Filed on behalf of Meta Platforms, Inc. Filed: March 18, 2026

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

COGMEDIA LLC,
Patent Owner

Case No. IPR2026-00247

Petition for *Inter Partes* Review of
U.S. Patent No. 9,817,562

TABLE OF CONTENTS

I. INTRODUCTION....1

II. MANDATORY NOTICES....1

A. Real Parties-in-Interest....1

B. Related Matters....2

C. Notice of Counsel and Service Information....2

D. Fee for *Inter Partes* Review....3

E. Grounds for Standing....3

III. IDENTIFICATION OF CHALLENGES....4

IV. BACKGROUND....5

A. '562 Patent and Alleged Priority Date....5

B. Challenged Claims....5

C. Prosecution History....5

V. THE PRIOR ART....5

A. McQueen (EX1005)....5

B. Forsyth (EX1006)....6

C. Csaszar (EX1014)....7

D. Briggs (EX1015)....8

E. Rieger (EX1016)....9

F. Knapp (EX1017)....10

G. Colas (EX1026)....11

VI. LEVEL OF ORDINARY SKILL 11

VII. CLAIM CONSTRUCTION 12

VIII. GROUND 1: CLAIMS 1-3, 6, 7, AND 11 ARE OBVIOUS IN VIEW OF MCQUEEN AND FORSYTH 12

A. Motivation to Combine 12

1. Blurb posts with instant messaging forums and a related new message count indicator 1[c.i], 1[c.v] 13

2. Blurb posts with a vote count indicator 1[c.vi] 16

B. Reasonable Expectation of Success 17

C. Independent Claim 1 18

1. 1[Preamble]: "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:" 18

2. 1[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;" 23

3. 1[b]: "storing data corresponding to each of the information objects in the database system;" 25

4. 1[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," 26

a. 1[c.i]: "wherein the functions include: 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;".....30

b. 1[c.ii]: "wherein the functions include: … a vote function, by which each user having access to the card can provide one vote for the information object;".....32

c. 1[c.iii]: "wherein the functions include: … 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".....33

d. 1[c.iv]: "wherein the functions include: … a link function, by which each user having access to the card can invoke the link to the data item; and".....34

e. 1[c.v]: "wherein the indicators include: a message indicator that displays a number of instant messages associated with the information object; and".....35

f. 1[c.vi]: "wherein the indicators include: … a vote indicator that displays a number of votes associated with the information object; and" 36

5. 1[d]: "wherein the database system is configured to allow (i) each user to have at least one user-selected collection of cards in the database system and (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.” 37

D. Dependent Claims 2, 3, 6, 7, and 11 40

1. Claim 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.” 40

2. Claim 3: “A method according to claim 1, wherein the format includes within the card an indication of a date of creation of the card.” 42

3. Claim 6: “A method according to claim 1, wherein the information object is configurable to include a user-accessible file attachment.” 43

4. Claim 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.” 43

5. Claim 11: “A method according to claim 1, further comprising:” 44

a. Claim 11[a]: “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;” 44

b. Claim 11[b]: "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."....45

IX. GROUND 2: CLAIM 2 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND CSASZAR....46

A. Motivation to Combine....46

B. Reasonable Expectation of Success....47

C. Claim 2....47

X. GROUND 3: CLAIM 5, 14, AND 15 ARE OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND BRIGGS....51

A. Motivation to Combine....51

B. Reasonable Expectation of Success....52

C. Claim 5: "A method according to claim 1, wherein the format includes a user-accessible report relating to users who replicated the information object"....53

D. Claim 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."....56

E. Claim 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."....59

XI. GROUND 4: CLAIM 7 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND COLAS....61

A. Motivation to Combine....61

B. Reasonable Expectation of Success 62

C. Claim 7 62

XII. GROUND 5: CLAIM 8 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND RIEGER 65

A. Motivation to Combine 65

B. Reasonable Expectation of Success 66

C. Claim 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." 67

XIII. GROUND 6: CLAIMS 12, 13, 17, AND 18 ARE OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND KNAPP 69

A. Motivation to Combine 69

B. Reasonable Expectation of Success 71

C. Claim 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." 72

D. Claim 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." 77

E. Claim 17: "A method according to claim 1, further comprising:" 80

1. Claim 17[a]: "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;" 80

2. Claim 17[b]: "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." 81

F. Claim 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." 83

XIV. GROUND 7: CLAIM 13 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, BRIGGS, AND KNAPP 84

XV. CONCLUSION 85

CLAIM LISTING APPENDIX 86

TABLE OF AUTHORITIES

Page(s)

Cases

Cogmedia, LLC v. Meta Platforms, Inc.,
1:25-cv-12127 (D. Mass.) 2

KSR Int'l Co. v. Teleflex Inc.,
550 U.S. 398 (2007) ..... *passim*

Target Corp. v. Proxicom Wireless, LLC,
IPR2020-00904, Paper 11 (PTAB Nov. 10, 2020) 12

Other Authorities

35 U.S.C. § 102(e) 4

35 U.S.C. § 103 4

37 C.F.R. § 42.10(b) 3

37 C.F.R. § 42.15(a) 3

37 C.F.R. § 42.24(a) 90

37 C.F.R. § 42.24(d) 90

37 C.F.R. § 42.100(b) 12

37 C.F.R. § 42.104(a) 3

TABLE OF EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 9,817,562 to Keel, et al. ("the '562 Patent")
1002	File History of U.S. Patent No. 9,817,562
1003	Declaration of Andrew Cockburn, Ph.D ("Cockburn")
1004	Curriculum Vitae of Andrew Cockburn, Ph.D ("Cockburn")
1005	U.S. Patent No. 7,310,612 to McQueen, III et al. ("McQueen")
1006	U.S. Patent No. 7,047,030 to Forsyth ("Forsyth")
1007	U.S. Pre-grant Publication No. 2002/0069105 to do Rosario Botelho et al. ("do Rosario Botelho")
1008	RESERVED
1009	U.S. Pre-grant Publication No. 2003/0189592 to Boresjo ("Boresjo")
1010	File History of U.S. Patent No. 9,524,090
1011	U.S. Patent No. 7,293,074 to Jellinek et al. ("Jellinek")
1012	U.S. Pre-grant Publication No. 2004/0136510 to Vander Veen ("Vander Veen")
1013	U.S. Pre-grant Publication No. 2002/0091775 to Morehead et al. ("Morehead")
1014	U.S. Pre-grant Publication No. 2003/0233422 to Csaszar et al. ("Csaszar")

Exhibit No.	Description
1015	U.S. Patent No. 7,080,139 to Briggs et al. ("Briggs")
1016	U.S. Patent No. 7,136,915 to Rieger ("Rieger")
1017	U.S. Patent No. 6,769,010 to Knapp et al. ("Knapp")
1018	U.S. Pre-grant Publication No. 2003/0103603 to Kurita et al. ("Kurita")
1019	Cockburn, A. and Greenberg, S. *Making contact: getting the group communicating with groupware. In Proceedings of the conference on Organizational computing systems (COCS '93)* (1993)
1020	Cockburn, A., et. al. *WebView: A Graphical Aid for Revisiting Web Pages OzCHI'99: Australian Conference on Computer-Human Interaction* (1999)
1021	Schatz, Bruce R. *Building an electronic community system* (1991)
1022	Engelbart, Douglas C. and English, William K. *A research center for augmenting human intellect* (1968)
1023	Borenstein, Nathaniel S. and Thyberg, Chris A. *Cooperative work in the Andrew message system* (1988)
1024	Greenberg, Saul and Rounding, Michael. *The notification collage: posting information to public and personal displays. In Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (CHI '01)* (2001)
1025	U.S. Patent No. 5,854,893 to Ludwig ("Ludwig")

Exhibit No.	Description
1026	U.S. Pre-grant Publication No. 2003/0046152 to Colas et al. ("Colas")

I. INTRODUCTION

Meta Platforms, Inc. ("Petitioner") respectfully requests *inter partes* review of claims 1-3, 5-8, 11-15, 17, and 18 of U.S. Patent No. 9,817,562 ("'562 Patent"). Among other nominal features, the challenged claims specify various methods for collaborating and interacting with networked content by voting, commenting, etc. But the '562 Patent was filed too late, as such interface and collaboration features were already well-known before the alleged time of invention.

Amazon, for instance, filed for a patent (McQueen; EX1005) about a year earlier in 2003, and that patent serves as the primary reference in this petition. McQueen describes a system for publishing user-generated "blurbs" in a blog format that others could view, share, discuss, vote on, etc. It also describes publishing blurb posts in rectangular, uniform units that contained titles, graphics, and interactive links, just like that claimed by the '562 Patent. Numerous other patents and publications disclose similar and complementary systems for group messaging and other networked interaction features, as explained in this petition.

For these reasons and those explained below, Petitioner respectfully requests that the Board find all challenged claims of the '562 Patent unpatentable.

II. MANDATORY NOTICES

A. Real Parties-in-Interest

The real party-in-interest is Meta Platforms, Inc.

B. Related Matters

U.S. Patent Office records indicate that the '562 Patent (EX1001) is assigned to Cogmedia LLC ("PO"), which is currently asserting the '562 Patent in the following litigation filed on July 30, 2025: *Cogmedia, LLC v. Meta Platforms, Inc.*, 1:25-cv-12127 (D. Mass.).

Petitioner has filed or plans to file petitions for *inter partes* review against U.S. Patent Nos. 11,036,371 and 10,664,141, which are in the same family as the '562 Patent and are asserted in the same parallel litigation.

C. Notice of Counsel and Service Information

Lead Counsel	Lisa K. Nguyen (Reg. No. 58,018) Paul Hastings LLP 1117 S. California Avenue Palo Alto, CA 94303 Telephone: 650.320.1800 Fax: 650.320.1900 Email: PH-META-CogmediaIPR@paulhastings.com
Back-Up Counsel	David M. Tennant (Reg. No. 48,362) Paul Hastings LLP 2050 M St., N.W. Washington, DC 20036 Telephone: 202.551.1700 Fax: 202.551.1705 Email: PH-META-CogmediaIPR@paulhastings.com
Back-Up Counsel	Diane Ghrist (*pro hac vice* to be filed) Paul Hastings LLP 2050 M St., N.W. Washington, DC 20036 Telephone: 202.551.1700

	Fax: 202.551.1705 Email: PH-META-CogmediaIPR@paulhastings.com
Back-Up Counsel	Michelle H. Zhang (*pro hac vice* to be filed) Paul Hastings LLP 1117 S. California Avenue Palo Alto, CA 94303 Telephone: 650.320.1800 Fax: 650.320.1900 Email: PH-META-CogmediaIPR@paulhastings.com

Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney accompanies this petition. Petitioner consents to electronic service by e-mail.

D. Fee for *Inter Partes* Review

The Director is authorized to charge the fee specified by 37 C.F.R. § 42.15(a) to Deposit Account 50-2613.

E. Grounds for Standing

Petitioner certifies pursuant to 37 C.F.R. § 42.104(a) that the '562 Patent is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

III. IDENTIFICATION OF CHALLENGES[1]

Ground 1: Claims 1-3, 6, 7, and 11 are obvious under 35 U.S.C. § 103 in view of McQueen (EX1005) and Forsyth (EX1006).

Ground 2: Claim 2 is obvious under 35 U.S.C. § 103 in view of McQueen, Forsyth, and Csaszar (EX1014).

Ground 3: Claims 5, 14, and 15 are obvious under 35 U.S.C. § 103 in view of McQueen, Forsyth, and Briggs (EX1015).

Ground 4: Claim 7 is obvious under 35 U.S.C. § 103 in view of McQueen, Forsyth, Briggs, and Colas.

Ground 5: Claim 8 is obvious under 35 U.S.C. § 103 in view of McQueen, Forsyth, and Rieger (EX1016).

Ground 6: Claims 12, 13, 17, and 18 are obvious under 35 U.S.C. § 103 in view of McQueen, Forsyth, and Knapp (EX1017).

Ground 7: Claim 13 is obvious under 35 U.S.C. § 103 in view of McQueen, Forsyth, Briggs, and Knapp.

[1] The references cited in this petition qualify as prior art at least under 35 U.S.C. § 102(e).

IV. BACKGROUND

A. '562 Patent and Alleged Priority Date

The challenged '562 Patent claims priority to a provisional application filed on April 29, 2004. EX1001, 2. Petitioner assumes for this proceeding that the '562 Patent claims are entitled to this date; Petitioner does not concede this and reserves its right to challenge it.

The '562 Patent has 22 claims. Claim 1 is the only independent claim; claims 2-22 depend on claim 1.

B. Challenged Claims

This petition challenges claims 1-3, 5-8, 11-15, 17, and 18 of the '562 Patent.

C. Prosecution History

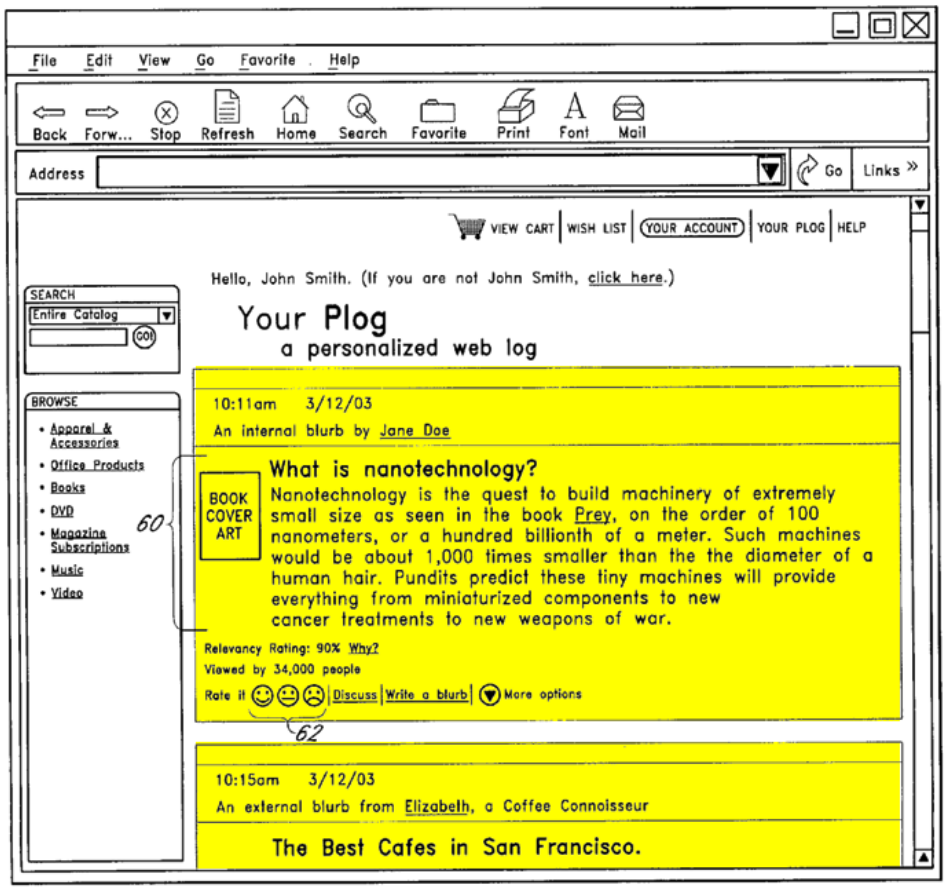
Critically, the PTO ***never*** made a prior art rejection for this patent during prosecution. *See generally* EX1002. The Examiner indicated the claims were allowable in his first office action, and the patent thereafter issued after a series of uncontested claim amendments. *E.g.*, *id.*, 202-205, 278-284, 325.

V. THE PRIOR ART

A. McQueen (EX1005)

McQueen ingests content from various "external sources"—such as newsletters, blogs, or RSS feeds—and saves corresponding "blurbs" within a database 44. EX1005, 4:53-5:3, 1:54-63, FIG. 1. Blurbs can be browsed and may include a title, relevant graphics, and a hyperlink, as well as a variety of interactive

features (e.g., voting icons 62, a "Discuss" link). *Id.*, 5:52-6:3, 7:55-64, 8:4-16, FIG. 4.

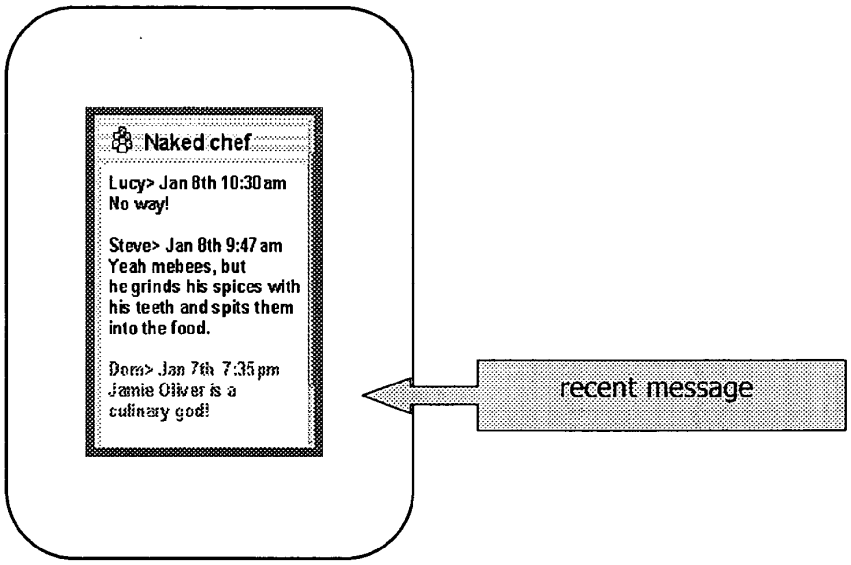


Id., FIG. 4.

B. Forsyth (EX1006)

Forsyth discloses systems and methods for facilitating group communications. *See, e.g.*, EX1006, 1:15-23, 3:2-18, 6:27-52. "Forums" structure user interactions about social events, topics, pictures, common interests, book/music recommendations, etc. *Id.*, 5:27-30, 7:19-43, 9:36-45, 10:14-19. Like McQueen's

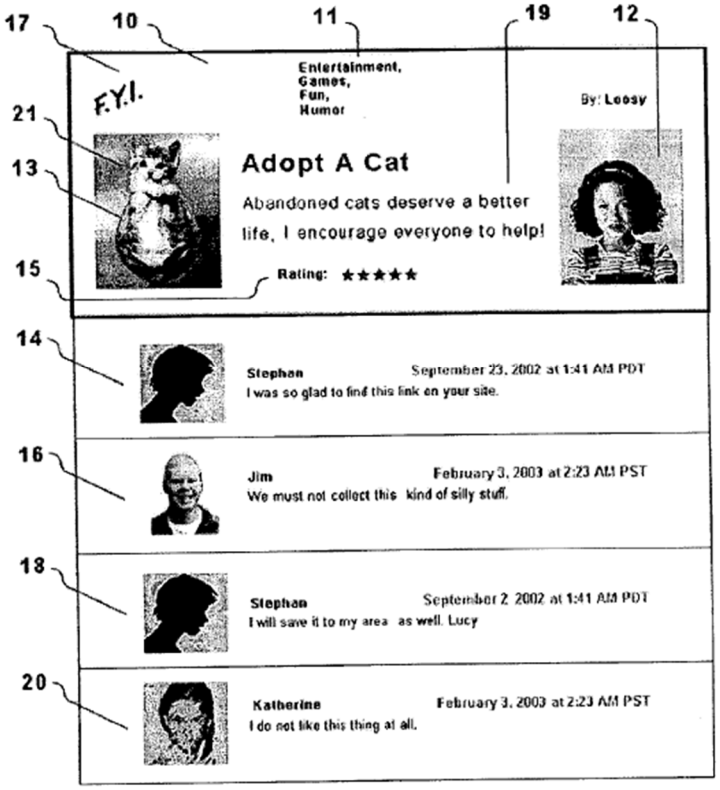
"Discuss" link for a blurb, EX1005, FIG. 4, Forsyth discloses that users can access a discussion Forum by clicking on a link. *Id.*, 6:27-52.



Id., FIG. 7.

C. Csaszar (EX1014)

Like McQueen's blurb posts, Csaszar discloses "Flyers," such as the one illustrated below in Figure 7. EX1014, [0211-0212], claim 1. A user is shown the option to "MAKE FLYER" when moving a cursor over a web page. *Id.*, [0243]-[0247].



EX1014, Fig. 7.

D. Briggs (EX1015)

Briggs teaches tracking a user's online activity. EX1015, 2:50-55. Collected data may also be annotated and reported "with a history of users who forwarded the information." EX1015, 19:25-36. Briggs further teaches selectively sharing data via graphical selections and corresponding user interfaces. *Id.*, 9:55-57, FIG. 6.

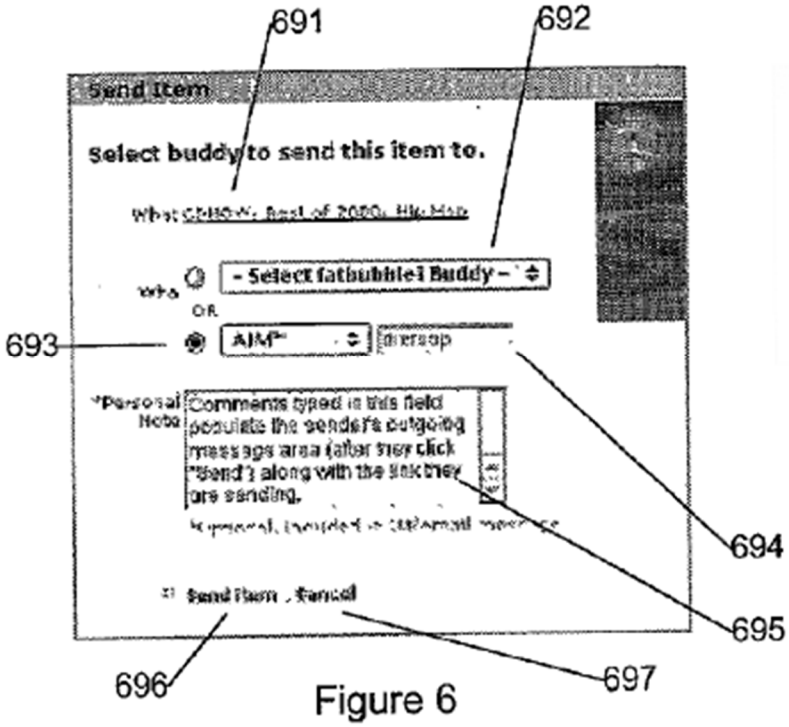
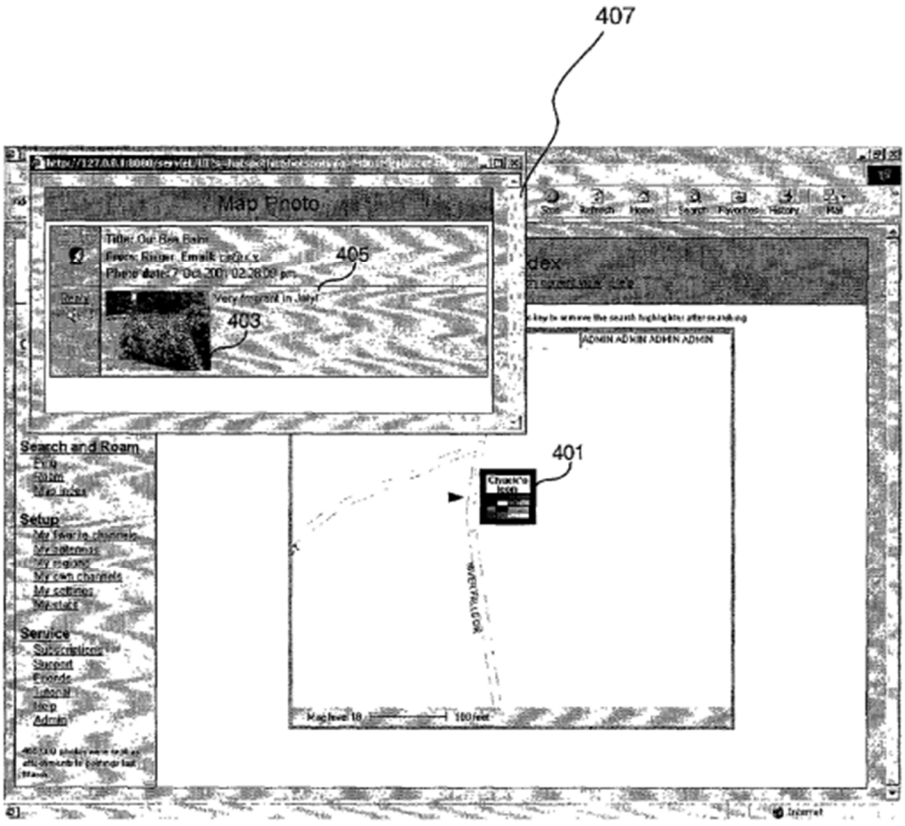


Figure 6

EX1015, Fig. 6.

E. Rieger (EX1016)

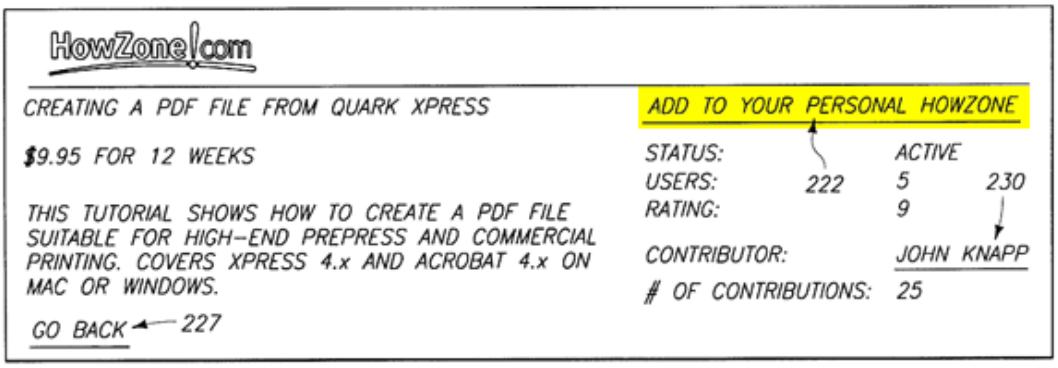
Rieger discloses that a user can browse and receive "geographically relevant postings" in an outlined region. EX1016, Abstract. When a user selects a post on a map, Rieger's system "displays the photo 403, its message 405, and any supporting elements, typically in a pop-up browser window." *Id.*, 13:26-30, Fig. 4.



EX1016, Fig. 4.

F. Knapp (EX1017)

Knapp teaches copying a GUI object to a user's personal page via a graphically entered copy command. EX1017, 23:36-24:3, 25:31-56, 28:31-44. A user may click an "add to personal HowZone" link to duplicate a third-party content object into their own personalized digital space. *Id.*, 23:36-24:3, 25:31-56, 28:31-44, 6:53-7:2, FIGs. 9, 12, 17.



EX1017, FIG. 17 (annotated).

G. Colas (EX1026)

Colas teaches that online postings can include prominently displayed geographic location indicators (e.g., city or region identifiers positioned at the top of the posting) to inform users where the advertised offering is located. EX1026, [0121]-[0122], FIGs. 4A, 10A-B, 11A, 12A, 13, 24A-B.

VI. LEVEL OF ORDINARY SKILL

A person of ordinary skill in the art ("POSITA") in 2004 would have had a bachelor's degree in electrical engineering, computer science, or a similar technical field, with two years of relevant experience working with graphical interfaces and/or networked data systems. Additional experience could substitute for less education, and additional education could likewise substitute for less experience. Cockburn, ¶¶21.[2]

[2] Petitioner submits the declaration of Andrew Cockburn, Ph.D (EX1003), an expert in the '562 Patent field(s). EX1003; EX1004.

This Petition does not turn on this precise definition, and the challenged claims would be unpatentable from the perspective of any reasonable person of ordinary skill in the art at the relevant time. *Id.* ¶22.

VII. CLAIM CONSTRUCTION

The Board construes the claims "using the same claim construction standard that would be used" in district courts. 37 C.F.R. §42.100(b). This Petition establishes the prior art meets each of the claim limitations under any reasonable plain meaning.[3] Thus, no express construction is required.

VIII. GROUND 1: CLAIMS 1-3, 6, 7, AND 11 ARE OBVIOUS IN VIEW OF MCQUEEN AND FORSYTH

A. Motivation to Combine

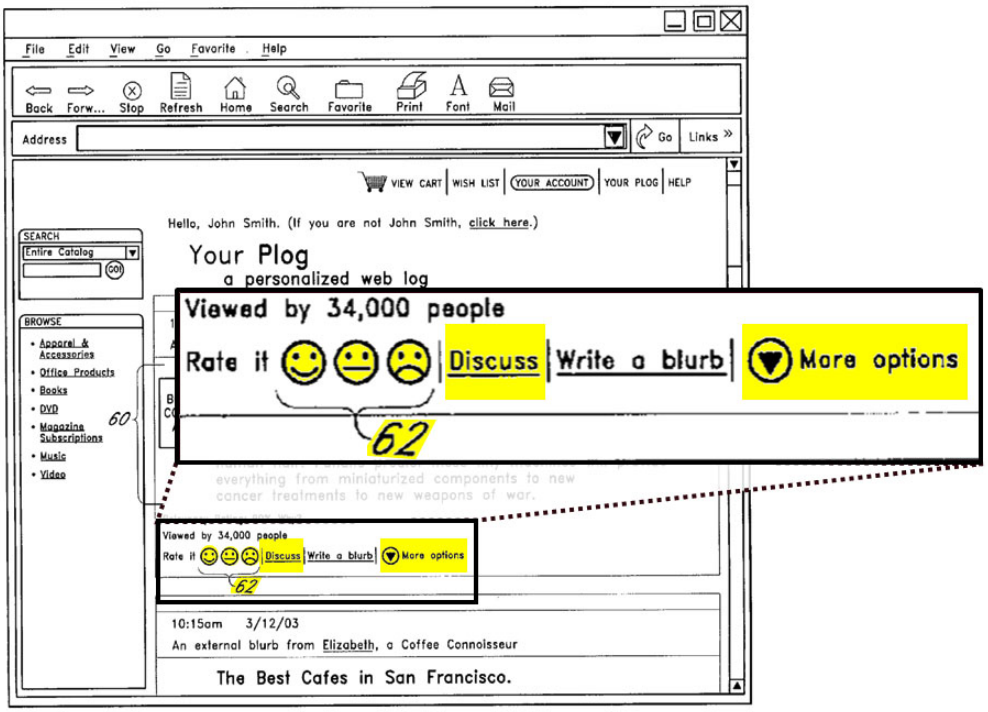
It would have been obvious to a POSITA to modify McQueen to incorporate Forsyth's instant messaging, new message count, and related features. Cockburn, ¶¶76-84. It also would have been obvious for McQueen's blurb posts to display a "current tally of the votes submitted on a particular review," as McQueen discloses and a "typical" configuration at the relevant time. *See* EX1005, 1:34-53. Detailed below, the combination would have resulted in McQueen's blurb posts including an

[3] Petitioner reserves all rights to raise claim construction and other arguments in other proceedings consistently with this proceeding. *See, e.g.*, *Target Corp. v. Proxicom Wireless, LLC*, IPR2020-00904, Paper 11 at 11-13 (PTAB Nov. 10, 2020).

instant messaging function and a corresponding blurb discussion forum (§VIII.C.4.a), along with indicators for the number of new messages (§VIII.C.4.e) and votes (§VIII.C.4.f). Cockburn, ¶76.

1. Blurb posts with instant messaging forums and a related new message count indicator 1[c.i], 1[c.v]

A POSITA would have had ample reason to combine McQueen and Forsyth. Cockburn, ¶¶77-81. McQueen already seeks to facilitate user interaction by including voting icons 62, a "More options" drop-down menu, and a "Discuss" element. EX1005, FIG. 4, 8:24-33; Cockburn, ¶¶77.



EX1005, FIG. 4 (annotated). Incorporating Forsyth's "chat/instant messaging" aspects, which were a "current and very popular internet type service," EX1006, 5:3-

14; 5:27-43, for McQueen's "Discuss" feature or as an additional aspect of McQueen's "More options" drop-down menu (*see* (§VIII.C.4.a)) would have been an obvious and predictable combination of known elements for known improvements and/or benefits. Cockburn, ¶78; *see KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 415-421 (2007).

A POSITA would have recognized that implementing the discussion feature as an instant messaging or chat function would have enhanced user experience with the blurbs by allowing for real-time, dynamic interaction between mobile devices. EX1006, FIGs. 1, 6-7, 2:40-53, 5:8-26, 6:27-57; Cockburn, ¶79. This would have "handle[d] effectively" the communications McQueen suggests. EX1006, 2:40-47. It would have offered group, push, and threaded conversation benefits over state-of-the-art technology like web bulletins and group e-mail. *Id.*, FIG. 1 (below).

Capability:	**Can you create a discussion between group members on your own device?** (Important since it facilitates setting up a group discussion)	**Push delivery?** (Push is more convenient to mobile users)	**Is it possible to retain a long term record of exchanges between group members?** (An important attribute for many new kinds of services)	**Can you deliver messages to all members of a group, or is it restricted to one to one?** (Clearly critical to group based messaging)	**Do all group members see the same, unitary message thread, or are there instead many separate individual messages?** (A single, unitary message entity (e.g. a thread) makes message organisation and navigation far easier.)	**If a recipient is off-line (e.g messaging app not open), are they alerted anyway?** Potentially very important for mobile useage because of the high proportion of time users may not be on-line (i.e. actively using their messaging application).
Web bulletin board	No	No	Yes	Yes	Yes	No
Chat/instant messaging	Yes	Yes	No	Yes	Awkward	No
Group e-mail	Yes	No	Awkward	Yes	No	No
SMS	Awkward	Yes	No	Awkward	No	Yes
Forums	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

The communications would have made it "far easier for people to reach similar individuals than ever before," providing a "foundation stone for building applications which enable a huge range of new group based communication/interaction functions" and increasing user social engagement and collaboration. *Id.*, 3:3-18; Cockburn, ¶80. Indeed, Forsyth explicitly describes the advantages offered by providing an "easy to understand messaging tool that facilitates open discussion." EX1006, 5:27-30.

Displaying a number of new messages associated with a discussion would have helped the user understand if new messages existed for increased convenience and usability. Cockburn, ¶81; EX1006, 6:28-36. Such new message indicators were

helpful and ubiquitous before the alleged time of invention. Cockburn, ¶81; *see, e.g.*, EX1011, 14:11-13; EX1012, [0058], FIG. 8; EX1013, [0033].

2. Blurb posts with a vote count indicator 1[c.vi]

A POSITA also would have had good reason to modify McQueen to display the number of votes for a given blurb. Cockburn, ¶¶82-84. McQueen discloses that a set of "icons 62 for voting on [a] blurb," with the system tracking "the total number of votes cast on such blurbs," and that "[a] current tally of the votes submitted on a particular review is typically displayed to assist readers in assessing the review." EX1005, 1:32-43, 6:42-45, 8:17-24, FIG. 4. Displaying the number of votes for user-generated content, such as McQueen's blurb posts, would have assisted readers in assessing the blurb and any corresponding review. *Id.*; Cockburn, ¶82. The vote display would have allowed a user to "take into consideration the reputation of the associated reviewer." EX1005, 1:32-43. In all, it would have been an obvious and predictable combination of known elements for known improvements and/or benefits. Cockburn, ¶82; *KSR*, 550 U.S. at 415-421.

Users faced a high volume of information in such a system designed to aggregate large amounts of content via RSS feeds, etc. EX1005, 4:53-58; Cockburn, ¶83. Displaying a vote indicator would have provided an immediate visual metric of quality or popularity, enabling users to quickly distinguish between "good" and

"poor" content without opening or reading every individual blurb. EX1005, 6:14-30; Cockburn, ¶83.

By the early 2000s, such total vote displays were standardized, boosted user engagement, and simplified content navigation. Cockburn, ¶84. A POSITA would have appreciated that showing a "total vote tally," EX1007, [0050], would have provided immediate social information, allowing users to instantly gauge post popularity. Cockburn, ¶84. Such an indicator also would have helped users filter through noise; by highlighting "more popular proposals," such systems "increase the likelihood" that the most relevant and helpful content is prioritized and considered. *See, e.g.*, EX1009, [0055]; Cockburn, ¶84.

B. Reasonable Expectation of Success

A POSITA would have had a reasonable expectation of success modifying McQueen. Cockburn, ¶¶85-86. Forsyth's communication features allowed "access[] by different applications … for a wide variety of purposes—whenever an application designer wishes to include" such communication features. EX1006, 5:55-60. Forsyth's communication features thus would have been readily applicable to McQueen, which can operate with any "web site, an online services network, or any other type of multi-user system," EX1005, 7:38-45; integration would have been a routine exercise in database and/or GUI design and/or software integration. Cockburn, ¶85.

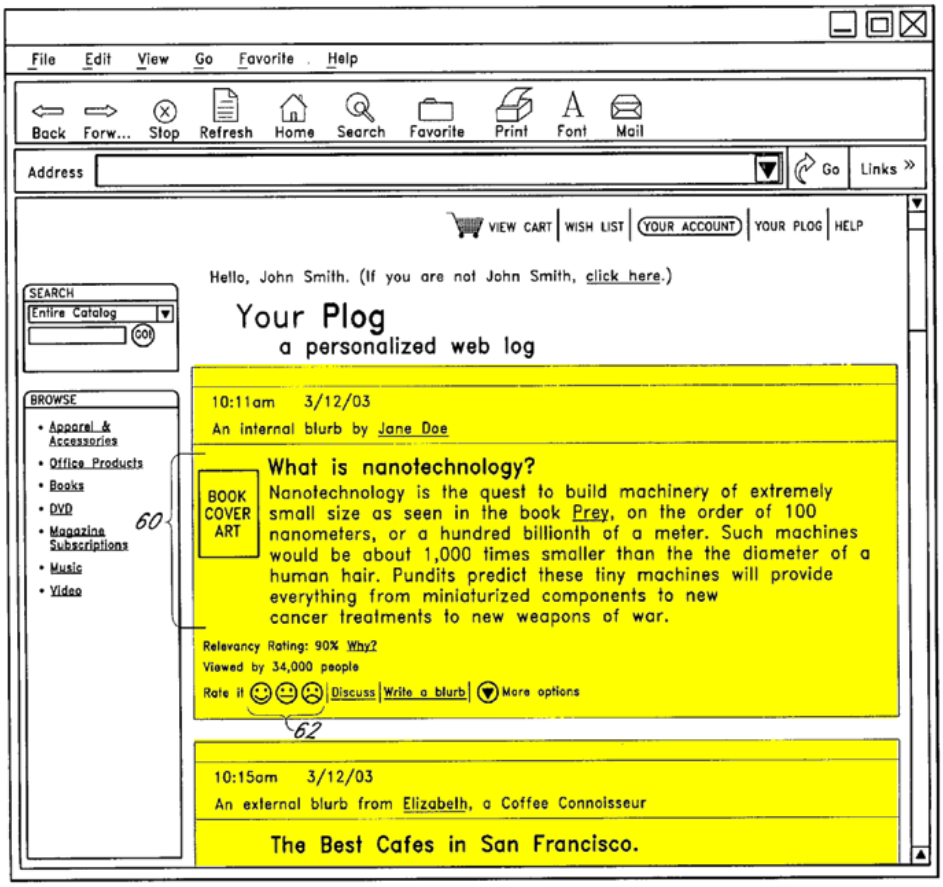
Moreover, group messaging was a "current and very popular" service at the time. EX1006, 5:7-14. Vote tally display features were conventional and "typical." EX1005, 1:32-43. The protocols and programming techniques required to implement such chat interfaces or message threads were well-known standard practices. Cockburn, ¶86. Thus, the McQueen-Forsyth system would have been a predictable combination of known components according to known methods (*e.g.*, communication and GUI methods), and would have produced predictable display and communication results. Cockburn, ¶86; *KSR*, 550 U.S. at 416.

C. Independent Claim 1

1. 1[Preamble]: "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:"

McQueen discloses this limitation to the extent the preamble is limiting. Cockburn, ¶¶87-93. McQueen discloses a system for managing and interacting with digital content. EX1005; *supra* §V.A. The system ingests data from various sources—such as blogs and RSS feeds—into a central database 44 comprising formatted "blurbs." *See, e.g.*, EX1005, Abstract, 4:53-58. These blurbs comprise titles, graphics, hyperlinks, etc. that appear within personalized "plogs" or author-

specific blogs. *Id.*, 1:54-63, 7:55-64. McQueen's interface enables user engagement through "Discuss" links, navigation to originating sites, and a rating mechanism for casting votes on content quality. *Id.*, 6:61-7:2, 6:14-23, FIG. 4; Cockburn, ¶88.

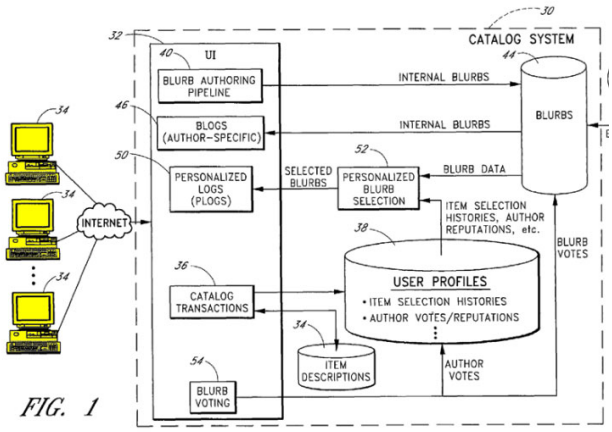


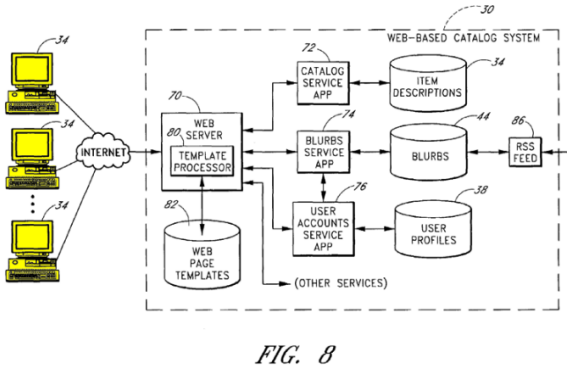
EX1005, FIG. 4 (annotated).

As to the ***computer-implemented method…software instructions*** and ***software…processes*** claim limitations, McQueen details that its functionality "may be implemented within executable software that runs on one or more general purpose

computers." EX1005, 7:37-45.[4] A POSITA would have understood that such a computer would execute the software to ***initiate[] execution of software instructions*** to perform the ***computer processes*** and methods disclosed by McQueen and in this Petition as claimed. *Id.*; Cockburn, ¶89.

McQueen also discloses that its method and processes may run on general purpose computers, as claimed, with respect to Figures 1 and 8. Cockburn, ¶90. McQueen's catalog system 30 stores blurbs and related information, and targets users with blurbs. *Supra* §V.A; EX1005, FIGs. 1, 4. Figure 8 describes an architecture used to implement such a system, which "run[s] on general purpose computers" like computers 34. EX1005, 7:37-45, 12:11-13, FIG. 8. Figure 1 illustrates the system runs using computers 34. EX1005, FIG. 1, 3:17-27, 7:37-45.





EX1005, FIGs. 1 (annotated), 8 (annotated).

[4] All emphasis is added unless otherwise noted in this petition. ***Bold-italicized language*** is intended to denote claim language.

In McQueen's computer-implemented system and method, ***at least one data item*** broadly encompasses blogs, blog entries, news, hyperlinks, and other custom online content, etc. *See, e.g.*, EX1010, 201; Cockburn, ¶91. Indeed, users and their corresponding computers can view and edit various "blogs" and blog entries, which are both ***data items***, thereby ***interacting with data item[s]***. EX1005, Abstract ("The blurbs submitted by a particular author are made available for viewing in an author-specific blog (web log) format."), 4:28-43, 5:4-18, 7:26-36, 7:37-45. Likewise, users ***interact[] with data item[s]*** by voting on the content, commenting, etc. when the data items are configured into information objects and displayed to users for the reasons explained below. *Id.*; §§VIII.C.2, 4.

The blog and blog entry ***data items*** are ***obtained from at least one source*** such as an "external source." EX1005, Abstract, FIG. 1, 1:61-63 ("Blurbs may also be obtained from other, independent sources, such as through RSS feeds from external web sites that host blogs."), 4:53-5:3, 11:35-52. And they are ***rendered … accessible from*** database 44 (***database system***) because they or corresponding "blurbs" can be viewed, displayed, and edited. *Id.*; *id.*, 4:28-5:8. Figure 1 likewise illustrates that the "blogs" and corresponding entries are accessed via database 44, from one or more computers 34. *Id.*, FIG. 1; Cockburn, ¶92.

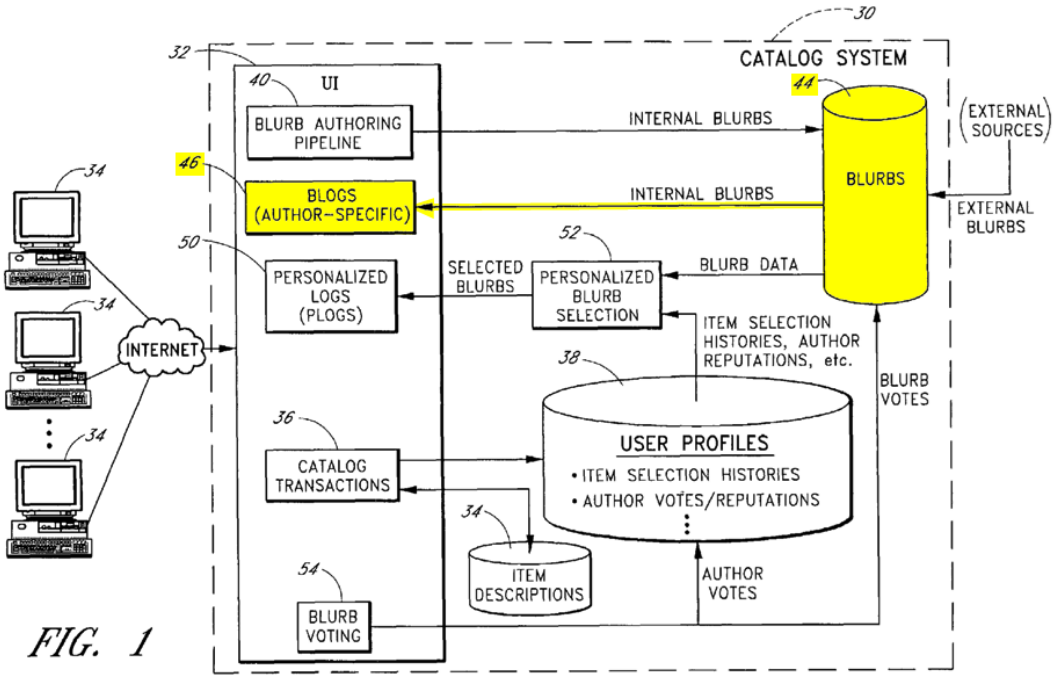


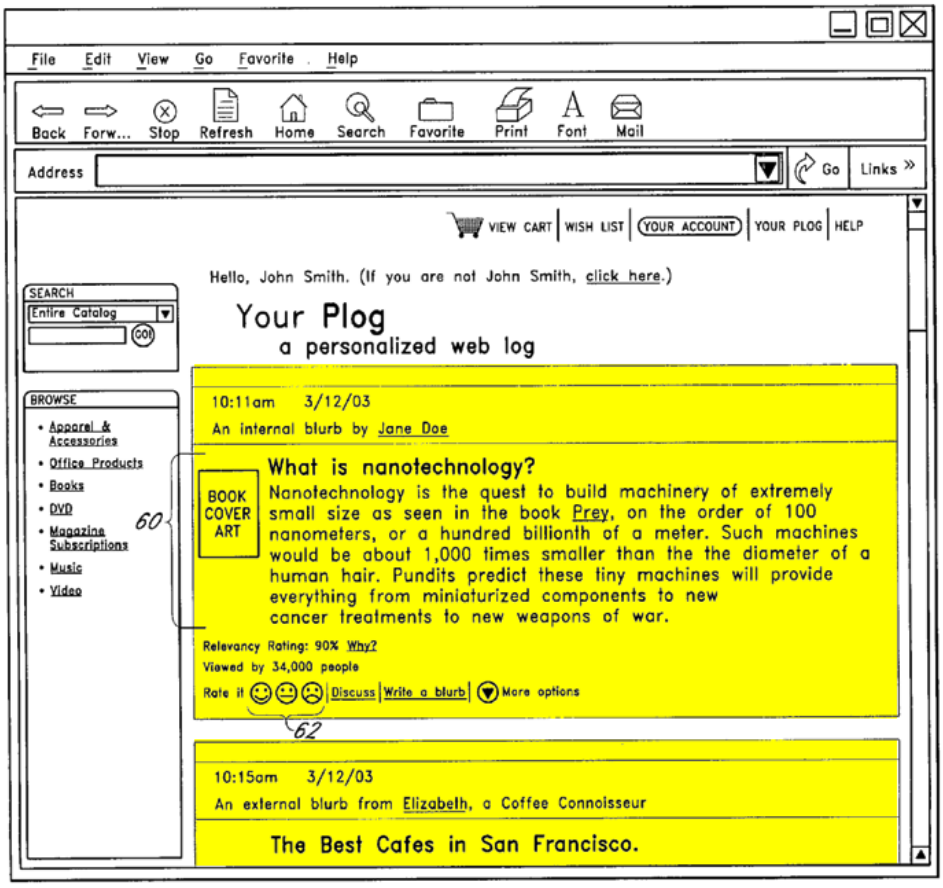
FIG. 1

EX1005, FIG. 1 (annotated).

McQueen's ***at least one source*** is ***external to the database system*** (database 44). Cockburn, ¶93. McQueen's database 44 "may also be populated … from one or more external sources," including external websites hosting blogs and corresponding blog entries (***at least one data item***), newsletters, and other content. EX1005, 4:53-65, 1:61-63, 11:35-52, FIG. 1. Blog content may be published using RSS so that content hosted on external web sites "can [be] re-publish[ed]" or syndicated. EX1005, 4:44-52.

2. 1[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;"

McQueen discloses this limitation. Cockburn, ¶¶94-98. McQueen discloses ***configuring each of*** its blog ***data items*** (§VIII.C.1) ***into a distinct information object*** because its system converts or saves each "blog," which may be in a different "RSS" format, as one or more "blurbs" or blurb posts. EX1005, 4:44-5:3; Cockburn, ¶95. Blog entry ***data items*** (§VIII.C.1) are similarly converted or saved to blurbs or blurb posts, and thereby ***configur[ed] … into a distinct information object***. EX1005, 4:44-5:3; Cockburn, ¶95. The blog and blog entries are "new items" that "are added to the blurbs database 44 as blurbs." EX1005, 4:44-5:3. Figure 4 (below) exemplifies first and second (partial) blurb posts (***distinct information object***).



Id., FIG. 4; Cockburn, ¶95.

McQueen discloses that its blog and blog entries (***data items***) are configured into one or more blurbs or associated posts (***information object***) ***by extracting, from each data item, extracted data including a picture, a heading, and a link to the data item***. Cockburn, ¶96.

For instance, blurbs include "images" or a "graphic" (***picture***) and "other types of content." EX1005, 4:13-27, 7:55-64, 8:4-16. They include a title (***heading***) and "a ***link*** to the originating site" and/or "a ***link*** to the author's blog page," which is or includes the ***data item***. *Id.*, 5:52-6:3, 8:4-16; *see also* FIG. 2 ("Headline").

Figure 4 above likewise illustrates one such blurb post including a "BOOK COVER ART" ***picture***, a "What is nanotechnology?" ***heading***, and a ***link*** to the blog of "Jane Doe." *Id.*, FIG. 4. Cockburn, ¶97.

The aforementioned elements are ***extract[ed] from each*** of the blog and blog entry ***data items*** because, as discussed previously (§VIII.C.1), the system converts or saves each blog and blog entry from an external source as one or more "blurbs," EX1005, 4:44-5:3; the information is sourced from the "blogs" and blog entry ***data items***, and thus ***extract[ed]*** therefrom. EX1005, 4:13-5:3, 5:52-6:3, 7:55-64, 8:4-16, FIG. 1; Cockburn, ¶98.

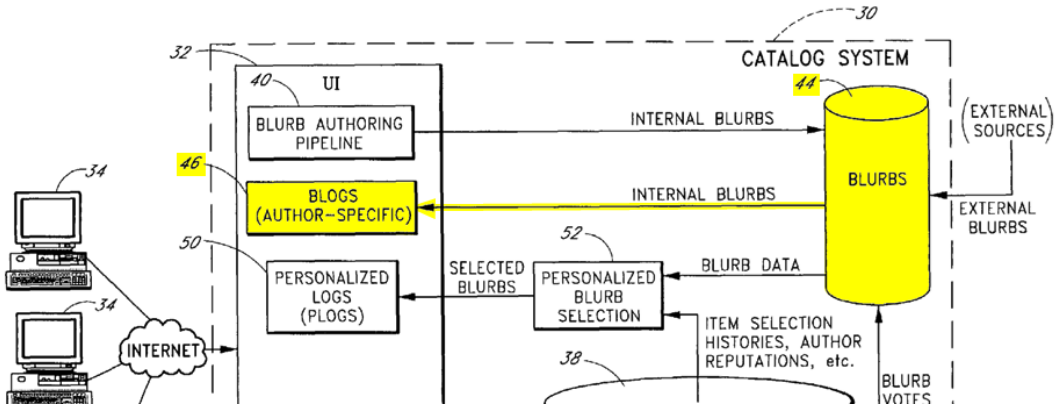
3. 1[b]: "storing data corresponding to each of the information objects in the database system;"

McQueen discloses this limitation. Cockburn, ¶¶99-100. As established above, McQueen's system and method includes database 44 (***database system***) and processes blogs or blog entries into "blurbs" (including ***information objects***). §§VIII.C.1-2. McQueen further discloses that each blurb (including with related post data) ***information object*** is "stored in" or "added to" database 44 with "associated data," thereby ***storing data…in the database system*** as claimed. EX1005, 4:29-5:3, 7:3-17, FIG. 1.

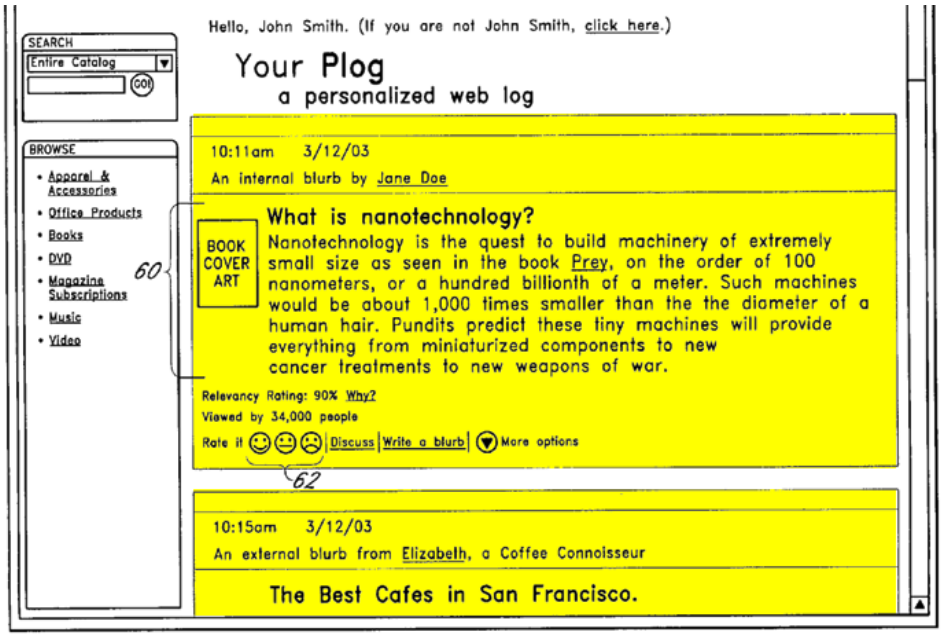
4. 1[c]: "using the extracted data from a plurality of the data items to make available for display a representation of each of at least two of the information objects in the database system, the at least two information objects being selected for display, the representation being in a uniform format, 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,"

McQueen discloses this limitation. Cockburn, ¶¶101-125. As discussed previously, McQueen ***extract[s]*** picture, heading, and link ***data from*** blogs or blog entry ***data items*** and stores the data as blurb ***information objects*** in database 44. §§VIII.C.2-3; Cockburn, ¶102.

McQueen ***us[es] the 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*** by pulling blurbs from database 44 and the corresponding extracted data (§§VIII.C.2-3) to display blurbs and corresponding data to a user. EX1005, FIG. 4, 4:28-43, 5:19-33.



Id., FIG. 1 (annotated). The display may be organized in "chronological order," *id.*, 8:4-16, FIG. 4, thereby displaying ***at least two*** such blurbs. Cockburn, ¶103. First and second example blurbs with related information are highlighted below in yellow, which a user can browse using the scroll bar/function. Cockburn, ¶104.



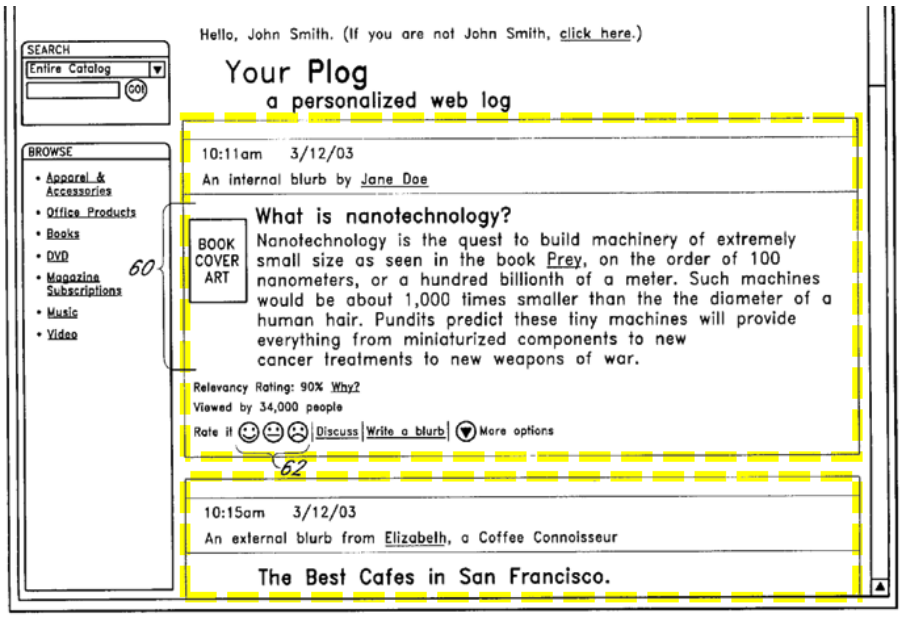
EX1005, FIG. 4 (annotated); Cockburn, ¶104.

The displayed blurbs are "selected" from the database 44, with ***at least two information objects*** thus ***being selected for display***. EX1005, 4:28-43, 5:19-33; Cockburn, ¶105.

McQueen's blurbs displayed in consistent rectangular fashion are in a ***representation being in a uniform format, wherein the format includes a card*** as claimed. Cockburn, ¶106. Blurbs are presented in a ***uniform format*** including, among other features, a blurb portion 60 in a rectangular structure "together with the

following information: the date and time of creation, the name of the author (displayed as a link to the author's blog page), a graphic of the referenced item, an indication of the number of users who have viewed the blurb 60, and a relevancy rating reflective of a score generated by a personalized selection algorithm." EX1005, 8:4-33, FIG. 4. The consistent layout above in Figure 4 allows users to scan posts efficiently. *Id.*; Cockburn, ¶106.

The "blurb" representation described by McQueen constitutes the "***card***." Cockburn, ¶107. For instance, it is a distinct, rectangular container of information as highlighted below in yellow, like the layout of "index cards, credit cards. … and postcards" as disclosed by the '562 Patent. EX1005, 8:4-33, FIG. 4; EX1001, 11:14-20; Cockburn, ¶107.

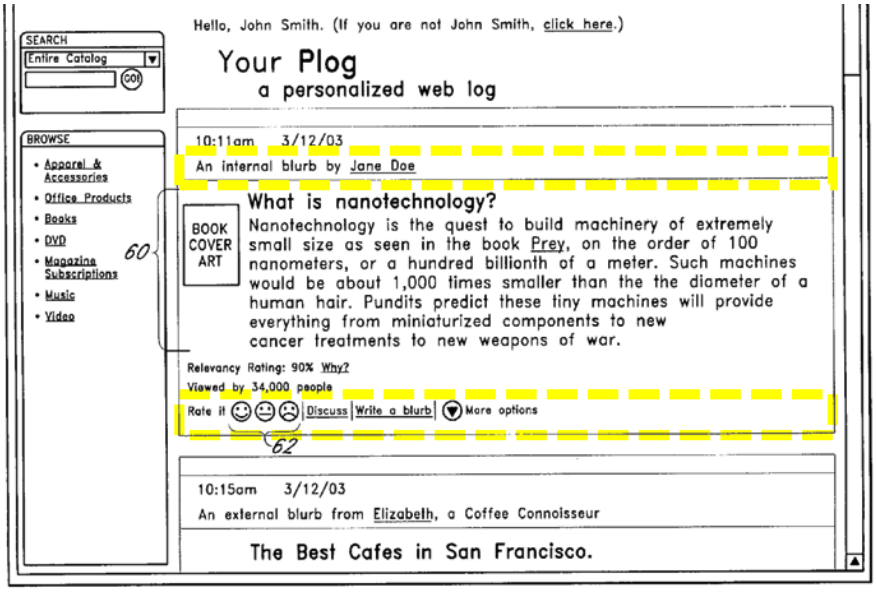


EX1005, FIG. 4 (annotated) (highlighting example ***card*** format).

McQueen displays, ***within the card, in uniform locations thereof, the picture, the heading, a set of indicators***. Cockburn, ¶108. Within McQueen's ***card*** highlighted above, McQueen displays in consistent and structured fashion: "a graphic" (***picture***) (e.g., "BOOK COVER ART"); the ***heading*** of the entry (e.g., "Best Cafes in San Francisco," the banner including date, time, and author information); and a ***set of indicators*** in uniform locations, including "the date and time of creation" banner (including the text who authored the blurb), "an indication of the number of users who have viewed the blurb 60," any location data in the title field (e.g., "San Francisco"), and "a relevancy rating." EX1005, FIGs. 2, 4, 4:13-27, 5:52-6:3, 7:55-64, 8:4-16; Cockburn, ¶108. Users can create the blurbs of the cards and populate heading fields. EX1005, 4:45-64, FIGs. 2-3. And the system "automatically" adds the graphic and organizes the heading and related indicators for display consistently. *Id.*; *id.*, 8:4-33, FIG. 4.

McQueen also displays ***within the card, in uniform locations thereof, … a function mechanism giving graphical access to a set of functions***. Cockburn, ¶109. McQueen's cards include a portion that consistently and uniformly includes voting icons 62, "Discuss," "link," and "More options" items that give ***graphical access*** to corresponding ***functions***. EX1005, 8:4-33, FIG. 4. The options inside the "More options" drop down menu are likewise consistently and uniformly ***within the card***

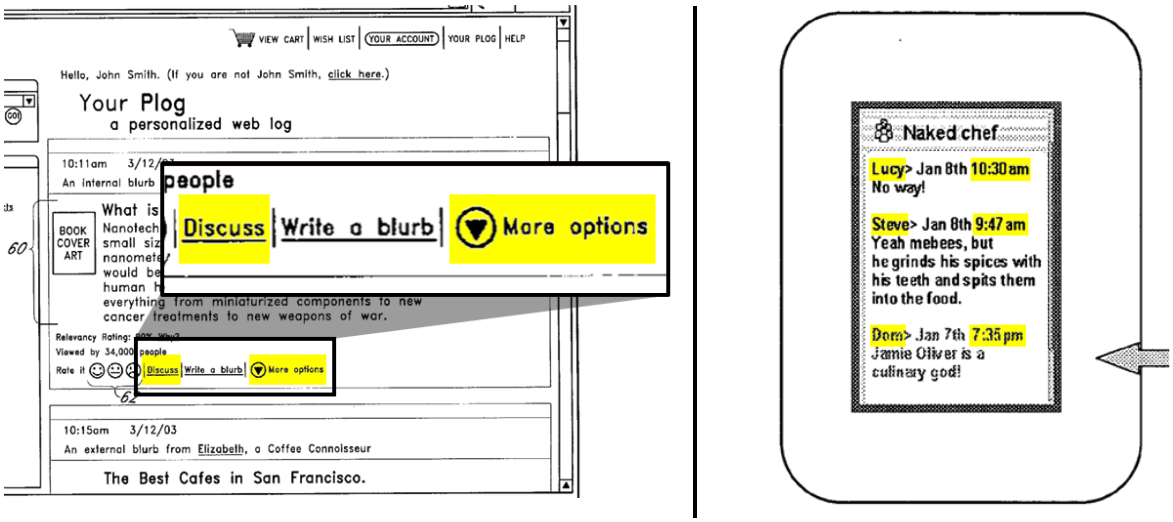
and are an aspect of the ***function mechanism***. *Id.* An example of McQueen's ***function mechanism*** is highlighted below. Cockburn, ¶110.



EX1005, FIG. 4 (annotated).

a. 1[c.i]: "wherein the functions include: 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;"

McQueen in view of Forsyth renders this limitation obvious. Cockburn, ¶¶111-114. McQueen's ***function mechanism*** includes a "Discuss" function link. §VIII.C.4. And as explained previously, it would have been obvious to modify McQueen to incorporate Forsyth's ***instant messaging*** and related features for McQueen's "Discuss" function link or as an additional aspect in the "More options" drop-down menu. §VIII.A.



EX1005, FIG. 4 (left) (annotated); EX1006, FIG. 7 (right) (annotated).

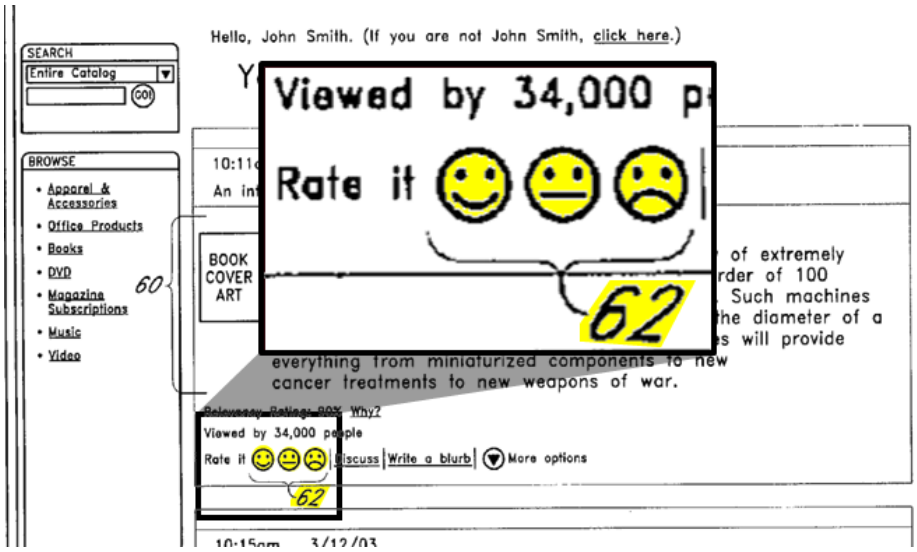
The combination would result in McQueen's system and operation method including a link to an ***instant messaging function***, such as Forsyth's Figure 7. Cockburn, ¶112; EX1006, FIG. 7, 2:40-53, 5:8-24, 6:27-57. ***Users having access to the card*** (for instance, because the underlying content was "made available" or "license[d]" (EX1005, 4:44-52, 5:62-6:3)) would click the discuss link or option and would ***exchange author- and time-stamped messages*** like those also highlighted above (e.g., "Lucy," "9:47 am"). EX1006, FIG. 7, 2:40-53, 5:8-24, 6:27-57; Cockburn, ¶113.

The linked thread of the McQueen-Forsyth system (and method) and corresponding messages would ***relat[e] to the information object***, consistent with McQueen's disclosure that individual posts include a "Discuss" link and Forsyth's disclosure that custom forums are for individual topics, postings, etc. EX1005, FIG. 4; EX1006, FIGs. 6-7, 4:9-15, 4:18-34 ("[A]ll messages relating to that … diary

event … can all become part of the same communication objects."), 6:28-57, 7:19-43, 9:5-10:19. Likewise, ***[s]uch messages*** would ***be[] associated with the information object and accessible to users who view the information object*** at least given the linked structure for a specific post that a user with access can access and click upon viewing. EX1005, FIG. 4; EX1006, FIGs. 6-7, 4:9-15, 4:18-34, 6:28-57, 7:19-43, 9:5-10:19; Cockburn, ¶114.

b. 1[c.ii]: "wherein the functions include: … a vote function, by which each user having access to the card can provide one vote for the information object;"

McQueen discloses this limitation. Cockburn, ¶¶115-117. Specifically, McQueen discloses a set of "icons 62 for voting" on a blurb allows the user to select a rating level for a specific blurb (***wherein the functions include: … a vote function***). EX1005, 8:17-23 ("Also displayed is a set of icons 62 for voting on the blurb. In this example, three rating levels are supported: good, neutral, and poor."), FIG. 4. McQueen's ***function mechanism*** gives graphical access to this voting function. §VIII.C.4; Cockburn, ¶116.



EX1005, FIG. 4 (annotated). A vote option is made available to users viewing the blurb and the icons 62 (***by which each user having access to the card can provide one vote for the information object***). EX1005, 6:14-29, 8:17-23. McQueen also discloses that access to blurbs and their corresponding vote functions can be "made available" or "license[d]," wherein ***each user having access to the card*** can cast a vote. EX1005, 4:44-52, 5:62-6:3, 8:17-23, 6:14-29; Cockburn, ¶117.

c. 1[c.iii]: "wherein the functions include: … 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"

McQueen discloses this limitation. Cockburn, ¶¶118-120. As discussed previously, McQueen's ***function mechanism*** gives graphical access to the "More options" menu and its corresponding functions. §VIII.C.4. McQueen's drop-down More options menu provides a "***replicate function***" that allows a user who has access to an information object (blurb/card) to replicate it by "forward[ing]" or

"send[ing]" it to a second collection of another user or friend, as claimed. EX1005, 8:24-33, 10:36-47, FIG. 4, 2:7-12. When this function is invoked ***by which each user having access to the card*** because it is made available or "license[d]," EX1005, 4:44-52, 5:62-6:3, the card from ***a first collection*** (the user's view and/or plog) is ***replicated in a second collection of cards*** (the friend's view, plog, shared, and/or cards the second user can view and access), as claimed. EX1005, 8:24-33, 10:36-47, FIG. 4, 2:7-12; Cockburn, ¶¶119.

The system and method also ***can cause the card to be replicate[d] in a second collection of cards*** of another user (or users) because the send function from ***a first collection*** (the user's view and/or plog) "implicitly" votes for the blurb post. EX1005, 6:22-48, 8:25-31, 10:48-11:35, FIG. 7; Cockburn, ¶120. Consequently, the system copies the voted-on blurb post to the plog of one or more users. EX1005, 6:22-48 ("Each vote … preferably affects the frequency with which the corresponding blurb is subsequently selected to present to other users….[T]he injection rate may be adjusted based on feedback (votes) from readers of the blurb."), 8:25-31, 10:48-11:35, FIG. 7; Cockburn, ¶120.

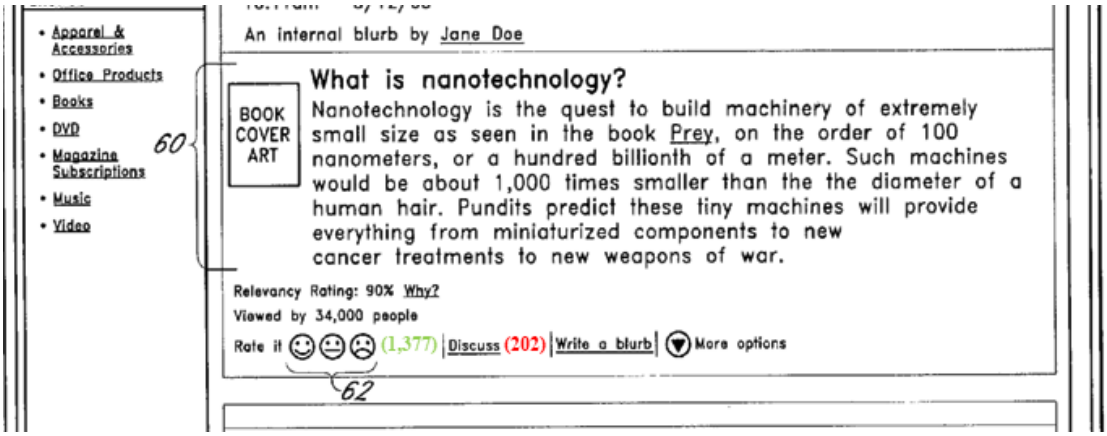
d. 1[c.iv]: "wherein the functions include: … a link function, by which each user having access to the card can invoke the link to the data item; and"

McQueen discloses this limitation. Cockburn, ¶¶121-122. As discussed previously, McQueen's ***function mechanism*** gives graphical access to a "link"

function. §§VIII.C.2, 4. Such a ***link function*** may allow access to "the originating site" or the "author's blog page" and corresponding blog and blog entries ***data items***. EX1005, 5:62-6:3, 8:4-16, FIG. 4; §VIII.C.1. By displaying these elements as active links, McQueen enables ***each user having access to the card can invoke the link to the data item***. EX1005, 4:44-52, 5:62-6:3, 8:4-16. Cockburn, ¶122.

e. 1[c.v]: "wherein the indicators include: a message indicator that displays a number of instant messages associated with the information object; and"

McQueen in view of Forsyth renders this limitation obvious. Cockburn, ¶¶123-124. Each of McQueen's cards includes a set of indicators such as "the date and time of creation." §VIII.C.4. But McQueen does not limit its indicators to just time and date information. Cockburn, ¶124. And, as explained previously, it would have been obvious to modify McQueen to incorporate Forsyth's "graphical indication of the number of unread (new) messages" for the system's discussion and corresponding messaging features. EX1006, 6:28-36; §§VIII.A, C.4.a. The display of the "number of unread" or "new" messages for a given blurb discussion is ***a message indicator that displays a number of instant messages associated with the information object***. EX1006, 6:28-36; §§VIII.A, C.4.a. An example of such an implementation follows with the added number of messages in red. Cockburn, ¶124.

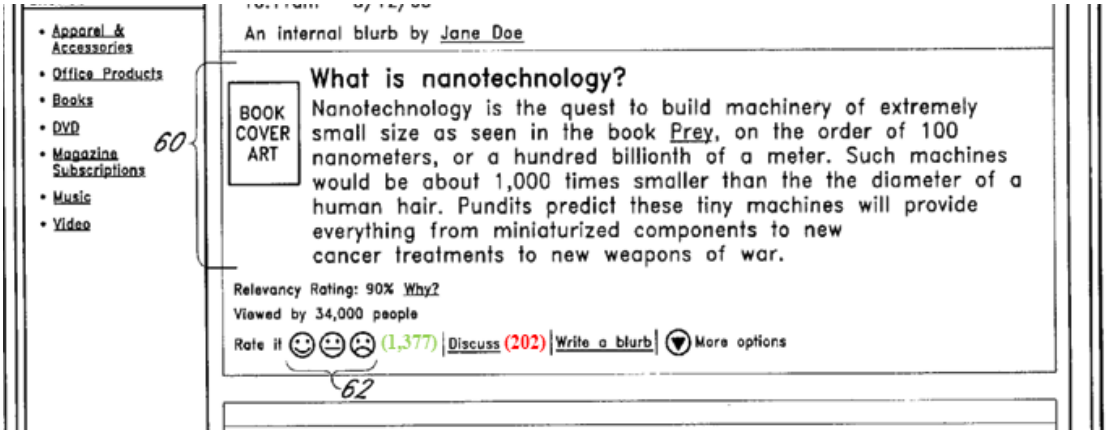


Cockburn, ¶124; EX1005, FIG. 4 (annotated); EX1006, 6:28-36, FIGs. 6-7.

f. 1[c.vi]: "wherein the indicators include: … a vote indicator that displays a number of votes associated with the information object; and"

McQueen renders this limitation obvious. Cockburn, ¶¶125-126. Each of McQueen's cards includes and a set of indicators such as "the date and time of creation." §VIII.C.4. But McQueen does not limit its indicators to just time and date information. Cockburn, ¶126. Consistent with that explained previously, it would have been obvious to display a "current tally of the votes" (***a vote indicator***) as disclosed by McQueen in conjunction, for instance, with voting icons 62. EX1005, 1:32-43, 6:42-46, 8:17-24, FIG. 4; §§VIII.A-B, C.4.a. A POSITA indeed would have appreciated that the configuration for displaying a "tally of the votes" for reviews as disclosed by McQueen would have just as easily and helpfully applied to a tally of total votes for a blurb (that includes or does not include a review). *Id.*; Cockburn, ¶126. The display of the "current tally of the votes" for a given blurb discussion ***displays a number of votes associated with the information object.***

EX1005, 1:32-43, 6:42-46, 8:17-24, FIG. 4; §§VIII.A.2, C.4.a. An example of such an implementation follows with the added vote tally in green. Cockburn, ¶126.



EX1005, FIG. 4 (annotated).

5. 1[d]: "wherein the database system is configured to allow (i) each user to have at least one user-selected collection of cards in the database system and (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."

McQueen discloses this limitation. Cockburn, ¶¶127-132. Blogs generated by each user and stored in McQueen's database 44 (§VIII.C.1) ***allow*** the ***database system*** with corresponding control and software (*id.*) to perform the following actions. Cockburn, ¶128.

***(i) User-Selected Collection[s]*:** As described in McQueen, users submit/generate blurbs via an interface (FIGs. 2-3), which are then aggregated into a personal collection referred to as the user's "blog." EX1005, FIGs. 2-3, Abstract,

4:28-43, 7:46-8:3. Specifically, each user has a "chronological log of the blurbs submitted by that author," and "each submitted blurb... preferably becomes an entry within the corresponding author's publicly-accessible blog." *Id.* Such an "author-specific blog" generated by each user and stored in database 44 (§VIII.C.1) corresponds to ***each user*** having ***at least one user-selected collection of cards in the database system*** as claimed. EX1005, 4:29-5:3 ("Blurbs posted via the blurb authoring pipeline 40 are stored in a blurbs database 44."), 7:3-17, FIG. 1; §§VIII.C.1-3; Cockburn, ¶129.

(ii) Accessible and Replicable Across Card Collections*:** McQueen further discloses that its blurbs and corresponding information formatted as a ***card in the database system (§§VIII.C.1, 4) ***with any associated picture and heading, and other associated data, regardless of the collection in which it may have first appeared,*** is ***accessible and replicable across card collections of users*** as claimed. §VIII.C.4.c, §VIII.C; Cockburn, ¶130.

Regarding ***accessib[ility]***, McQueen configures the database system such that users can access card collections belonging to others. Cockburn, ¶131. McQueen explains that "users may visit a page associated with a particular author to view... that author's blog." EX1005, 4:28-43, Abstract, 8:10-16, FIGs. 1, 4. Because the blurbs are part of a "publicly-accessible blog," they are accessible to users, via a ***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, other than the creator with all card elements and any associated data (§VIII.C.4), allowing cross-collection viewing regardless of the origin it first appeared as claimed. Cockburn, ¶131.

Regarding ***replicab[ility]***, as detailed in §VIII.C.4.c (Replicate Function), McQueen allows users to replicate cards into other collections. Cockburn, ¶132. For example, a user can "send the blurb to a friend" via the "more options" menu, or "forward[] a particular blurb." EX1005, 8:24-33; 10:36-47, FIG. 4. This action replicates the ***card*** with all card elements and any associated data (***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***) into the recipient's collection (e.g., the friend's view or shared card). §VIII.C.4.c. It also causes the card to be replicated to other's collections given an implicit vote for the card as claimed. *Id.* Thus, the card is also replicable across collections regardless of its origin, as claimed. Cockburn, ¶132.

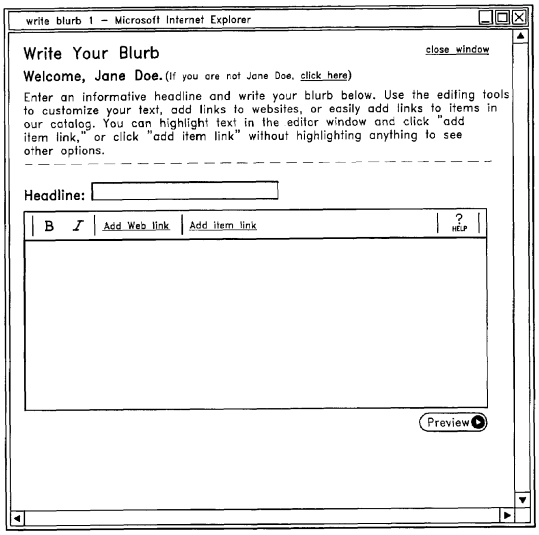
D. Dependent Claims 2, 3, 6, 7, and 11

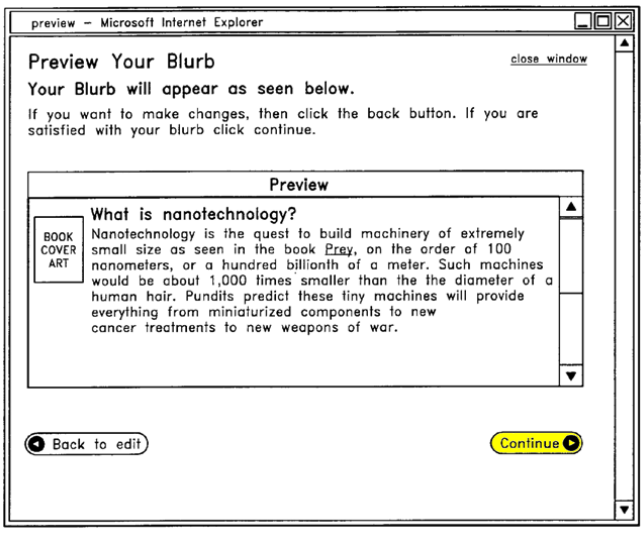
1. Claim 2: "A method according to claim 1, the computer processes further comprising: providing a user interface having a graphical button, which, when invoked while content is being displayed, causes the displayed content to be handled as one of the data items, namely, by configuring the displayed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

McQueen in view of Forsyth renders this limitation obvious. Cockburn, ¶¶133-137. As discussed previously, McQueen in view of Forsyth discloses or suggests Claim 1, including methods for presenting users with various blurbs (including ***information object[s]***) and performing corresponding ***computer processes***. *See* §VIII.C. The McQueen-Forsyth system and method performs the following ***computer processes*** (*see* §VIII.C.1) that allow a user to click a button to save and post displayed content as a new blurb. EX1005, FIGs. 2-4, 7:45-8:32; Cockburn, ¶134.

With respect to Figures 2-3, McQueen discloses ***providing a user interface having a graphical button*** that can be ***invoked while content is being displayed***, as claimed. EX1005, FIGs. 2-3, 7:45-8:32; Cockburn, ¶135. The screen illustrated in Figure 2 allows a user to create a blurb by entering the "headline and body of the blurb," etc. EX1005, FIG. 2, 7:46-54. After the user presses a "Preview" button, a "Continue" ***graphical button*** can be pressed (***invoked***) as illustrated in Figure 3

while a screen ***display[s]*** the ***content*** of the blurb (e.g., headline, body, picture). EX1005, FIGs. 2-3, 7:46-8:3.





Id., FIG. 2 (left), FIG. 3 (right) (annotated).

Pressing the "Continue" button, and thereby ***invoking*** it, directly or indirectly ***causes the displayed content to be handled as one of the*** blog entry ***data items*** because thereafter the system saves the new post as a blurb in blurb database 44. EX1005, FIGs. 1, 3, 2:64-67, 4:13-43, 7:46-8:3; §§VIII.C.1-3. This is done ***namely, by*** the system ***configuring the displayed content as a new information object***, as previewed data displayed in Figure 3 is saved as a new blurb and a corresponding ***new information object***. EX1005, FIGs. 1, 3, 2:64-67, 4:13-43, 7:46-8:3; §§VIII.C.1-3. McQueen's Figure 4 discloses the blurb post that is authored and previewed in Figure 3. EX1005, FIGs. 3-4, 7:46-8:32. And the Continue button causes this configuring to occur regardless of whether the system includes additional

optional menus; without the Continue button press, the system configuring would not occur. EX1005, FIGs. 2-4, 7:45-8:32; Cockburn, ¶136.

Likewise, pressing McQueen's "Continue" button illustrated in Figure 3 directly or indirectly ***causes the displayed content to be handled as one of the data items, namely, by*** … the system ***making a representation of the new information object available for display in the uniform format.*** EX1005, FIGs. 1, 3-4, 2:64-67, 4:13-43, 7:46-8:32; §§VIII.C.2-4; Cockburn, ¶137. For instance, pressing the Continue button causes the system to display the formatted blurb to a user. EX1005, FIGs. 3-4, 2:64-67, 4:13-43, 7:46-8:32; §VIII.C.4; Cockburn, ¶137. A user can also see the blurb post by going to an author-specific blog page. EX1005, FIGs. 1, 3-4, 2:64-67, 4:13-43, 7:46-8:32. Indeed, the blurb accordingly "becomes available" for such displays. EX1005, 7:46-8:32.

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

McQueen in view of Forsyth renders this limitation obvious. Cockburn, ¶¶138-139. As established, McQueen configures data items into information objects and "***cards***." §VIII.C.4. Each ***card*** is ***formatted*** such that it is "displayed together with … the date and time of creation" ***within the card*** as claimed. EX1005, 8:4-16, FIG. 4. Cockburn, ¶139.

3. Claim 6: "A method according to claim 1, wherein the information object is configurable to include a user-accessible file attachment."

McQueen in view of Forsyth renders this limitation obvious. Cockburn, ¶¶140-142. An "attachment" includes embedded visual data such as thumbnails and picture files. '562 Patent, 22:37-49, 23:16-24. McQueen's ***information objects*** (§VIII.C.2) are ***configurable to include*** exactly this type of attachment. Cockburn, ¶141. McQueen discloses that a blurb is "displayed together with... a graphic of the referenced item" or a picture. EX1005, 8:4-16, 13-27, 7:55-64; §VIII.C.4. This graphic serves as a ***file attachment***—specifically an image thumbnail—that is associated with the blurb. Cockburn, ¶141.

Furthermore, this attachment is "***user-accessible***" because it is presented directly to the user as part of the blog post interface. EX1005, 8:4-16, 6:14-29. Cockburn, ¶142.

4. Claim 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."

McQueen in view of Forsyth renders this limitation obvious. Cockburn, ¶¶143-145. As previously discussed, McQueen configures data items into ***information objects*** that include various indicators and data. §VIII.C.2. McQueen specifically discloses that these objects can be associated with a geographic location. Cockburn, ¶144.

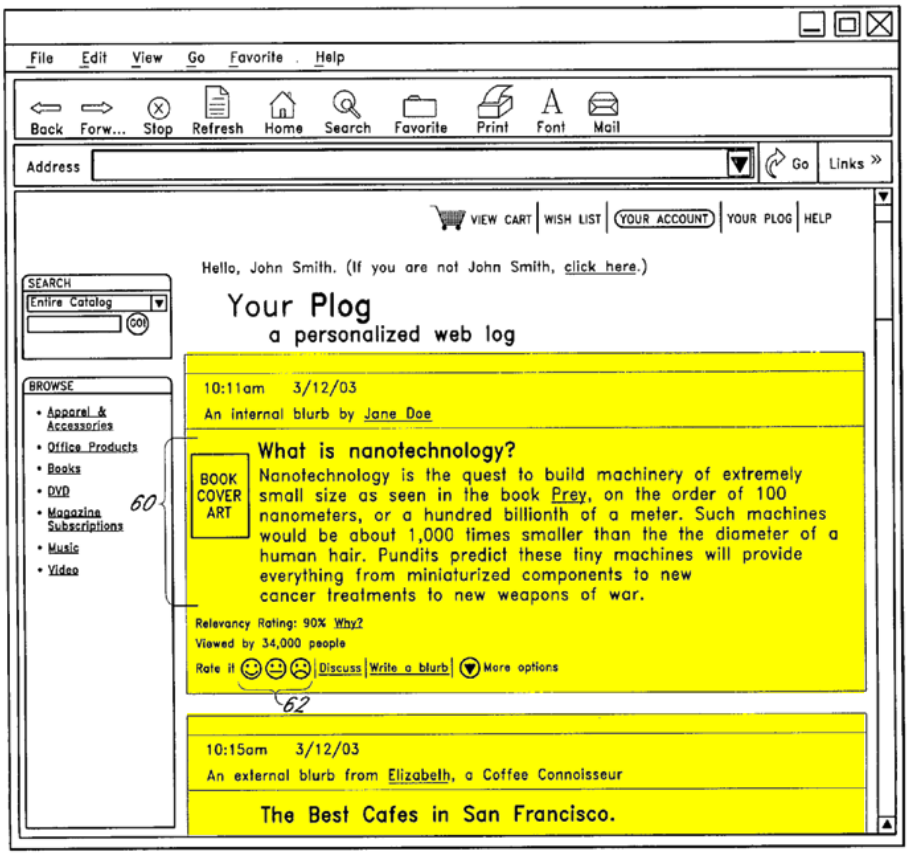
For example, Figure 4 of McQueen illustrates a blurb titled "Best Cafes in San Francisco." EX1005, FIG. 4. This content of the blurb includes an ***indicator*** ("San Francisco") that ***indicates the presence of a geographic location associated with the information object***. *Id.*; Cockburn, ¶145. By explicitly associating the blurb (the review/post) with a specific city ("San Francisco"), McQueen discloses the claimed indicator. Cockburn, ¶145. Such an indicator may be consistently included in a headline field. EX1005, FIGs. 2, 4; Cockburn, ¶145.

5. Claim 11: "A method according to claim 1, further comprising:"

McQueen in view of Forsyth renders this limitation obvious. Cockburn, ¶¶146-151.

a. Claim 11[a]: "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;"

McQueen describes presenting blurbs to a user on their device (***serving to a client computing device of a first user***) in the form of a "personalized log or 'plog,'" which is a customized collection for that user (***a first view of a first set of information objects constitut[ing] a first collection of the first user***). EX1005, 5:47-61; Cockburn, ¶¶147-148. Figure 4 of McQueen illustrates this first view, showing "a portion of an example plog page, with a single plog entry (blurb) 60 shown in its entirety." EX1005, 8:4-16.



Id., FIG. 4 (annotated).

b. Claim 11[b]: "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."

McQueen also discloses ***serving***, ***to the*** same ***client computing device, a second view of a second set of information objects constitut[ing] a collection of a second user***. Cockburn, ¶¶150-151. McQueen discloses that users can view blurb collections created by other authors on their device. EX1005, 4:28-43 ("As depicted by the 'blogs' user interface component 46 in FIG. 1, users of the system 30 can also preferably view the blurbs created via the authoring pipeline 40 in an author-specific

blog format….[U]sers may visit a page associated with a particular author to view a chronological log of the blurbs submitted by that author...or equivalently, to view that author's blog."), 8:10-16, 7:65-8:3. The system thus ***serv[es]*** an author-specific blog, which constitutes a ***collection of a second user*** as claimed, when the first user views the blog on their device. *Id.*; Cockburn, ¶151.

IX. GROUND 2: CLAIM 2 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND CSASZAR

A. Motivation to Combine

A POSITA would have been motivated to modify McQueen-Forsyth's blurb and blog publishing system and method with Csaszar's one-click mechanism for converting a web page into an internet post. Cockburn, ¶152. Implementing Csaszar's features would have reduced the amount of effort and time needed to create McQueen's blurb posts by "automatically captur[ing]" the appropriate title, heading, description element, image, etc. from a web page. EX1014, [0014], [0243]-[0247], FIG. 7; EX1005, FIG. 4; Cockburn, ¶152. Such streamlining would have increased the usability and reach of the McQueen system. EX1014, [0014], [0243]-[0247], FIG. 7; Cockburn, ¶152. Csaszar's functionality for capturing information in a uniform format also would have increased readability and user experience. Cockburn, ¶152; EX1005, FIG. 4, 8:24-33; EX1014, [0044].

Integrating Csaszar's capture trigger with McQueen's blurb posting system would have been a straightforward application of known programming techniques,

allowing users to "enable greater efficiency to experience and exchange information." EX1014, [0044], [0053]; Cockburn, ¶153; *see KSR*, 550 U.S. at 415-421.

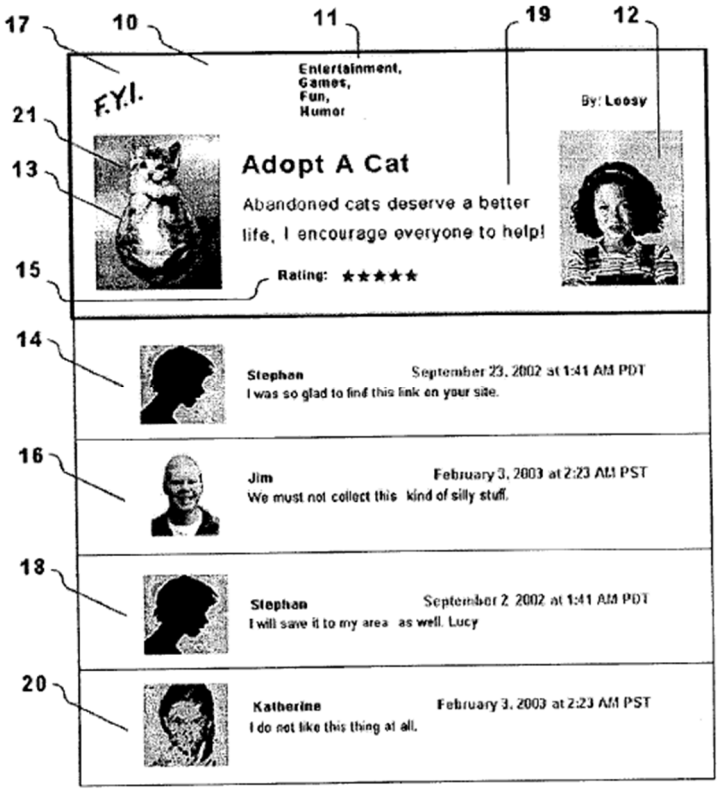
B. Reasonable Expectation of Success

A POSITA would have had a reasonable expectation of success in implementing Csaszar's teachings in the McQueen-Forsyth system and method. Cockburn, ¶154. Both McQueen and Csaszar use a centralized server-side database to store digital objects for client-side retrieval, such that Csaszar's capture trigger with McQueen's display templates would be a straightforward application of known programming techniques. Cockburn, ¶154; EX1014, [0125-0130], [0244]; EX1005, 4:29-5:33. Both describe similar uniform objects including headings, pictures, and links, such that integration into a single interface would have been within the technical skill of a POSITA. Cockburn, ¶154; EX1005, 8:4-16; EX1014, [0126]. Thus, the system and method would have been a predictable combination of known components according to known methods (*e.g.*, communication and GUI methods) and would have produced predictable display and communication results. Cockburn, ¶154; *KSR*, 550 U.S. at 416.

C. Claim 2

To the extent the McQueen-Forsyth system and method does not disclose or suggest Claim 2, McQueen and Forsyth in combination with Csaszar renders this

limitation obvious. Cockburn, ¶¶155-160. As discussed previously, McQueen in view of Forsyth discloses or suggests Claim 1, including methods for presenting users with various blurbs (including ***information object[s]***) and performing corresponding ***computer processes***. *See* §VIII.C. And like McQueen's blog and blurb-posting interfaces, Csaszar contemplates "[w]eb log" and "blog" applications, as well as presenting user posts in a standard format, *e.g.*, via a "flyer." EX1014, [0163], FIG. 7; §V.C. The Csaszar systems and methods, like McQueen's, may be performed using a "general purpose computer," programs, and corresponding ***computer processes***. EX1014, [0043]-[0044], [0244]; Cockburn, ¶156.



EX1014, Fig. 7 (illustrating a digital "flyer").

Csaszar discloses ***providing a user interface having a graphical button.*** Cockburn, ¶157. Users can "move the[ir] cursor over a representative illustration on [a] Web page and click the Right Mouse Button," which ***provid[es] a*** pop-up menu ***user interface*** where a "MAKE FLYER," ***graphical button*** is displayed. EX1014, [0244]-[0247].

Csaszar's "MAKE" button, ***which, when invoked while content is being displayed, caus[es] the displayed content to be handled as one of the data items, namely, by configuring the displayed content as a new information object.*** Cockburn, ¶158. Csaszar's "MAKE" button can be invoked while the user is viewing a web page Primary Object, which is ***displayed content.*** EX1014, [0244]-[0247] ("a representative illustration on the Web page"). When clicked, the "MAKE" button ***caus[es]*** the system to "automatically capture[] the title and the URL…and…Web page element" and add a "thumbnail-size version of the selected image to [a] newly-made Flyer." *Id.*, [0247]. This "automatic[] capturing" of the selected web page ***causes the displayed content*** (the web page) ***to be handled as one of the data items, namely, by configuring the displayed content as a new information object*** because information such as the title, URL, web page element, and picture are captured and stored for packaged display. *Id.*, [0244]-[0247], [0032] ("descriptive text elements"), [0207]-[0209], [0127], FIG. 7; Cockburn, ¶158. Like

McQueen, a database stores such content. EX1014, [0127], FIG. 3; EX1005, FIG. 1, 4:28-5:3 ("blurbs database 44").

The ***displayed*** web page ***content*** is ***configured…as a new information object*** because the system formats it as a newly-made card comprising a heading, description element, link, and picture. EX1014, [0247], FIG. 7, [0032]. Csaszar discloses ***making a representation … available for display in the uniform format*** based on the MAKE button press. Cockburn, ¶159. For instance, Csaszar's ***new*** object ***representation*** is ***available for display in the uniform format*** known as the "flyer metaphor," which like McQueen's blurb posts, is a digital object that includes "descriptive text elements, illustrative images, numeric descriptors," links, etc. that a user can view. EX1014, [0244]-[0247], [0032], FIG. 7.

Invoking Csaszar's "MAKE" function in the McQueen-Forsyth system and method would have "automatically capture[d] the title and the URL…and…Web page element" (e.g., a description element) and add a "thumbnail-size version of the selected image to the newly-made" blurb for a web page. EX1014, [0243]-[0247], [0032]; Cockburn, ¶160. This capture mechanism triggered by a graphical button would cause the displayed content to be handled as a new data item by configuring it into a new information object available for display in the uniform card format. Cockburn, ¶160. Such a configuration would have entailed McQueen's ***computer processes*** further 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. Cockburn, ¶160.

X. GROUND 3: CLAIM 5, 14, AND 15 ARE OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND BRIGGS

A. Motivation to Combine

A POSITA would have been motivated to modify the McQueen-Forsyth system and method to incorporate Briggs' reporting and information-tracing features. Cockburn, ¶161. A POSITA would have recognized that implementing Briggs' reporting teachings (e.g., on tracking "velocity," "diffusion," and "spreading of information") in the system and method would have significantly enhanced a user's understanding of social influence and weight of posts, a helpful addition to the McQueen-Forsyth system that allows users to publish content and "forward" or "send" blurbs. Cockburn, ¶161; EX1015, 5:30-32, 8:24-33, 9:25-27, 10:36-47, 19:5-36; EX1005, FIGs. 2-4. Incorporating Briggs' teachings similarly would have allowed users to know whether a given post could be trusted based on who forwarded the information. Cockburn, ¶161; EX1015, 9:25-27, 19:31-36.

Further, a POSITA would have been motivated to implement Briggs' instant messaging and object sharing teachings in the McQueen-Forsyth system and method. Cockburn, ¶162. For instance, a POSITA would have appreciated that

including Briggs' GUI and selection logic for an internet object in the McQueen-Forsyth system and method would have provided an easy and efficient method for graphically selecting specific information to share with recipients, thereby enhancing user experience. Cockburn, ¶162; EX1015, 7:37-55, 9:16-57, FIG. 6. Indeed, Briggs' automated method of "evoking [a] user's IM tool" would be an integrated and efficient bridge between the information object viewing taught by McQueen and its suggestion for sharing and forwarding such content. Cockburn, ¶162; EX1015, FIGs. 6, 19, 15:9-13; EX1005, FIG. 4, 8:25-33, 10:38-47. A POSITA also would have recognized that adopting Briggs' teachings would have improved the user experience by enabling selected information to be shared more clearly and easily. Cockburn, ¶162; EX1015, 7:37-55, 9:15-57, FIG. 6.

In all, the modifications would have been obvious and predictable combinations of known elements for known improvements and/or benefits. Cockburn, ¶153; *see KSR*, 550 U.S. at 415-421.

B. Reasonable Expectation of Success

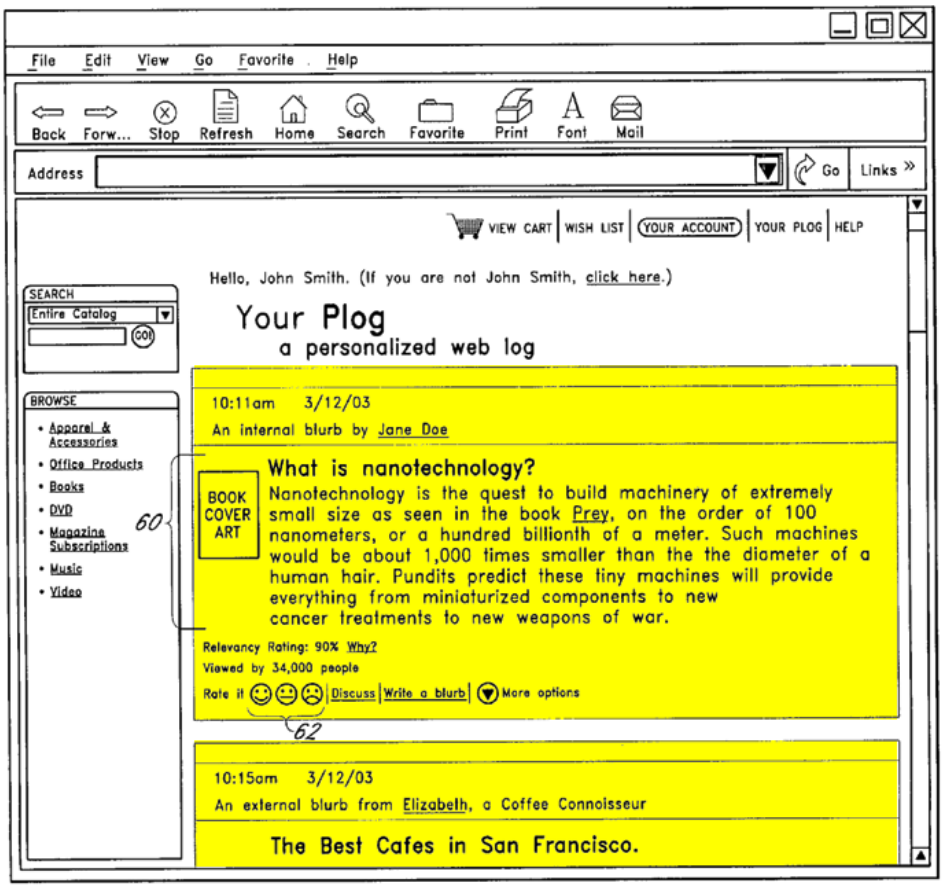
A POSITA would have had a reasonable expectation of success in combining the McQueen-Forsyth system and method with Briggs. Cockburn, ¶164-165. The disclosures utilize similar and combinable object-oriented data structures to manage digital content; they disclose combinable centralized server-side database teachings for storing digital objects for client-side retrieval. Cockburn, ¶165; EX1005, 1:13-

22, FIG. 1; EX1006, 2:17-24; EX1015, 2:45-49. Briggs' teachings on "forwarding history" or calculating "velocity" would have been understood, standard implementations for software developers at the time. Cockburn, ¶165; EX1015, 19:25-27, 19:31-36. Briggs details one potential implementation or aspect of McQueen's share/forwarding feature, confirming that the two technologies were compatible. Cockburn, ¶165; EX1015, 19:22-46, FIG. 6.

Thus, the system and method would have been a predictable combination of known components according to known methods (*e.g.*, data collection, communication, and GUI methods) and would have produced predictable display and communication results. Cockburn, ¶165; *KSR*, 550 U.S. at 416.

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

McQueen and Forsyth in combination with Briggs renders this limitation obvious. Cockburn, ¶¶166-170. As discussed previously, McQueen in view of Forsyth discloses or suggests Claim 1, including methods for presenting users with various blurb posts (including ***information object[s]***) in a uniform ***format***. *See* §VIII.C; Cockburn, ¶167.



EX1005, FIG. 4 (annotated).

Briggs discloses ***a user-accessible report relating to users who replicated*** an ***information object***. Cockburn, ¶168. For instance, Briggs discloses sending information that is "annotated with a history of users who forwarded the information" or a subset of users that forwarded the information. EX1015, 19:25-27. Cockburn, ¶168. Such "[t]racking data can be posted…for buddies to access according to their defined access rights." EX1015, 19:5-6. Moreover, Briggs even details that such aggregated data is "reported." *Id.*, 4:64-5:32. The annotations thus constitute a ***user-accessible report*** to those with access to the information or who

receive the information; the report is accessible to users, and not restricted to administrators or logs. EX1015, 19:5-46; Cockburn, ¶168.

The "history of users who forwarded the information" ***relat[es] to users who replicated*** an ***information object*** because it denotes who copied the information to another user previously. EX1015, 4:64-5:32, 19:5-46; Cockburn, ¶169. And various information may be sent, including the "full text index of items viewed," "a limited number of previous forwarding users," etc. EX1015, 19:16-46. Indeed, "[t]he computer user experiences tracked could include viewing URLs, downloading files, listening to songs, viewing videos, making purchases, sending items from a user to their buddies, or general messaging between the user and buddies." *Id.*, 18:53-57.

Invoking Briggs' tracking and reporting functionality within the McQueen-Forsyth system and method would likewise have resulted in "a history of users who forwarded the information" to be included on shared information, that is McQueen's shared or forwarded blurb posts. Cockburn, ¶170; EX1015, 19:5-46; 4:64-5:32; EX1005, FIG. 4. Such a configuration would have entailed ***the format includ[ing] a user-accessible report relating to users who replicated the information object.*** Cockburn, ¶170.

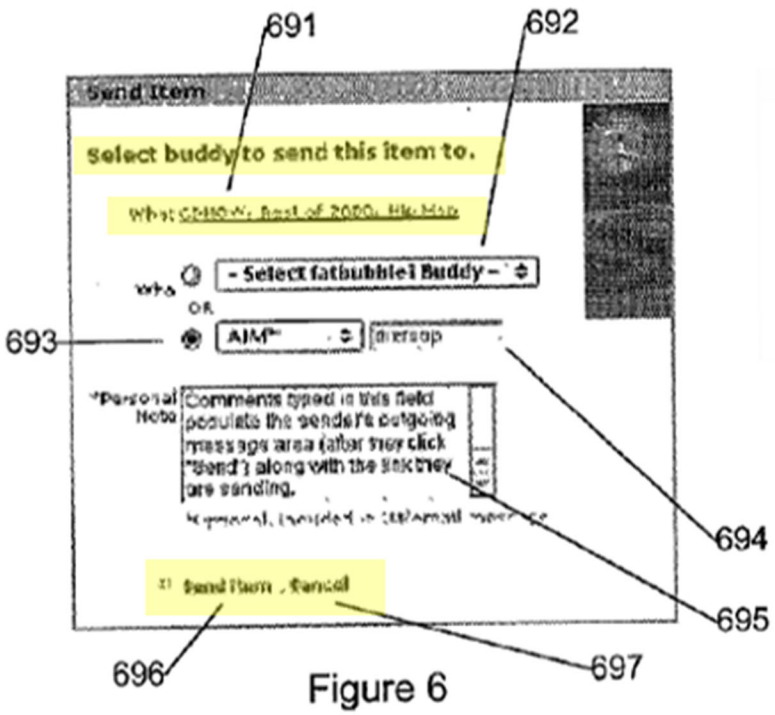
D. Claim 14: "A method according to claim 1, further comprising: on a user-entered command, causing an information object to be shared with another user when the information object and the other user have been graphically selected."

McQueen and Forsyth in combination with Briggs renders this limitation obvious. Cockburn, ¶171-176. As discussed previously, McQueen in view of Forsyth discloses or suggests Claim 1, including methods for presenting users with various blurb posts (including ***information object[s]***). *See* §VIII.C. McQueen further discloses that users can share and forward such blurb posts to their friends, thereby ***causing an information object to be shared with another user***. *See* §VIII.C.4.c. Cockburn, ¶172.

Briggs similarly discloses ***a user-entered command*** that ***caus[es] an information object to be shared with another user***. Cockburn, ¶173. Briggs discloses that users initiate the sharing of data by selecting specific controls within a messaging interface, which is ***a user-entered command***. *Id.*, ¶173; EX1015, 7:37-55, 9:15-57. Specifically, Briggs teaches that a user can initiate transfer by selecting a "send item button 696" or by using "[r]ow select commands, such as mouse-click, shift mouse-click and control mouse-click can be used to select one or more rows prior to selecting the send button" to prepare data for transmission. EX1015, Fig. 6, 7:37-55, 9:55-57.

A user ***caus[es] an information object to be shared with another user*** upon hitting send because the selected content by "evoking user's IM tool and populating the message field" with the selected content. EX1015, 7:37-55, 7:39, 7:51-52, Fig. 6. Briggs teaches that sent information "may be data such as multimedia files, XML documents, database searches or virtually any other material." EX1015, 3:41-43. Further, Briggs teaches that the recipient of the shared information is a "buddy," which is ***another user***. *Id.*, Fig. 6 (depicting how user can send information to another user by selecting a buddy). Cockburn, ¶174.

Briggs further discloses sending the content to the other user ***when the information object and the other user have been graphically selected.*** Cockburn, ¶175. Indeed, Briggs enables a user to "Select buddy to send this item to" from a list of contacts maintained by integrated messaging tools such as AIM (***the other user have been graphically selected***). *Id*., Figs. 6 (highlighted), 19, 7:37-55. The user selects what is being sent to the other user using item identification 691, which may be "any … material" such as an ***information object.*** *Id.*



EX1015, Fig. 6 (highlighted).

When combined, the modified McQueen system and method would allow a user to graphically select a blurb post and buddy to send it to a buddy, consistent with McQueen's sending and forwarding blurbs to friends. Cockburn, ¶176. McQueen teaches a "more options" drop down menu, which is a list that allows the plog's owners to access other options such as sending a blurb to a friend. EX1005, Fig. 4, 8:24-33, 10:36-47. Briggs' teachings enable a detailed selection of such an information object to be sent to a specific recipient. Cockburn, ¶176; EX1015, 9:55-57, 7:37-55, Fig. 6. Such a configuration in combination would have entailed ***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.*** Cockburn, ¶176.

E. Claim 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."

McQueen and Forsyth in combination with Briggs renders this limitation obvious. Cockburn, ¶¶177-180. As discussed previously, McQueen in view of Forsyth discloses or suggests Claim 1, including methods for presenting users with various blurb posts (including ***information object[s]***). *See* §VIII.C. McQueen further discloses that users can share and forward such blurb posts to their friends, thereby ***causing an information object to be shared with another user***. *See* §VIII.C.4.c.

For similar reasons to those discussed for Claim 14, McQueen in view of Forsyth and Briggs discloses or suggests the remaining limitations of Claim 15. Cockburn, ¶178; §X.D. Briggs discloses ***on a user-entered command, causing an information object to be shared with another user*** as discussed previously. Cockburn, ¶178; §X.D. Briggs further discloses that such user-entered command sharing occurs ***via an instant message sent through an integrated messaging system***. Cockburn, ¶178. Briggs teaches that upon a user's selection of an item and the activation of a "send" command, the system "evok[es] [the] user's IM tool and populat[es] the message field" with the selected content for transmission to another user. EX1015, 7:39-46, Figs. 6, 19. AIM was an ***integrated messaging system***

where users could send such instant messages to each other. Cockburn, ¶178; EX1015, Fig. 6 (circled below); 4:42-47, 7:39-46.

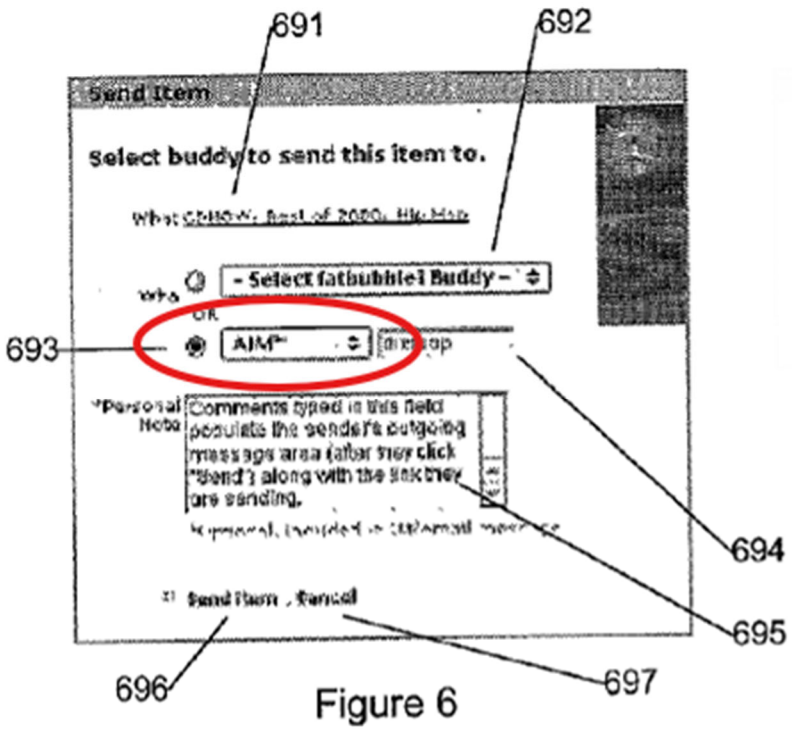


Figure 6

EX1015, Fig. 6 (circled).

Thus, upon a user hitting "send," an instant message of the selected item is sent ***as a result of graphical selection by a first user*** (e.g., selecting the information object, user, and/or sending) as discussed previously. *Id.*, 7:39-46, Fig. 6; §§X.A-B, D. And it would have been obvious to incorporate such features in the McQueen-Forsyth system and method to send information objects as discussed previously. Cockburn, ¶180; §§X.A-B, D.

XI. GROUND 4: CLAIM 7 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND COLAS

A. Motivation to Combine

A POSITA would have been motivated to modify the McQueen-Forsyth blogging system and method to incorporate Colas's techniques for using online pages to post advertisements or other blurbs including location indicators. Cockburn, ¶¶181-182. For instance, a POSITA would have appreciated that including such advertisements in an author's blog page would have allowed the author to generate revenue for his or her business (e.g., a real-estate business), a complementary function to McQueen's system, which already contemplates online catalog applications. EX1026, [0002]-[0003], [0008]; EX1005, Abstract, FIGs. 1, 4, 1:54-63; Cockburn, ¶181.

A POSITA also would have appreciated that including a uniform location indication on a post as described by Colas would have increased the effectiveness and engagement of McQueen's posts by allowing users to see if the post is relevant to them, close by, etc. EX1026, [0121]-[0122], FIGs. 4A, 10A-B, 11A, 12A, 13, 24A-B; Cockburn, ¶182. Incorporation of the Colas features also would have helped sales professionals better maintain and control their advertising and online outreach. EX1026, [0094]-[0095]; Cockburn, ¶182. A user could easily manage when and how such a post is published and timed. EX1026, [0016], [0110]-[0111] ("ad run period"), [0132], [0244]; Cockburn, ¶182. In all, the modification would have been

an obvious and predictable combination of known elements for known improvements and/or benefits. *See KSR*, 550 U.S. at 415-421.

B. Reasonable Expectation of Success

A POSITA would have had a reasonable expectation of success in combining the McQueen-Forsyth system and method with Colas. Cockburn, ¶183. The disclosures describe using discrete digital objects and storing similar titles, images, and links, and such known combinations and required software implementations would have been predictable and well within a POSITA's skill. Cockburn, ¶183; *see also, e.g.*, EX1005, FIGs. 1, 4; EX1006, 4:15-17; EX1026, FIGs. 4A, 10A-B, 11A, 12A, 13, 24A-B. Colas details that its techniques were applicable to "on-line catalogs, yellow pages," other online platforms, and "any electronic … media that can support perusing of ads by potential purchasers," EX1026, [0003], [0018], [0097], including McQueen's online pages that a user can browse. Cockburn, ¶183; EX1005, FIG. 4. Such a system and method would have been a predictable combination of known components according to known methods (*e.g.*, advertisement, communication, and GUI methods), and would have produced predictable display results. Cockburn, ¶183; *KSR*, 550 U.S. at 416.

C. Claim 7

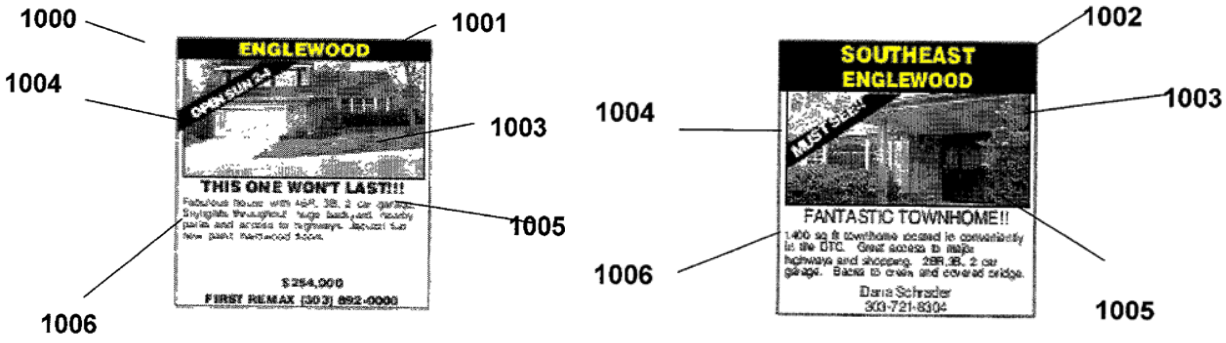
To the extent the McQueen-Forsyth system and method does not disclose or suggest the additional features of Claim 7, the McQueen-Forsyth combination in

view of Colas renders this limitation obvious. Cockburn, ¶¶184-187. As previously discussed, McQueen configures data items into ***information objects*** that include various indicators and data. §VIII.C.2; Cockburn, ¶184.

Like McQueen, Colas discloses a system that allows content creators to post various created media, including advertisements, to "Web pages." EX1026, [0003], [0008], [0118], [0132], FIGs. 4A, 24B. Colas details that its posts were applicable not only to "items for sale" but also to movie previews, personal ads, etc.—any online media that supports browsing. *Id.*, [0003], [0018], [0097]. And Colas's advertisements include "images, text, … Web page link[s], etc."—just like McQueen's blurb posts and corresponding information objects. *Id.*, [0018], FIGs. 10A-B; §VIII.C; Cockburn, ¶185.

Colas also details that a post may include various and prominent "geographic location display[s]" 1000, which allow a user who comes across the ad to know what and where the post is for (e.g., Southeast Englewood, Denver South). EX1026, [0121]-[0122], FIGs. 4A, 10A-B, 11A, 12A, 13, 24A-B. It likewise is an ***indicator*** that ***indicat[es] the presence of a geographic location, associated with*** an ***information object***. *Id.*; Cockburn, ¶186. The location display element moreover may "consist[] of a single city line 1001 or a two line Region and City entry 1002," and it is formatted "for emphasis." EX1026, [0121]-[0122], FIGs. 4A, 10A-B, 24A-B. This location identifier is "always" the first line of a two line graphic location; it

is consistently located at the top of an ad. *Id.* A few examples of Colas's various location identifiers for an online post follow.



EX1026, FIGs. 10A-B (annotated).

Id., FIG. 24B (annotated).

Utilizing Colas's location indicators for postings and advertisements within the McQueen-Forsyth system and method would align with McQueen's disclosure for allowing authors to create their own specific blogs and webpages. Cockburn, ¶187; §VIII. Specifically, a user would navigate to persons' pages to see current blurb post listings including relevant city/area tags, brief descriptions, etc. for real-estate, blogging, etc. applications in the modified McQueen system and method. Cockburn, ¶187. Such a configuration would have comprised ***one of the indicators***

of a blurb post ***indicat[ing] the presence of a geographic location, associated with the information object.*** Cockburn, ¶187.

XII. GROUND 5: CLAIM 8 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND RIEGER

A. Motivation to Combine

A POSITA would have been motivated to modify the McQueen-Forsyth system and method to incorporate Rieger's technique for illustrating the location of online posts on a map. Cockburn, ¶¶188-190. For instance, a POSITA would have recognized that Rieger's "geographically relevant postings" would enhance user experience by allowing users to see the physical "point of relevance" for the information being shared and search for relevant posts based on location. Cockburn, ¶188; *see* EX1016, 1:25-34, Fig. 4 (exemplary illustration of a map and posts for user), FIG. 11, 1:62-65, 2:39-43, 4:4-14, 13:1-31, 24:4-28. Moreover, a POSITA would have recognized that Rieger's functionality would help facilitate the community-based interactions that McQueen and Forsyth seek to provide by better enabling dialog options between users for specific groups, etc. and enabling more geographically relevant information to be provided to particular populations. Cockburn, ¶188; EX1016, 2:9-27, 4:4-14, 16:36-48, Abstract.

A POSITA also would have recognized that implementing Rieger's teachings also would have better linked McQueen's "blurb" sharing based on location to better target certain posts and/or advertisements. EX1005, 1:64-2:16 (describing targeted

posts for users); EX1016, Abstract (describing location-based posts for users). McQueen contemplates that users can be targeted with blurbs based on locations (EX1006, 5:18-26) and Rieger discloses a helpful way to target users with posts by dynamically defining the target area. EX1016, 1:53-57, 2:1-7, 21:11-22:6, FIG. 7B; Cockburn, ¶189. In all, the modification would have been an obvious and predictable combination of known elements for known improvements and/or benefits. Cockburn, ¶190; *see KSR*, 550 U.S. at 415-421.

B. Reasonable Expectation of Success

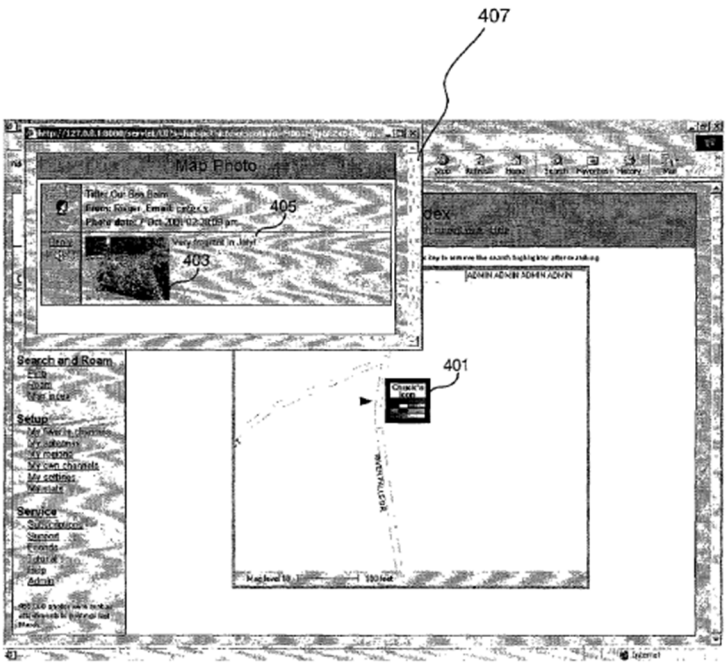
A POSITA would have had a reasonable expectation of success in combining the McQueen-Forsyth system and method with Rieger. Cockburn, ¶191. The disclosures describe using discrete digital objects and storing similar titles, images, and links, such that their combination would have been predictable and well within the skill of a POSITA. Cockburn, ¶191; *see also, e.g.* EX1005, 5:66-6:3 (describing storing links), EX1006, 8:60-64 (describing storing links); EX1016, 5:19-23 (describing storing graphics, audios, links). Further, a POSITA would have had a reasonable expectation of success in combining because Rieger's pop-up window teachings were well-understood, standard practices for software developers at the time. Cockburn, ¶191; EX1016, 19:25-27, 19:31-36. In all, the system and method would have been a predictable combination of known components according to known methods (*e.g.*, data collection, communication, and GUI methods), and

would have produced predictable display and communication results. Cockburn, ¶191; *KSR*, 550 U.S. at 416.

C. Claim 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."

McQueen and Forsyth in combination with Rieger renders this limitation obvious. Cockburn, ¶192-197. As discussed previously, McQueen in view of Forsyth discloses or suggests Claim 1, including methods for presenting users with various blurb posts (including ***information object[s]*** and their ***representation[s]***). *See* §VIII.C. Similar to McQueen, Rieger relates to the communication of targeted "postings" from a source to a user via a networked computer server. Cockburn, ¶192-193; EX1016, Abstract, 1:20-36; §V.E. Users can publish and browse posts for various geographical regions by working with various displayed map controls. EX1016, Abstract, FIGs. 4, 7.

Rieger teaches that "postings" including photos are represented on a map by an icon visible to users as they browse. EX1016, 13:1-29, Fig. 4. When a user selects an icon for a post (such as icon 401), the system displays the photo 403, its associated message 405, and "any supporting elements" in a window over the map. *Id.*; *id.*, 1:20-57. Cockburn, ¶194.



EX1016, Fig. 4.

Rieger discloses ***a map including a location, marked on the map, associated with at least one … information object[].*** Cockburn, ¶195. For instance, Rieger discloses a map interface that serves as the basis for the communications system. EX1016, 4:39-44, 13:1-29, FIG. 4. The map includes a location because the system is organized among a series of geographical maps covering a specific service area. *Id.* The location is marked on the map using an icon (401) that is visible to users as they browse the map. *Id.*, Fig. 4. And the location is associated with at least ***one information object*** because the icon represents an attached "photo" or "posting" containing information like a title and message. *Id.*; Cockburn, ¶195.

Further, Rieger discloses that the map can be displayed ***at the same time as the representation.*** Cockburn, ¶196. Rieger discloses an information object is

represented as a "pop-up." EX1016, 13:26-30 ("When selected in a suitable way, e.g., by Ctrl-clicking the photo's icon 401, the communications system 200 displays the photo 403, its message 405, and any supporting elements, typically in a pop-up browser window 407").

Invoking Rieger's map-based postings within the McQueen-Forsyth system and method would align with McQueen's blurb postings. Cockburn, ¶197; EX1005, Fig. 5 (depicting heading of entry in a plog). Specifically, a user could navigate to a map option like that disclosed by Rieger to view relevant and associated blurb postings and their corresponding information objects. Cockburn, ¶197; EX1016, 2:23-24, 13:1-30, 4:38-44, FIG. 4. Such a configuration would have entailed ***at the same time as the representation*** of the information object being presented displaying ***a map including a location, marked on the map, associated with at least one of the information objects.*** Cockburn, ¶197.

XIII. GROUND 6: CLAIMS 12, 13, 17, AND 18 ARE OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, AND KNAPP

A. Motivation to Combine

It would have been obvious to a POSITA to modify the McQueen-Forsyth system and method to allow a user to copy a selected blog post of another author to the user's plog in view of Knapp. Cockburn, ¶¶198-199. Knapp identifies a critical problem in distributed networking like McQueen's where the vast availability of data potentially leads to a "syndrome that can best be characterized as 'sipping

information from a fire hose.'" EX1017, 1:20-43. This overwhelming volume of data causes users to "either fail to find the information they seek or they lose track of the information," and as a result, "they cannot find it again at a later point in time." *Id.* By applying Knapp's solution to the McQueen-Forsyth system and method, a POSITA would recognize the functional benefit of allowing a user to add (by copying) external posts into a centralized, stable website to ensure easier and robust access and organization, as well as to mitigate issues associated with losing information. *Id.*; EX1017, FIGs. 9, 12, and 17; Cockburn, ¶198.

The integration of Knapp's add feature into McQueen's blurb pages would have helped transition the user from a passive reader to an active curator, significantly enhancing utility and user engagement with plogs. Cockburn, ¶199; EX1017, FIGs. 9, 12, and 17. Knapp's select-then-display configuration also would have allowed system operators to earn money on posts while increasing interest in the content by first having the user select the content. EX1017, 23:35-24:3, 25:30-56, 28:31-44, FIGs. 6-9, 11-12, 16-17; Cockburn, ¶199. Further, such features would have streamlined the reuse of valuable content and reduced duplication of effort across user pages. EX1017, FIGs. 9, 12, and 17; Cockburn, ¶199. Thus, modifying McQueen's user blurb pages and system would have predictably "improv[ed] … the way in which users access desired information" in several ways. EX1017, 2:15-20; Cockburn, ¶199.

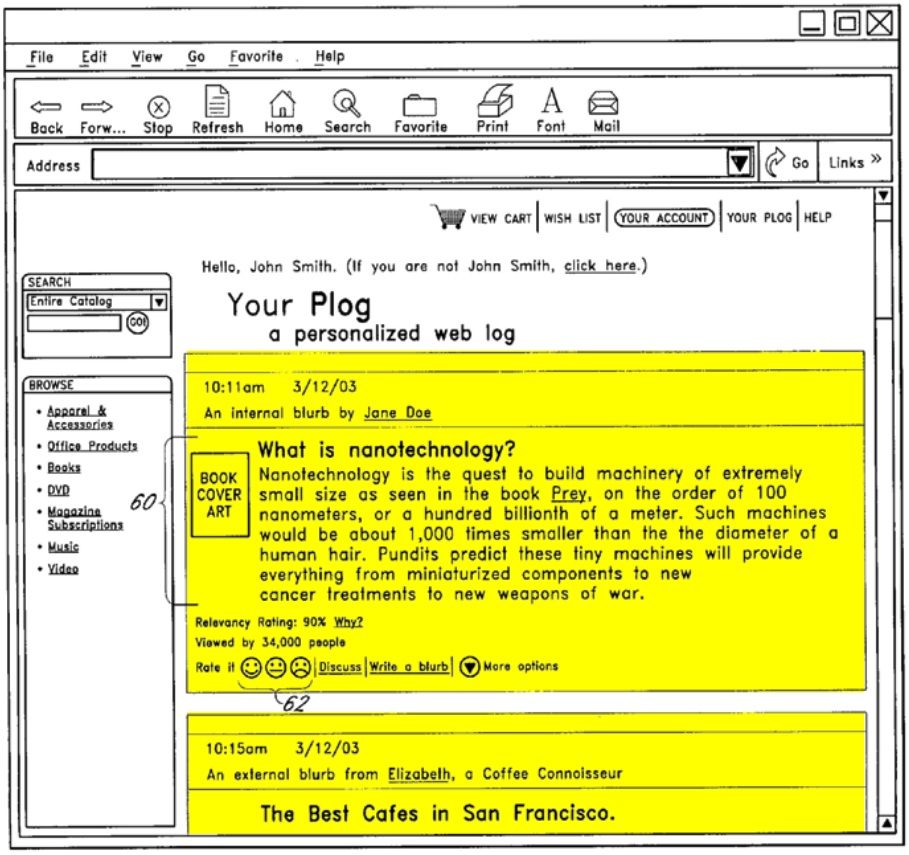
B. Reasonable Expectation of Success

A POSITA would have had a reasonable expectation of success modifying the McQueen-Forsyth combination in view of Knapp. Cockburn, ¶¶200-201. Knapp, like McQueen, discloses various GUI configurations for browsing and interacting with content posted over the internet; both contemplate distributing content for potential e-commerce applications. EX1005, 1:5-11 ("provide personalized content to users of [catalog systems]"), 1:54-64, 9:29-50, FIG. 4; EX1017, 1:10-18, 23:64-24:3, FIGs. 6-9, 11-12, and 16-17; §V.F; Cockburn, ¶200.

Knapp and McQueen both contemplate compatible configurations where partial content is displayed, for instance because of licensing requirements, in a scrollable window, and then more information about the content is displayed once the content is selected. EX1005, FIG. 4, 5:61-6:3; EX1017, FIGs. 6-9, 11-12, and 16-17. Both also disclose compatible content configurations that can link to other options and detailed pages. EX1005, 7:48-54; EX1017, FIGs. 6, 11, 16. In all, the McQueen-Forsyth-Knapp system and method would have been a predictable combination of known components according to known methods (*e.g.*, communication and GUI methods), and would have produced predictable display and communication results. Cockburn, ¶201; *KSR*, 550 U.S. at 416.

C. Claim 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."

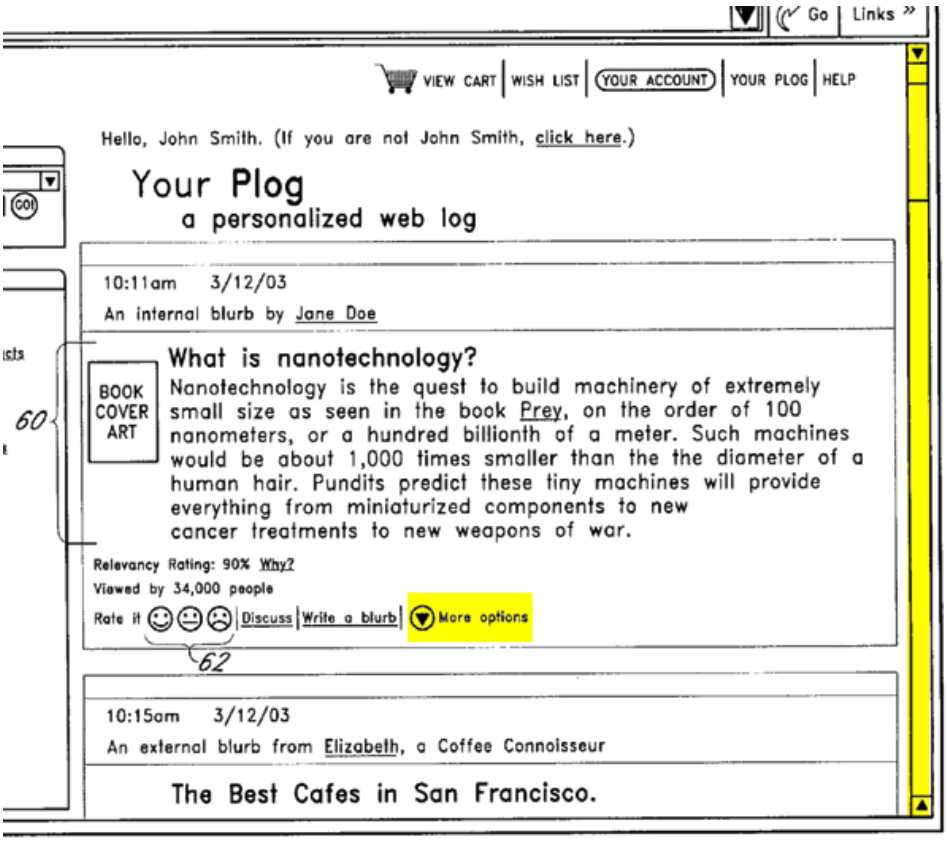
McQueen in view of Forsyth and Knapp renders this limitation obvious. Cockburn, ¶¶202-209. As explained previously, McQueen in view of Forsyth renders obvious Claim 11, including a system and method wherein a ***first user*** can view blurb posts (including ***information object[s]***) of a second user ***in a second view*** by loading an "author-specific" page. §VIII.D.5. The ***first user*** similarly has their own "plog" page, which, as illustrated below, includes a personalized blurb feed presented in a ***first view***. §VIII.D.5. Cockburn, ¶203.



Id., FIG. 4 (blurb posts highlighted).

McQueen discloses graphically selecting blurb posts when viewing another author's page in two ways (***responsive to (i) a graphical selection, by the first user, of an information object in the second view***). Cockburn, ¶204. First, the ***first user*** graphically clicks on a "More options" link of a blurb post displayed in the second view, thereby selecting the information object in the second view. EX1005, FIG. 4, 4:28-43, 8:24-34, 10:36-48; Cockburn, ¶204. Such information objects and card interfaces were known to be selected by triggering a menu to appear. Cockburn, ¶204; *see, e.g.*, EX1018, [0086], [0062]. Second, the ***first user graphical[ly]***

select[s] a blurb post as claimed by loading it on their screen using a scroll function. EX1005, FIG. 4, 2:6-14, 4:28-43, 7:65-8:16, 10:36-48; Cockburn, ¶204.



EX1005, FIG. 4 (annotated).

Once the first user selects an author's given blurb post, McQueen does not explicitly disclose that the blog post can be copied to the first user's plog as claimed. Cockburn, ¶205. But it would have been obvious to modify the McQueen-Forsyth system and method to allow a user to copy a selected blog post of another author to the user's plog in view of Knapp. §§XIII.A-B; Cockburn, ¶206.

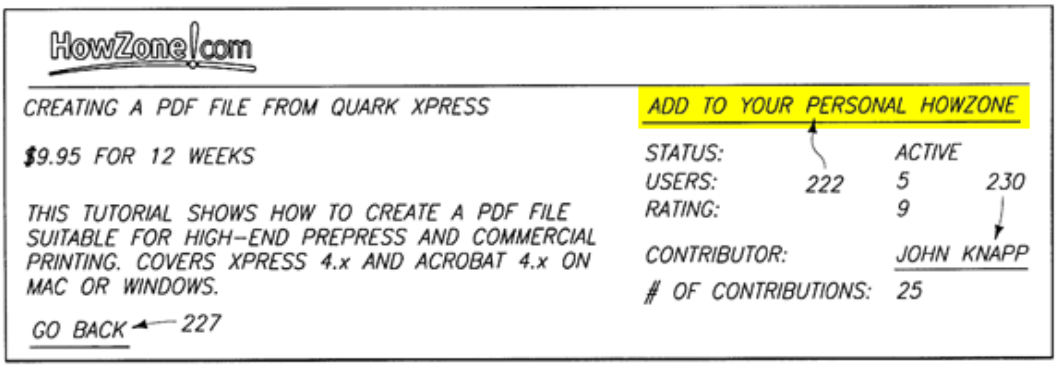
Knapp discloses ***(i) a graphical selection, by [a] first user*** of a "content object" by clicking on an associated link or a "clickable icon or graphic." EX1017,

19:50-66 (system "tracks the number of users that have selected the content object represented by link 176"), 24:62-25:21, 28:3-45, FIGs. 6-7, 11, 16.[5] Before the user clicks to select a content object, the system represents content objects by listing snippets of information (e.g., a title, rating, link, cost) in a ***second view***; additional options for the content object are presented once a user selects a content object. EX1017, FIGs. 6-7, 9, 11-12, 16-17. The content object can be authored by various parties. *Id.*; *id.*, 6:53-7:2; Cockburn, ¶207.

Knapp discloses copying a GUI object to their personal page via ***(ii) a copy command that has been graphically entered by the first user.*** Cockburn, ¶208. Knapp discloses adding a third-party generated content object to a user's "personal HowZone" website by clicking on an "add to personal HowZone" link after the user selected the content object. EX1017, 6:53-7:2, 23:35-24:3, 25:30-56, 28:31-44, FIGs. 9, 12, 17. Clicking on the "add" link results in the user entering a copy command that duplicates the content object in the user's own personal page. EX1017, 6:53-7:2, 23:35-24:3, 25:30-56, 28:31-44, FIGs. 9, 12, 17. The personal HowZone moreover is a "personal web site" constituting a collection of various

[5] To the extent the Board finds McQueen does not disclose that a first user can select another's blog post as claimed, Knapp does and the feature would have been obvious in combination.

other content objects, similar to a user's personal plog page disclosed by McQueen. EX1017, FIG. 8, 23:3-17, 25:39-55 ("[A]n actual content object is added to the user's personal web page.").



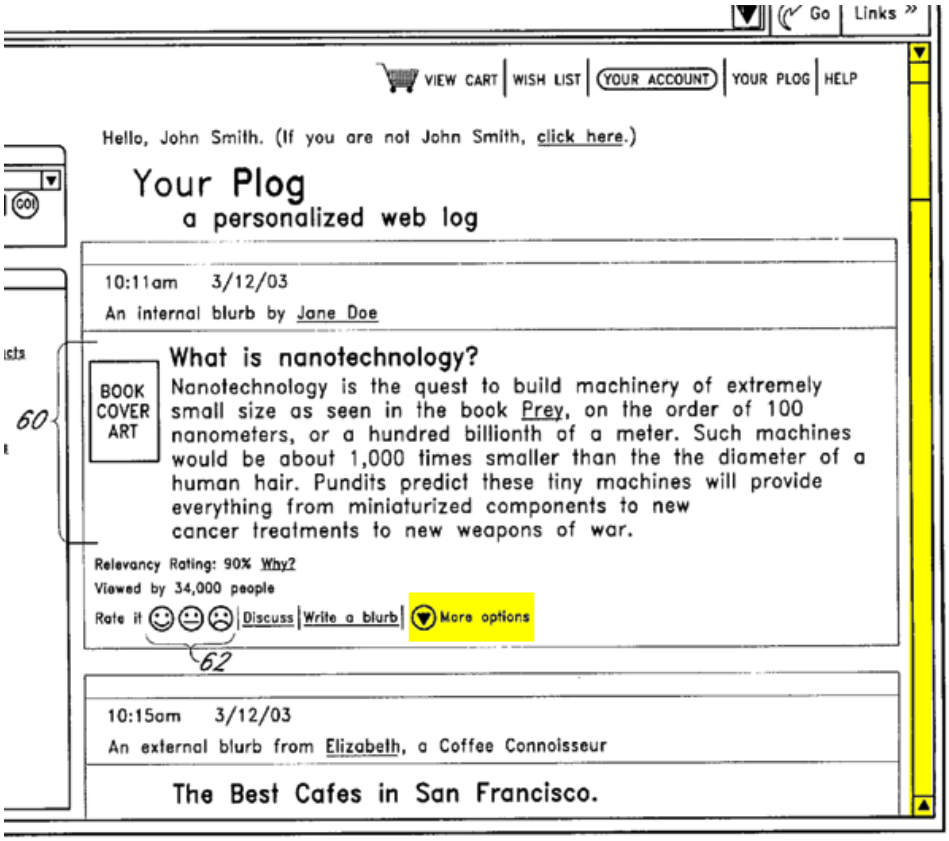
EX1017, FIG. 17 (annotated).

When combined, the McQueen-Forsyth system and method would similarly allow a user to select a blurb post of another author (via a "More options," scroll, or heading/graphic click) and copy it to their own personal plog, consistent with Knapp's disclosure of selecting a content object authored by a third-party to add the "actual content object" to the "user's personal web page." Cockburn, ¶208; *supra* §§XIII.A-B. Such a configuration would have entailed ***causing [a] 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 … responsive to (i) a graphical selection, by the first user, of an information object in the second view (ii) a copy command that has been graphically entered by the first user.*** Cockburn, ¶209; §§XIII.A-B.

D. Claim 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."

McQueen in view of Forsyth and Knapp renders this limitation obvious. Cockburn, ¶¶210-216. As previously explained, McQueen serves a ***first view*** (a blog or "plog") containing ***information objects*** to a ***first user***. §§VIII.C.4, D.5. McQueen further discloses a method for sending these objects to the ***second user*** via graphical selection and commands entered by the user. Cockburn, ¶211.

The McQueen-Forsyth system and method (including as modified by Knapp) discloses or suggests ***(i) a graphical selection, by the first user, of an information object in the first view***. Cockburn, ¶212. Consistent with Claim 12, users can ***graphical[ly] select[]*** blurb post ***information objects*** as claimed via a "More options" selection of a blurb post or selectively displaying the blurb on their screen. §VIII.C.4. It also would have been obvious for the user to click on a blurb post heading/graphic link consistent with Knapp's disclosure. *Id.* These selections can occur when the user views their plog ***in the first view***. EX1005, FIG. 4; §VIII.C.4.



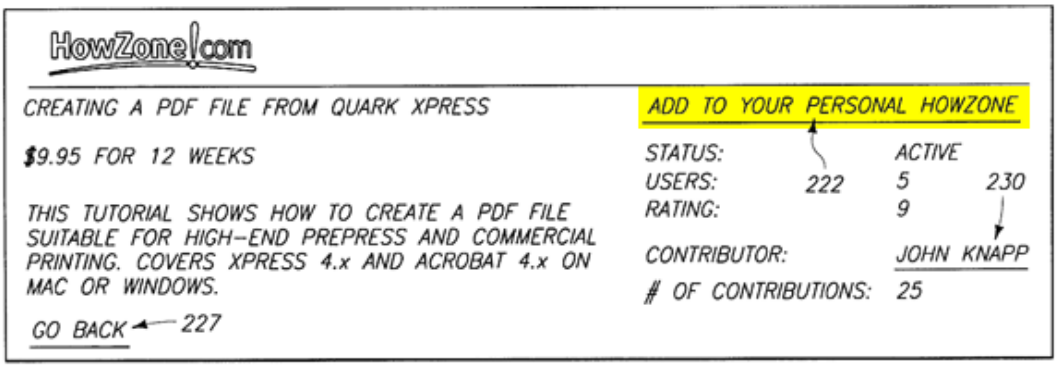
EX1005, FIG. 4 (annotated).

McQueen further discloses ***causing the selected information object to be sent to the second user … responsive to*** the (i) graphical selection ***and (ii) a send command that has been graphically entered by the first user***. Cockburn, ¶213. Within the "More options" menu once the user selected a blurb post (responsive to (i)), the ***first user*** can ***(ii) graphically enter[]*** a ***send command***, as McQueen explicitly describes "an option to send the blurb to a friend." EX1005, 8:25-33, 10:35-47 ("user forwards a particular blurb to a friend"), FIG. 4. This "send to a friend" option is or triggers a send command that was ***graphically entered*** via the ***first user***'s interaction with the GUI to send the blurb, and thereby ***caus[es] the***

selected information object to be sent to the second user (*e.g.*, a blog author). EX1005, 8:25-33, 10:35-47 ("user forwards a particular blurb to a friend"), FIG. 4.

Although McQueen does not explicitly disclose that the information object sent ***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***, this feature would have been obvious for reasons similar to claim 12; it would have been obvious to a POSITA to modify the McQueen-Forsyth system and method to allow a user to copy a selected blog post of another author to the user's plog or blog in view of Knapp. Cockburn, ¶214.

Knapp discloses GUI objects wherein the object ***is made available to the second user to be included in the collection of the second user.*** Cockburn, ¶215. Explained previously, an "add" link for an object allows a content object that is displayed to a ***second user*** to be added to their personal page comprising a ***collection of the second user***. EX1017, 6:53-7:2, 23:35-24:3, 25:30-56, 28:31-44, FIGs. 9, 12, 17; §XIII.C.



EX1017, FIG. 17 (annotated).

In combination, and consistent with the reasons discussed previously, the information object would be sent as taught by McQueen ***so that the selected information object in the collection of the first user*** that the first sends to another author or second user ***is made available to the second user to be included in the collection of the second user*** by adding it to their personal plog or blurb page. Cockburn, ¶216; §§XIII.A-C.

E. Claim 17: "A method according to claim 1, further comprising:"

McQueen in view of Forsyth and Knapp renders this limitation obvious. Cockburn, ¶217.

1. Claim 17[a]: "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;"

McQueen in view of Forsyth and Knapp renders this limitation obvious for substantially the reasons explained for Claim 11. Cockburn, ¶218; §VIII.D.5.

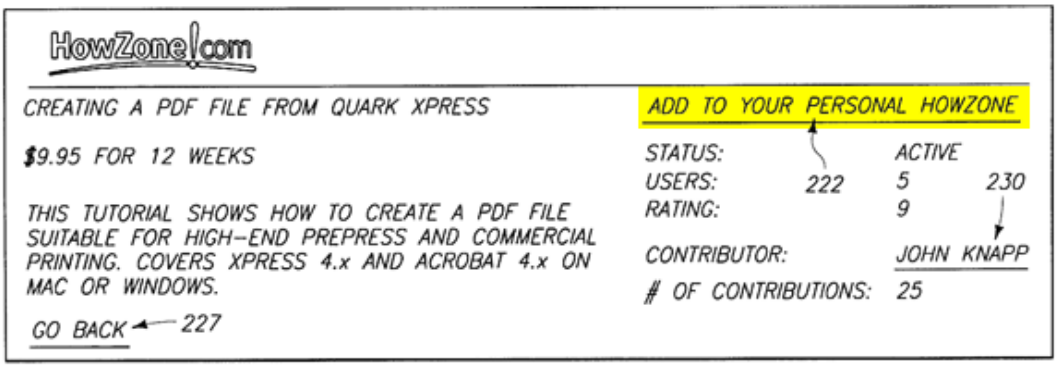
2. Claim 17[b]: "also serving, to the client computing device of the first user, a second view of a second set of information objects, outside of the first collection, wherein any given member of the second set of information objects is both included in a collection of another user and the other user 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."

McQueen in view of Forsyth and Knapp likewise discloses or suggests ***also serving, to the client computing device of the first user, a second view of a second set of information objects*** for substantially the reasons explained for Claim 11 and its "author-specific" blog analysis. Cockburn, ¶¶219-223; §VIII.D.5; EX1005, 4:28-43, 7:65-8:3, 8:10-16. Blurb posts from such an author-specific page are ***outside of the first collection*** of a user (the user's plog; §VIII.C.4.c) when the user's plog does not include blurbs from the author, for instance because the user did not pay for the blurb post, the system does not target the user with the author's material, the author and user do not have similar item selection histories, or the author's blurbs do not reference catalog items that the user previously selected. EX1005, 1:64-2:16, 9:50-10:47; Cockburn, ¶220. ***Any given member of the second set of information objects*** from the author-specific blog ***is … included in a collection of another user*** because it is a part of the author-specific blog collection rather than the user's collection. EX1005, 4:28-43, 7:65-8:3, 8:10-16. And users load the author-specific page by

clicking on the author's link, such that ***the other user has been selected by the first user*** as claimed. *Id.* ("a link to the author's blog page"); Cockburn, ¶220.

Although McQueen does not explicitly disclose ***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***, this feature would have been obvious for reasons similar to those discussed for claim 12; it would have been obvious to a POSITA to modify the McQueen-Forsyth system and method to allow a user to copy a selected blog post of another author to the user's plog in view of Knapp. Cockburn, ¶221.

Knapp discloses GUI objects ***wherein each of the … objects in [a] second view can, on a user-entered command, be caused to be copied to [a] first view.*** Cockburn, ¶222. Explained previously, clicking on an "add" link results in a ***user-entered command*** that duplicates the content object in the user's own personal page and corresponding ***first view***. EX1017, 6:53-7:2, 23:35-24:3, 25:30-56, 28:31-44, FIGs. 9, 12, 17; §XIII.C. The "add" option maintains the ***second view*** of any displayed objects because the system presents the add option in a "pop-up window." EX1017, 23:35-24:3, 25:30-56, 28:31-44, 43:7-25, 43:14-18, FIGs. 9, 12, 17; Cockburn, ¶222.



EX1017, FIG. 17 (annotated).

In combination, and consistent with the reasons discussed previously, ***each of the information objects in the second view*** for an author's blurbs as disclosed by McQueen thus ***can, on a user-entered command, be caused to be copied to the first view*** comprising the user's plog view. Cockburn, ¶223; §§XIII.A-C.

F. Claim 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."

McQueen in view of Forsyth and Knapp renders this limitation obvious. Cockburn, ¶¶224-225. McQueen further discloses that author-specific blurbs are displayed "chronological[ly]" based on when the blurb posts are submitted by the author, such that ***the information objects in the second view [are] displayed in an order determined by a criterion … consisting of the information object's creation time*** as claimed. EX1005, 4:13-43, 7:65-8:3;Cockburn, ¶225.

XIV. GROUND 7: CLAIM 13 IS OBVIOUS IN VIEW OF MCQUEEN, FORSYTH, BRIGGS, AND KNAPP

To the extent Petition's above Claim 13 mapping (§XIII.D) for ***causing [a] selected information object to be sent to the second user … 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*** is misplaced (it is not), these features would have been obvious in view of Briggs for substantially the same reasons discussed for Claims 14 and 15. Cockburn, ¶226-227; §§X.D-E. Indeed, sending a ***graphical[ly] select[ed] information object*** via instant messaging as discussed (§§X.D-E) would have constituted a ***first user graphically enter[ing] a send command*** via, *e.g.*, a "send item button 696," as disclosed by Briggs. EX1015, 7:37-55, FIG. 6; §§X.D-E.

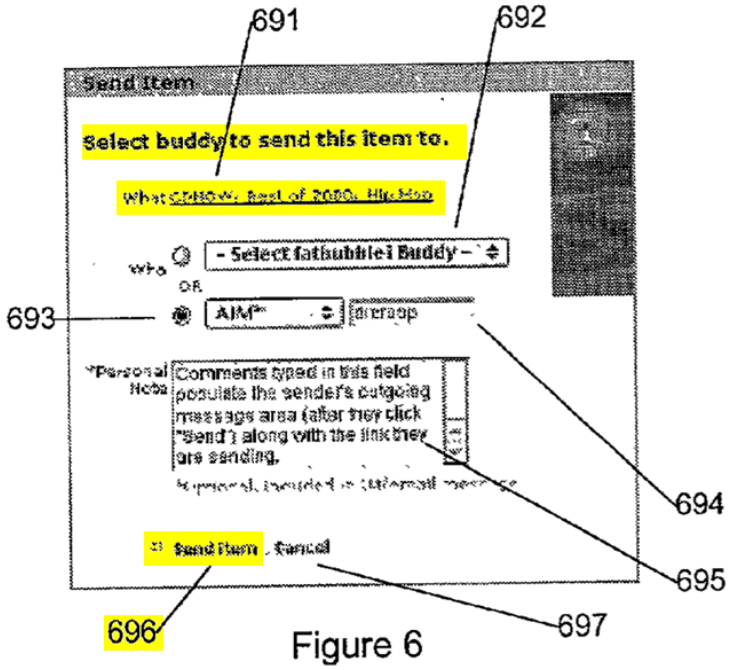


Figure 6

EX1015, FIG. 6 (annotated).

Once the ***information object*** is sent via instant messaging, the remaining features of Claim 13 would have been obvious for substantially the same reasons discussed in Claim 13. Cockburn, ¶227; §XIII.D.

XV. CONCLUSION

For these reasons, Petitioner respectfully requests institution.

Dated: March 18, 2026

Respectfully submitted,

By: / Lisa K. Nguyen /
Lisa K. Nguyen (Reg. No. 58,018)
Michelle H. Zhang (*pro hac vice* to be filed)
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, CA 94304
Telephone: 650-320-1800
lisanguyen@paulhastings.com
PH-META-CogmediaIPR@paulhastings.com

David Tennant (Reg. No. 48,362)
Diane Ghrist (*pro hac vice* to be filed)
PAUL HASTINGS LLP
2050 M St., N.W.
Washington, DC 20036
Telephone: 202-551-1700
PH-META-CogmediaIPR@paulhastings.com

Counsel for Petitioner
META PLATFORMS, INC.

CLAIM LISTING APPENDIX

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:

[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;

[b] storing data corresponding to each of the information objects in the database system;

[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,

[i] wherein the functions include:

[ii] 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;

[iii] a vote function, by which each user having access to the card can provide one vote for the information object;

[iv] 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

[v] a link function, by which each user having access to the card can invoke the link to the data item; and

[vi] wherein the indicators include:

[v] a message indicator that displays a number of instant messages associated with the information object; and

[vi] a vote indicator that displays a number of votes associated with the information object; and

[d] wherein the database system is configured to allow (i) each user to have at least one user-selected collection of cards in the database system and (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

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.

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

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

6. A method according to claim 1, wherein the information object is configurable to include a user-accessible file attachment.

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.

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.

11. A method according to claim 1, further comprising:

[a] 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;

[b] 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.

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.

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.

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.

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.

17. A method according to claim 1, further comprising:

[a] 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;

[b] 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.

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.

CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that foregoing **PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 9,817,562** exclusive of the parts exempted as provided in 37 C.F.R. §42.24(a), contains 13,796 words and therefore complies with the type-volume limitations of 37 C.F.R. §42.24(a).

Dated: March 18, 2026

Respectfully submitted,

By: / Lisa K. Nguyen /
Lisa K. Nguyen (Reg. No. 58,018)
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, CA 94304
Telephone: 650-320-1800
lisanguyen@paulhastings.com

Counsel for Petitioner
META PLATFORMS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO 9,817,562 AND EXHIBITS EX1001-1007 and EX1009-1026** are being served on March 18, 2026 via Federal Express overnight mail on counsel of record for U.S. Patent No. 9,817,562 as addressed below:

SUNSTEIN LLP
100 High Street, 20th Floor
Boston, MA 02110-2321

A courtesy copy is also being served on counsel for the patent holder in the pending litigation:

Jonathan T. Suder (jts@fsclaw.com)
Michael T. Cooke (mtc@fsclaw.com)
Dave R. Gunter (gunter@fsclaw.com)
Alexander Yow (ayow@fsclaw.com)
FRIEDMAN, SUDER & COOKE
604 East 4th Street, Suite 200
Fort Worth, TX 76102

Dated: March 18, 2026

Respectfully submitted,

By: / Lisa K. Nguyen /
Lisa K. Nguyen (Reg. No. 58,018)
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, CA 94304
Telephone: 650-320-1800
lisanguyen@paulhastings.com

Counsel for Petitioner
META PLATFORMS, INC.