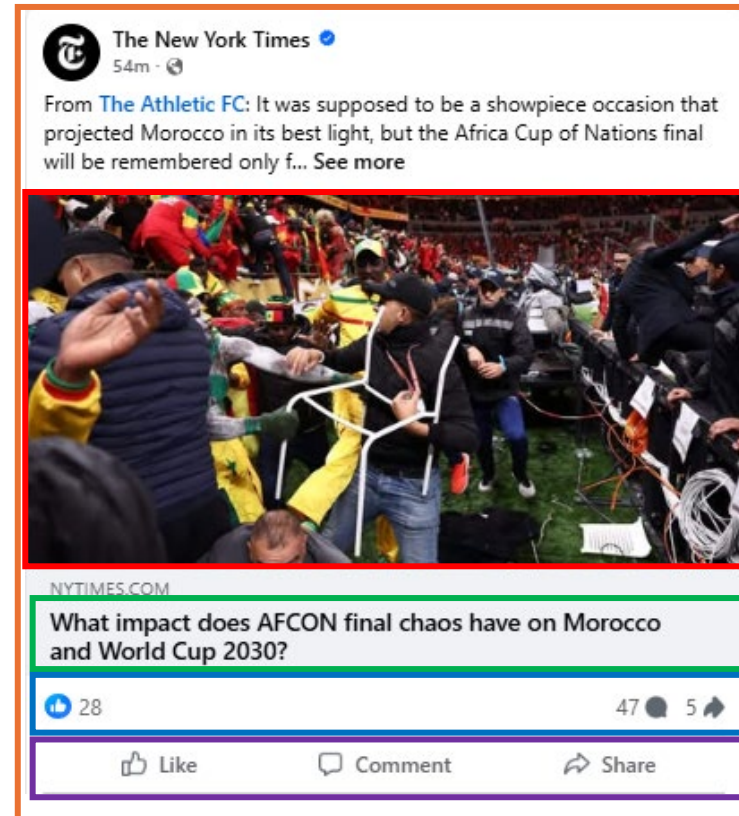
- Defendant stores data corresponding to each of the information objects in its database system.
- Upon information and belief, the storing occurs in Defendant's database through its backend servers or local software application.
- In the first image, the distinct information object and its corresponding picture and heading are shown.
- Defendant causes storing of data corresponding to each of the information objects in the database system of the Facebook platform.
- In the second image, Defendant further causes storage of data corresponding to each information object in the database system of the Facebook platform.



See <https://www.facebook.com/nytimes/>

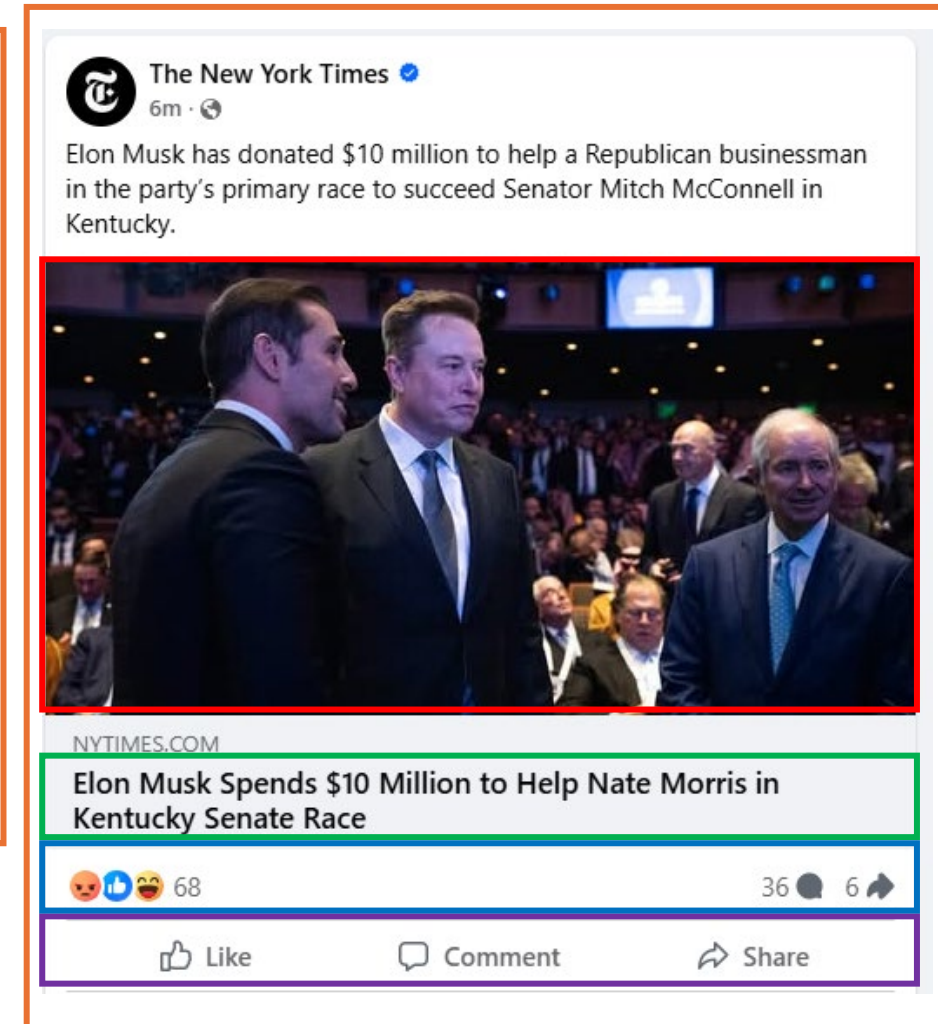
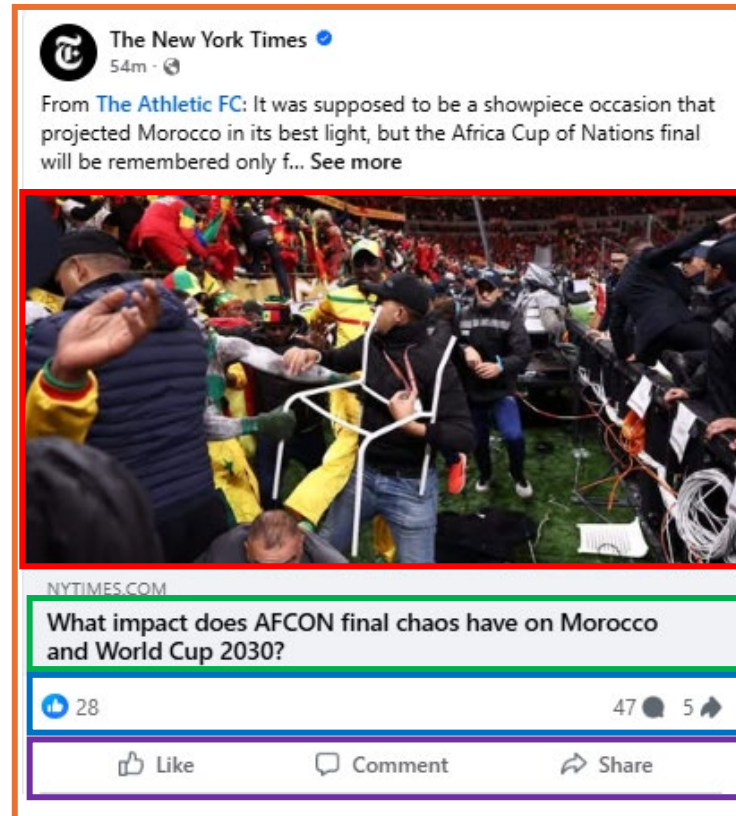
(c) using the extracted data from a plurality of the data items to make available for display a representation of each of at least two of the information objects in the database system, the at least two information objects being selected for display, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a function mechanism giving graphical access to a set of functions, wherein the functions include:

- Defendant uses extracted data from a plurality of data items to make available for display a representation of each of at least two of the information objects in the database system, the at least two information objects being selected for display, the representation being in a uniform format, wherein the format includes a card, and within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a function mechanism giving graphical access to a set of functions.
- Defendant's "Wall", "Timeline", "Profile", "Feed", and/or "Newsfeed" features make available for display each of at least two information objects by the same or different users in the database system. For example, Defendant displays New York Times' Facebook wall which contains representations of two or more information objects in Defendant's database system. Both images are exemplary representations of information objects shown on the New York Times' Facebook wall and are in uniform format.



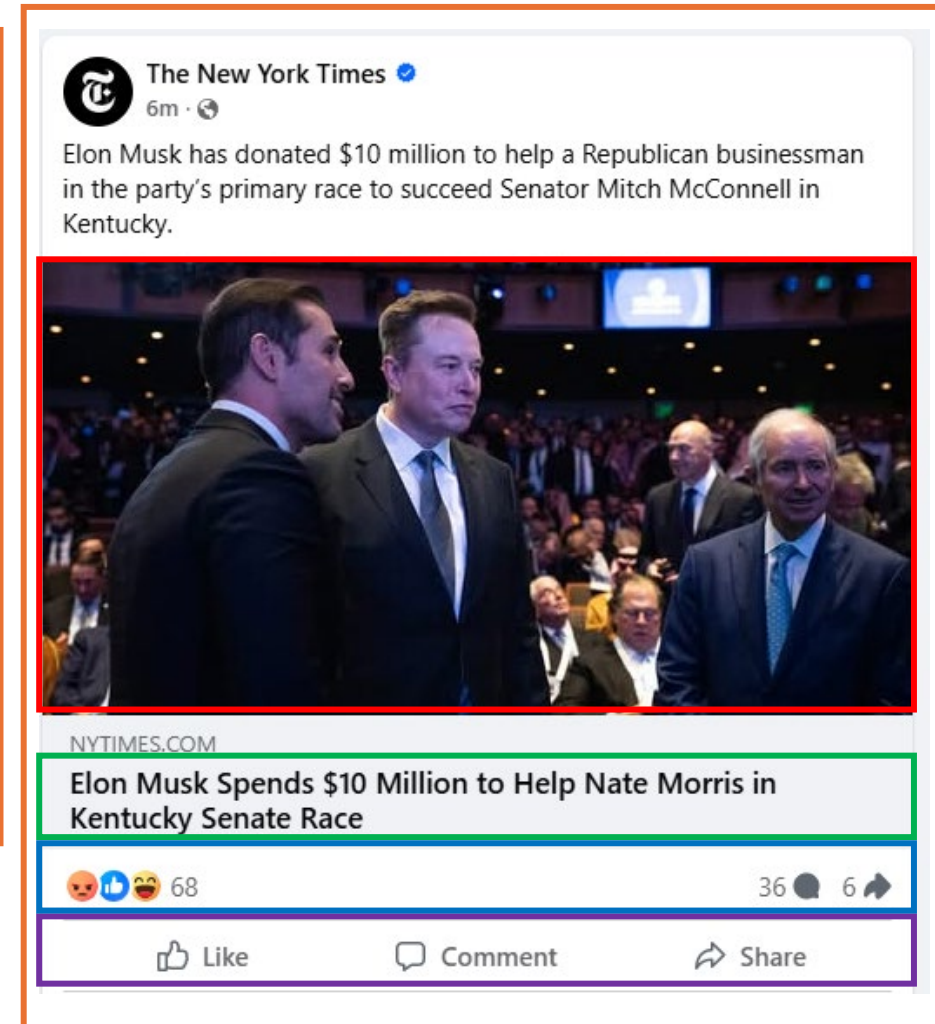
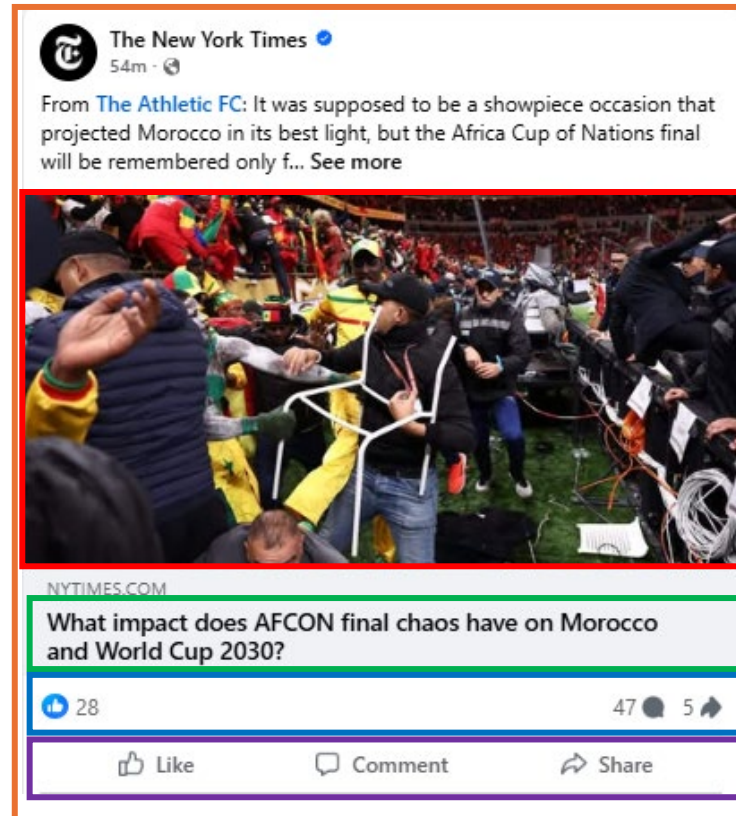
(c) using the extracted data from a plurality of the data items to make available for display a representation of each of at least two of the information objects in the database system, the at least two information objects being selected for display, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, **the picture, the heading, a set of indicators, and a function mechanism giving graphical access to a set of functions,** wherein the functions include:

- Under the first scenario of infringement (App scenario), the claimed “make available for display a representation” may also be performed in part on the user’s device through the execution of the local application software. The backend server network operates to store variable data for use by the application software to cause display of the representation.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user’s device, those steps are performed automatically by Defendant. *See* Plaintiff’s briefing on Defendant’s motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant’s backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



(c) using the extracted data from a plurality of the data items to make available for display a representation of each of at least two of the information objects in the database system, the at least two information objects being selected for display, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a function mechanism giving graphical access to a set of functions, wherein the functions include:

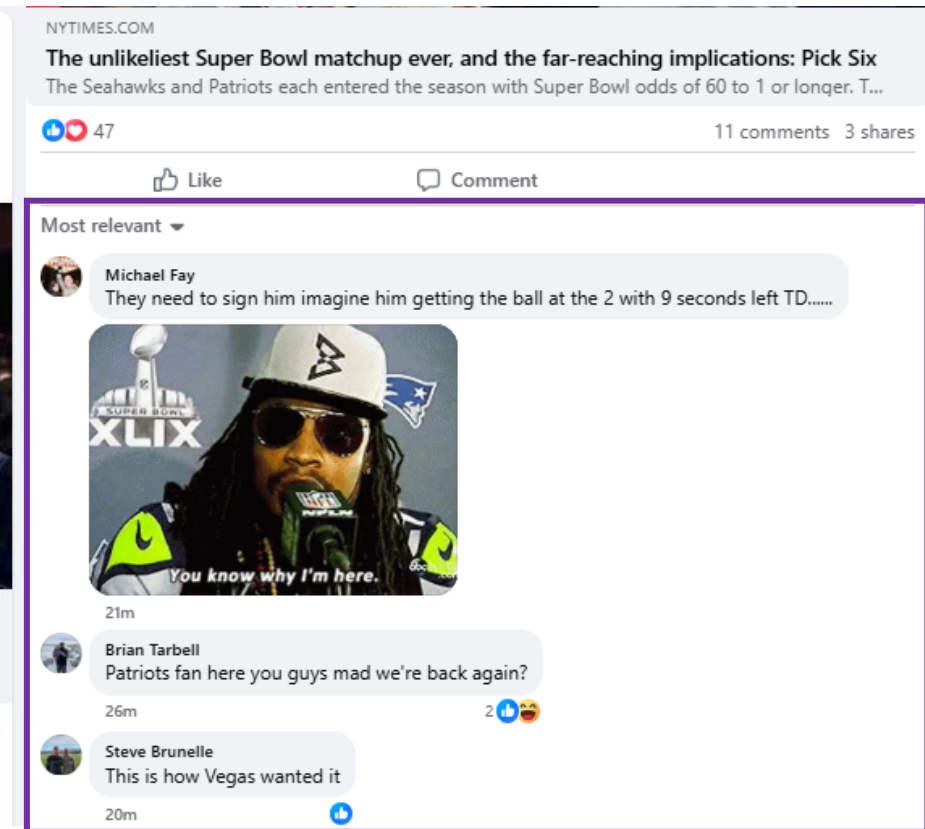
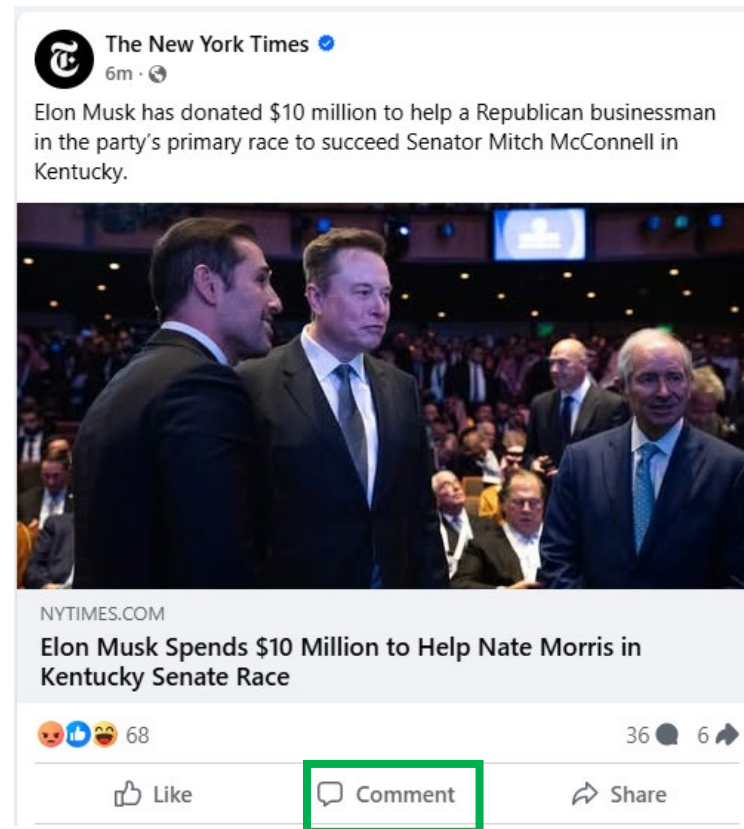
- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook backend to make available for display a representation of at least two of the information objects in the database system.
- Upon information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend does all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.



See <https://www.facebook.com/nytimes/>

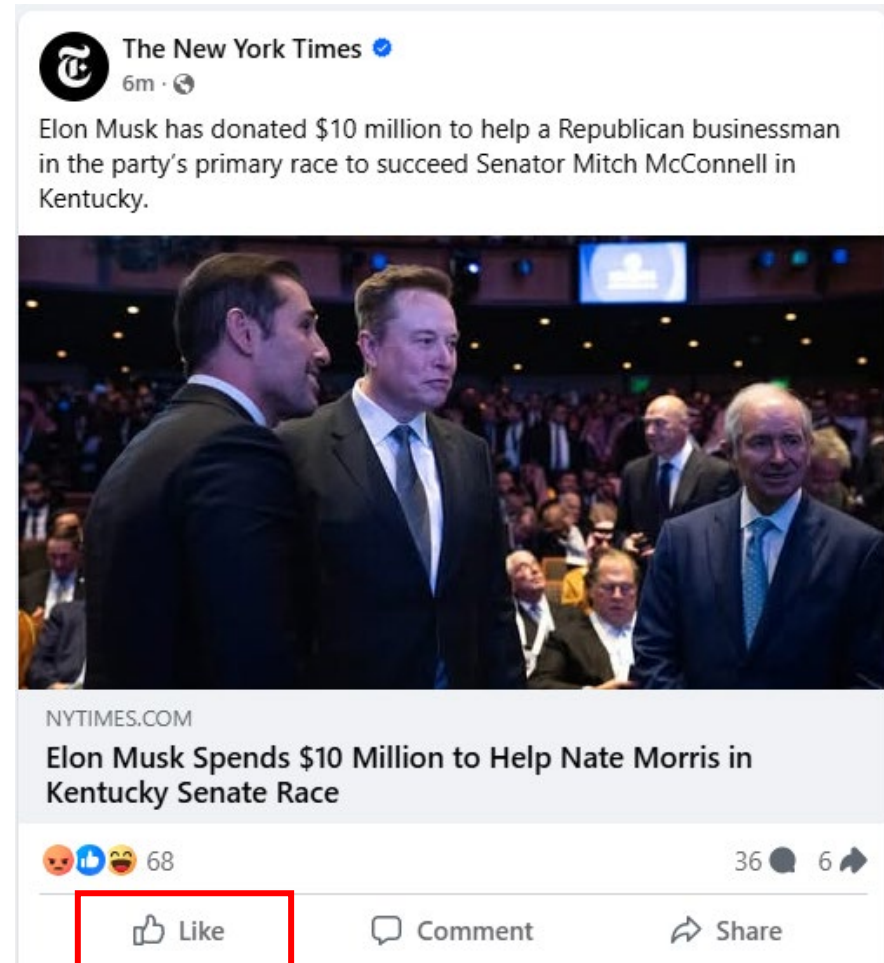
(c)(i) an instant messaging function, by which users having access to the card can exchange author- and time-stamped messages relating to the information object, such messages being associated with the information object and accessible to users who view the information object;

- Defendant provides an instant messaging function, by which users having access to the card can exchange author- and time-stamped messages relating to the information object, such messages being associated with the information object and accessible to users who view the information object.
- Defendant provides its “Comment” function which allows users with access to a given card to exchange author- and time-stamped messages relating to the information object.
- As shown in the second image, various users with access to a given card are able to exchange author and user time-stamped messages relating to an information object.



(c)(ii) a **vote function**, by which each user having access to the card can provide one vote for the information object;

- One of Defendant's functions is a vote function by which each user having access to the card can provide one vote for the information object.
- Defendant practices this limitation by providing its "Like" button which facilitates users' ability to provide one vote for an information object.



(c)(ii) a **vote function**, by which each user having access to the card can provide one vote for the information object;

- Defendant further provides users with access to a given card the ability to react to that card thereby providing each user with one vote for the information object.
- As explained by Defendant's public literature, Defendant provides users having access to cards the opportunity to react to the information object represented by the card by allowing them to hover over Defendant's like button and select their desired reaction or vote.

Liking tells your friends that you enjoyed their post or comment, while reacting allows you to specify your response. You can only leave one reaction per post or comment.

To react to a post or comment:

1. Go to the post or comment you want to react to.
2. Hover over **Like** and choose a reaction. The most popular reactions appear below the post or comment as icons (example:   ).



Like



Love



Haha



Wow



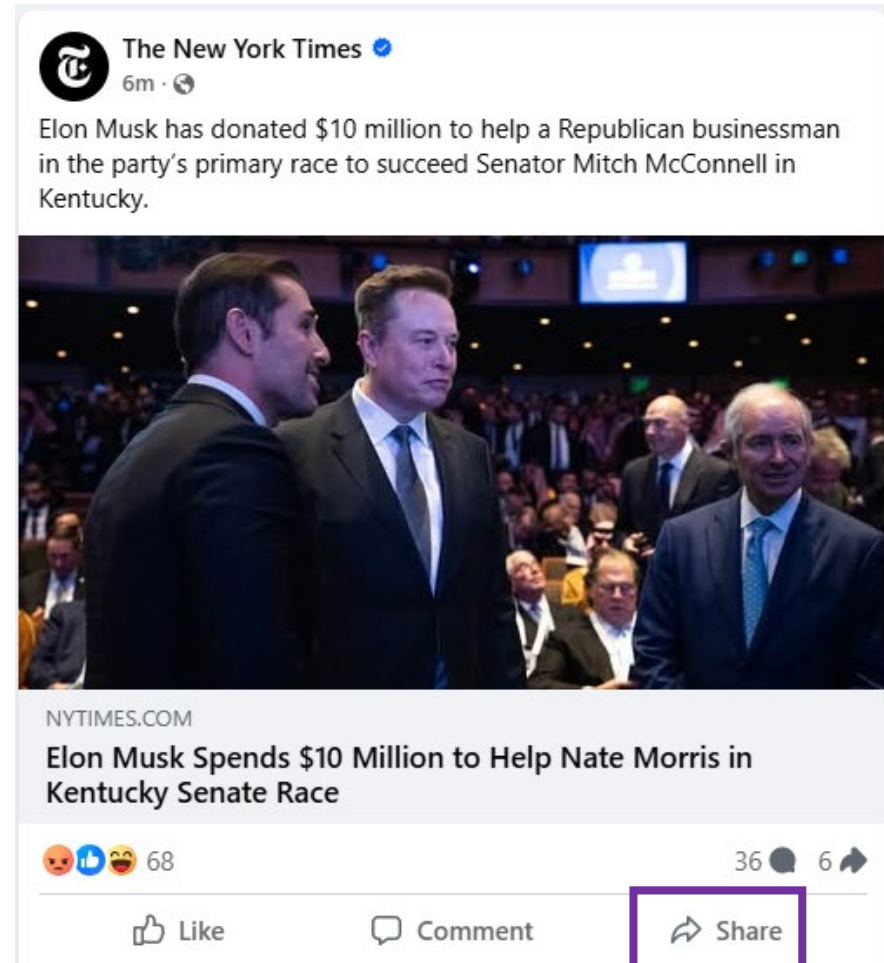
Sad



Angry

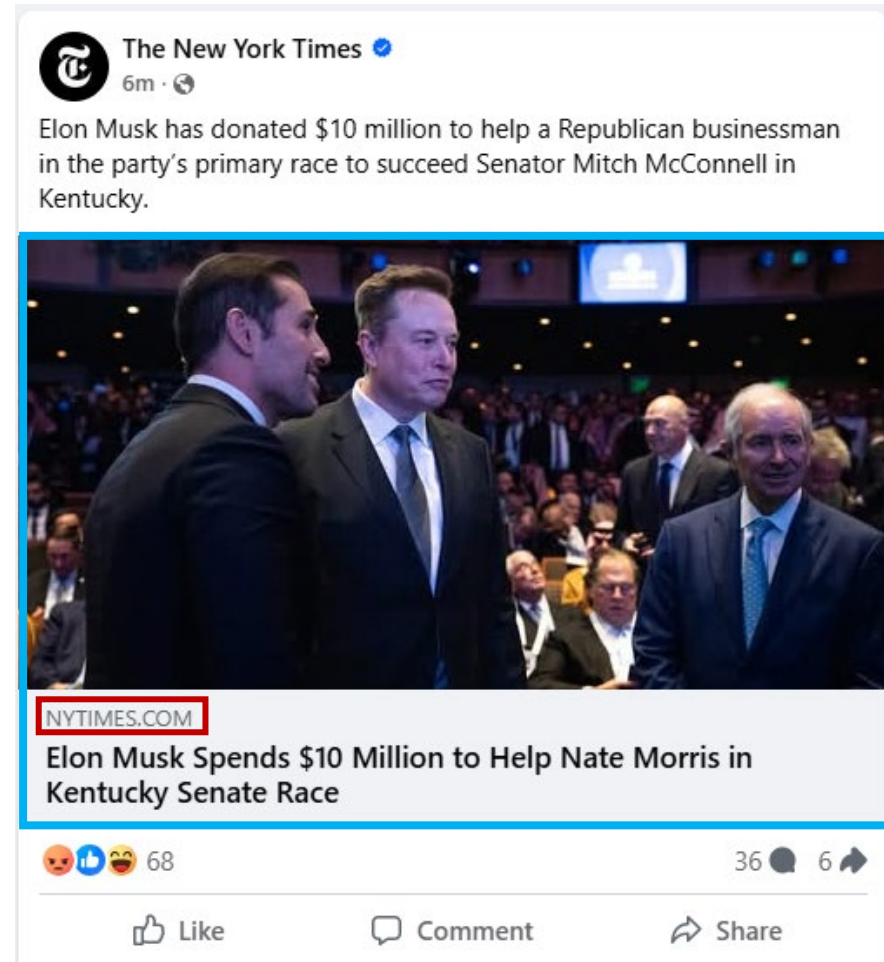
(c)(iii) a **replicate function**, by which each user having access to the card in a first collection of cards can cause the card to be replicated in a second collection of cards; and

- One of Defendant's functions is a replicate function, by which each user having access to the card in a first collection of cards can cause the card to be replicated in a second collection of cards.
- Defendant practices this limitation by providing its "Share" button which allows a user having access to the card in a first collection of cards to cause the card to be replicated in a second collection of cards.



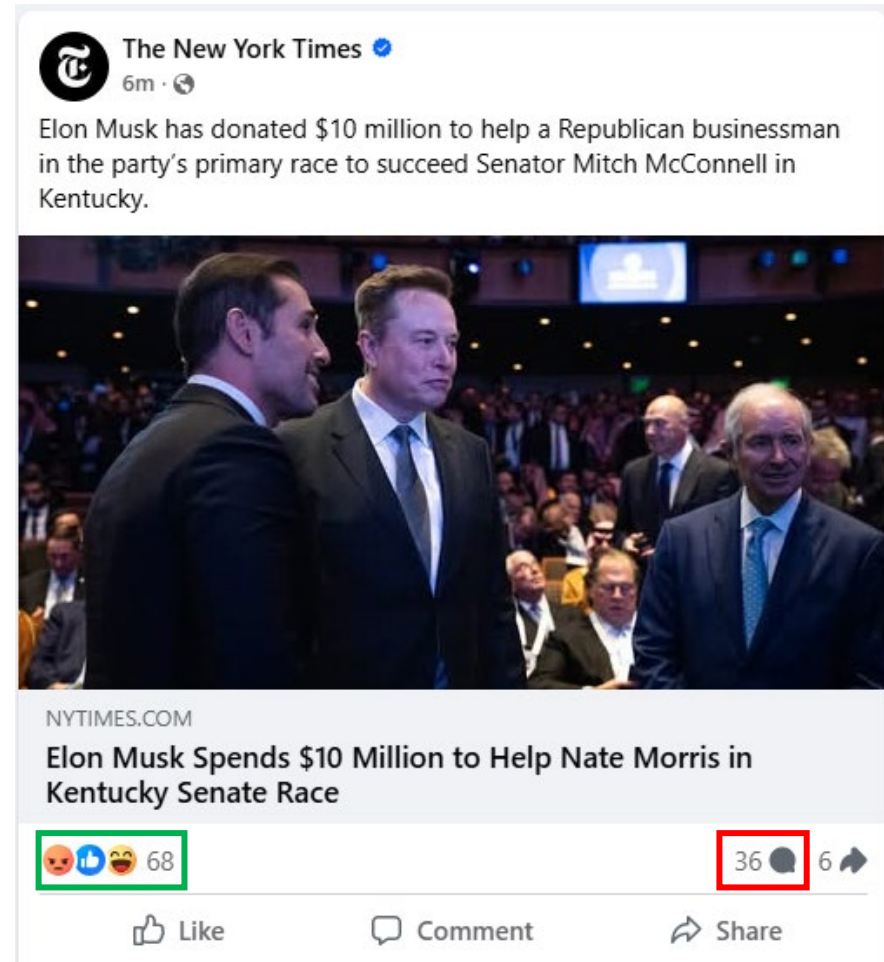
(c)(iv) a link function, by which each user having access to the card can invoke the link to the data item; and

- One of Defendant's functions is a link function, by which each user having access to the card can invoke the link to the data item.
- Defendant embeds the link to the data item into the image and heading portions of the card. In this way, a user is able to invoke the link by clicking on the uniform formatting. Defendant further provides a shortened preview of the link right above the header.



(c)(v) and wherein the set of indicators includes: a message indicator that displays a number of instant messages associated with the information object; and a vote indicator that displays a number of votes associated with the information object; and

- Defendant's set of indicators includes a message indicator that displays a number of instant messages associated with the information object and a vote indicator that displays a number of votes associated with the information object.
- Defendant practices this limitation by providing an indicator showing the number of likes and reactions associated with the information object as well as an indicator shown the number of instant messages associated with the information object.

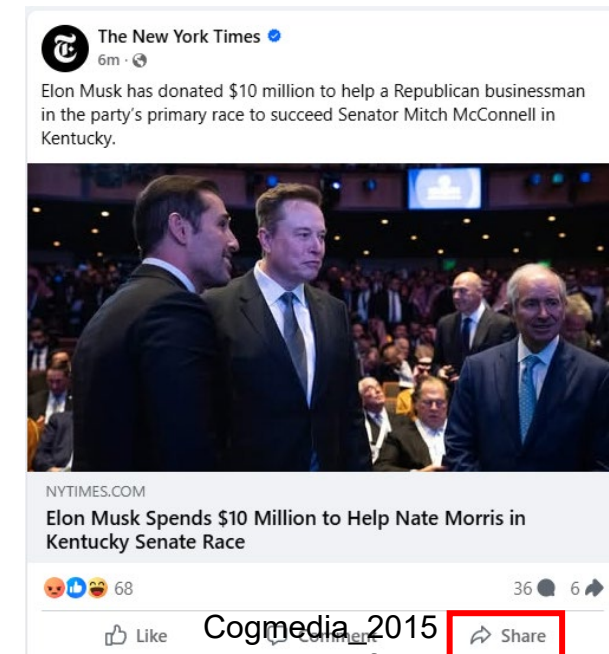


(d) wherein the database system is configured to allow

(d)(i) each user to have at least one user-selected collection of cards in the database system and

(d)(ii) each card in the database system, with any associated picture and heading, and other associated data, regardless of the collection in which it may have first appeared, to be accessible and replicable across card collections of users.

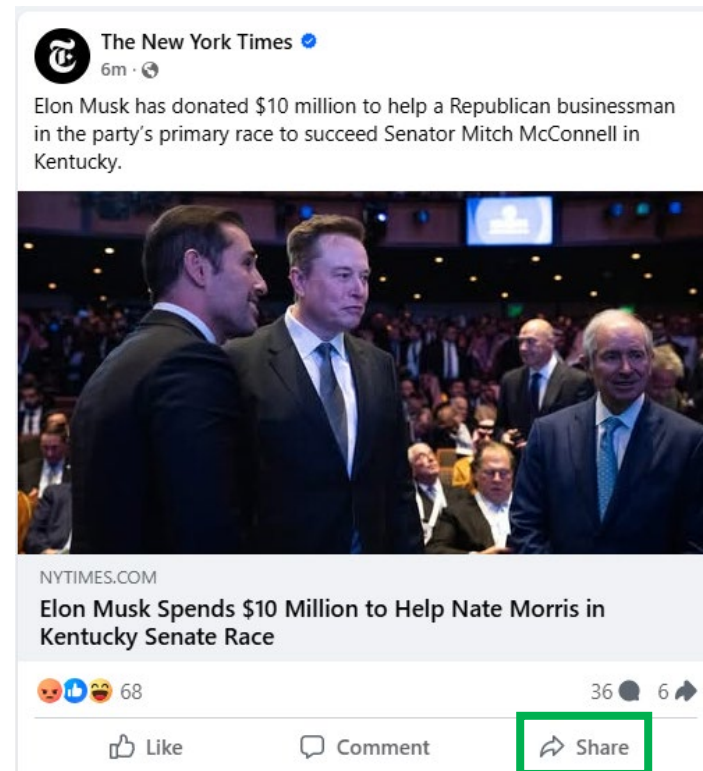
- Defendant configures its database system to allow each user to have at least one user-selected collection of cards in the database system and each card in the database system, with any associated picture and heading, and other associated data, regardless of the collection in which it may have first appeared, to be accessible and replicable across card collections of users. Note, Defendant's "database system" may be made up of multiple databases or otherwise arranged in a distributed database.
- Defendant practices this limitation by allowing users such as the New York Times to maintain a user-selected collection of cards in its database system. For example, the New York Times maintains its collection at: <https://www.facebook.com/nytimes/>.
- Through the use of Defendant's "Share" button, Defendant ensures that each card in the database system, regardless of the collection in which it may have first appeared, is accessible and replicable across the card collections of users.



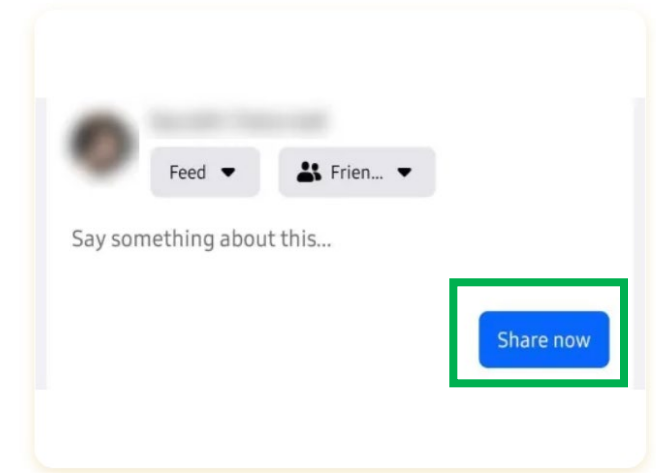
See <https://www.facebook.com/nytimes/>

2. A method according to claim 1, the computer processes further comprising: providing a user interface having a graphical button, which, when invoked while content is being displayed, causes the displayed content to be handled as one of the data items, namely, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.

- Defendant provides a user interface having a graphical button which when invoked while content is being displayed causes the displayed content to be handled as one of the data items, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.
- Defendant displays graphical buttons, namely Defendant's "Share" and "Share now" buttons which when invoked configure the displayed content as a new information object and makes a representation of the new information object available for display in the uniform format. Defendant's "Share now" button becomes available upon a user's selection of Defendant's copy function or Share button and when invoked configures the displayed content as a new information object available for display in the uniform format.



- If you want to reshare the post without making any changes, select **Share Now**.

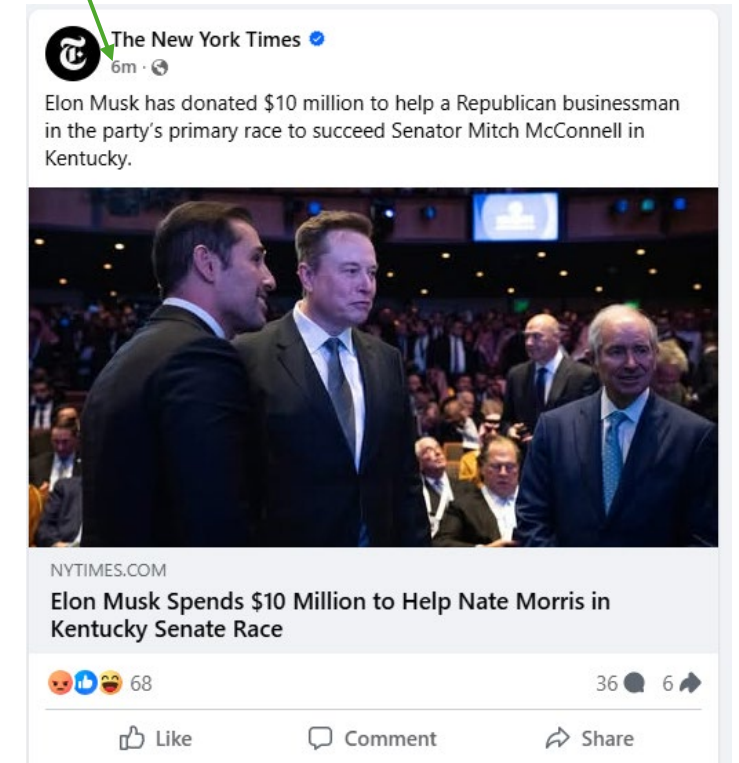


<https://recurpost.com/blog/how-to-repost-on-facebook/>

See <https://www.facebook.com/nytimes/>

3. A method according to claim 1, wherein the format includes within the card **an indication of a date of creation of the card.**

- Defendant's computer-implemented method further comprises a format which includes within the card an indication of a date of creation as exemplified on the right.
- Defendant updates the time between the date of creation of a card and the present. Briefly after a card has been created, Defendant includes within the card an indication of the date of creation by referencing that the card was made a certain number of seconds, minutes, hours, or days ago. Further after a card has been created, Defendant includes within the card a specific date and time of the card's creation.
- For example, the Business Rocks Women card contains an indicator it was created on June 3rd at 2:20 AM and The New York Times card indicates that it was posted just 6 minutes ago.

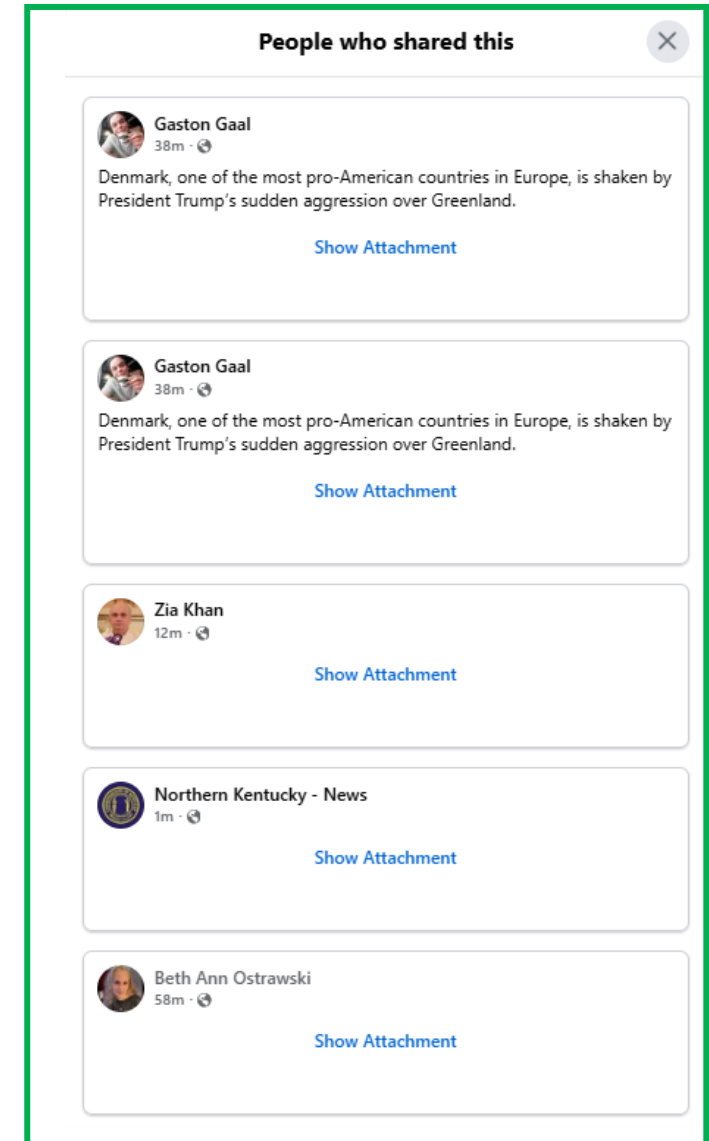
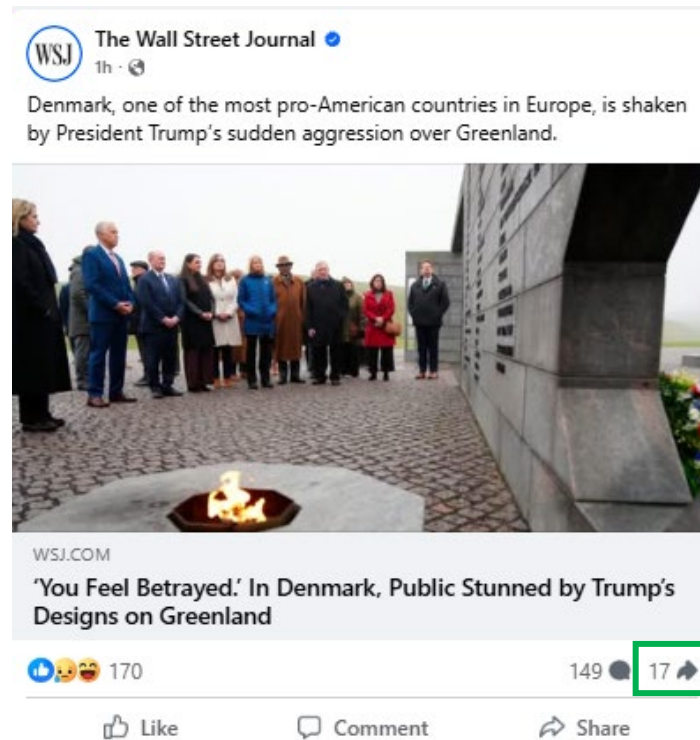


See <https://louisem.com/2541/post-link-on-facebook>

See <https://www.facebook.com/nytimes/>

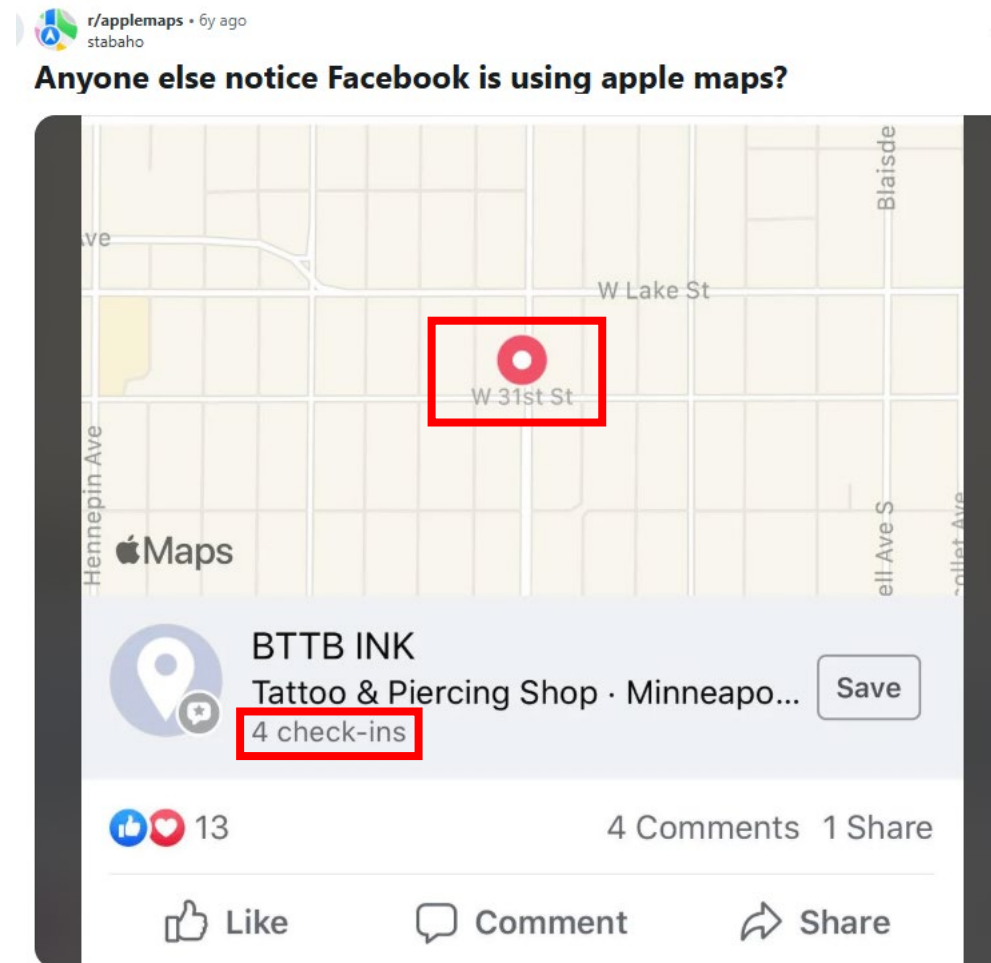
5. A method according to claim 1, wherein the **format includes a user-accessible report relating to users who replicated the information object.**

- Defendant's computer-implemented method further comprises a format which includes a user-accessible report relating to users who replicated the information object.
- Defendant's uniform format includes a user-accessible report relating to the number of users who have copied or shared the information object.



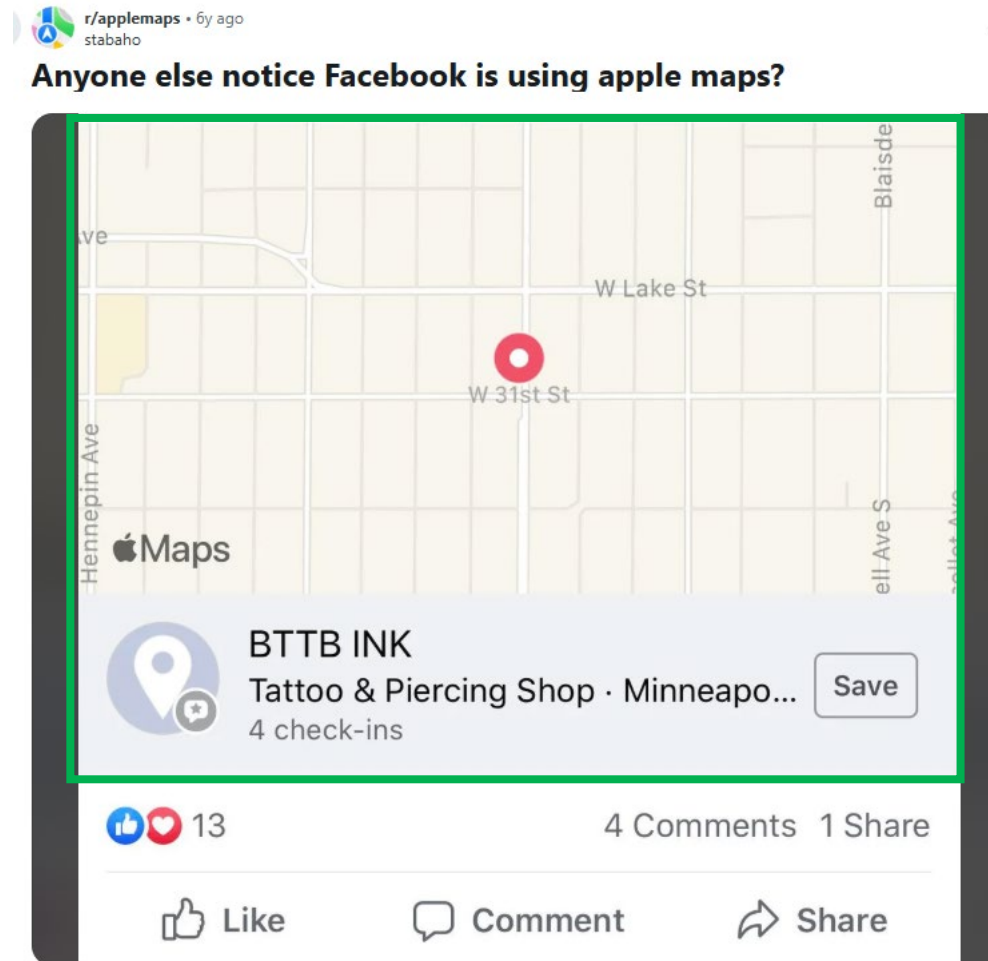
7. A method according to claim 1, wherein the one of the indicators indicates the presence of a geographic location, associated with the information object.

- Defendant's set of indicators includes an indicator that indicates the presence of a geographic location associated with the information object.
- Defendant practices this limitation by providing an indicator indicating the presence of a geographic location as well as information associated with the number of times other users have checked-in to the location associated with the information object.



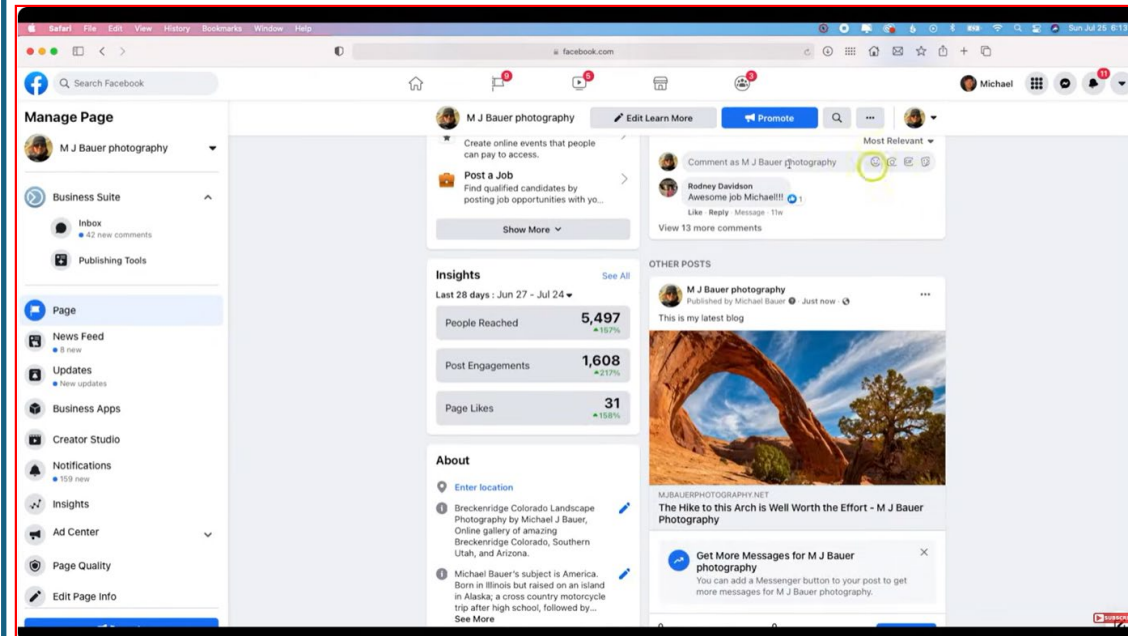
8. A method according to claim 1, further comprising:
further causing to be displayed, at the same time as
the representation, a map including a location,
marked on the map, associated with at least one of the
information objects.

- Defendant causes to be displayed at the same time as
the representation a map including a location, marked
on the map, associated with at least one of the
information objects.
- Defendant practices this limitation when a user pastes
a link to a geographical mapping site such as Apple
Maps. Upon pasting a link from Apple Maps,
Defendant displays a map including a location
marked on the map associated with an information
object.



11. A method according to claim 1, further comprising: serving, to a client computing device of a first user, a first view of a first set of information objects that constitute a first collection of the first user; also serving, to the client computing device of the first user, a second view of a second set of information objects, that constitute a collection of a second user.

- Defendant serves to a client computing device of a first user, a first view of a first set of information objects that constitute a first collection of the first user. Defendant does this in one example by providing each user with a timeline or wall that consist of cards posted to the first user's wall as shown by the first image. As shown in the first image, MJ Bauer photography is viewing their own wall which contains a first view of a first set of information objects.
- Defendant also serves to the client computing device of the first user, a second view of the second set of information objects that constitute a collection of a second user. For example, the client computing device can access another user's collection of cards as shown by the second image. In this example, Defendant provides to the first user a view of the Wall Street Journal's collection of cards.

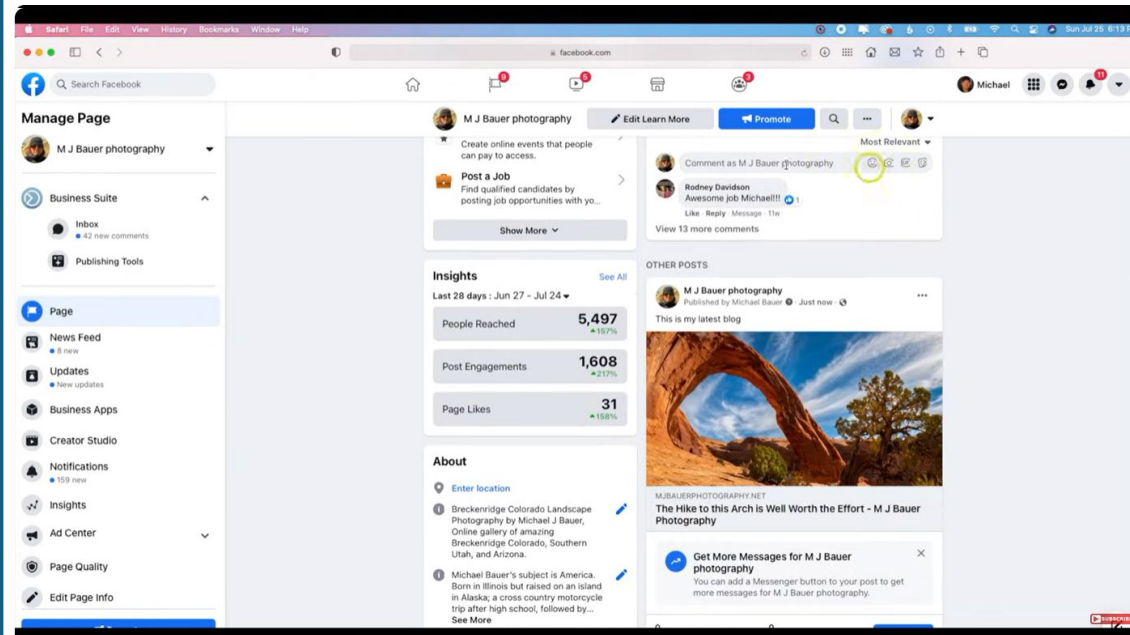


See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>

12. A method according to claim 11, further comprising: responsive to (i) a graphical selection, by the first user, of an information object in the second view and (ii) a copy command that has been graphically entered by the first user, causing the selected information object to be copied from the second view to the first view, so that the selected information object in the collection of the second user has been copied to the first collection of the first user.

- Defendant, responsive to a graphical selection, by the first user, of an information object in the second view and a copy command that has been graphically entered by the first user, causes the selected information object to be copied from the second view to the first view, so that the selected information object in the collection of the second user has been copied to the first collection of the first user.
- Building on the example provided in the prior slide, responsive to a first user's graphical selection and copy command, a Wall Street Journal article is able to be copied from the Wall Street Journal's card collection to a first user's card collection. In other words, the first user will now have in its card collection, a card from the Wall Street Journal's collection.
- In this way, Defendant causes a selected card to be copied from a second collection in a second view to a first collection of the first user in a first view.



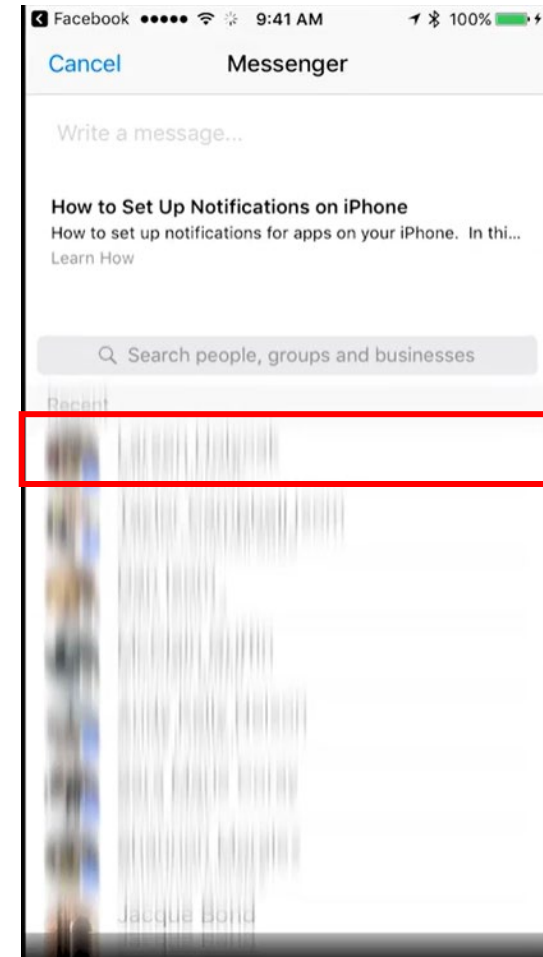
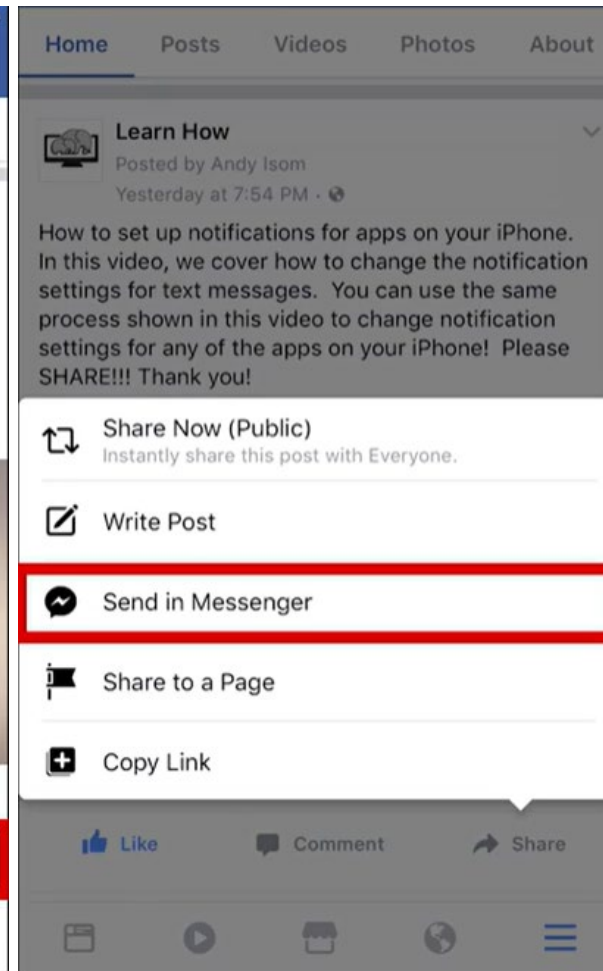
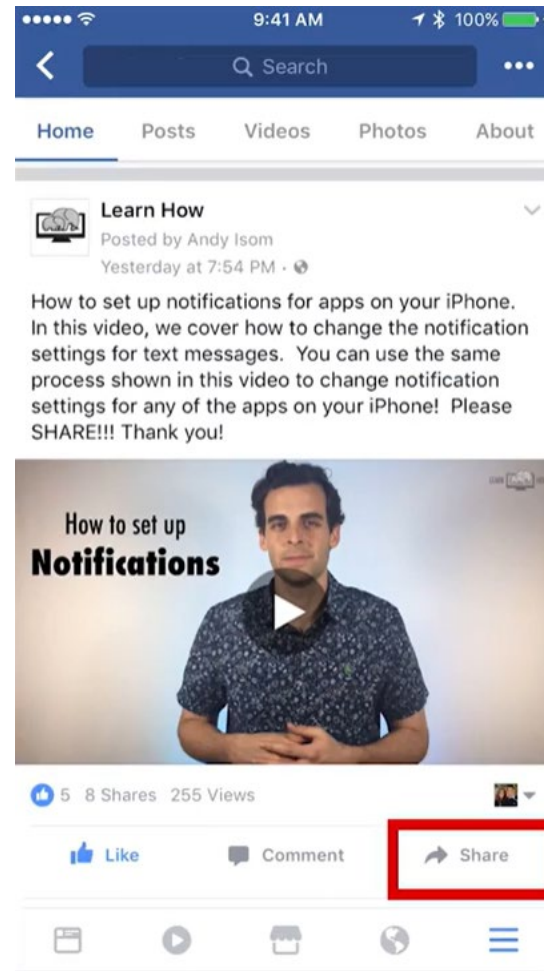
See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>



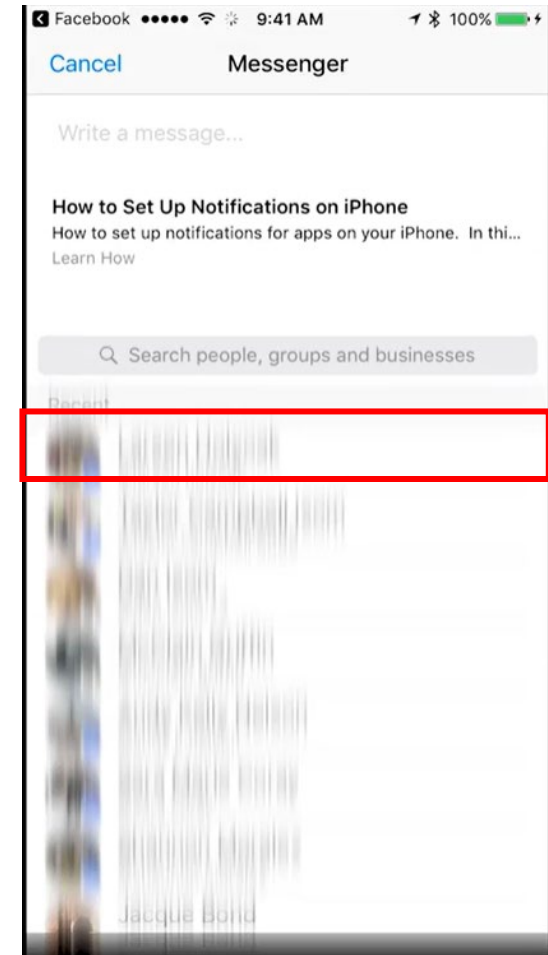
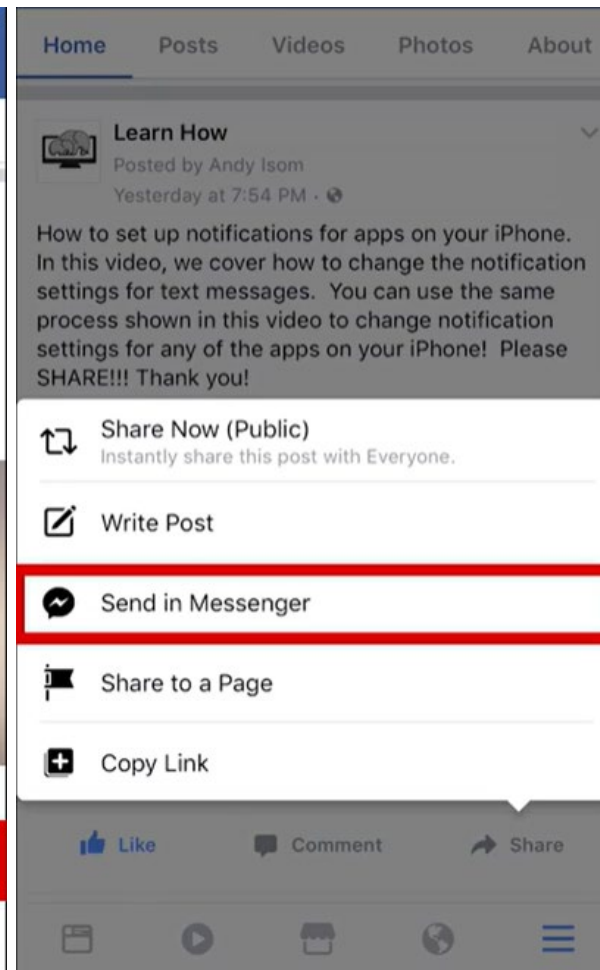
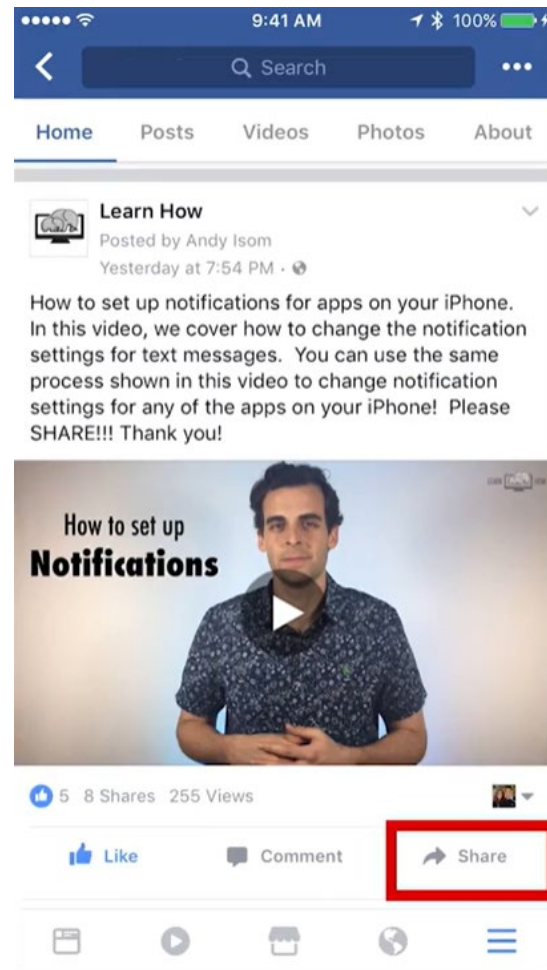
13. A method according to claim 11, further comprising: responsive to (i) a graphical selection, by the first user, of an information object in the first view and (ii) a send command that has been graphically entered by the first user, causing the selected information object to be sent to the second user, so that the selected information object in the collection of the first user is made available to the second user to be included in the collection of the second user.

- Defendant responds to a first user's graphical selection of an information object in the first view and a send command that has been graphically entered by the first user causing the selected information object to be sent to a second user so that the selected information object in the collection of the first user is made available to the second user to be included in the collection of the second user.
- Upon a graphical selection by the first user of a card in the first view and their entering of a send command, Defendant causes the selected card in the collection of the first user to be made available to the second user to be included in the collection of the second user through the use of its Facebook Messenger platform and "Share" button.



14. A method according to claim 1, further comprising: on a user-entered command, causing an information object to be shared with another user when the information object and the other user have been graphically selected.

- On a user-entered command, Defendant causes a card to be shared with another user when the card and the other user have been graphically selected.
- Upon a user selecting the share and send in messenger buttons, a user is able to select another user with whom the user wishes to share the selected card. Upon such a user-entered command, Defendant causes the card to be shared with the other user.



15. A method according to claim 1, further comprising: on a user-entered command, causing an information object to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.

- Defendant maintains at least one integrated instant messaging system which it refers to as Facebook Messenger.



Overview for the Messenger Platform

The Messenger Platform Overview details how the platform works and what you need to successfully implement the platform.

Messenger from Meta is a messaging service that allows a business' Facebook Page or Instagram Professional account to respond to people who are interested in your business or social media. Conversations between a person and your account must be initiated by the person.

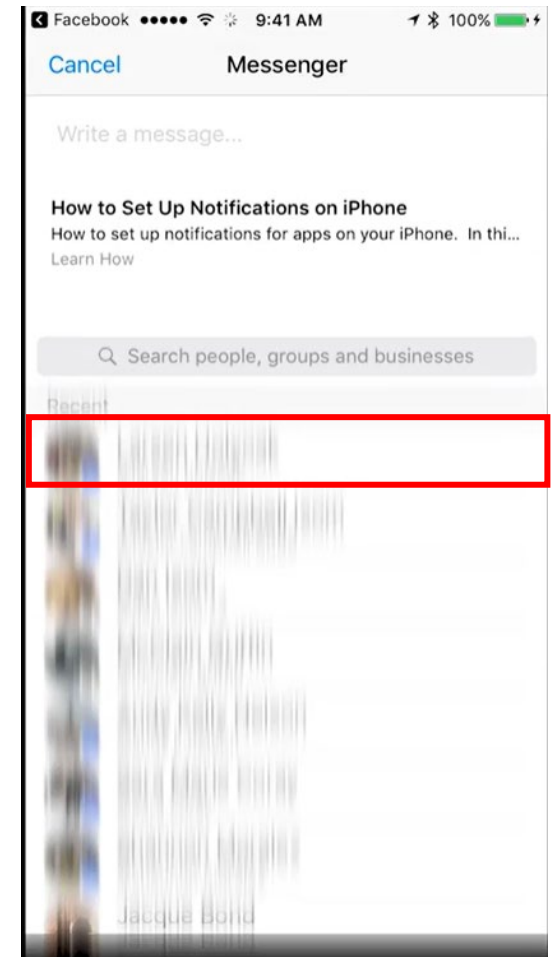
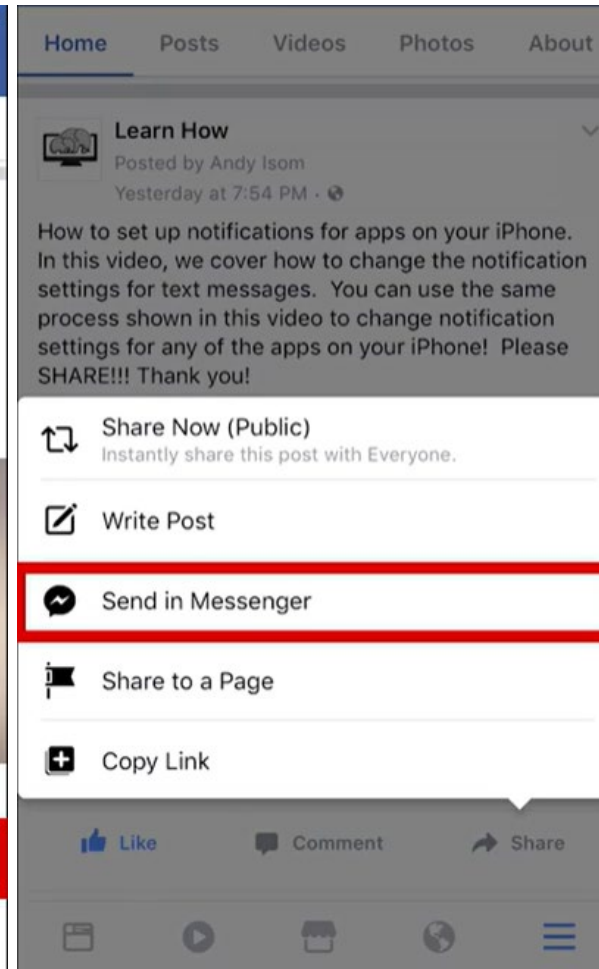
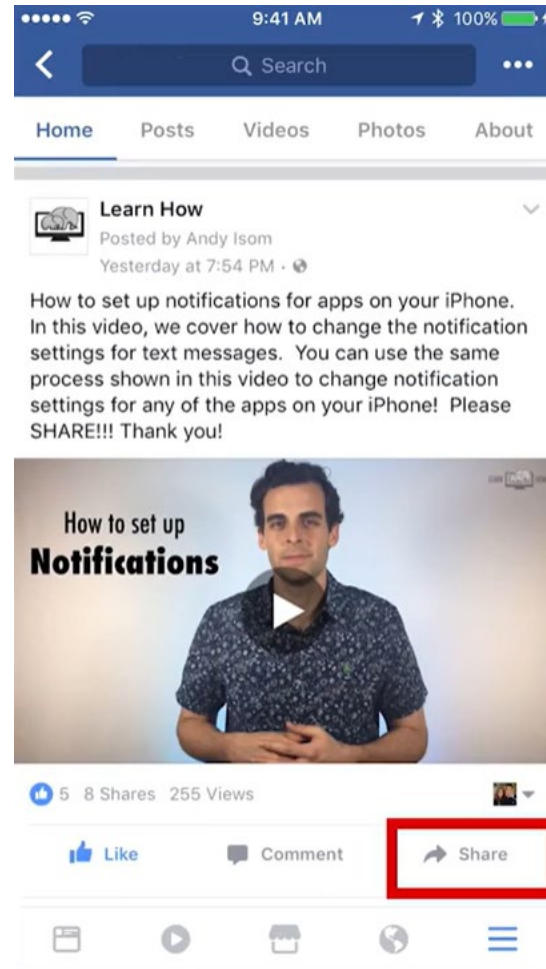
The Messenger Platform is free for you to use.

A place for
meaningful
conversations

Messenger helps you connect with your Facebook friends and family, build your community, and deepen your interests.

15. A method according to claim 1, further comprising: on a user-entered command, causing an information object to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.

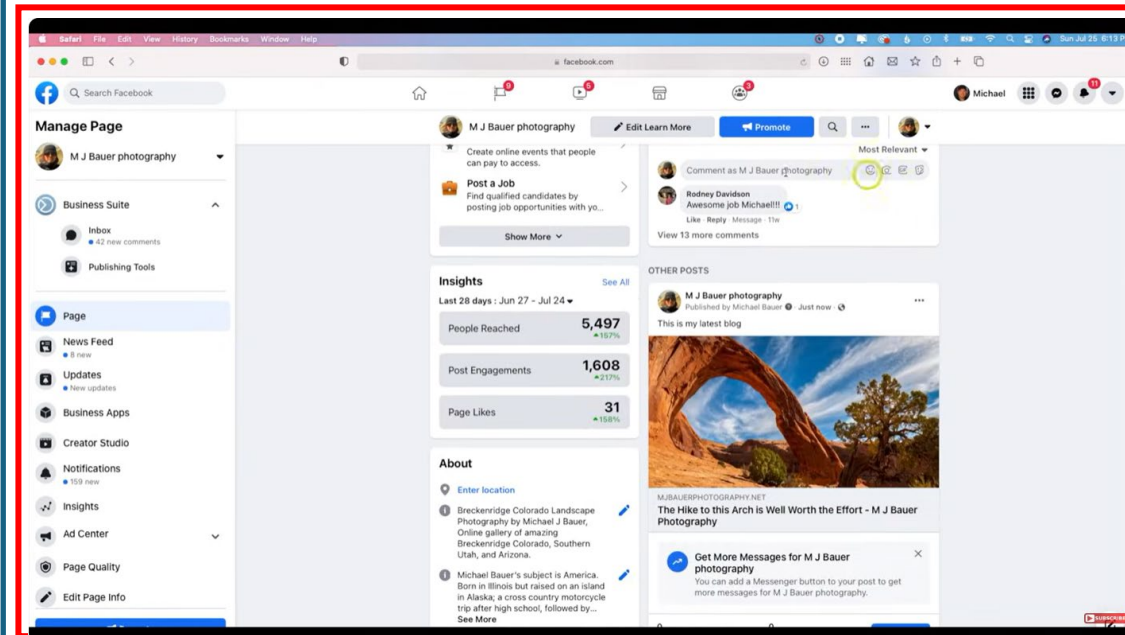
- On a user entered command, Defendant causes a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.
- Defendant practices this limitation by causing a card to be shared with another use via Facebook Messenger which is an integrated instant messaging system in response to a graphical selection by a first user.



17. A method according to claim 1, further comprising: serving, to a client computing device of a first user, a first view of a first set of information objects that constitute a first collection of the first user; also serving, to the client computing device of the first user, a second view of a second set of information objects, outside of the first collection, wherein any given member of the second set of information objects is both included in a collection of another user and the other user has been selected by the first user; and wherein each of the information objects in the second view can, on a user-entered command, be caused to be copied to the first view.

- Defendant serves to a client computing device of a first user a first view of a first set of information objects that constitute a first collection of the first user and also serves to the client computing device of the first user, a second view of a second set of information object outside of the first collection, wherein any given member of the second set of information objects is both included in a collection of another user and the other user been selected by the first user' and wherein each of the information objects in the second view can, on a user-entered command be caused to be copied to the first view.

- Defendant practices this limitation by providing users with a first view of their timeline or wall and a second view of another user's wall and also providing the "Share" button which allows for any given member of the second set of information objects to be copied onto the first user's wall.



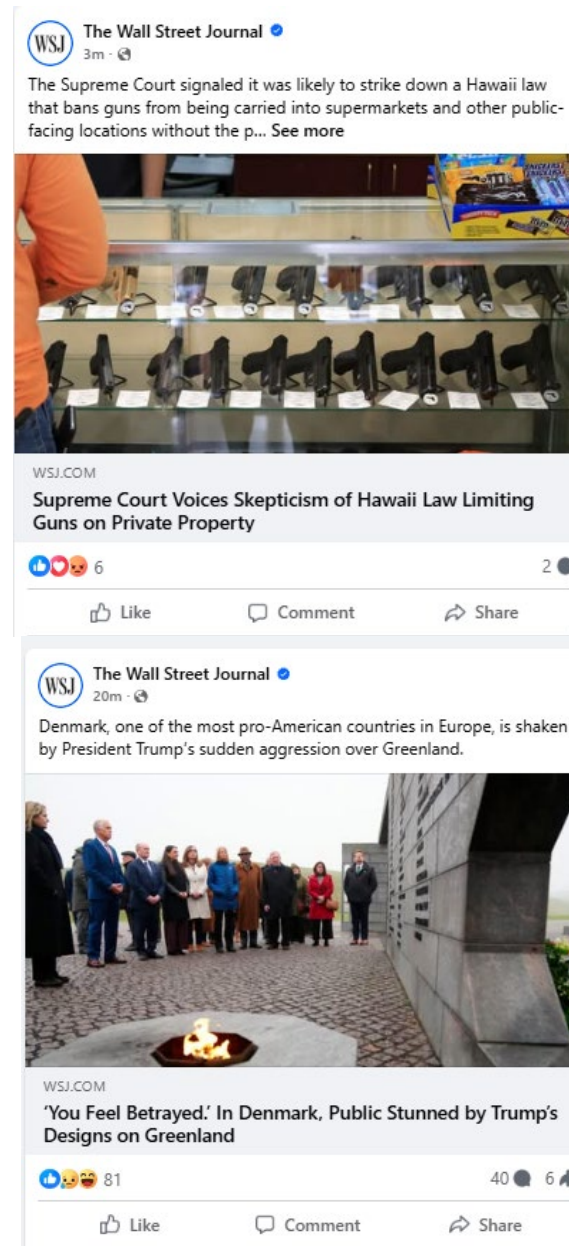
See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>



18. A method according to claim 17, wherein each of the information objects in the second view is displayed in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.

- Defendant's method displays cards in the second view in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.
- Defendant practices this limitation at least by displaying cards in the second view in order of the information object's creation time. For example, when viewing The Wall Street Journal's page, Defendant displays the cards in order of the information object's creation time and intentionally places the most recent posts at the top of the second view.



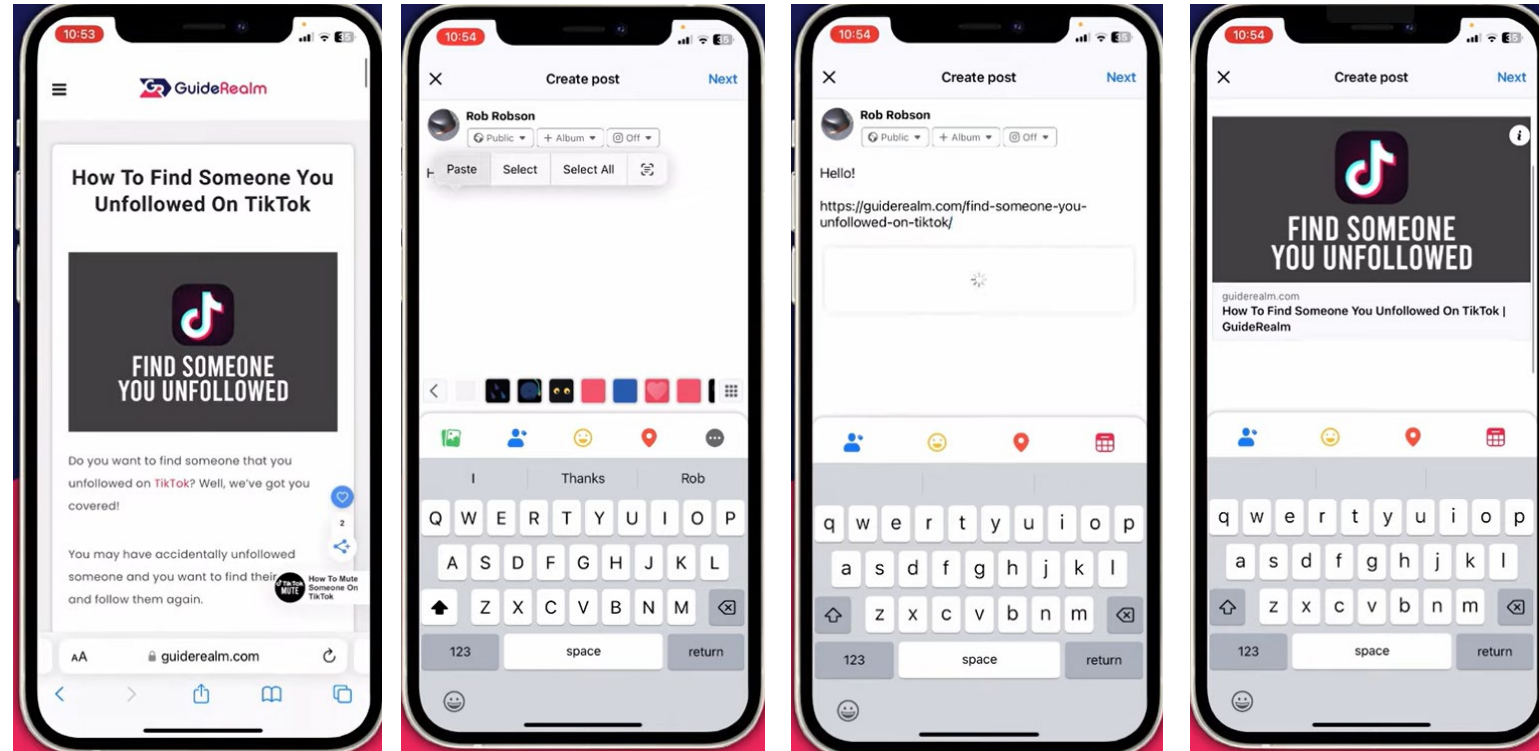
Plaintiff's Preliminary Infringement Contentions
Exhibit C

U.S. Pat. No. 10,664,141
Methods and Apparatus for Managing and Exchanging Information
Using Information Objects

US 10,664,141

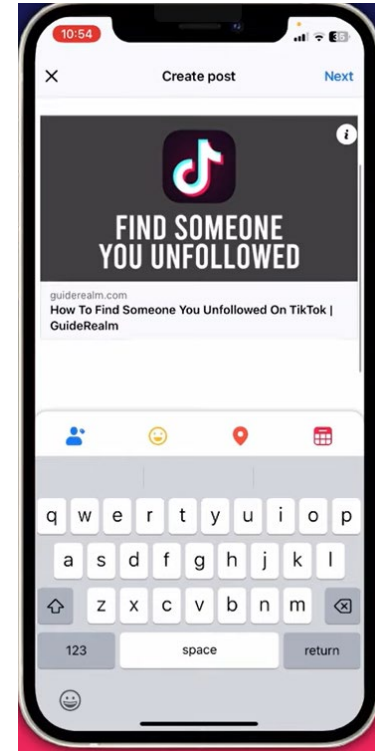
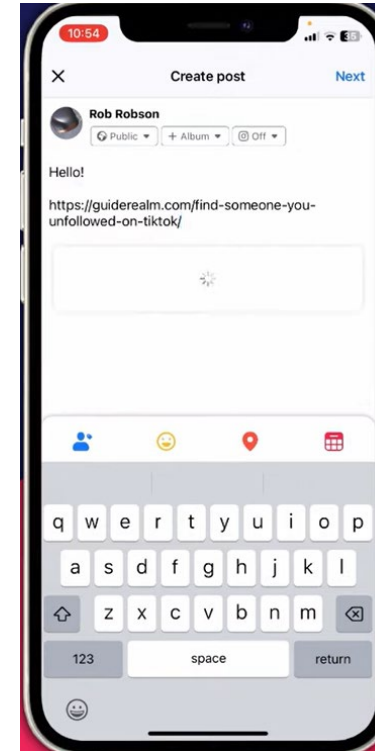
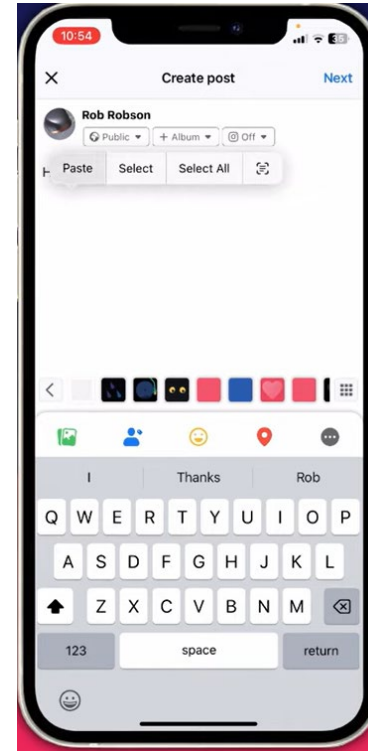
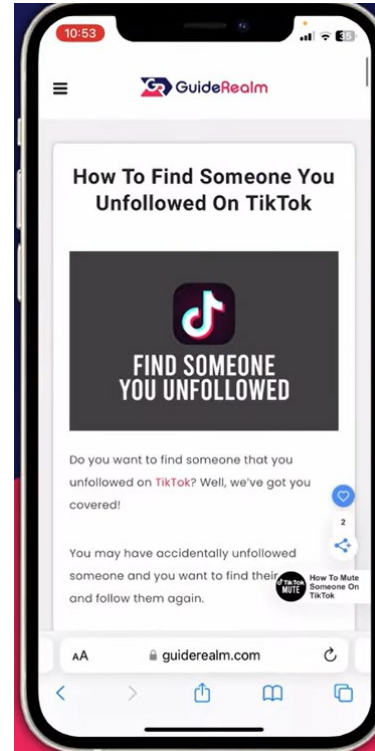
1. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method. Defendant infringes the accused method in at least two scenarios.
- In the first scenario, Defendant provides a mobile application which contains software resident on a user's device. This can include applications resident on a range of consumer electronic devices, including but not limited to smartphones, tablets, desktop computers, and laptops.
- In the second scenario, Defendant allows access to its Facebook website platform via a browser or other website interface. Defendant's website platform is similarly accessible via the web browser application of a range of consumer electronic devices including but not limited to smartphones, tablets, computers, laptops, and smart tv's. This resident application software allows access to, and interacts with, Defendant's Facebook platform.
- Under both scenarios, Defendant practices (in whole or in part) the claimed method through execution of software instructions on its backend servers of its Facebook platform as explained further below.
- The infringing methodology set forth by this claim chart applies equally to both scenarios unless otherwise indicated. To be clear, the use of an exemplary photo showing infringement under the first or second scenario would equally apply to infringement under the other scenario.



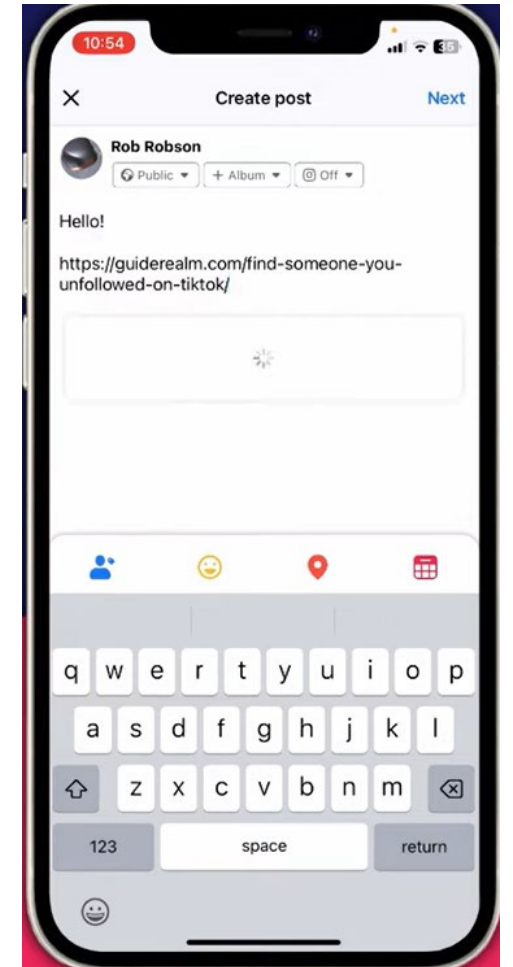
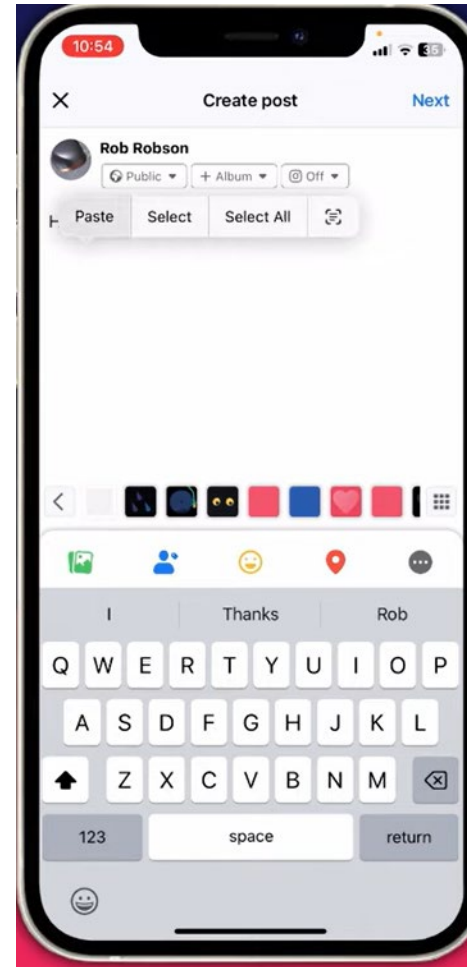
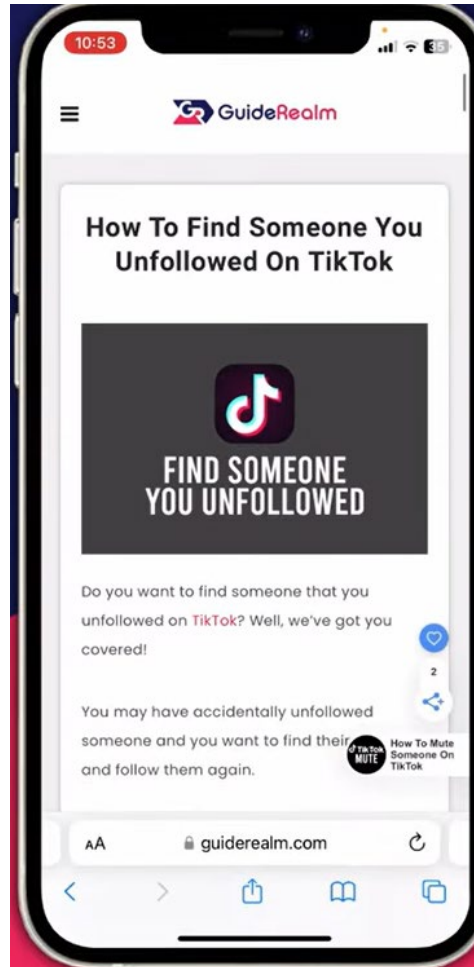
1. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, wherein the at least one source is external to the computer.
- The first photo represents a data item obtained from a source that is external to the at least one computer. In this example, the data item corresponds to an article hosted via a third-party website, namely, an article titled How to Find Someone You Unfollowed on TikTok via the website guiderealm.com.
- Photographs 2-4 represent the method whereby Defendant interacts with at least one data item obtained from at least one external source.



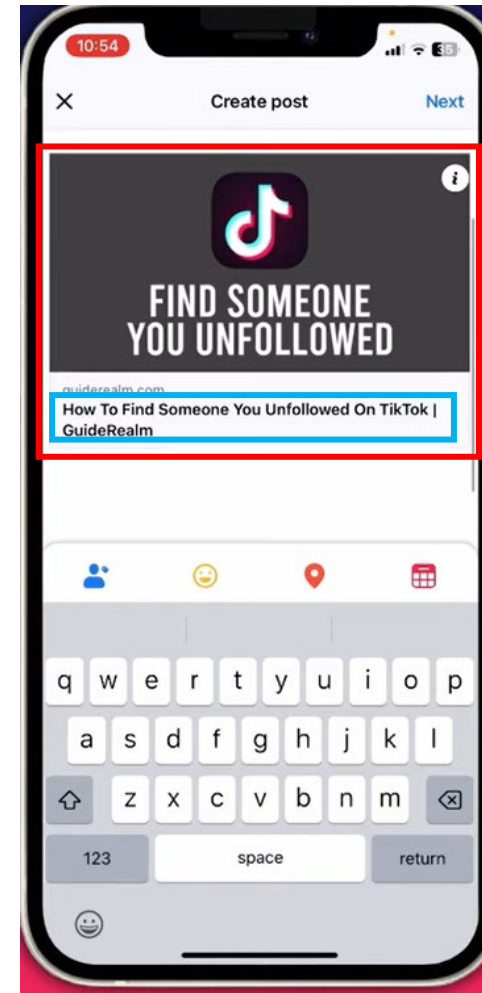
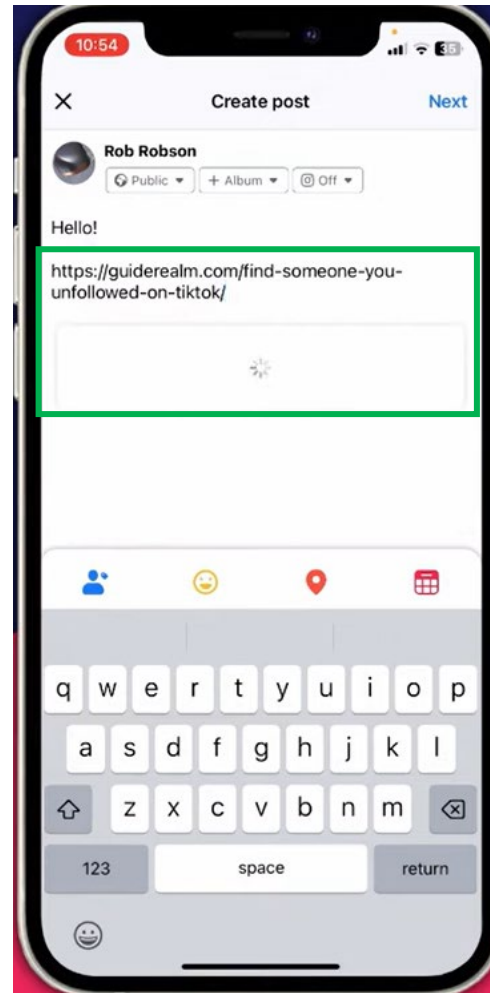
(a) responsive to a user selection of the at least one data item:

- Users may make a selection of a data item. In this example, the data item is the third-party web article entitled How to Find Someone You Unfollowed on TikTok.
- Defendant performs a series of steps responsive to the user selection of the at least one data item.
- While users select data items, Plaintiff notes the user's selection is not an affirmative step of the claim. Instead, the claim's focus is on Defendant's actions "responsive to" the user selection.



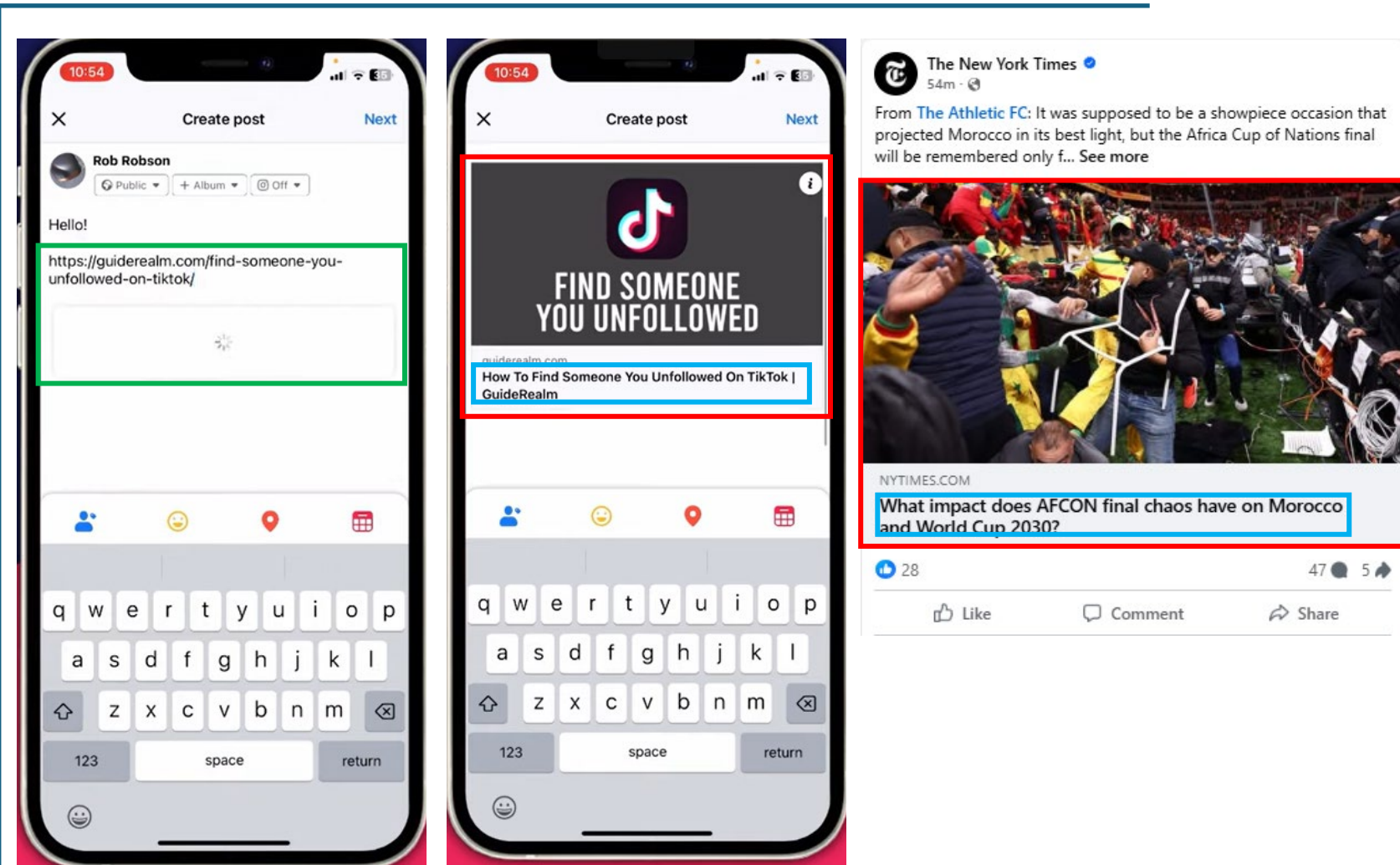
(a)(i) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item, and causing storing of data corresponding to each of the information objects in a database system;

- Defendant causes configuring of each data item into a distinct information object by extracting from each data item extracted data including a picture and a heading, and a link to the data item, and causes storing of data corresponding to each information object in its database system. Upon information and belief, the storing occurs in Defendant's database through its backend servers or local software application.
- Responsive to the user pasting a link to an external source (Image 1), Defendant causes the configuring of a data item into a distinct information object (Image 2) by extracting from said data item extracted data including a picture, a heading, and a link to the data item, and causes storing of data corresponding to the information objects in its database system.
- In the second image, the distinct information object and its corresponding picture and heading are shown.
- Defendant causes storing of data corresponding to each of the information objects in the database system of the Facebook platform.
- In the third image, Defendant further causes storage of data corresponding to each information object in the database system of the Facebook platform.



(a)(i) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item, and causing storing of data corresponding to each of the information objects in a database system;

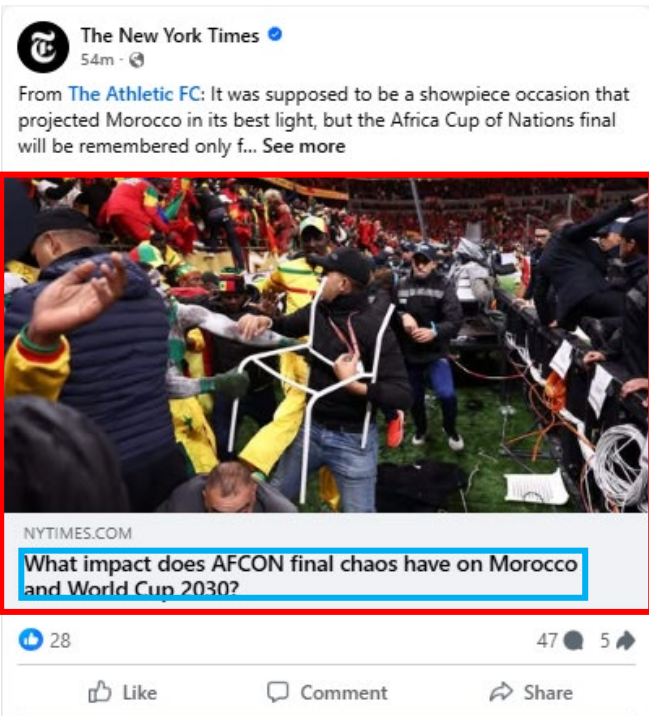
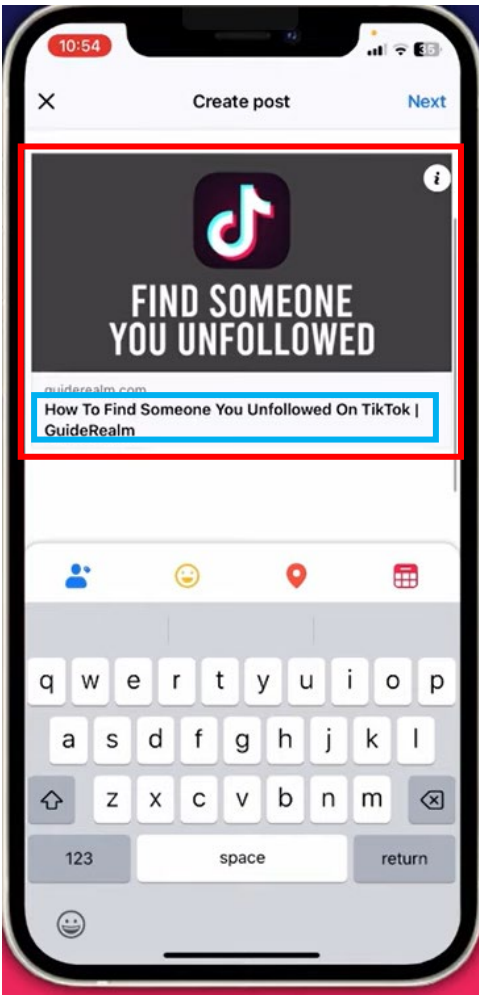
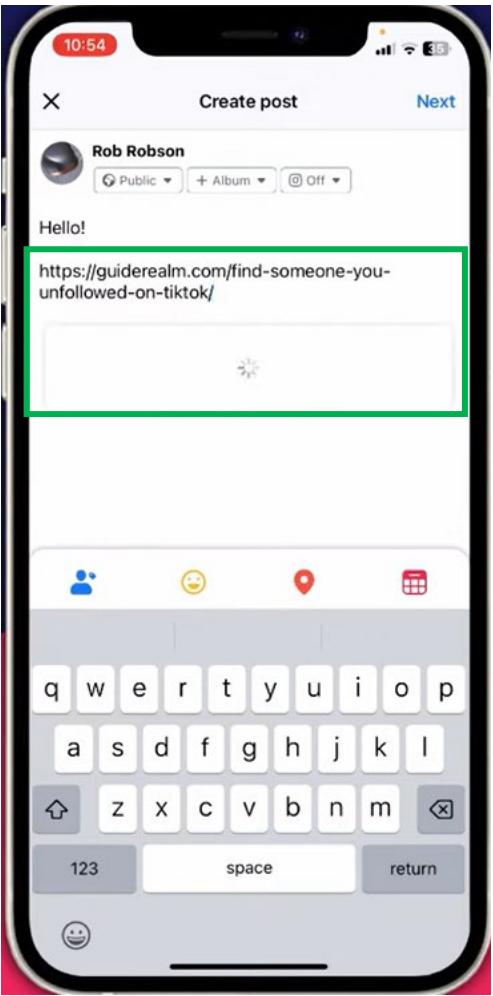
- In the first scenario of infringement (App Scenario), Defendant's software resident on the user's device works in concert with Defendant's Facebook platform (e.g. its backend servers) to practice the limitations of the Asserted Claims.
- This resident software is found within the Facebook application which previously has been downloaded to the user device.
- On information and belief, the user device executes aspects of the application software in response to input from end users, which cause it to communicate to Defendant's backend servers.
- In this environment, the extracting of data comprising an image, heading, and/or link for a shared article may be performed by Defendant's application software and Defendant's backend servers.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user's device, those steps are performed automatically by Defendant. See Plaintiff's briefing on Defendant's motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant's backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



See [How To Add Clickable Link On Facebook Post - Full Guide](#)

(a)(i) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item, and causing storing of data corresponding to each of the information objects in a database system;

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, on the processing steps claimed are performed by the Facebook platform, e.g., backend servers to configure each of the data items into a distinct information object.
- Upon information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend servers do all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set fort by *Sirf* and its progeny.

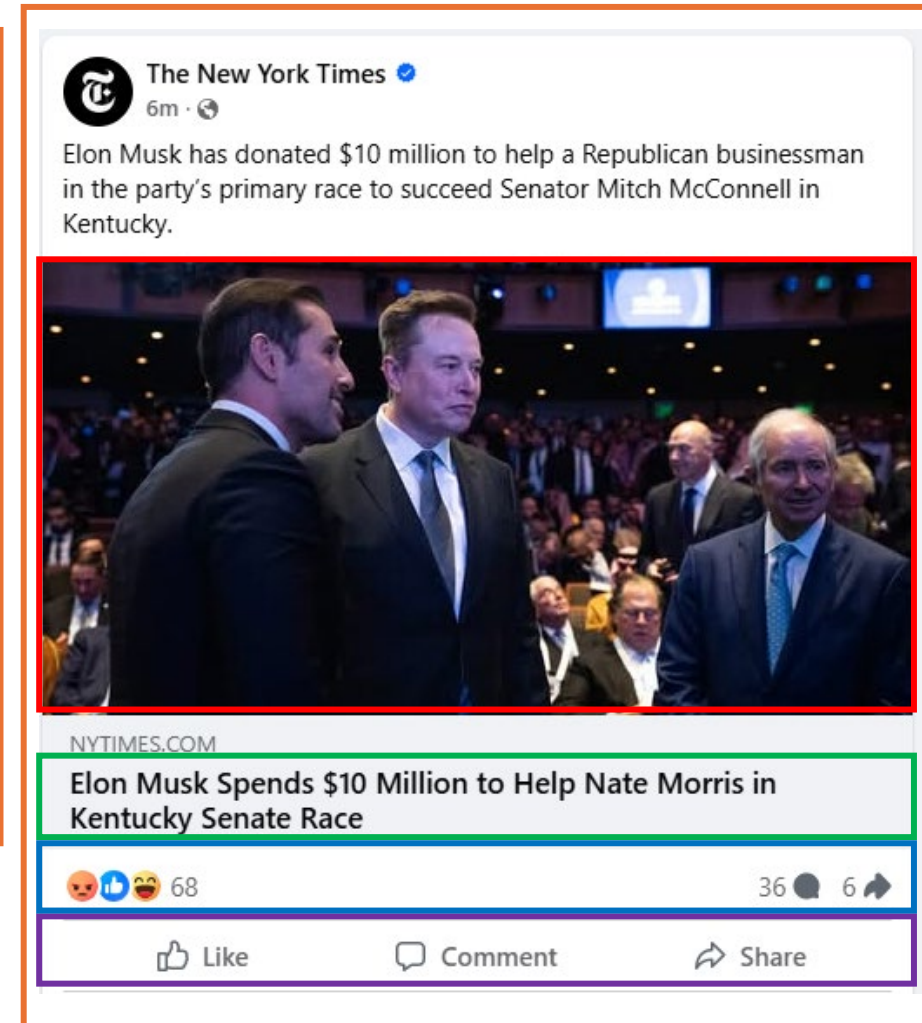
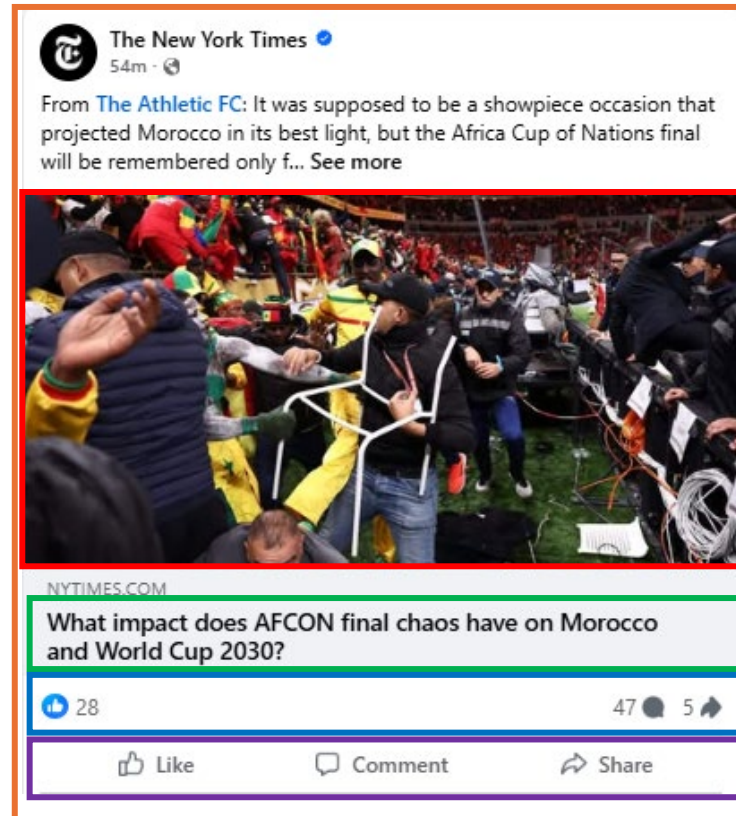


See <https://www.facebook.com/nytimes/>

See [How To Add Clickable Link On Facebook Post - Full Guide](#)

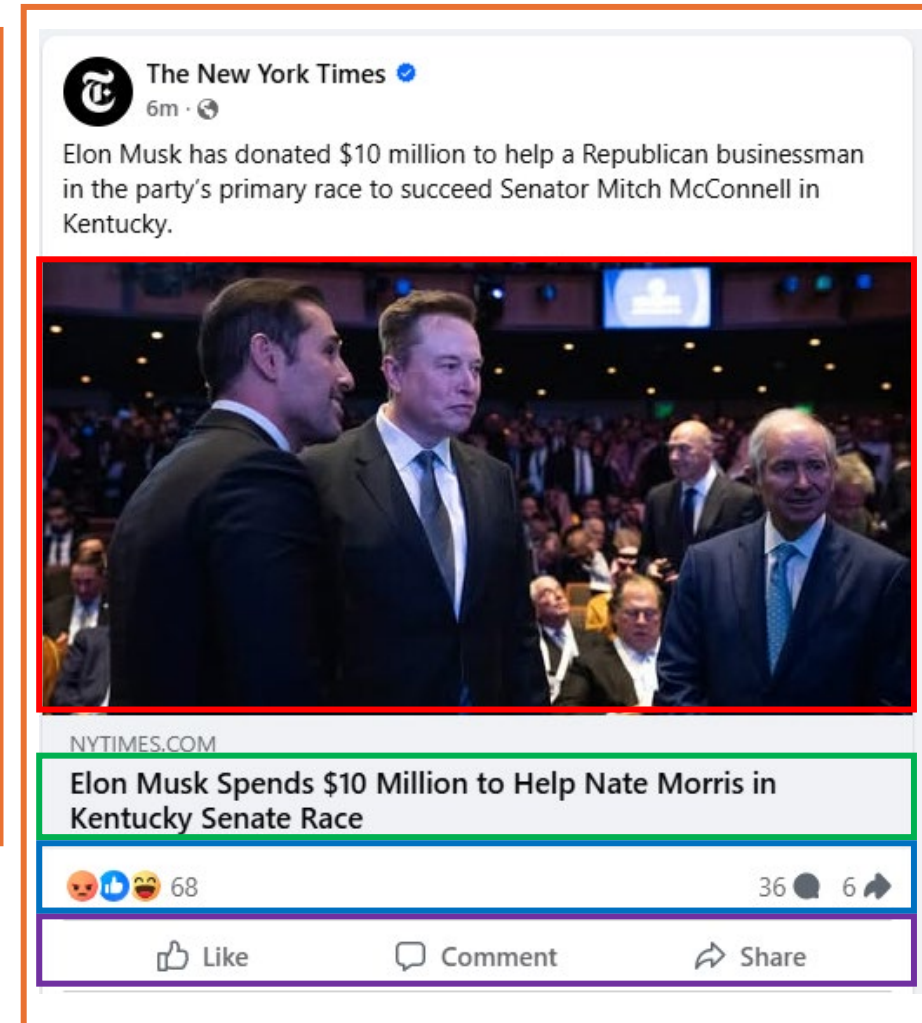
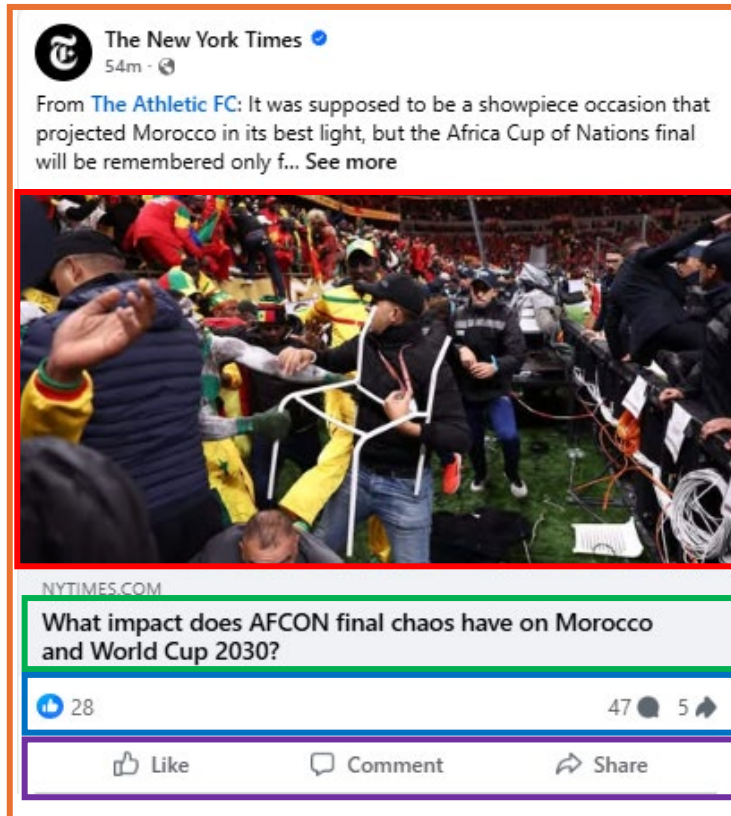
(a)(ii) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Defendant displays a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof the picture, the heading, a set of indicators, and a set of graphically accessible functions.
- Defendant's "Wall", "Timeline", "Profile", "Feed", and/or "Newsfeed" features display each of at least two information objects by the same or different users in the database system. For example, Defendant displays New York Times' Facebook wall which contains representations of two or more information objects in Defendant's database system. Both images are exemplary representations of information objects shown on the New York Times' Facebook wall and are in uniform format.



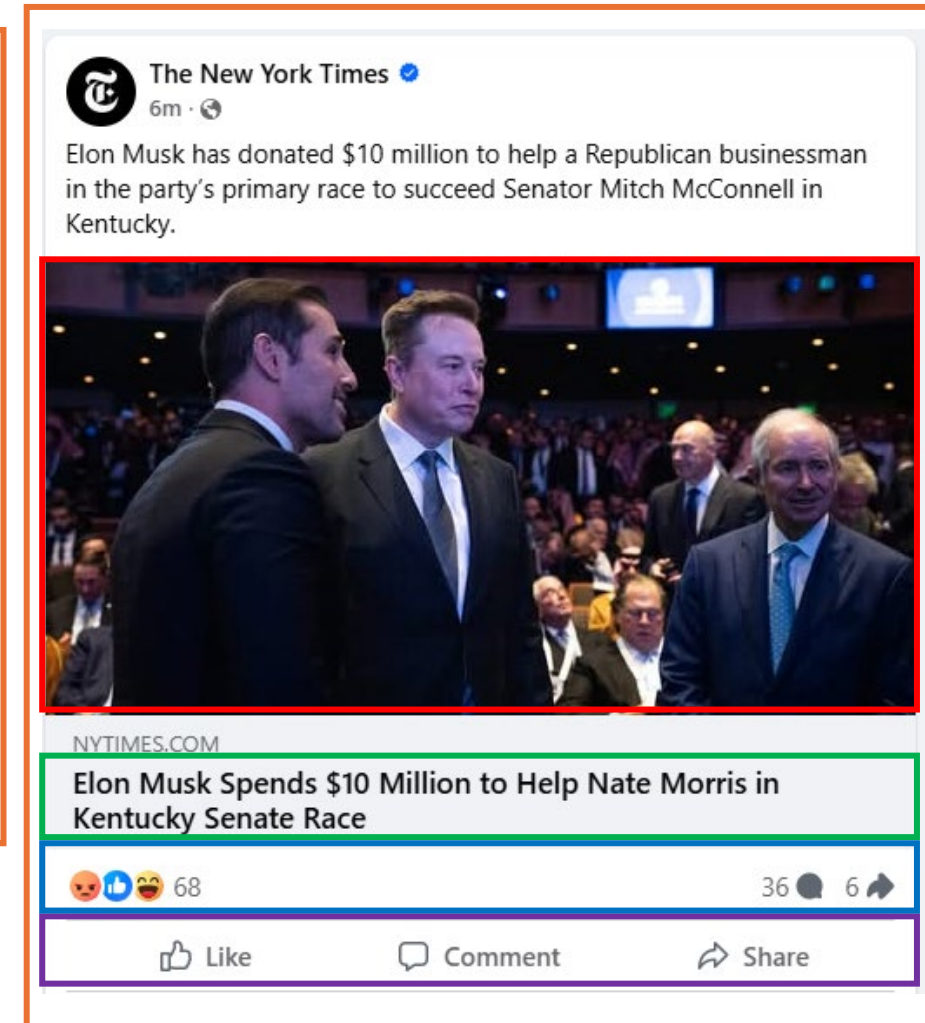
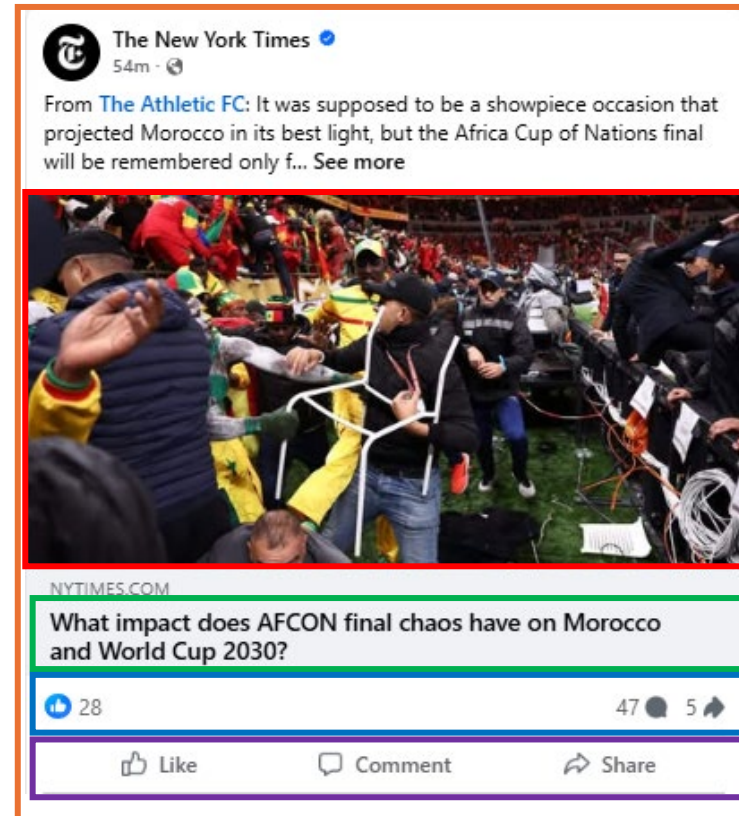
(a)(ii) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Under the first scenario of infringement (App scenario), the claimed “displaying a representation” may also be performed in part on the user’s device through the execution of the local application software. The backend server network operates to store variable data for use by the application software to cause display of the representation.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user’s device, those steps are performed automatically by Defendant. *See* Plaintiff’s briefing on Defendant’s motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant’s backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



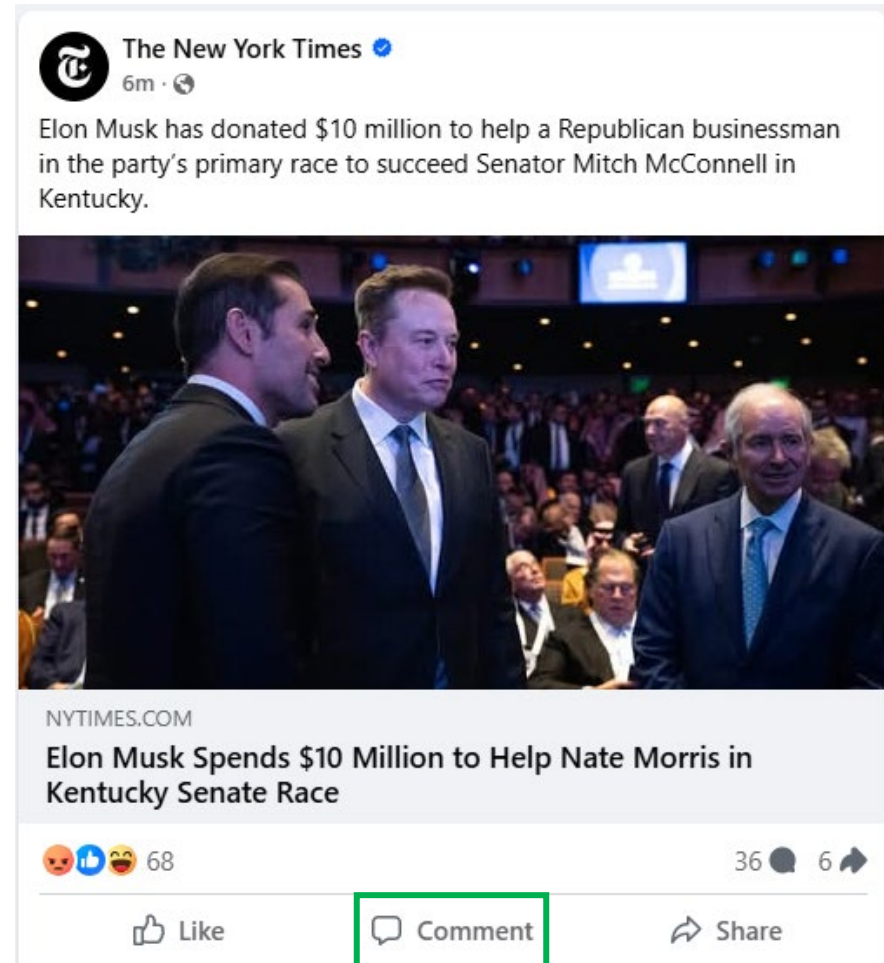
(a)(ii) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook backend to display a representation of at least two of the information objects in the database system.
- Upon information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend does all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.



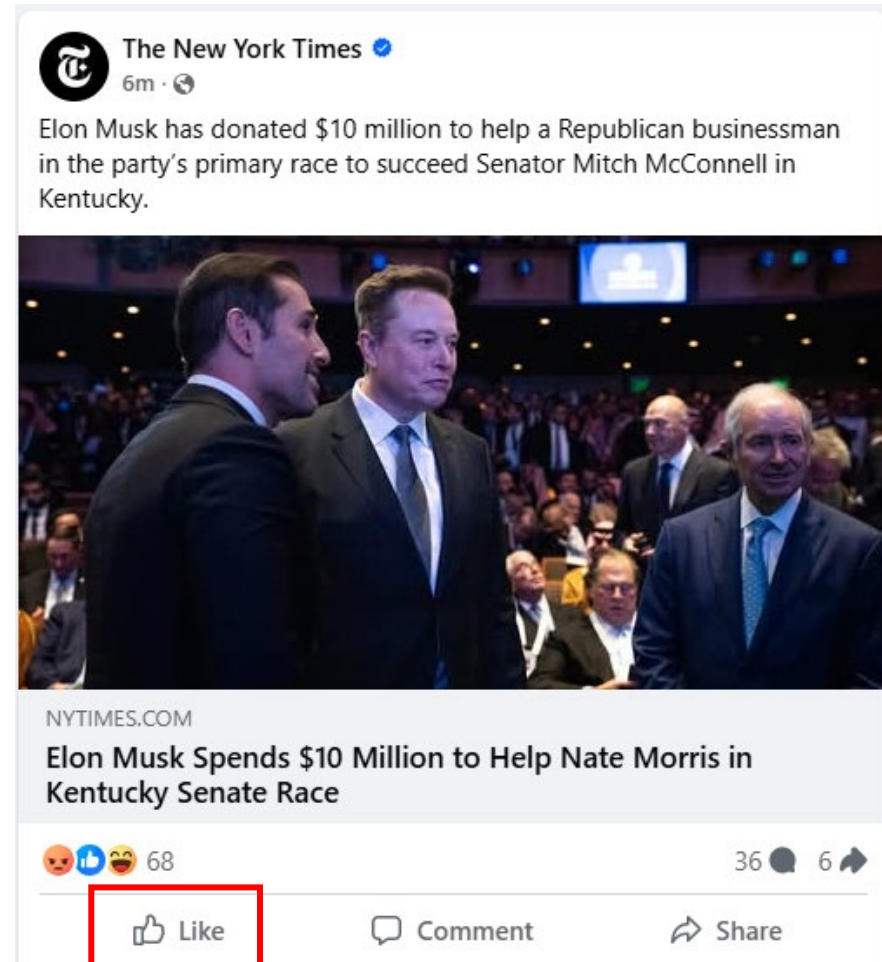
(a)(iii) a **comment function**, by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card;

- One of Defendant's graphical functions is a **comment function** by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card.
- Defendant practices this limitation by providing a comment function in a uniform location of the card which allows for comments associated with the information object.



(a)(iv) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- One of Defendant's graphical functions is a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card.
- Defendant practices this limitation by providing its "Like" button which facilitates users' voting for the card with such votes being associated with the information object represented by the card.



(a)(iv) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- Defendant further provides users with the opportunity to react to cards which facilitates users' voting for the card with such reactions or votes being associated with the information object represented by the card.
- As explained by Defendant's public literature, Defendant provides users having access to cards the opportunity to react to the information object represented by the card by allowing them to hover over Defendant's like button and select their desired reaction or vote.

Liking tells your friends that you enjoyed their post or comment, while reacting allows you to specify your response. You can only leave one reaction per post or comment.

To react to a post or comment:

1. Go to the post or comment you want to react to.
2. Hover over **Like** and choose a reaction. The most popular reactions appear below the post or comment as icons (example:   ).



Like



Love



Haha



Wow



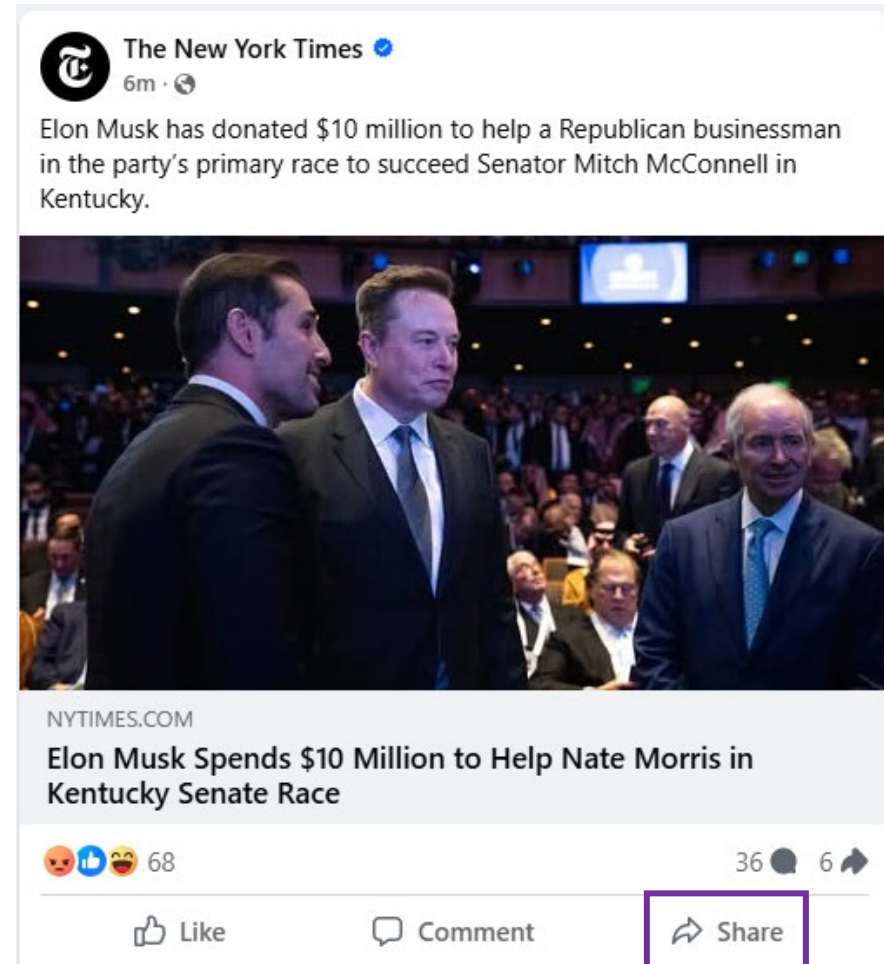
Sad



Angry

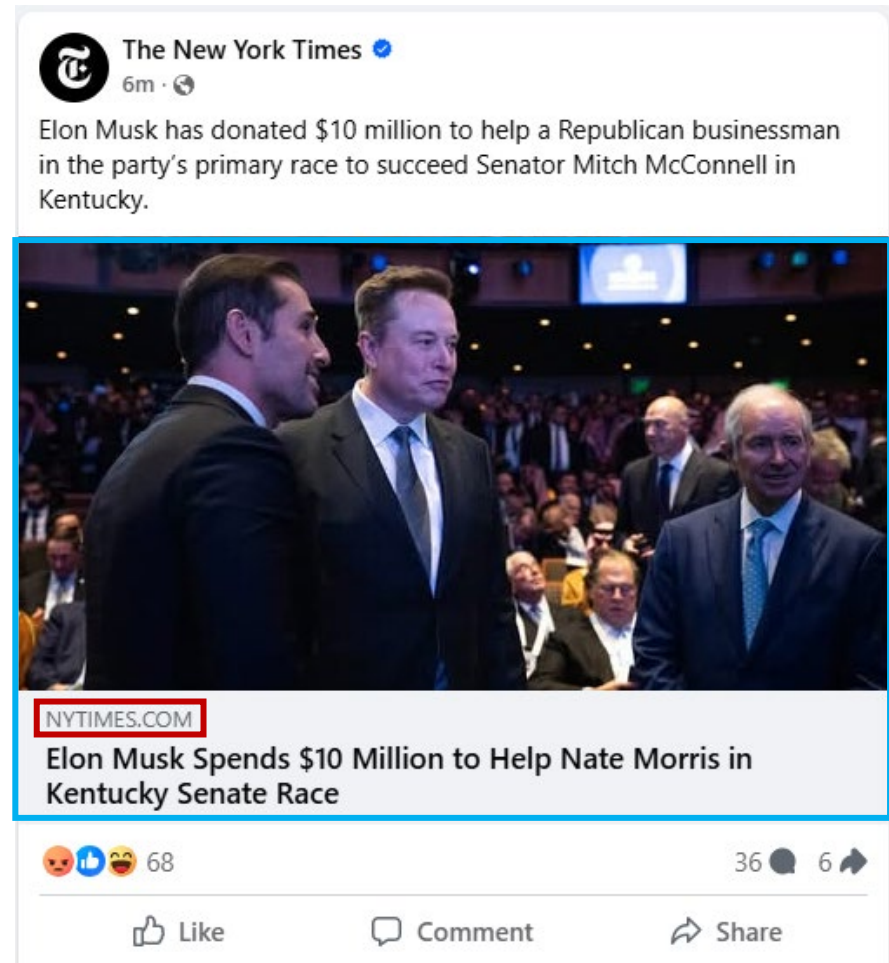
(a)(v) a **copy function**, by which users having access to the card copy function in a first collection of cards can cause the card to appear in a second collection of cards; and

- One of Defendant's graphical functions is a copy function, in this example a "Share" button, by which users having access to the card copy function in a first collection of cards of a first user can cause the card to appear in a second collection of cards of a second user.
- For example, when a user views the displayed post on The New York Times' Facebook timeline, that card appears in a first collection of a first user, namely the New York Times' card collection.
- Defendant's Share button is a copy function which can be used to cause a card to appear in a second collection of cards.



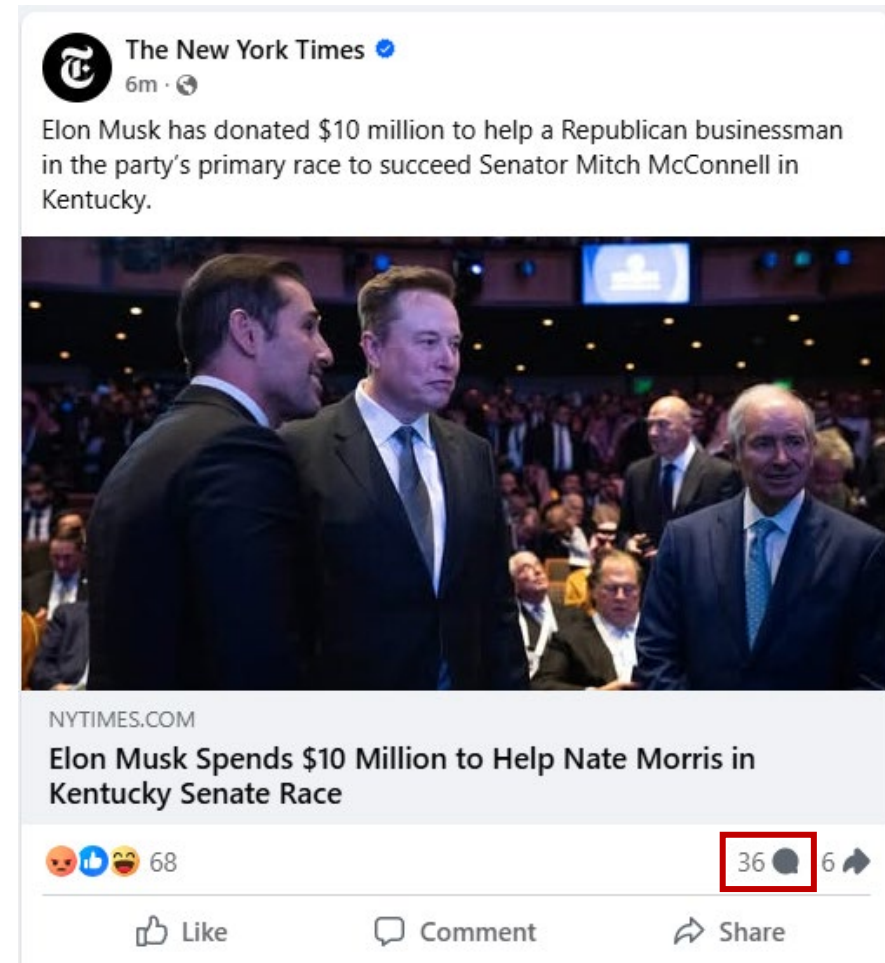
(a)(vi) a link function, by which users having access to the card link function can invoke the link to the data item; and

- One of Defendant's graphical functions is a link function, by which users having access to the card link function can invoke the link to the data item.
- Defendant embeds the link to the data item into the image and heading portions of the card. In this way, a user is able to invoke the link by clicking on the uniform formatting. Defendant further provides a shortened preview of the link right above the header.



(a)(vii) wherein the set of indicators includes: an indicator reflecting commenting activity associated with the card; and

- Defendant's set of indicators includes an indicator reflecting commenting activity associated with the card.
- Defendant's indicator shows the number of comments that have been posted that are associated with the card.

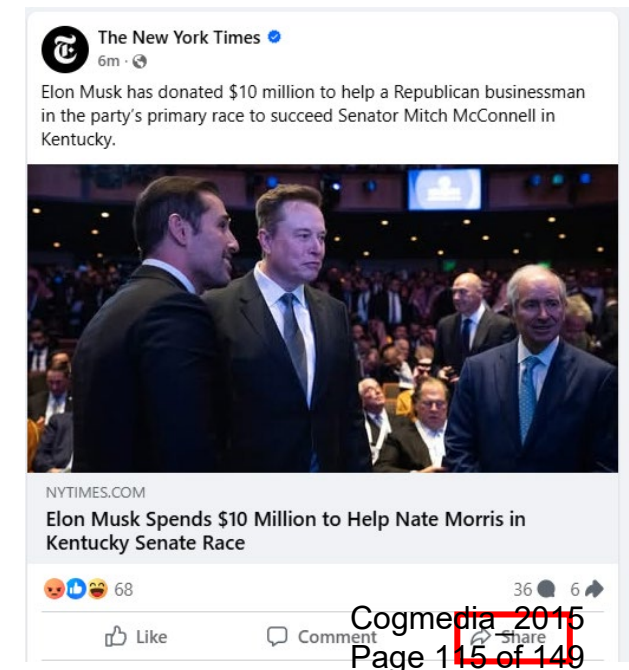
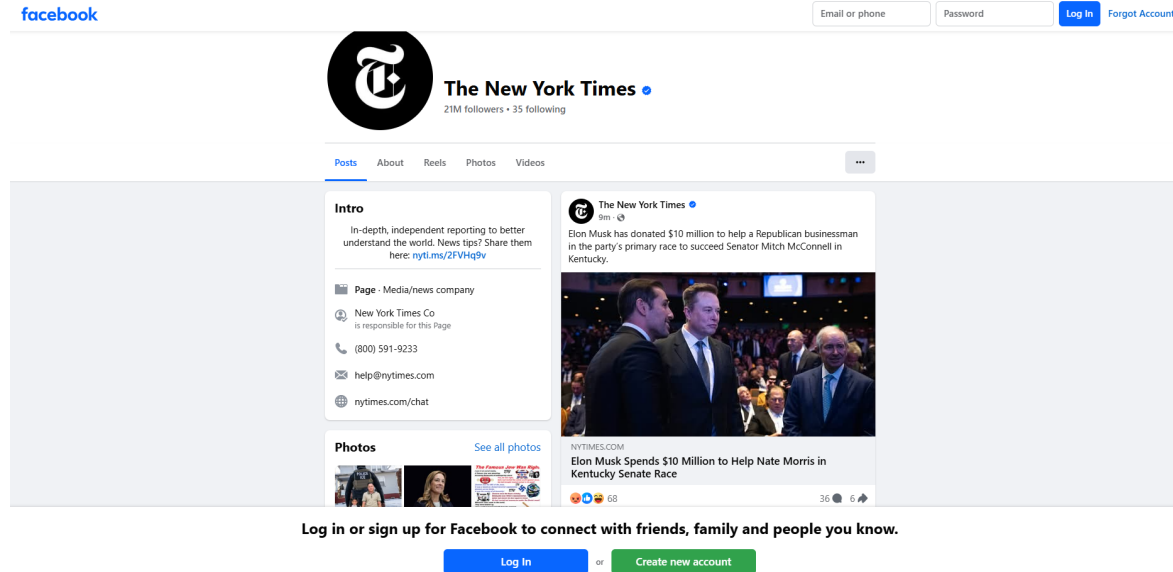


(b) wherein the database system has been configured to allow

(b)(i) each user to have at least one user-selected collection of cards representing information objects in the database system and

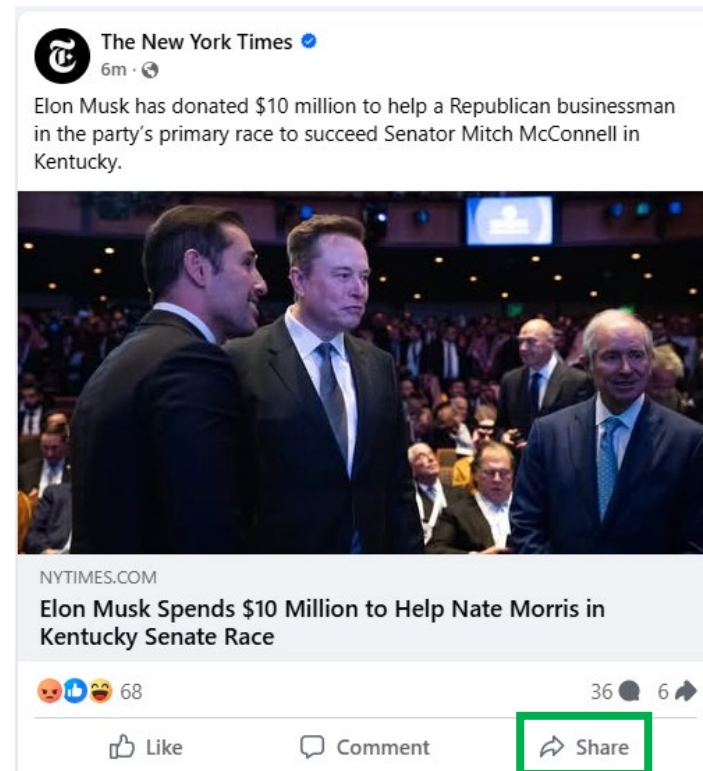
(b)(ii) at least some content of cards, including any associated picture and heading, regardless of the collections in which they may have first appeared, to be made accessible and copyable across card collections of users.

- Defendant configures its database system to allow each user to have at least one user-selected collection of cards representing information objects in the database system and cards, regardless of the collections in which they have first appeared, to be made accessible and copyable across card collections of different users. Note, Defendant's "database system" may be made up of multiple databases or otherwise arranged in a distributed database.
- Defendant practices this limitation by allowing users such as the New York Times to maintain a user-selected collection of cards representing information objects. For example, the New York Times maintains its collection at: <https://www.facebook.com/nytimes/>. These collections are stored in Defendant's database system.
- Although the cards are maintained in their user-selected collection, the cards may be made accessible and copyable across card collections of users in part due to Defendant's **Share button** which allows for the cards to be copyable across collections of different users.

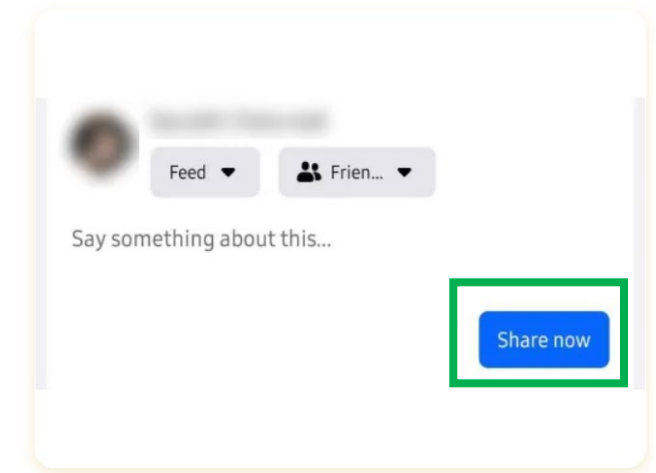


2. A method according to claim 1, the computer processes further comprising: displaying a graphical button, which, when invoked while content is being displayed, causes the displayed content to be handled as one of the data items, namely, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.

- Defendant provides a user interface having a graphical button which when invoked while content is being displayed causes the displayed content to be handled as one of the data items, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.
- Defendant displays graphical buttons, namely Defendant's "Share" and "Share now" buttons which when invoked configure the displayed content as a new information object and makes a representation of the new information object available for display in the uniform format. Defendant's "Share now" button becomes available upon a user's selection of Defendant's copy function or Share button and when invoked configures the displayed content as a new information object available for display in the uniform format.



- If you want to reshare the post without making any changes, select **Share Now**.

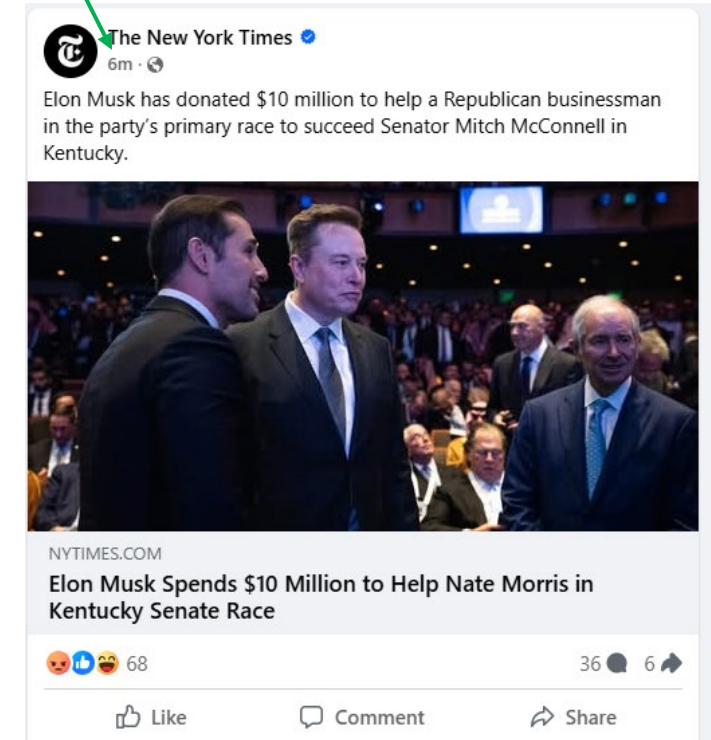


<https://recurpost.com/blog/how-to-repost-on-facebook/>

See <https://www.facebook.com/nytimes/>

3. A method according to claim 1, wherein the format includes within the card **an indication of a date of creation.**

- Defendant's computer-implemented method further comprises a format which includes within the card an indication of a date of creation as exemplified on the right.
- Defendant updates the time between the date of creation of a card and the present. Briefly after a card has been created, Defendant includes within the card an indication of the date of creation by referencing that the card was made a certain number of seconds, minutes, hours, or days ago. Further after a card has been created, Defendant includes within the card a specific date and time of the card's creation.
- For example, the Business Rocks Women card contains an indicator it was created on June 3rd at 2:20 AM and The New York Times card indicates that it was posted just 6 minutes ago.

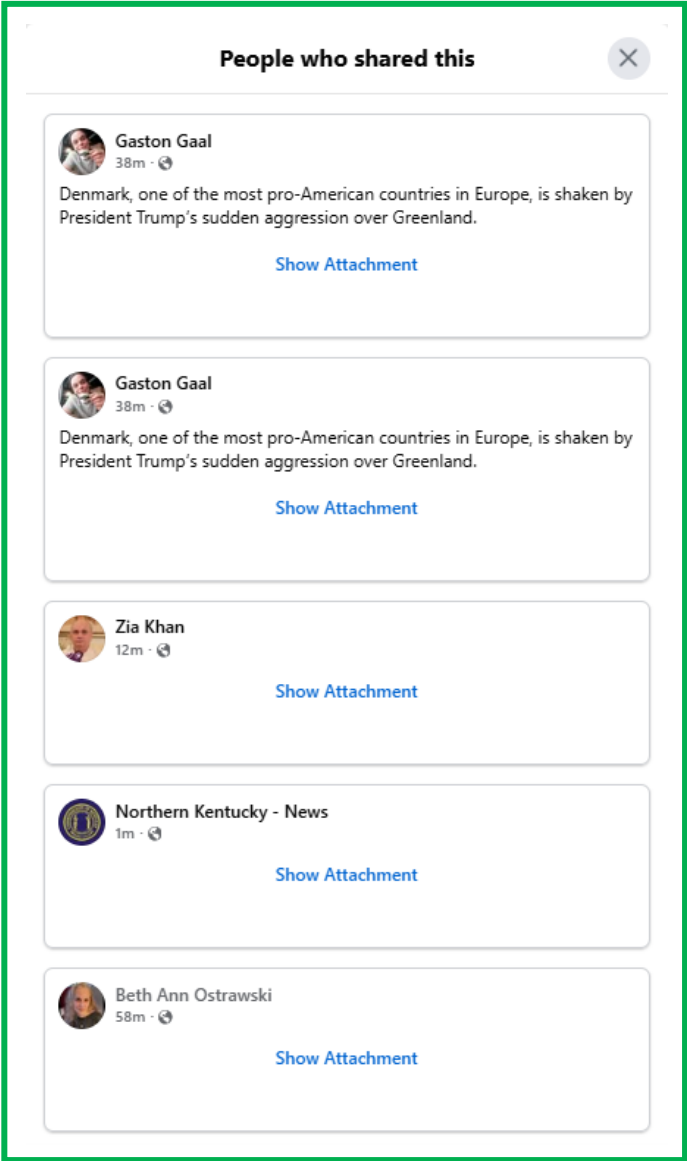
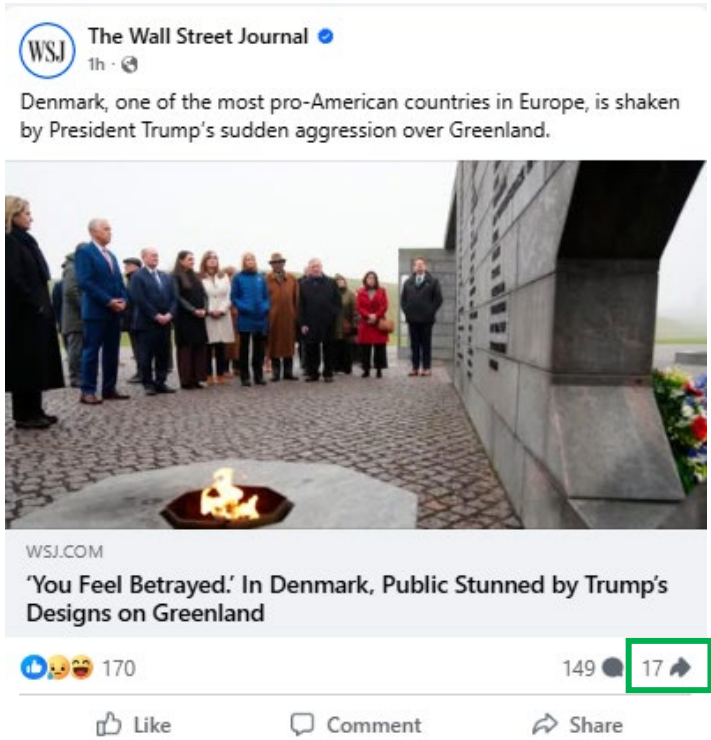


See <https://louisem.com/2541/post-link-on-facebook>

See <https://www.facebook.com/nytimes/>

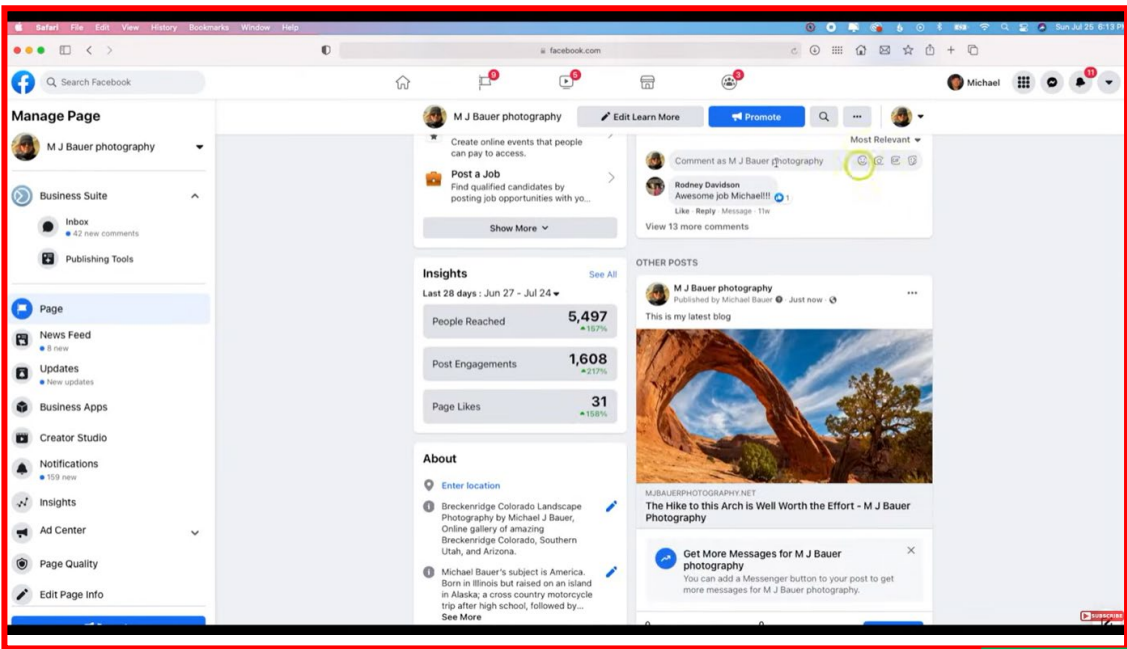
4. A method according to claim 1, wherein the format includes a user-accessible report relating to users who copied the information object.

- Defendant’s computer-implemented method further comprises a format which includes a user-accessible report relating to users who copied the information object.
- Defendant’s uniform format includes a user-accessible report relating to the number of users who have copied or shared the information object.



5. A method according to claim 1, further comprising: displaying in a computing device of a first user, a **first view of a first set of cards that constitute a first collection of the first user**; also displaying in the computing device of the first user, a **second view of a second set of cards that constitute a collection of a second user**.

- Defendant displays in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user and also displays in the computing device of the first user, a second view of a second set of cards that constitute a collection of a second user.
- As shown in the first image, a first user, Defendant is displaying in a computing device MJ Bauer photography's wall which constitutes a first view of a first set of cards that constitute a first collection of the first user.
- As shown in the second image, Defendant is displaying in a computing device the Wall Street Journal's wall which constitutes a second view of a second set of cards that constitute a collection of a second user.

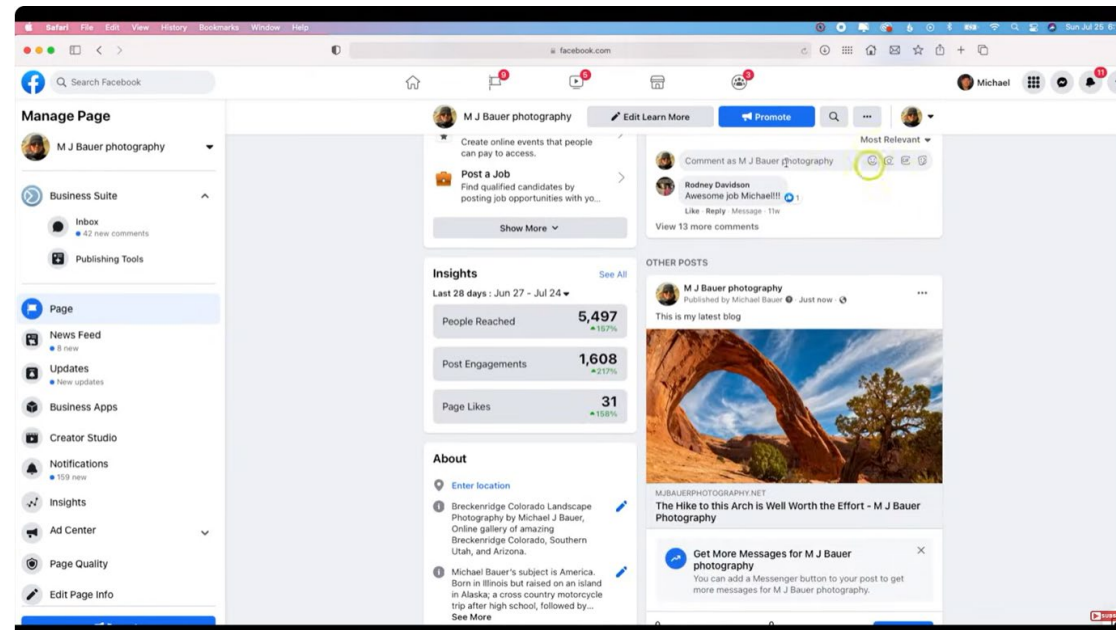


See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>

6. A method according to claim 5, further comprising: responsive to (i) a graphical selection, by the first user, of a card in the second view and (ii) a copy command that has been graphically entered by the first user, causing the selected card to be copied from the second view to the first view, so that the selected card in the collection of the second user appears in the first collection of the first user.

- Responsive to a graphical selection by the first user of a card in the second view and a copy command that has been graphically entered by the first user, Defendant causes the selected card to be copied from the second view to the first view, so that the selected card in the collection of the second user appears in the first collection of the first user.
- Building on the example provided in the prior slide, responsive to a first user's graphical selection and copy command, a Wall Street Journal article is able to be copied from the Wall Street Journal's card collection to a first user's card collection. In other words, the first user will now have in its card collection, a card from the Wall Street Journal's collection.
- In this way, Defendant causes a selected card to be copied from a second collection in a second view to a first collection of the first user in a first view.

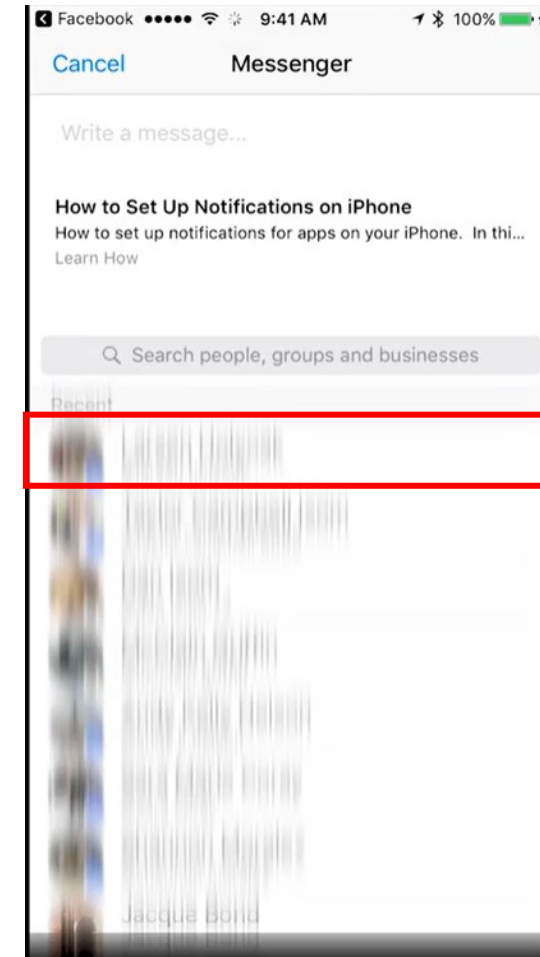
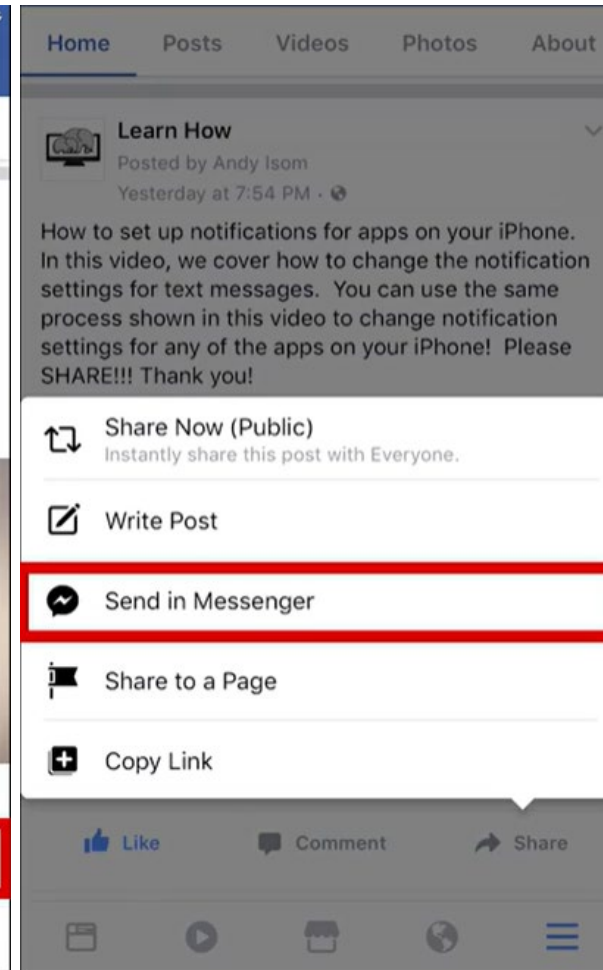
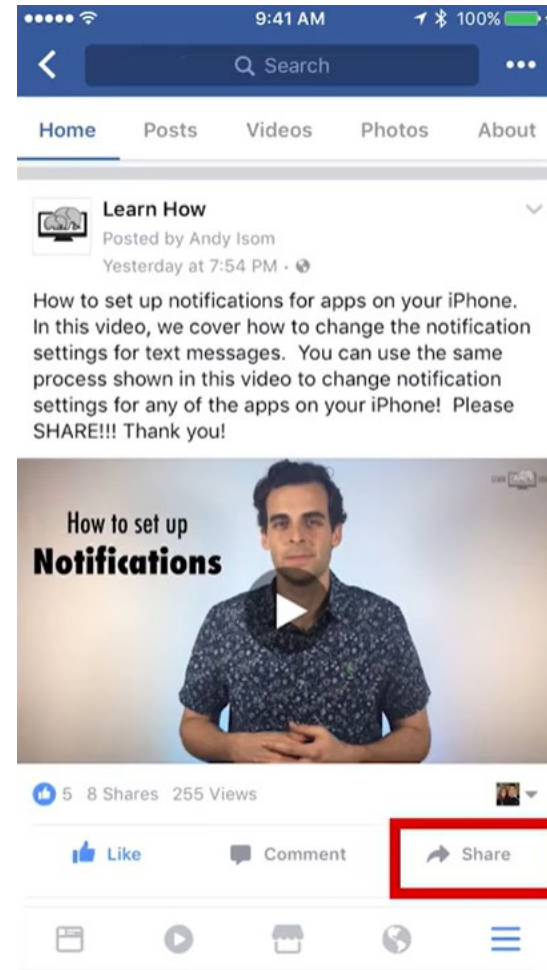


See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>

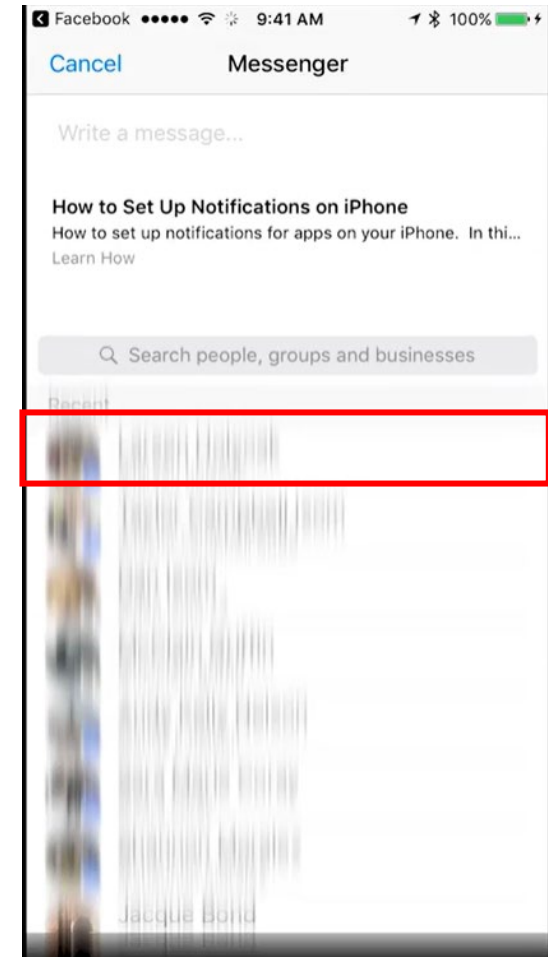
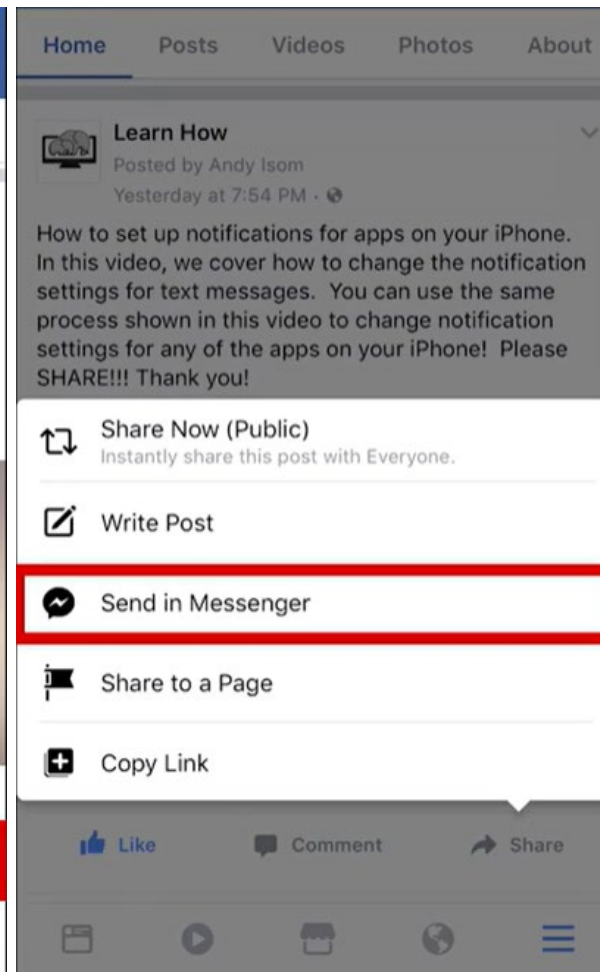
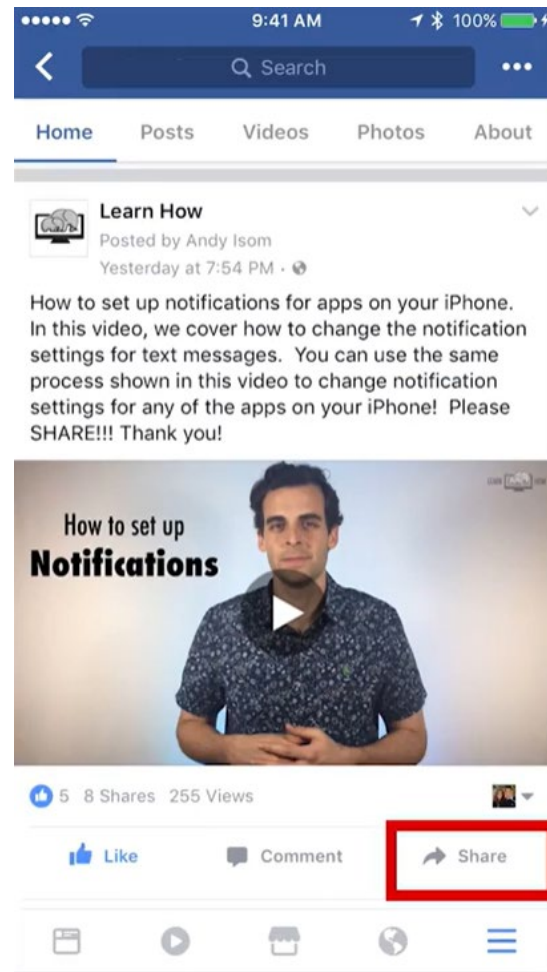
7. A method according to claim 5, further comprising:
 responsive to (i) a graphical selection, by the first user,
 of a card in the first view and (ii) a send command that
 has been graphically entered by the first user, causing
 the selected card to be sent to the second user, so that the
 selected card in the collection of the first user is made
 available to the second user to be included in the
 collection of the second user.

- Defendant responds to a first user's graphical selection of a card in the first view and sends a command that has been graphically entered by the first user which causes the selected card to be sent to the second user, so that the selected card in the collection of the first user is made available to the second user to be included in the collection of the second user.
- Upon a graphical selection by the first user of a card in the first view and their entering of a send command, Defendant causes the selected card in the collection of the first user to be made available to the second user to be included in the collection of the second user.



8. A method according to claim 1, further comprising: on a user-entered command, causing a card to be shared with another user when the card and the other user have been graphically selected.

- On a user-entered command, Defendant causes a card to be shared with another user when the card and the other user have been graphically selected.
- Upon a user selecting the share and send in messenger buttons, a user is able to select another user with whom the user wishes to share the selected card. Upon such a user-entered command, Defendant causes the card to be shared with the other user.



9. A method according to claim 1, further comprising: on a user-entered command, causing a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.

- Defendant maintains at least one integrated instant messaging system which it refers to as Facebook Messenger.



Overview for the Messenger Platform

The Messenger Platform Overview details how the platform works and what you need to successfully implement the platform.

Messenger from Meta is a messaging service that allows a business' Facebook Page or Instagram Professional account to respond to people who are interested in your business or social media. Conversations between a person and your account must be initiated by the person.

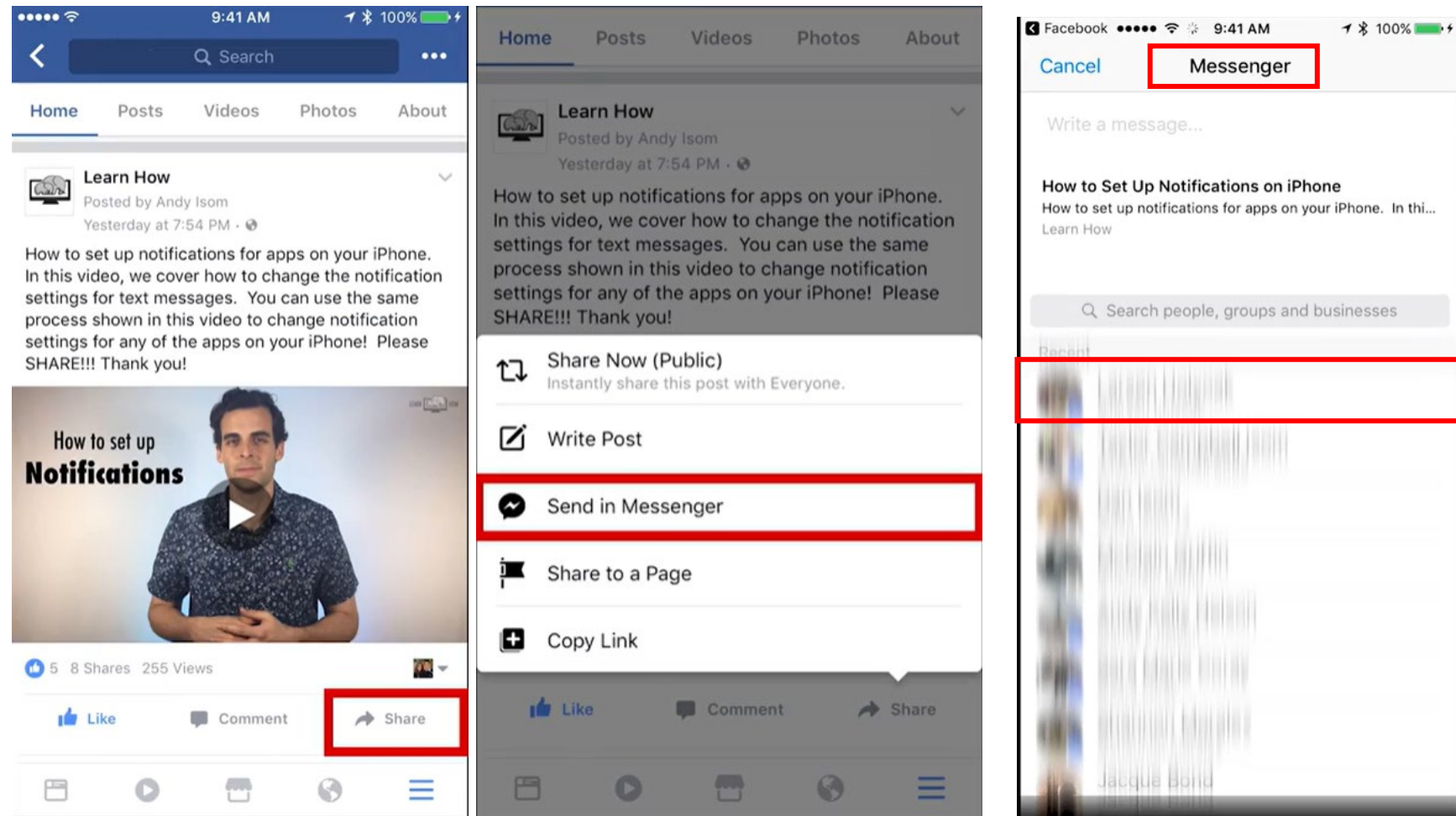
The Messenger Platform is free for you to use.

A place for
meaningful
conversations

Messenger helps you connect with your Facebook friends and family, build your community, and deepen your interests.

9. A method according to claim 1, further comprising: on a user-entered command, causing a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.

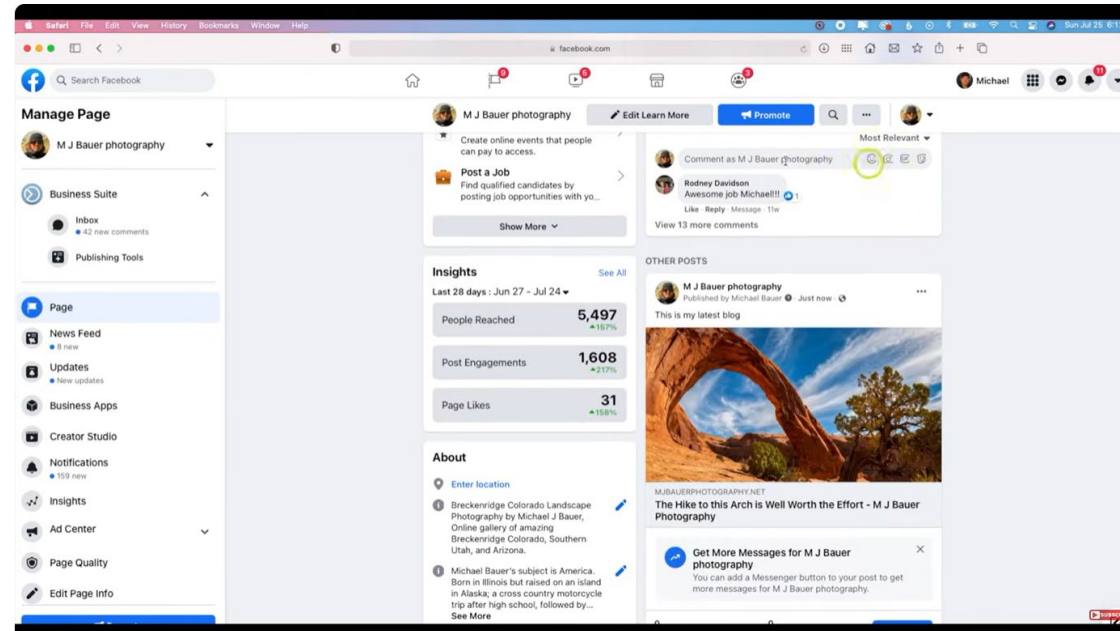
- On a user entered command, Defendant causes a card to be shared with another user via an instant message sent through an integrated instant messaging system as a result of graphical selection by a first user.
- Defendant practices this limitation by causing a card to be shared with another use via Facebook Messenger which is an integrated instant messaging system in response to a graphical selection by a first user.



10. A method according to claim 1, further comprising: displaying in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user; also displaying in the computing device of the first user, a second view of a second set of cards, outside of the first collection, wherein any given member of the second set of cards is both included in a collection of another user and the other user has been selected by the first user; and wherein each of the cards in the second view can, on a user-entered command, be caused to be copied to the first view.

- Defendant displays in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user; and also displays in the computing device of the first user, a second view of a second set of cards, outside of the first collection, wherein any given member of the second set of cards is both included in a collection of another user and the other user has been selected by the first user, and wherein each of the cards in the second view can, on a user-entered command, be caused to be copied to the first view.

- Defendant practices this limitation by providing users with a first view of their timeline or wall and a second view of another user's wall and also providing its "Share" button which allows any of the cards in the second view to be copied to the first view.



See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

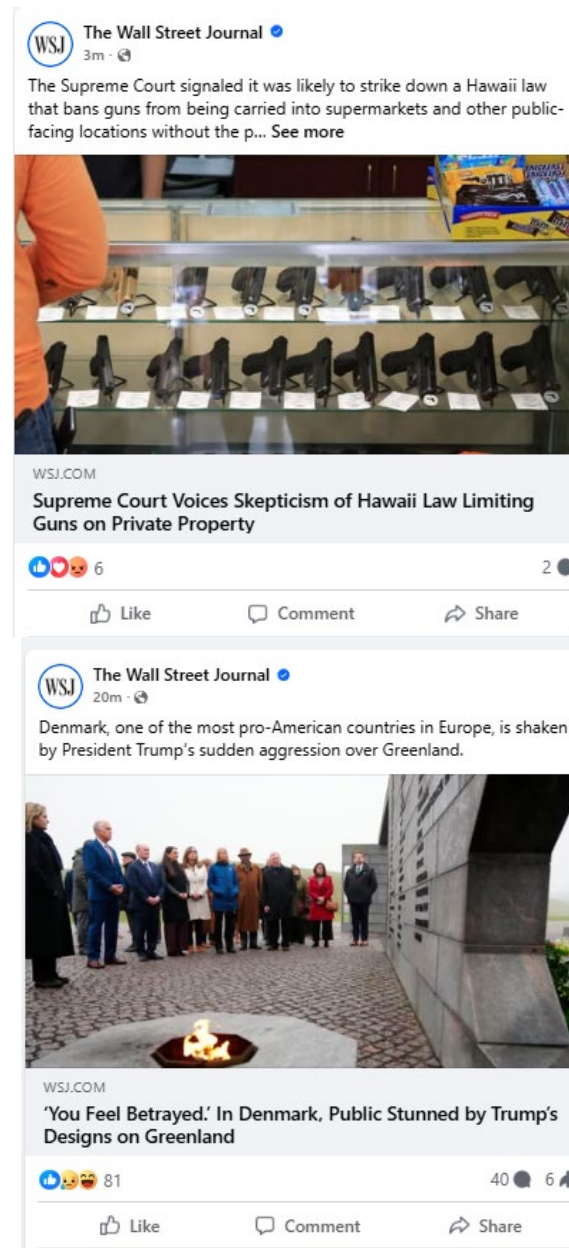
See <https://www.facebook.com/WSJ/>



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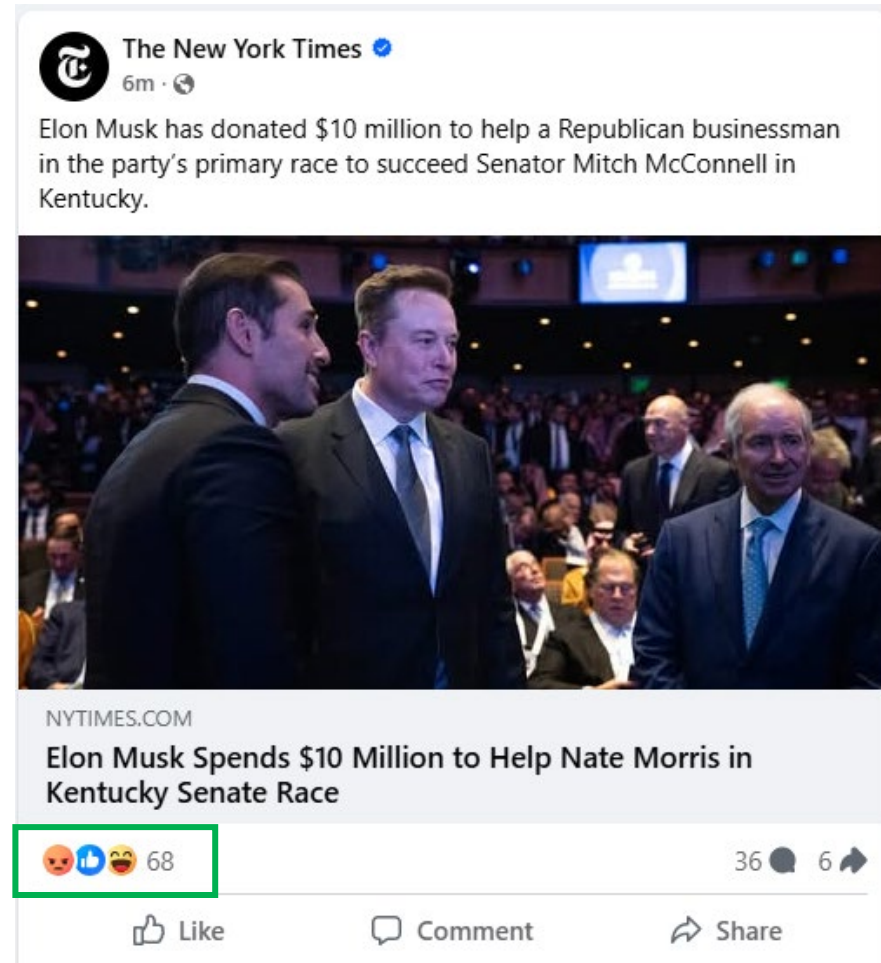
11. A method according to claim 10, further comprising: wherein each of the cards in the second view is displayed in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.

- Defendant's method displays cards in the second view in an order determined by a criterion selected from the group consisting of the information object's creation time, its access time, and combinations thereof.
- Defendant practices this limitation at least by displaying cards in the second view in order of the information object's creation time. For example, when viewing The Wall Street Journal's page, Defendant displays the cards in order of the information object's creation time and intentionally places the most recent posts at the top of the second view.



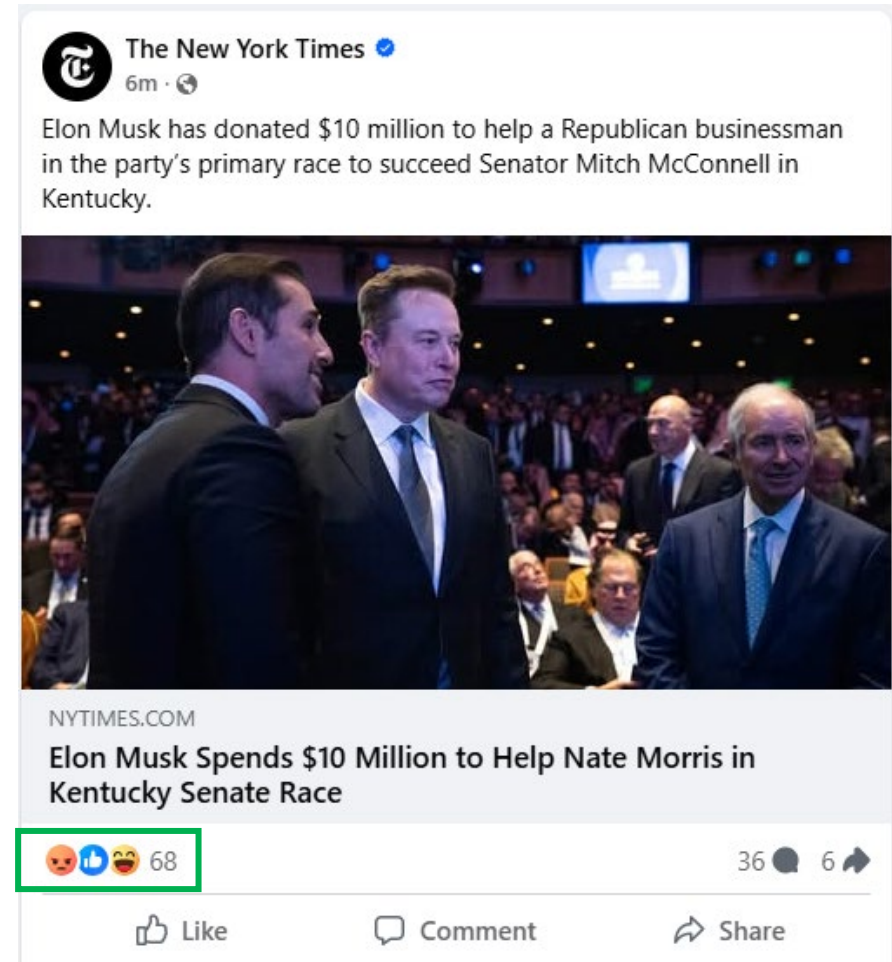
12. A method according to claim 1, wherein the set of indicators includes: **an indicator reflecting voting activity associated with the card.**

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting voting activity associated with the card.
- Defendant practices this limitation by providing an indicator reflecting the number of people who have liked, reacted, or otherwise voted on information associated with the card.



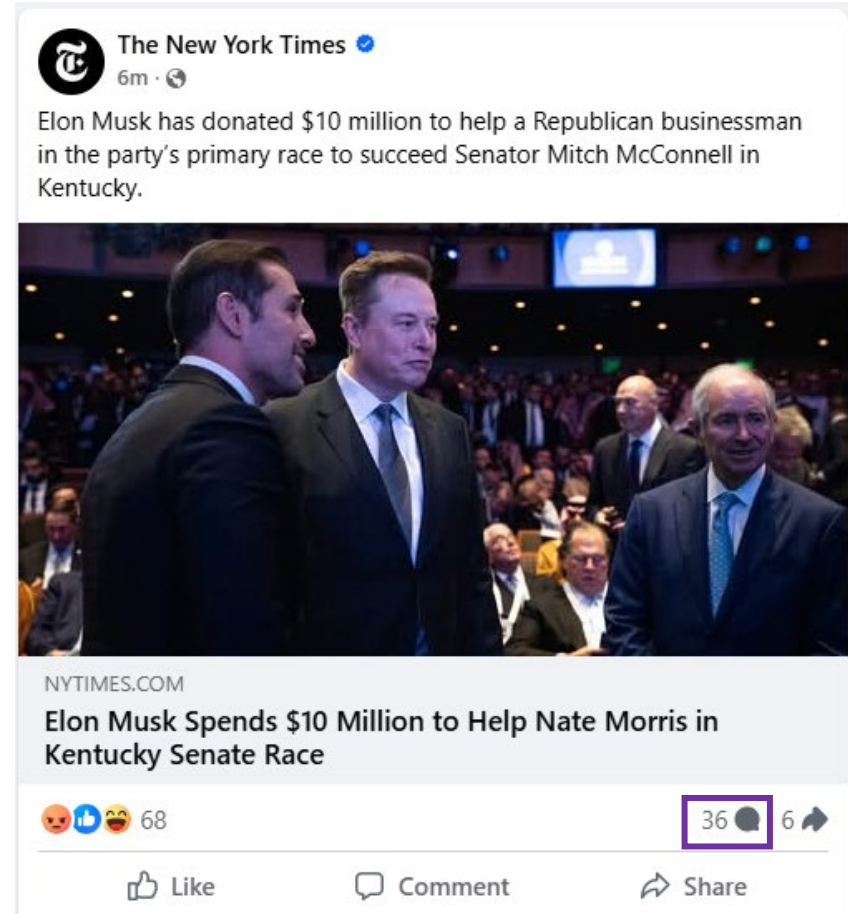
13. A method according to claim 12, wherein the indicator reflecting voting activity associated with the card provides a numeric count of the voting activity.

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting voting activity wherein the indicator provides a numeric count of the voting activity.
- Defendant practices this limitation by providing an indicator which provides a numeric count of the users who have liked, reacted, or otherwise voted on information associated with the card.



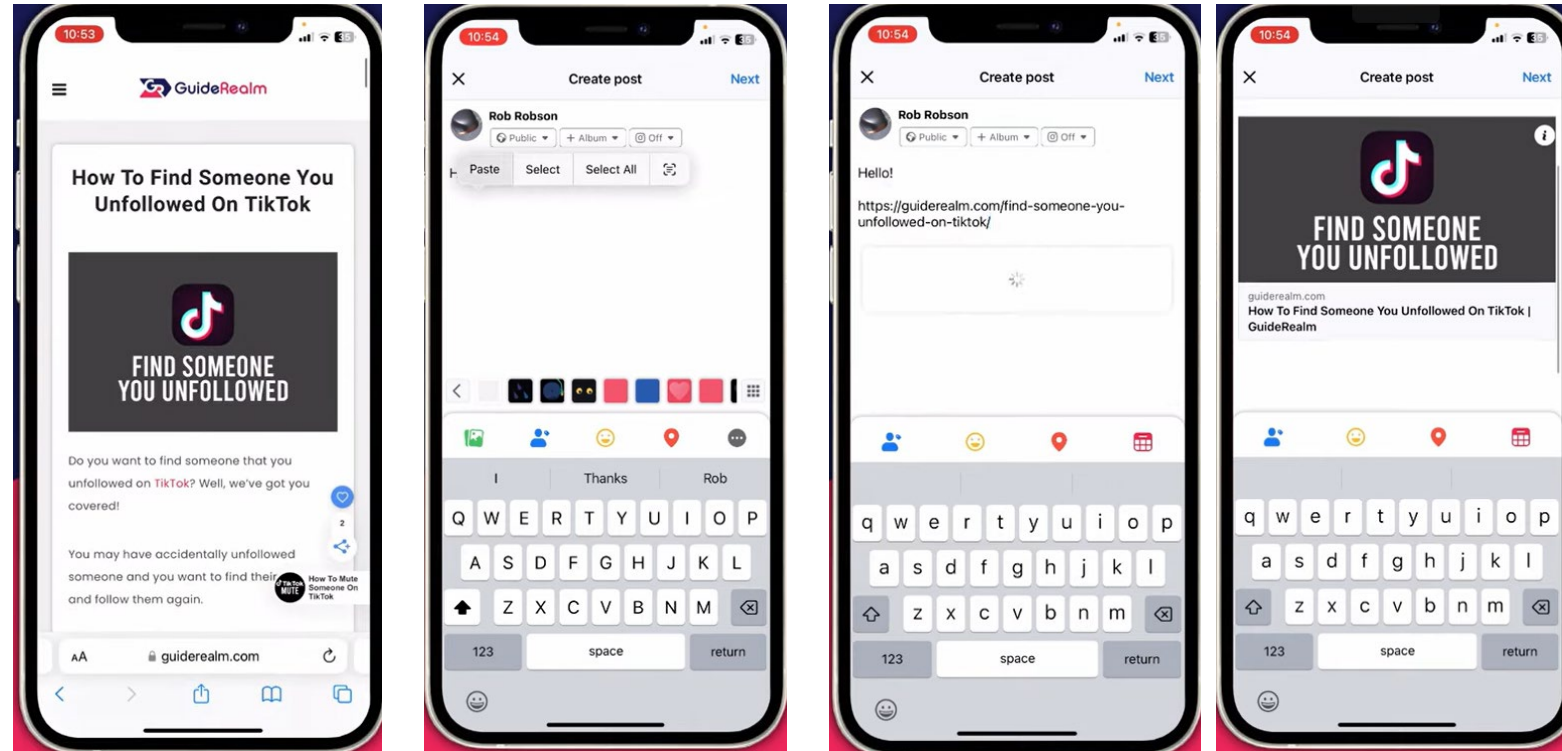
15. A method according to claim 1, wherein the indicator reflecting commenting activity associated with the card provides a numeric count of the commenting activity.

- Defendant's computer-implemented method further comprises a set of indicators including an indicator reflecting commenting activity associated with the card which provides a numeric count of the commenting activity.
- Defendant practices this limitation by providing an indicator reflecting the numeric count of the commenting activity on a given card.



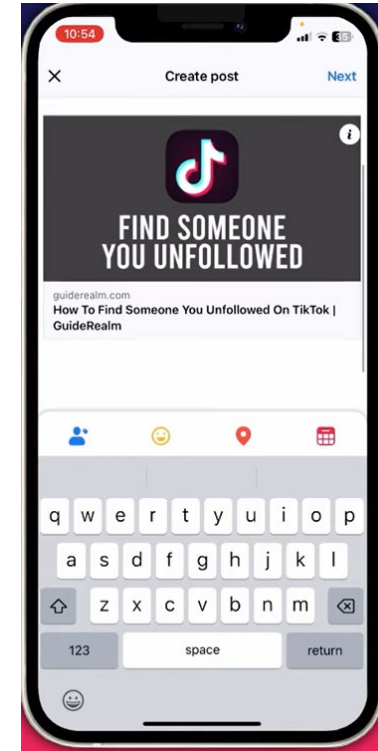
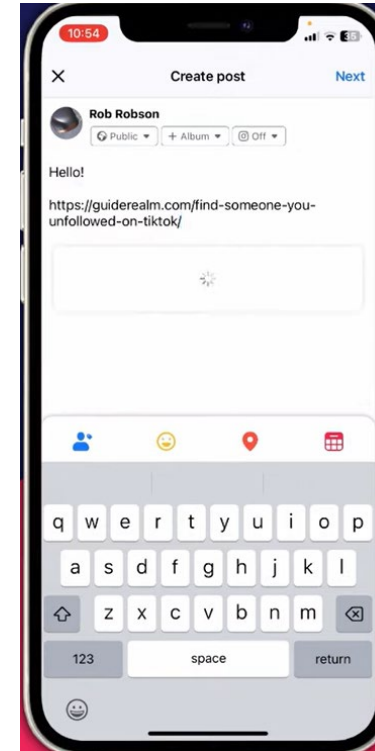
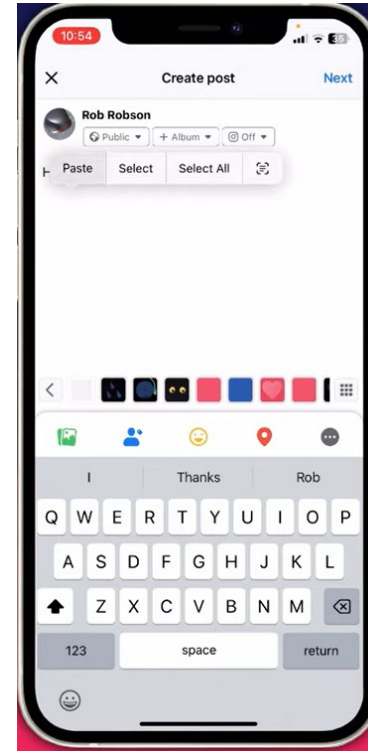
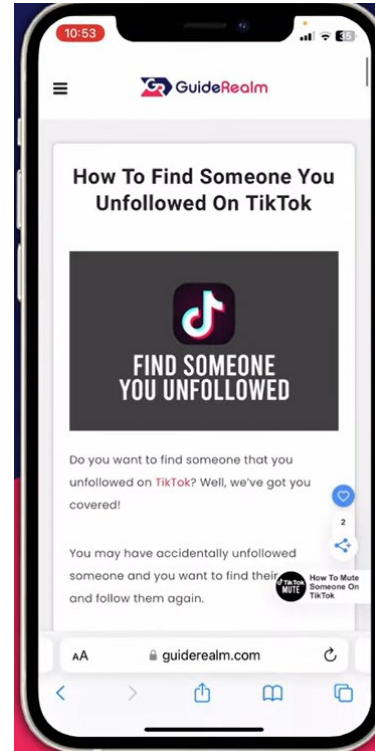
17. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method. Defendant infringes the accused method in at least two scenarios.
- In the first scenario, Defendant provides a mobile application which contains software resident on a user's device. This can include applications resident on a range of consumer electronic devices, including but not limited to smartphones, tablets, computers, and laptops.
- In the second scenario, Defendant allows access to its Facebook website platform via a browser. Defendant's website platform is similarly accessible via the web browser of a range of consumer electronic devices including but not limited to smartphones, tablets, desktop computers, laptops, and smart tv's. This resident application software allows access to, and interacts with, Defendant's Facebook platform.
- Under both scenarios, Defendant practices (in whole or in part) the claimed method through execution of software instructions on its backend servers of its Facebook platform as explained further below.
- The infringing methodology set forth by this claim chart applies equally to both scenarios unless otherwise indicated. To be clear, the use of an exemplary photo showing infringement under the first or second scenario would equally apply to infringement under the other scenario.



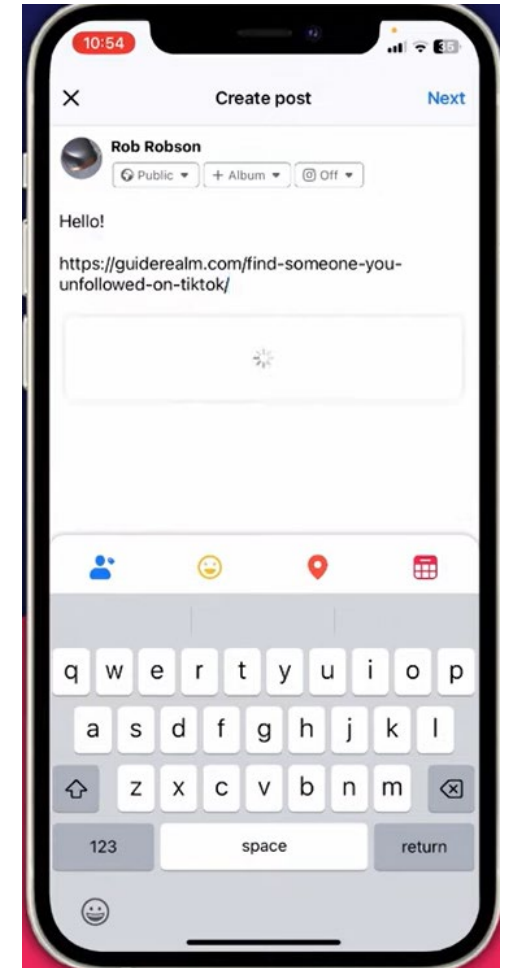
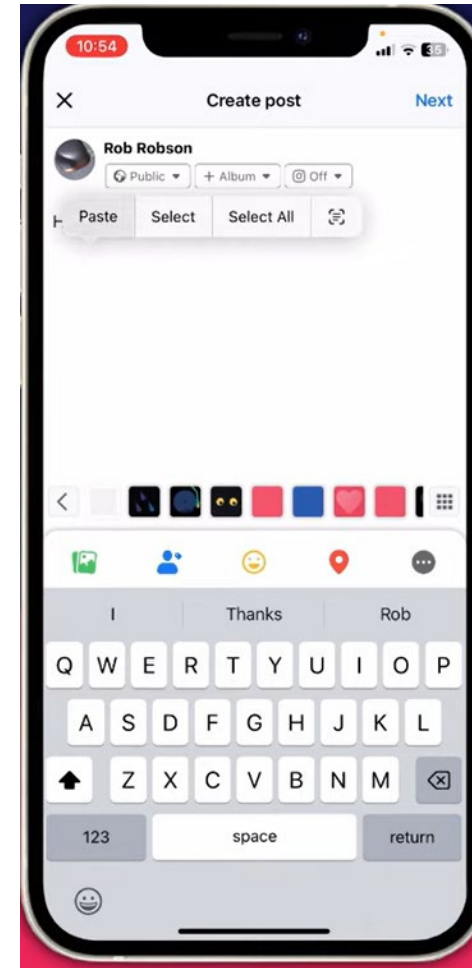
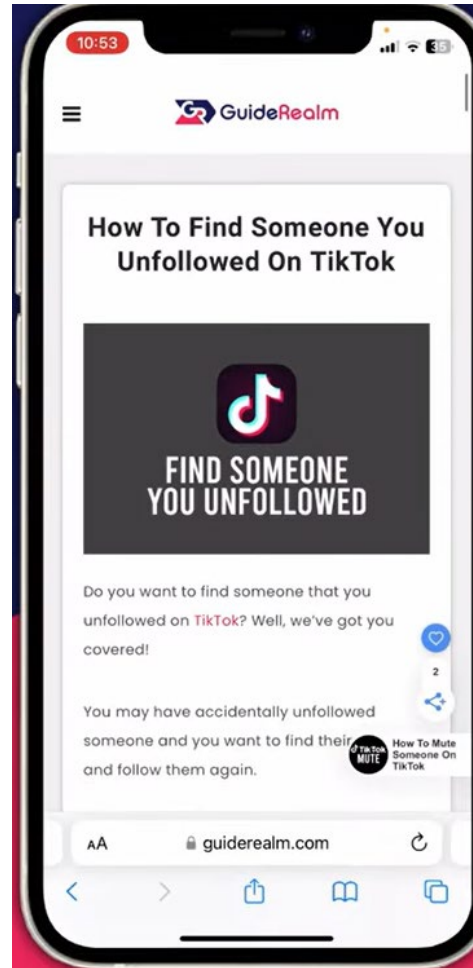
17. A computer-implemented method, in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, the computer processes comprising:

- Defendant through its provision of the Facebook application and/or website, practices the claimed computer implemented method in which at least one computer initiates execution of software instructions to perform computer processes, the method being for interacting with at least one data item obtained from at least one source, wherein the at least one source is external to the computer.
- The first photo represents a data item obtained from a source that is external to the at least one computer. In this example, the data item corresponds to an article hosted via a third-party website, namely, an article titled How to Find Someone You Unfollowed on TikTok via the website guiderealm.com.
- Photographs 2-4 represent the method whereby Defendant interacts with at least one data item obtained from at least one external source.



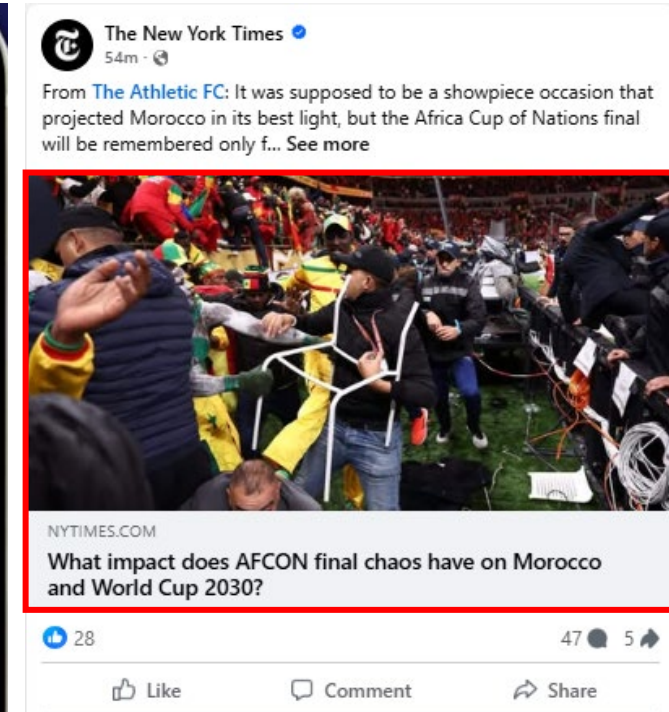
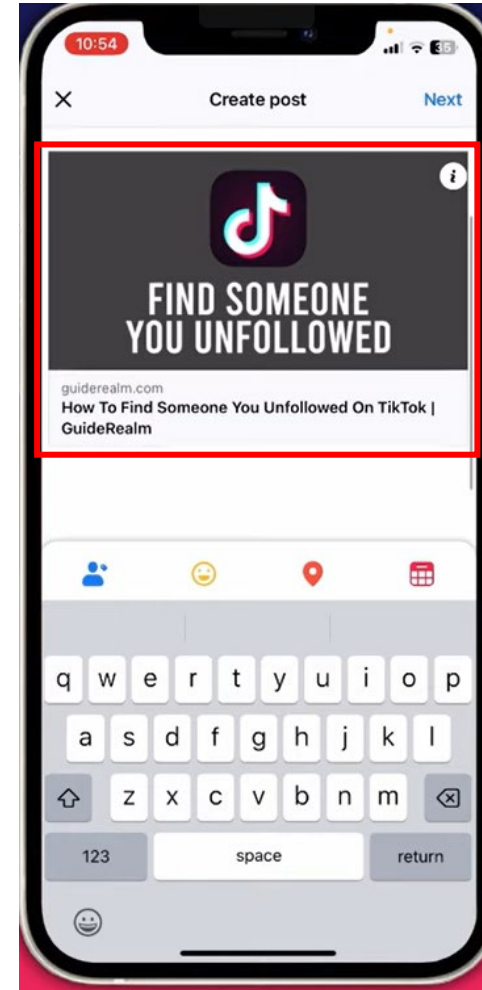
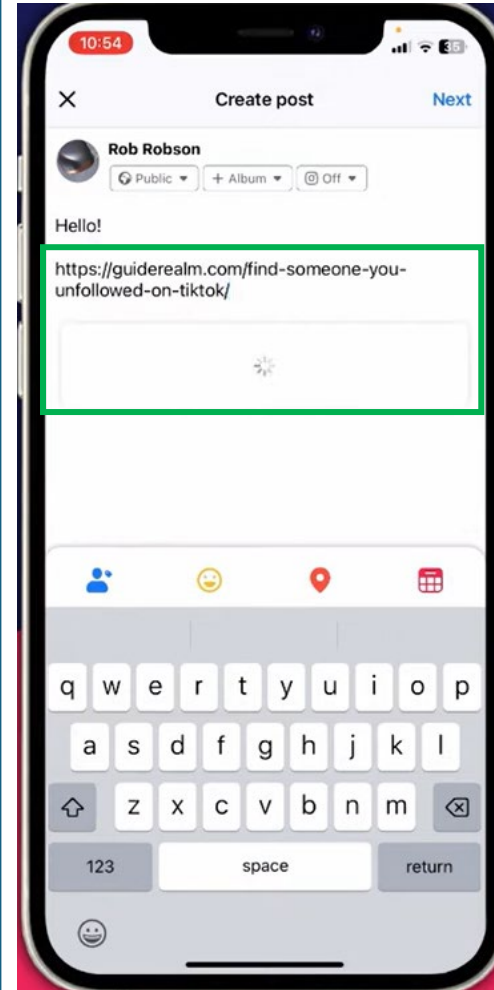
(a) responsive to a user selection of the at least one data item:

- Users may make a selection of a data item. In this example, the data item is the third-party web article entitled How to Find Someone You Unfollowed on TikTok.
- Defendant performs a series of steps in response to the user selection of the at least one data item.
- While users select data items, Plaintiff notes the user's selection is not an affirmative step of the claim. Instead, the claim's focus is on Defendant's actions "responsive to" the user selection.



(a)(i) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item, and causing storing of data corresponding to each of the information objects in a database system;

- Defendant causes configuring of each data item into a distinct information object by extracting from each data item extracted data including a picture and a heading, and causes storing of data corresponding to each information object, including a link to the at least one data item in a database. Upon information and belief, the storing occurs in Defendant's database through its backend servers or local software application.
- Responsive to the user pasting a link to an external source (Image 1), Defendant causes the configuring of a data item into a distinct information object (Image 2) by extracting from said data item extracted data including a picture and a heading, and causes storing of data corresponding to the information objects including a link to the data item in a database.
- In the second image, the distinct information object and its corresponding picture and heading are shown.
- Defendant causes storing of data corresponding to each of the information objects in its Facebook platform database system.
- In the third image, Defendant further causes storage of data corresponding to each information object in the database.

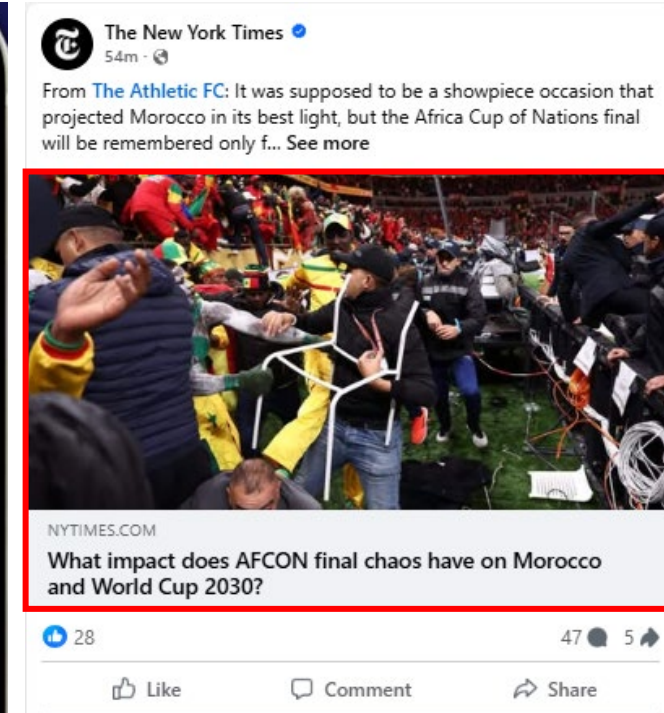
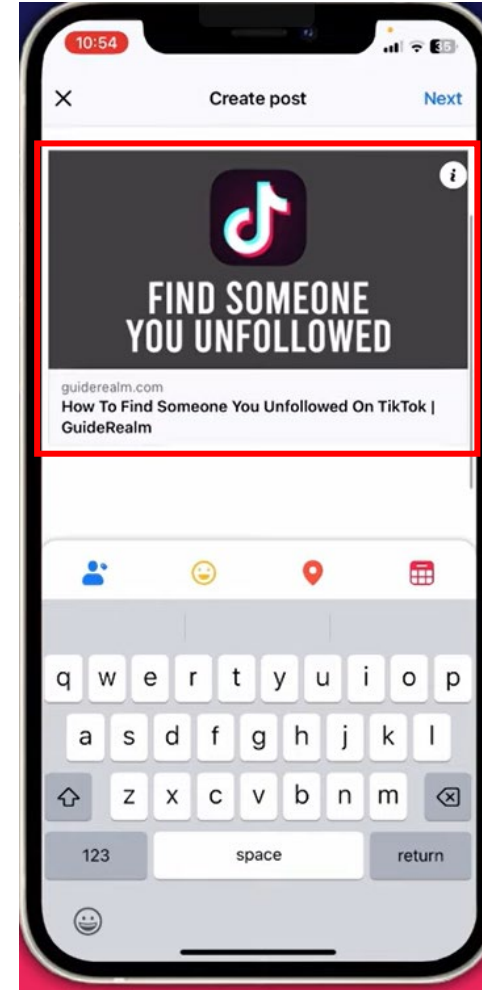
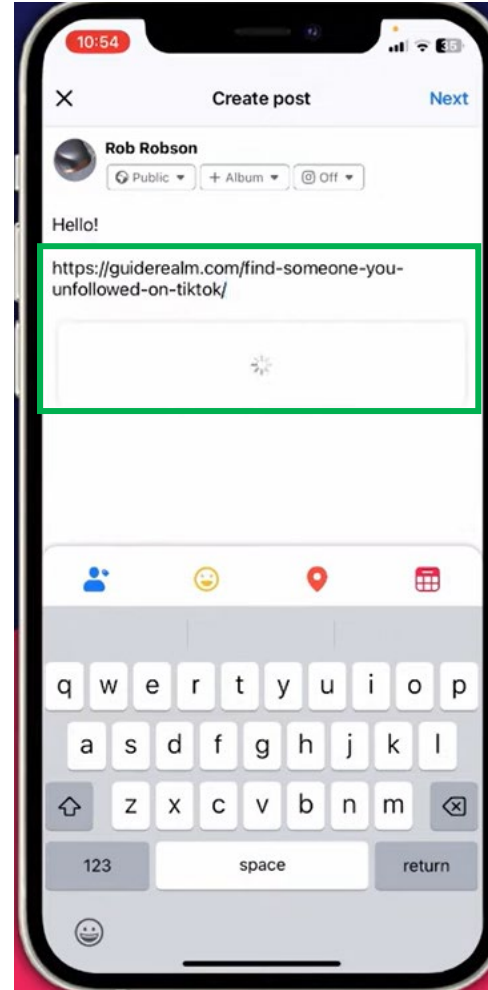


See <https://www.facebook.com/nytimes/>

See [How To Add Clickable Link On Facebook Post - Full Guide](#)

(a)(i) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item, and causing storing of data corresponding to each of the information objects in a database system;

- In the first scenario of infringement (App Scenario), Defendant's software resident on the user's device works in concert with Defendant's backend network to practice the limitations of the Asserted Claims.
- This resident software is found within the Facebook application which previously has been downloaded to the user device.
- On information and belief, the user device executes aspects of the application software in response to input from end users, which cause it to communicate to Defendant's backend servers.
- In this environment, the extracting of data comprising an image, heading, and/or link for a shared article may be performed by Defendant's application software and Defendant's backend servers.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user's device, those steps are performed automatically by Defendant. See Plaintiff's briefing on Defendant's motion to dismiss.

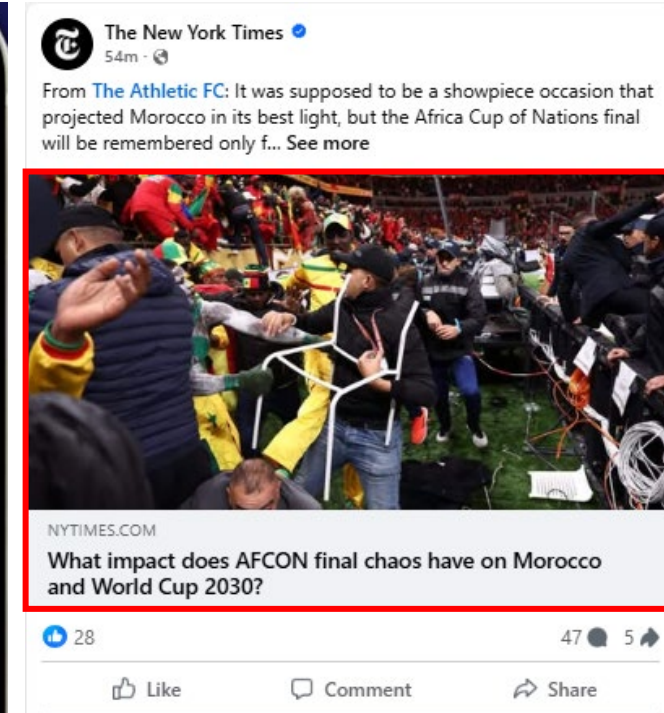
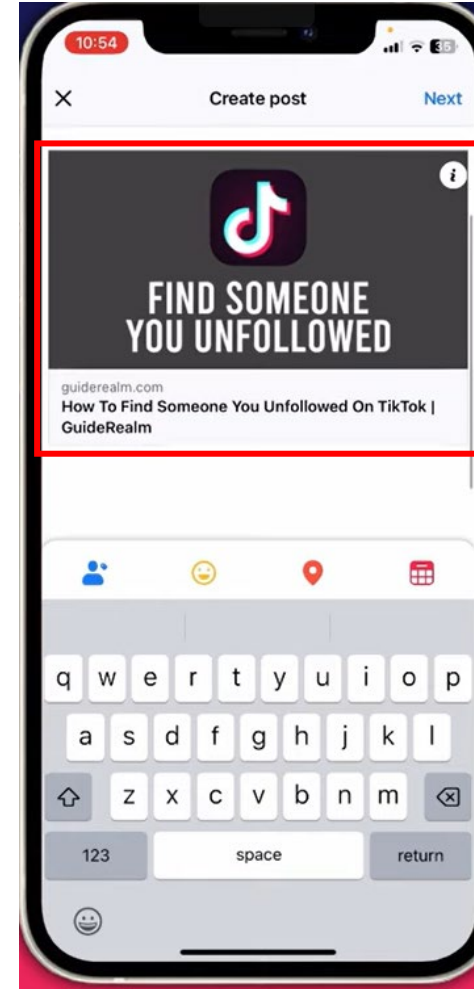
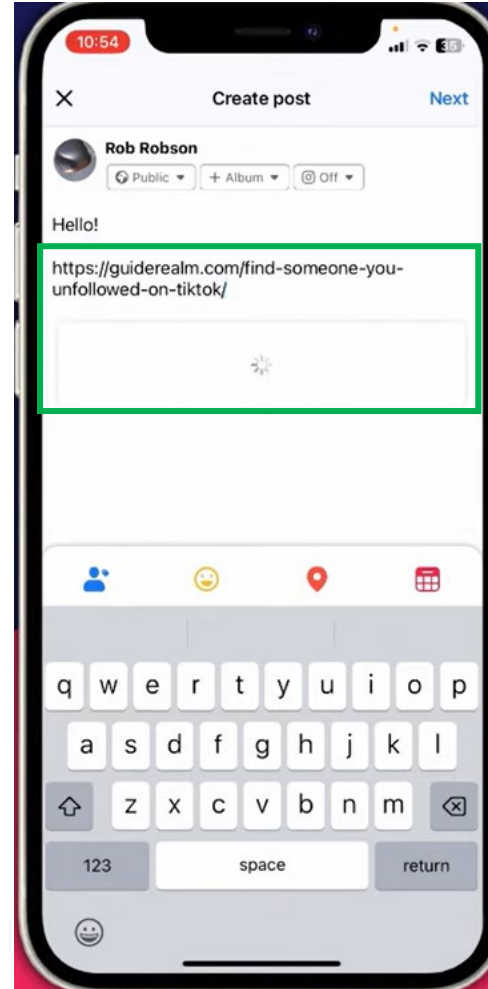


See [How To Add Clickable Link On Facebook Post - Full Guide](#)

See <https://www.facebook.com/nytimes/>

(a)(i) causing configuring of each of the data items into a distinct information object by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item, and causing storing of data corresponding to each of the information objects in a database system;

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook platform, e.g., backend servers to configure each of the data items into a distinct information object.
- On information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend does all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.

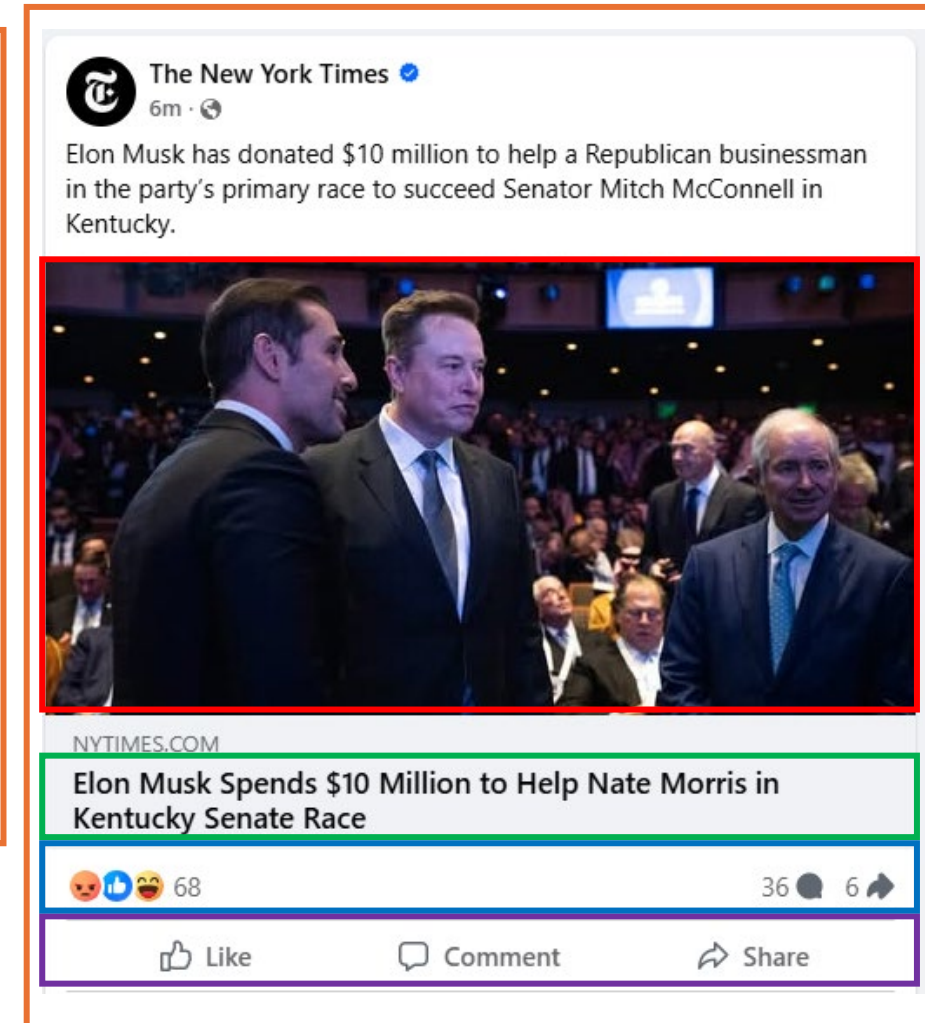
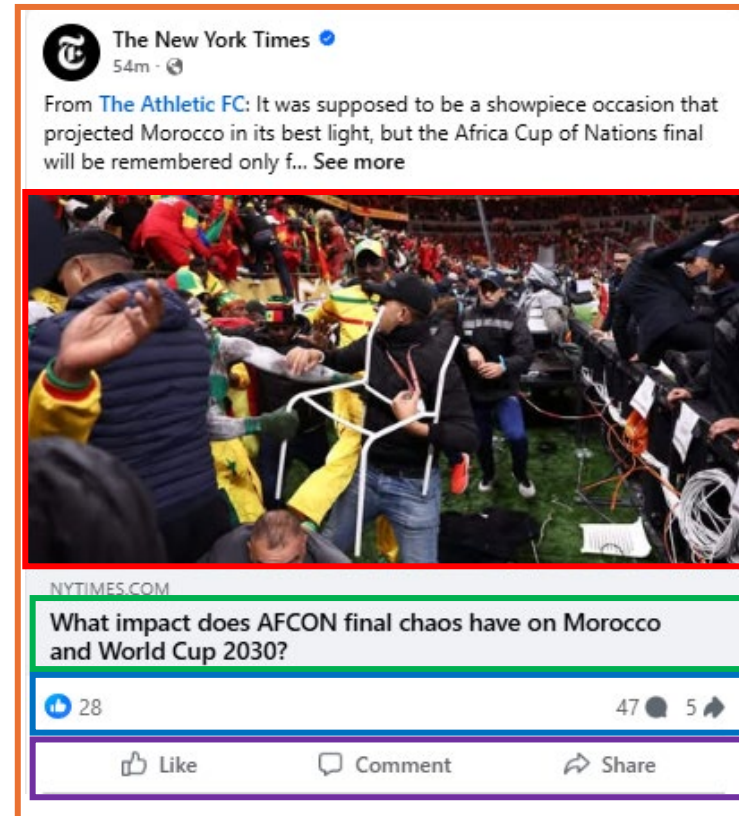


See [How To Add Clickable Link On Facebook Post - Full Guide](#)

See <https://www.facebook.com/nytimes/>

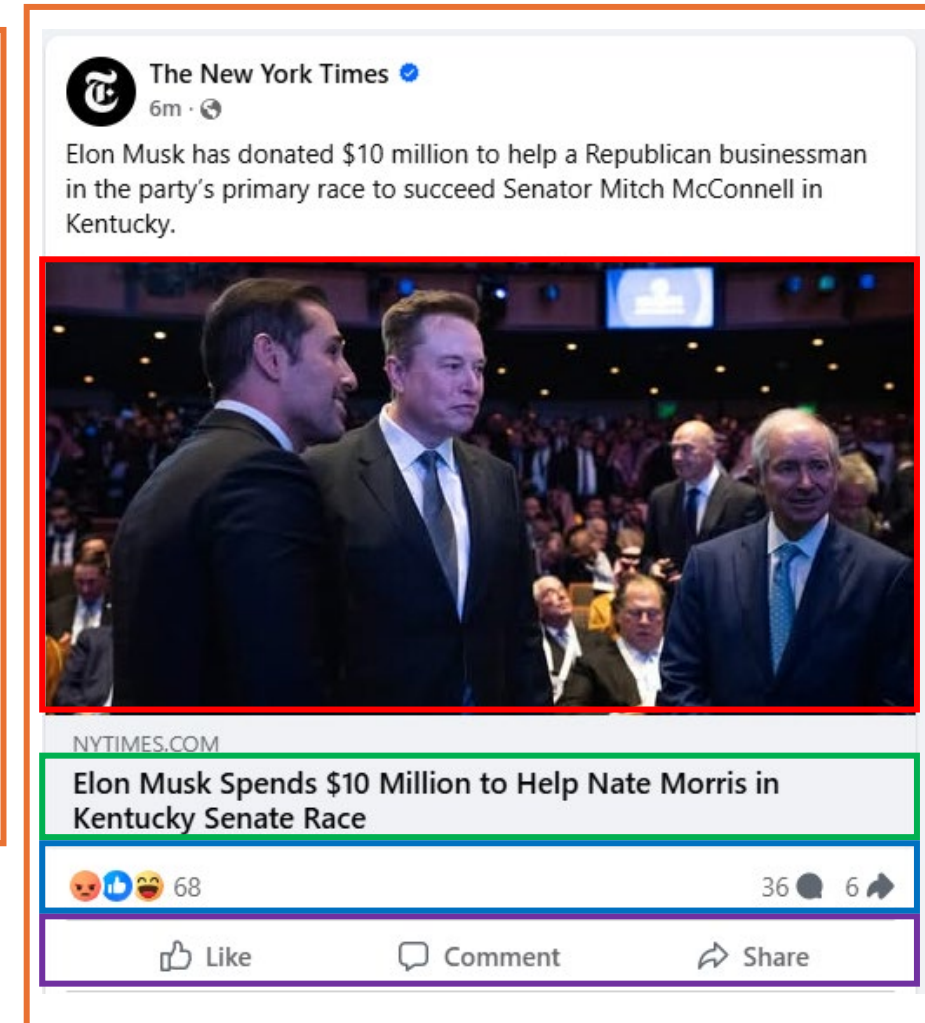
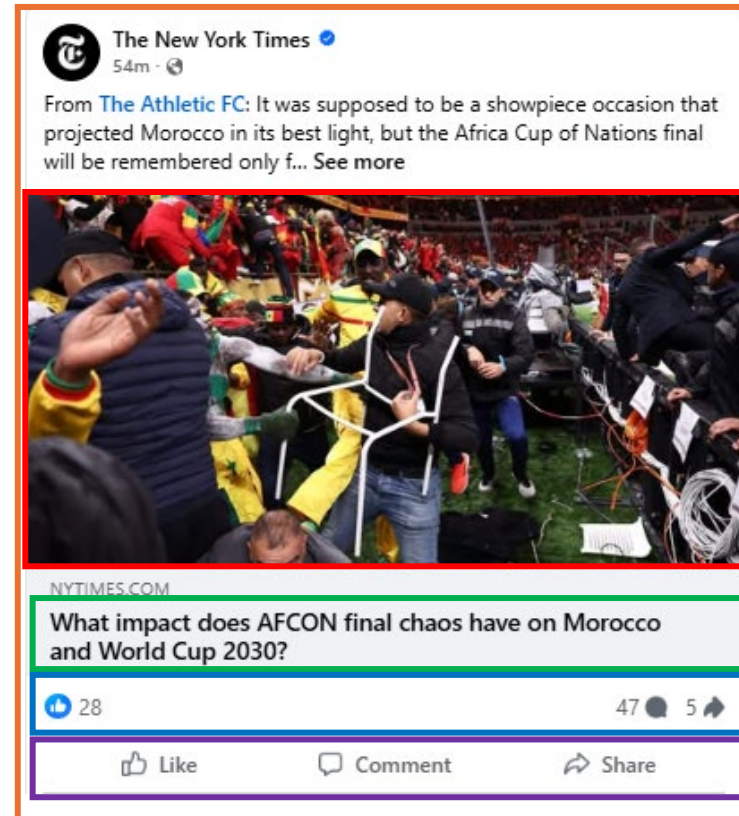
(a)(ii) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Defendant causes displaying of a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof the picture, the heading, a set of indicators, and a set of graphically accessible functions.
- Defendant's "Wall", "Timeline", "Profile", "Feed", and/or "Newsfeed" features cause the display of at least two information objects by the same or different users in the database system. For example, Defendant displays New York Times' wall which contains two or more information objects and is a part of Defendant's database system.



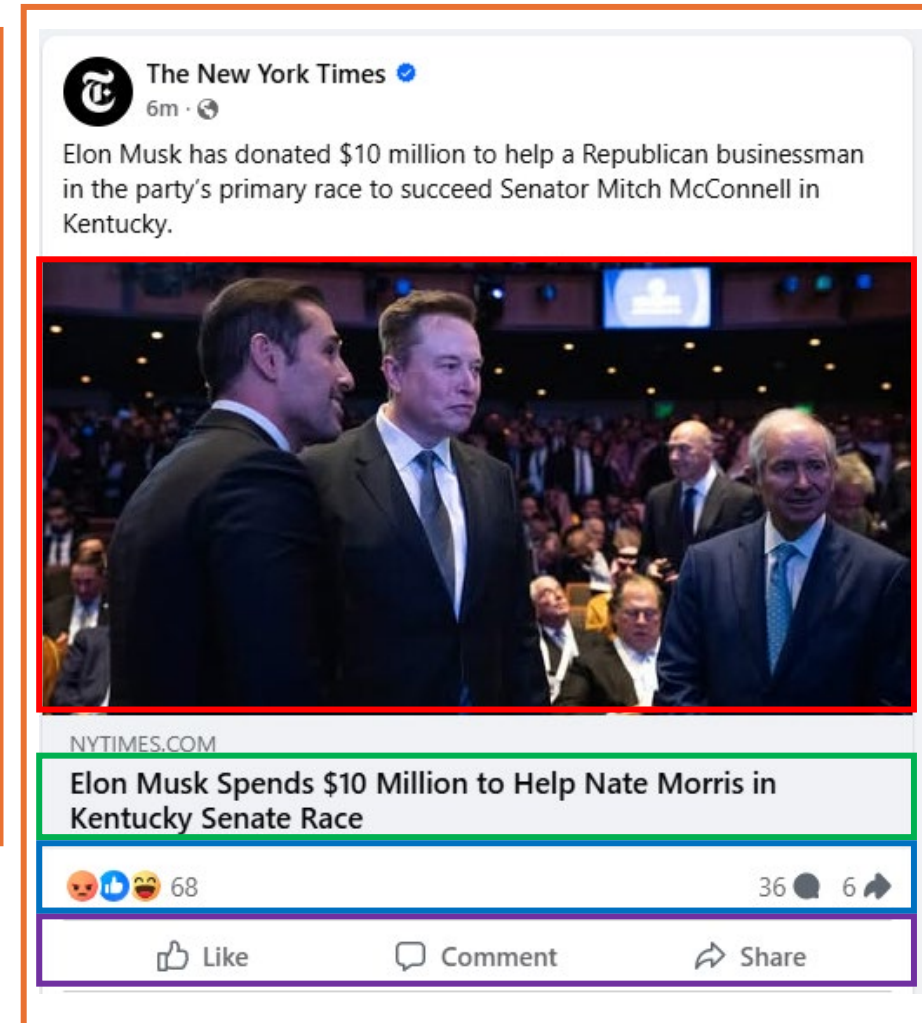
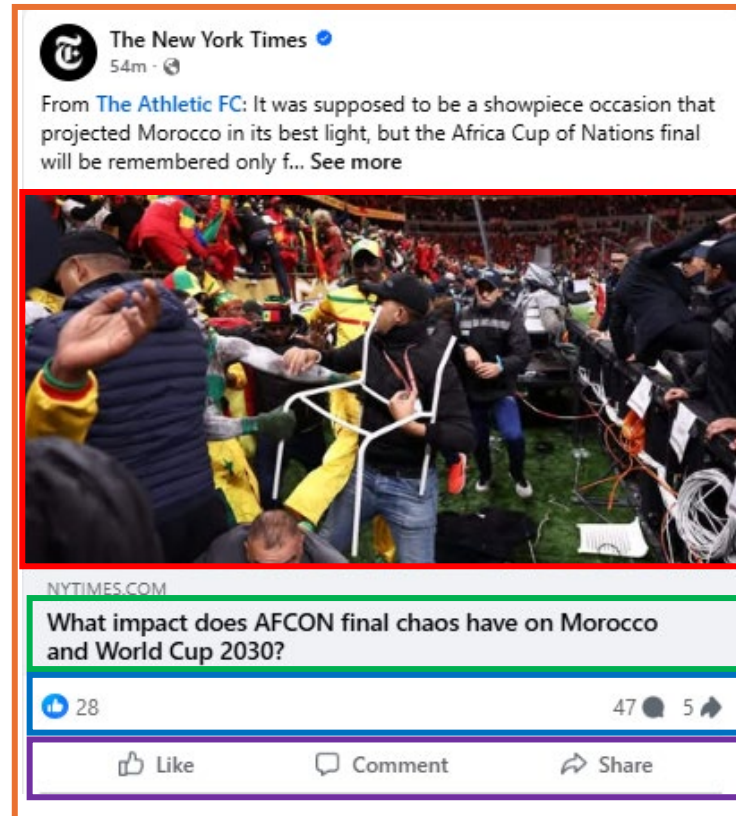
(a)(ii) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- Under the first scenario of infringement (App scenario), the claimed “displaying a representation” may also be performed in part on the user’s device through the execution of the local application software. The backend server network operates to store variable data for use by the application software to cause display of the representation.
- In this arrangement, Defendant directly infringes under the precedent set forth by *Sirf* and its progeny. To the extent limitations occur at the user’s device, those steps are performed automatically by Defendant. *See* Plaintiff’s briefing on Defendant’s motion to dismiss.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein all the above actions for this claim limitation on Defendant’s backend server, Defendant would nevertheless meet this limitation through the actions performed by its backend servers.



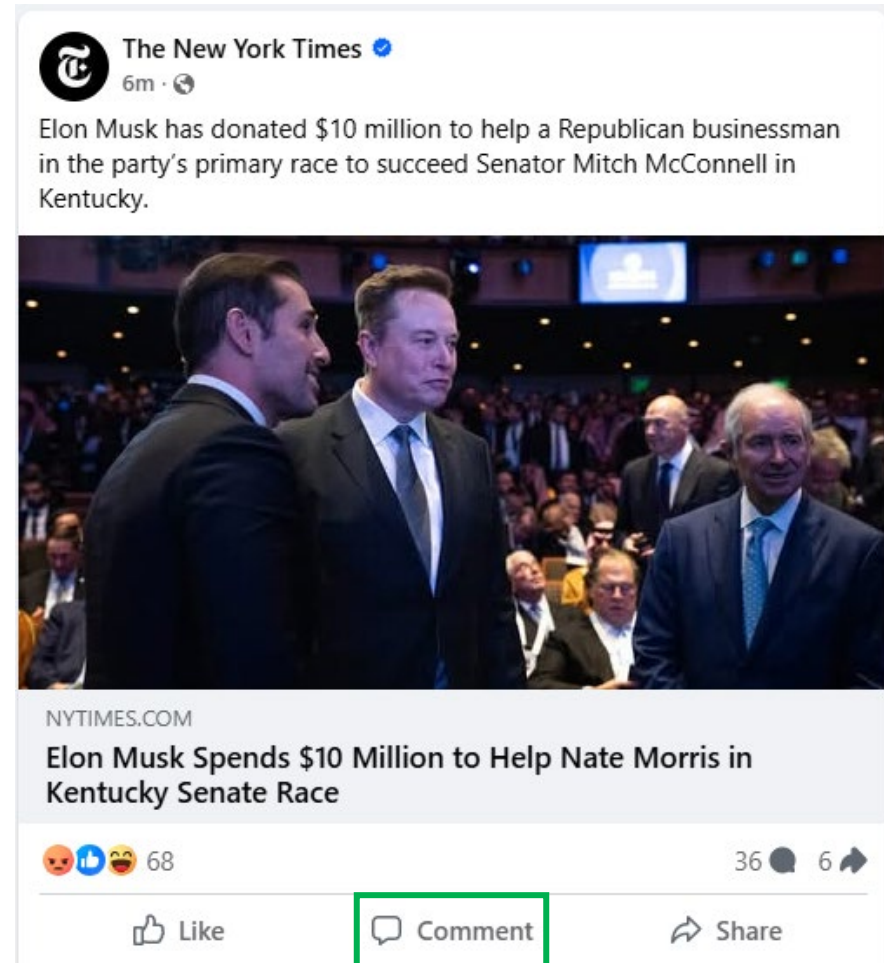
(a)(ii) displaying a representation of each of at least two of the information objects in the database system, the representation being in a uniform format, wherein the format includes a card, and, within the card, in uniform locations thereof, the picture, the heading, a set of indicators, and a set of graphically accessible functions including:

- In the context of the second scenario of infringement (Browser scenario), wherein end users are accessing Facebook using a web browser, the processing steps claimed are performed by the Facebook backend to display a representation of at least two of the information objects in the database system.
- On information and belief, no resident Facebook software exists on the computer or within the browser application. Therefore, Facebook backend does all of the processing and simply communicates the results to the browser application for display.
- These preliminary contentions are being provided in advance of receiving any internal technical information from Defendant. To the extent discovery bears out a situation wherein Defendant performs some of the claimed method on its backend servers and another portion occur automatically at the browser, Defendant similarly directly infringes the claimed method under the precedent set forth by *Sirf* and its progeny.



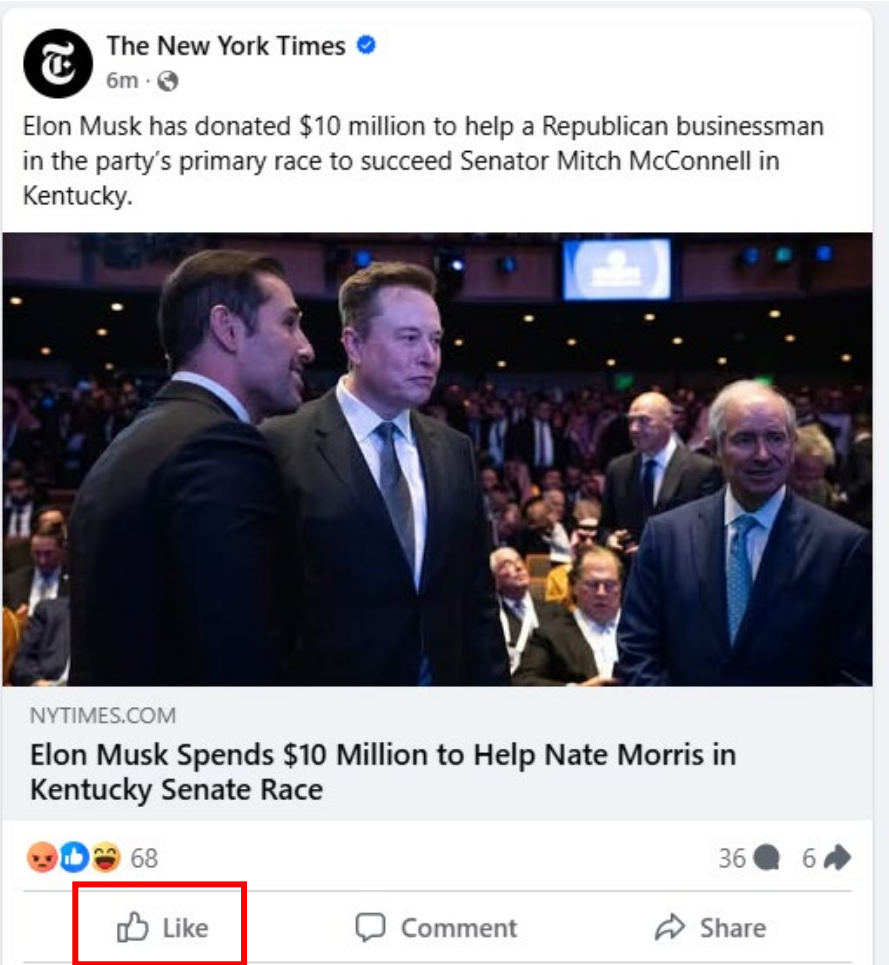
(a)(iii) a **comment function**, by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card;

- One of Defendant's graphical functions is a **comment function** by which users having access to the card comment function can exchange comments relating to the card, such comments being associated with the information object represented by the card.
- Defendant practices this limitation by providing a comment function in a uniform location of the card which allows for comments associated with the information object.



(a)(iv) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- One of Defendant’s graphical functions is a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card.
- Defendant practices this limitation by providing its “Like” button which facilitates users’ voting for the card with such votes being associated with the information object represented by the card.



(a)(iv) a **vote function**, by which users having access to the card vote function can vote for the card, such votes being associated with the information object represented by the card;

- Defendant further provides users with the opportunity to react to cards which facilitates users' voting for the card with such reactions or votes being associated with the information object represented by the card.
- As explained by Defendant's public literature, Defendant provides users having access to cards the opportunity to react to the information object represented by the card by allowing them to hover over Defendant's like button and select their desired reaction or vote.

Liking tells your friends that you enjoyed their post or comment, while reacting allows you to specify your response. You can only leave one reaction per post or comment.

To react to a post or comment:

1. Go to the post or comment you want to react to.
2. Hover over **Like** and choose a reaction. The most popular reactions appear below the post or comment as icons (example: 👍❤️😂).



Like



Love



Haha



Wow



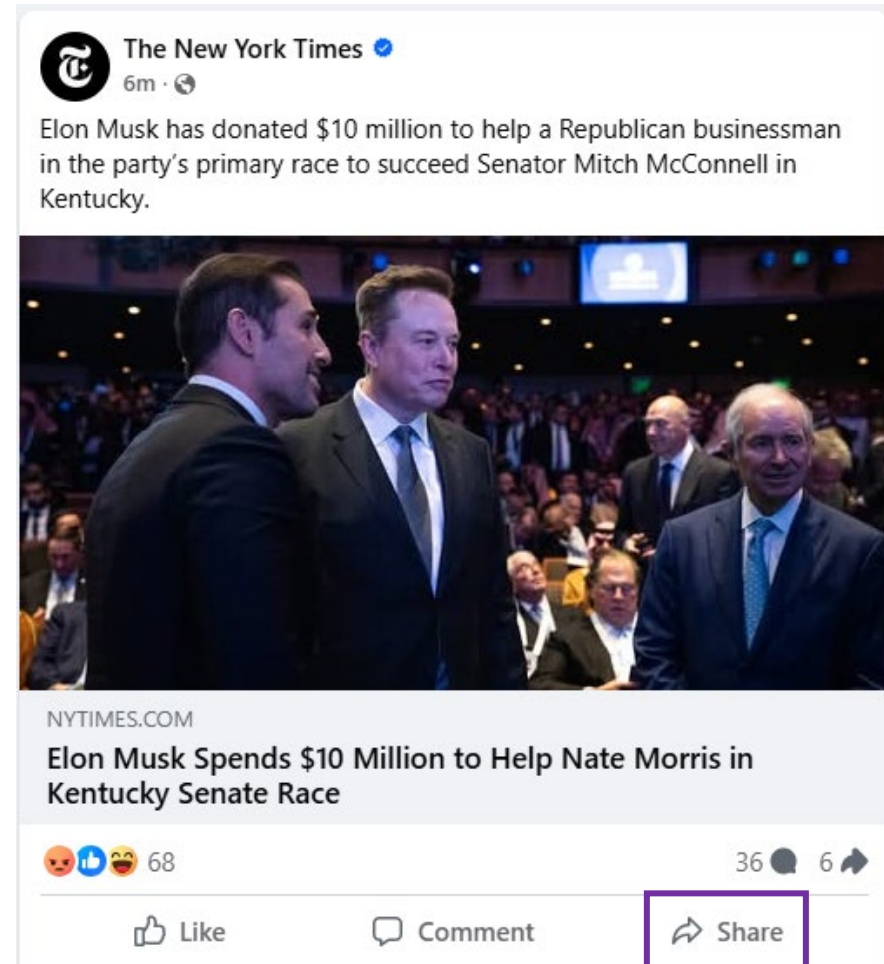
Sad



Angry

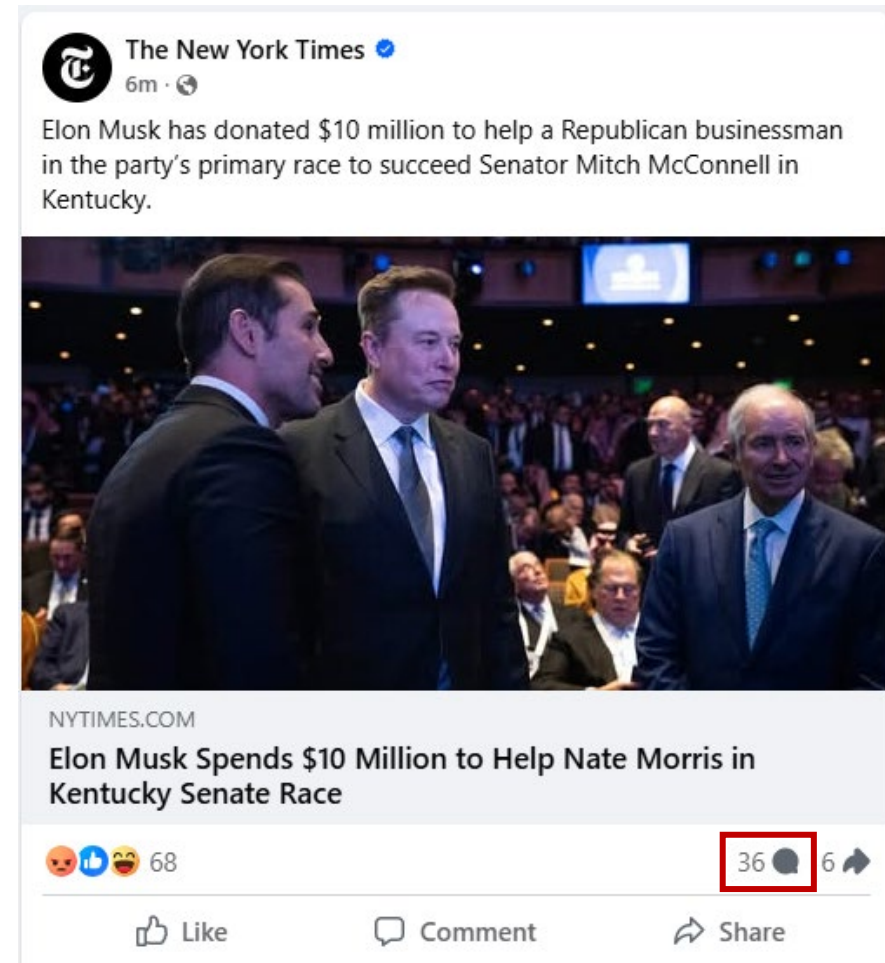
(a)(v) a **copy function**, by which users having access to the card copy function in a first collection of cards can cause the card to appear in a second collection of cards; and

- One of Defendant's graphical functions is a copy function, in this example a "Share" button, by which users having access to the card copy function in a first collection of cards of a first user can cause the card to appear in a second collection of cards of a second user.
- Defendant practices this limitation by providing its "Share" button which allows users having access to the Share button to cause the card to appear in a second collection of cards.



(a)(vi) wherein the set of indicators includes: an indicator reflecting commenting activity associated with the card; and

- Defendant's set of indicators includes an indicator reflecting commenting activity associated with the card.
- Defendant's indicator shows the number of comments that have been posted that are associated with the card.



- (b) wherein the database system has been configured to allow
- (b)(i) each user to have at least one user-selected collection of cards representing information objects in the database system and
- (b)(ii) at least some content of cards, including any associated picture and heading, regardless of the collections in which they may have first appeared, to be made accessible and copyable across card collections of users.
- Defendant configures its database system to allow each user to have at least one user-selected collection of cards representing information objects in the database system and cards, regardless of the collections in which they have first appeared, to be made accessible and copyable across card collections of different users. Note, Defendant's "database system" may be made up of multiple databases or otherwise arranged in a distributed database.
 - Defendant practices this limitation by allowing users such as the New York Times to maintain a user-selected collection of cards representing information objects. For example, the New York Times maintains its collection at: <https://www.facebook.com/nytimes/>
 - Although the cards are maintained in their user-selected collection, the cards may be made accessible and copyable across card collections in part due to Defendant's **Share button** which allows for the cards to be copyable across collections of different users.



See <https://www.facebook.com/nytimes/>

18. A method according to claim 17, wherein the extracted data from each data item includes at least the picture and the heading and wherein the heading is included within the card.

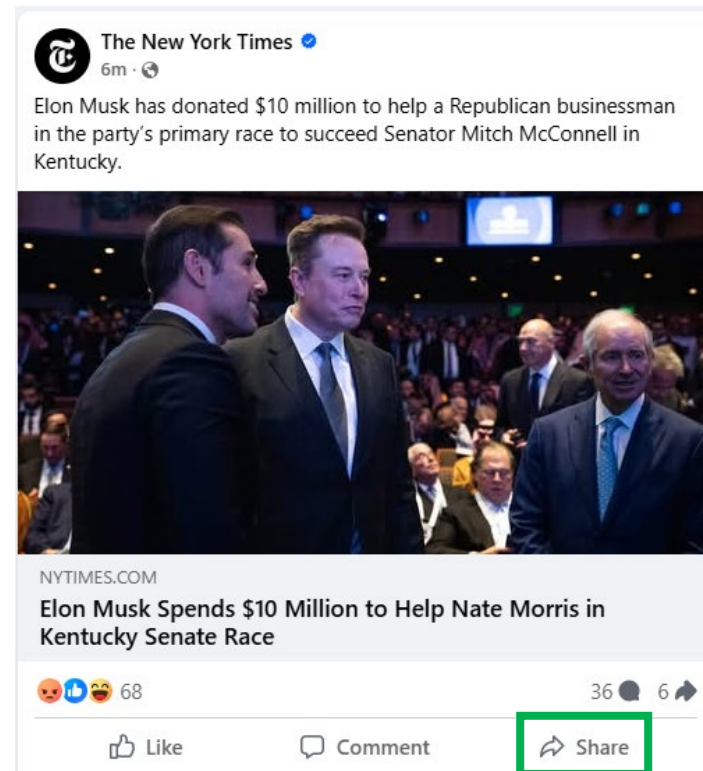
Defendant extracts data from each data item including at least a picture and heading, the heading being included in Defendant's card format.

In the example to the right, the title and the picture are both extracted by Defendant from The New York Times's data item.

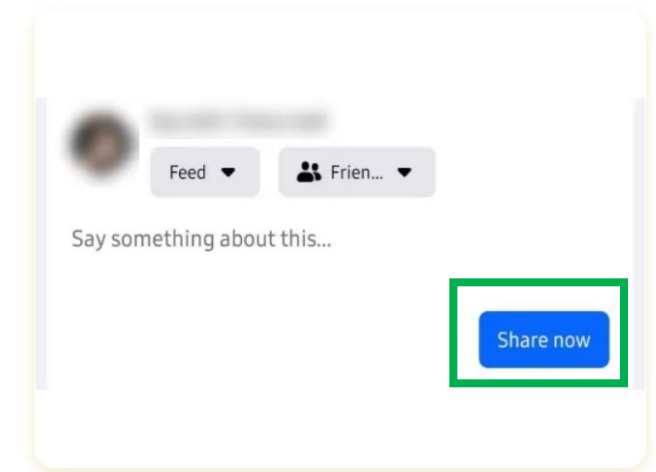


19. A method according to claim 17, the computer processes further comprising: displaying a graphical button, which, when invoked while content is being displayed, causes the displayed content to be handled as one of the data items, namely, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.

- Defendant's computer-implemented method further comprises displaying a graphical button, which, when invoked while content is being displayed, causes the displayed content to be handled as one of the data items, namely, by configuring the displayed content as a new information object and making a representation of the new information object available for display in the uniform format.
- Defendant displays graphical buttons, namely Defendant's "Share" and "Share now" buttons which when invoked configure the displayed content as a new information object and makes a representation of the new information object available for display in the uniform format. Defendant's "Share now" button becomes available upon a user's selection of Defendant's copy function or Share button and when invoked configures the displayed content as a new information object available for display in the uniform format.



- If you want to reshare the post without making any changes, select **Share Now**.

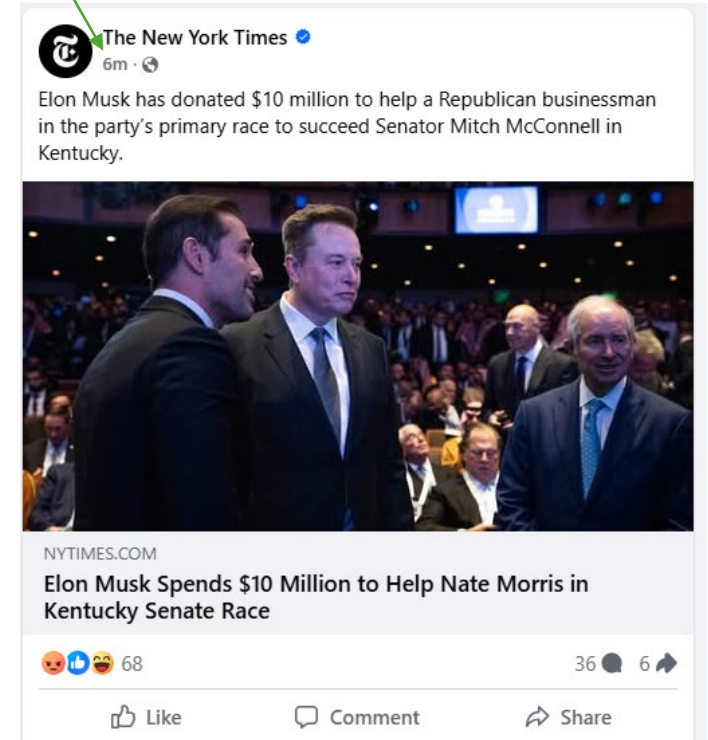


<https://recurpost.com/blog/how-to-repost-on-facebook/>

See <https://www.facebook.com/nytimes/>

20. A method according to claim 17, wherein the format includes **within the card an indication of a date of creation.**

- Defendant's computer-implemented method further comprises a format which includes within the card an indication of a date of creation as exemplified on the right.
- Defendant updates the time between the date of creation of a card and the present. Briefly after a card has been created, Defendant includes within the card an indication of the date of creation by referencing that the card was made a certain number of seconds, minutes, hours, or days ago. Further after a card has been created, Defendant includes within the card a specific date and time of the card's creation.
- For example, the Business Rocks Women card contains an indicator it was created on June 3rd at 2:20 AM and The New York Times card indicates that it was posted just 6 minutes ago.

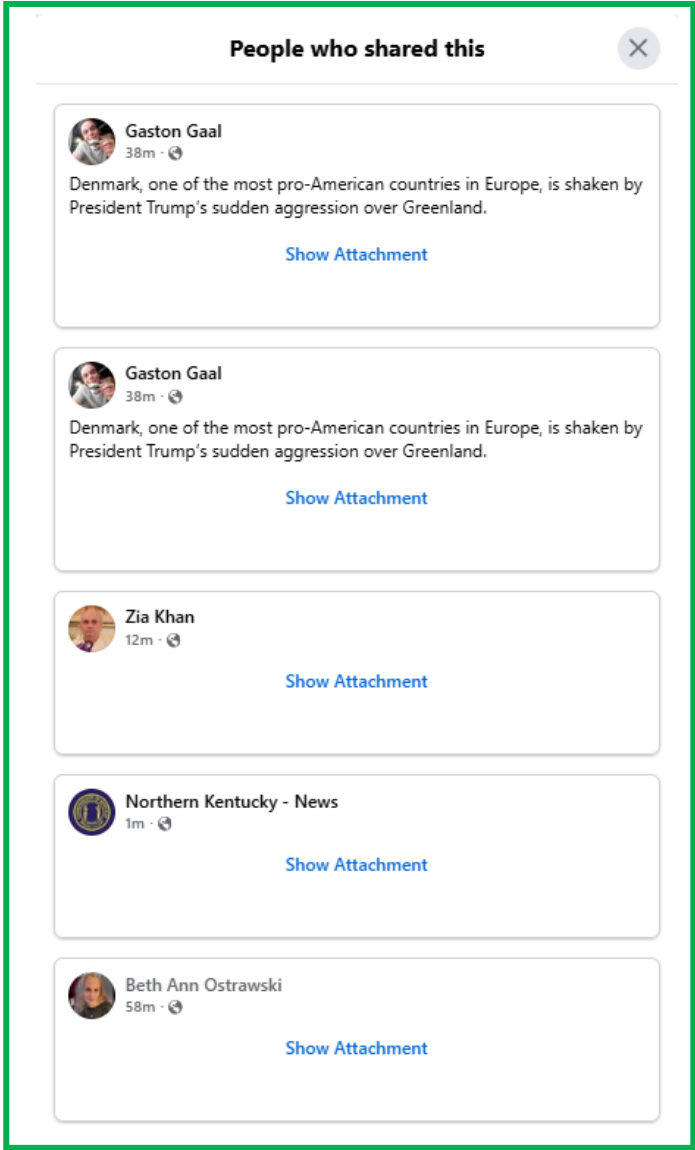
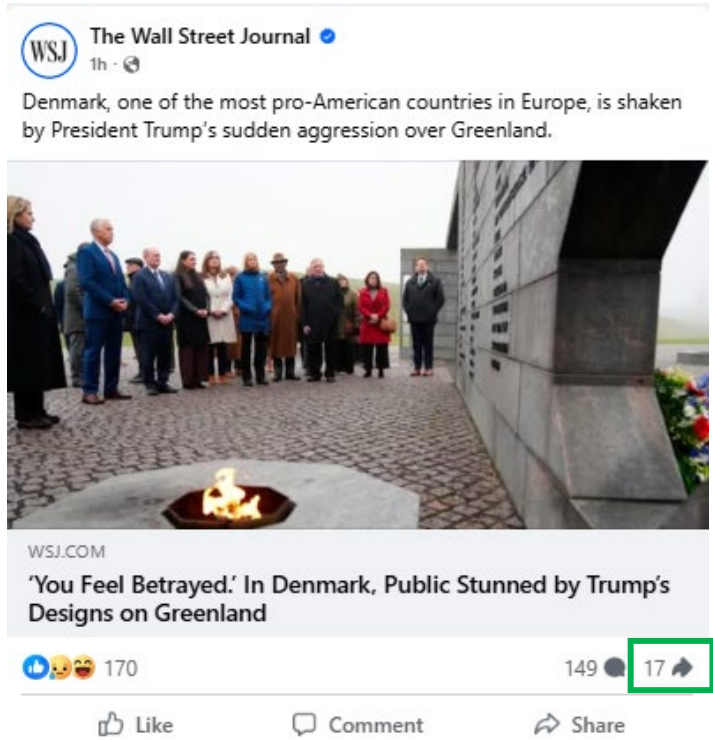


See <https://louisem.com/2541/post-link-on-facebook>

See <https://www.facebook.com/nytimes/>

21. A method according to claim 17, wherein the format includes a user-accessible report relating to users who copied the information object.

- Defendant’s computer-implemented method further comprises a format which includes a user-accessible report relating to users who copied the information object.
- Defendant’s uniform format includes a user-accessible report relating to the number of users who have copied or shared the information object.

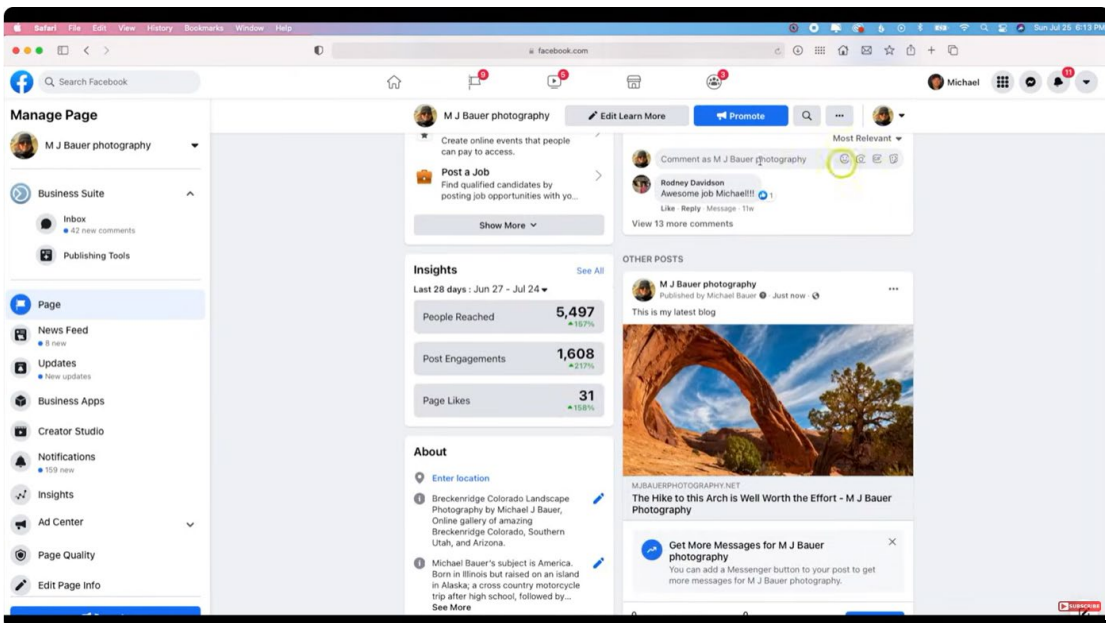


22. A method according to claim 17, further comprising: displaying in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user; also displaying in the computing device of the first user, a second view of a second set of cards that constitute a collection of a second user.

- Defendant displays in a computing device of a first user, a first view of a first set of cards that constitute a first collection of the first user and also displays in the computing device of the first user, a second view of a second set of cards that constitute a collection of a second user.

- As shown in the first image, a first user, Defendant is displaying in a computing device MJ Bauer photography's wall which constitutes a first view of a first set of cards that constitute a first collection of the first user.

- As shown in the second image, Defendant is displaying in a computing device the Wall Street Journal's wall which constitutes a second view of a second set of cards that constitute a collection of a second user.



See <https://www.youtube.com/watch?v=EpRqOhHB0jA>

See <https://www.facebook.com/WSJ/>