

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SALESFORCE, INC.,
Petitioner

v.

IQX CORP.,
Patent Owner

Case IPR2026-00476
U.S. Patent No. 11,876,924

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 11,876,924**

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PETITIONER'S EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 11,876,924 to Spindler <i>et al.</i> , issued January 16, 2024 (“the ’924 patent”)
1002	File History of U.S. Patent No. 11,876,924 (“’924 Patent File History”)
1003	Declaration of Bernard J. Jansen, Ph.D.
1004	<i>Curriculum Vitae</i> of Bernard J. Jansen, Ph.D.
1005	U.S. Patent Application Publication No. 2011/0178897 A1 to Balasubramanian <i>et al.</i> (“Balasubramanian”)
1006	U.S. Patent Application Publication No. 2022/0006895 A1 to Spindler <i>et al.</i> (“Spindler”)
1007	U.S. Patent Application Publication No. 2015/0052061 A1 to Anderson <i>et al.</i> (“Anderson”)
1008-1011	<i>Intentionally Left Blank</i>
1012	U.S. Patent Publication No. 2016/0239867 A1 to Sinha <i>et al.</i> (“Sinha”)
1013	<i>Intentionally Left Blank</i>
1014	International Application Publication No. WO 2018/103039 A1 to Wang <i>et al.</i> (“Wang”)
1015-1016	<i>Intentionally Left Blank</i>
1017	U.S. Patent Application Publication No. 2016/0364496 A1 to Li <i>et al.</i> (“Li”)
1018	U.S. Patent No. 6,360,254 B1 to Linden <i>et al.</i> (“Linden”)
1019	U.S. Patent Publication No. 2012/0191546 A1 to Phelan <i>et al.</i> (“Phelan”)

Exhibit No.	Description
1020-1022	<i>Intentionally Left Blank</i>
1023	File History of U.S. Patent Application No. 17/279,188 (“188 File History”)
1024	“Best Computer Science Scientists 2026” - Data Sources for the 12th Edition of the Research.com Best Computer Science Scientists Ranking (Page 13), accessed at https://research.com/scientists-rankings/computer-science?page=13
1025	Jafarzadeh, H., Aurum, A., D’Ambra, J., & Ghapanchi, A, “A Systematic Review on Search Engine Advertising,” <i>Pacific Asia Journal of the Association for Information Systems</i> , 7(3):1-32
1026	Ioannidis, John P.A. (2025), “August 2025 data-update for “Updated science-wide author databases of standardized citation indicators,” Elsevier Data Repository, V8, doi: 10.17632/btchxktzyw.8
1027-1036	<i>Intentionally Left Blank</i>
1037	U.S. Patent Application Publication No. 2011/0078762 A1 to Bijlsma (“Bijlsma”)
1038	U.S. Patent Application Publication No. 2013/0254036 A1 to Trinh <i>et al.</i> (“Trinh”)
1039	U.S. Patent Application Publication No. 2015/0142906 A1 to Tolcher (“Tolcher”)
1040	U.S. Patent Application Publication No. 2005/0278231 A1 to Teeter (“Teeter”)
1041	U.S. Patent Application Publication No. 2014/0052562 A1 to Oliveira <i>et al.</i> (“Oliveira”)
1042	U.S. Patent Application Publication No. 2003/0101345 A1 to Nyberg (“Nyberg”)

Exhibit No.	Description
1043	U.S. Patent Application Publication No. 2015/0373200 A1 to Zitnik <i>et al.</i> (“Zitnik”)
1044	U.S. Patent Application Publication No. 2007/0124399 A1 to Gillespie <i>et al.</i> (“Gillespie”)
1045	U.S. Patent Application Publication No. 2011/0314287 A1 to Escott <i>et al.</i> (“Escott”)

I. INTRODUCTION

Salesforce, Inc. (“Petitioner”) petitions for *inter partes* review, seeking cancellation of claims 1-20 of U.S. Patent No. 11,876,924 (“the ’924 patent”; EX1001), assigned to IQX Corp (“Patent Owner”).

The ’924 patent generally describes a computer-implemented method and system that dynamically generates a customized second document (e.g., a webpage) including information about one or more transactions (e.g., upcoming events) that may interest a user. EX1001, Abstract. A link to this webpage is then sent to the user so it can be displayed on the user’s device. *Id.* The ’924 patent claims recite, *inter alia*, that a “customized actionable item [included in the customized webpage] corresponds to prior actions associated with one or more prior transactions performed by the service subscriber.” This feature is not disclosed in the priority application, thus, the ’924 patent’s own priority application becomes prior art. This publication (Spindler) renders the claims obvious in combination with Anderson, which discloses well-known concepts related to resuming an abandoned online shopping transaction (i.e., “prior actions associated with one or more prior transactions performed by the service subscriber”). Further still, even without breaking the priority chain, everything recited in the ’924 patent claims was known in the prior art (e.g., Balasubramanian) before even the earliest claimed priority date.

This Petition is supported by the declaration of Dr. Bernard Jansen (EX1003), an expert with decades of experience in e-commerce, computer networking and telecommunications. Dr. Jansen's testimony confirms all challenged claims are unpatentable. The Board should institute IPR and cancel claims 1-20.

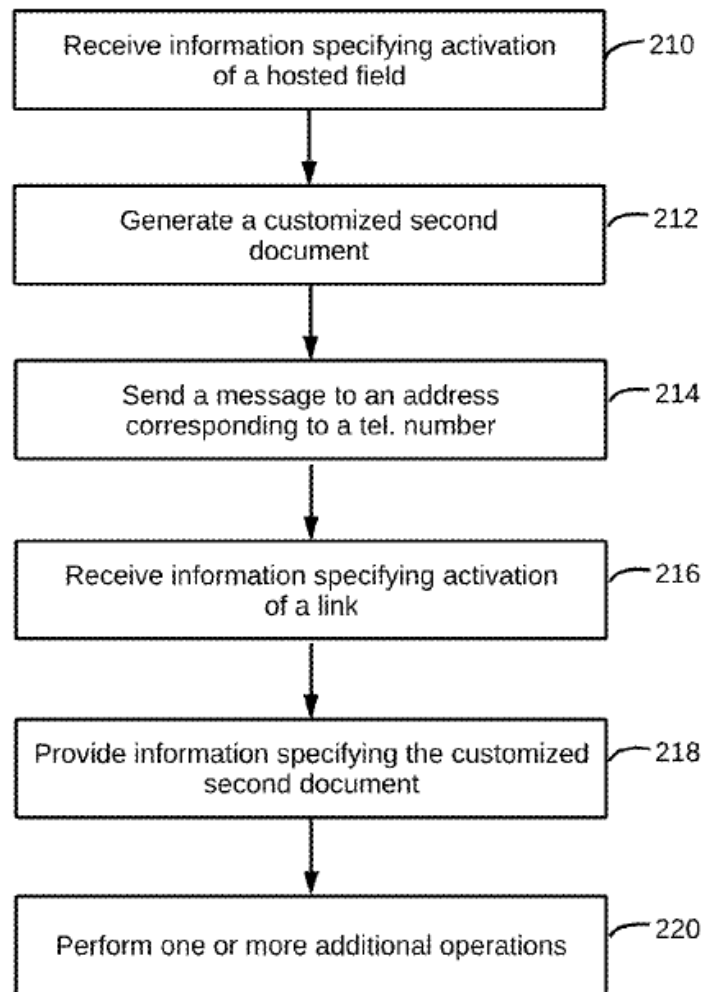
II. THE '924 PATENT

A. Overview

The '924 patent issued on January 16, 2024, from U.S. Patent Application No. 18/193,163 ("the '163 application"), which was filed on March 30, 2023. EX1001, (45), (21), (22). The '924 patent purports to claim priority to U.S. Provisional App. No. 62/737,315, which was filed on September 27, 2018. *Id.*, (60), 1:7-13. However, as explained below in detail, the '924 patent claims are correctly entitled to a priority date of no earlier than the filing of an Amendment in the '163 application filed on September 28, 2023. *See infra*, Section IV.B.1.

The '924 patent relates to "techniques for performing transactions using dynamically generated customized webpages." EX1001, 1:17-19. The '924 patent describes a "method 200 for dynamically generating a customized document," as shown in Figure 2 below. EX1001, 8:23-26.

200



EX1001, FIG. 2.

This method begins by receiving “information (operation 210) specifying activation of a hosted field in a document.” EX1001, 8:26-29. This information “specifies a willingness to receive one or more messages from the computer and specifies a telephone number” of the user. EX1001, 8:29-31. In response to receiving this information, “the computer may dynamically generate a customized second document (operation 212) that includes information about one or more

transactions (such as one or more upcoming events) of interest to an individual.”

EX1001, 8:33-37.

The computer may then “send a message (operation 214) to an address corresponding to the telephone number,” including “a link to the customized second document” as “a short Message Service (SMS) message.” EX1001, 8:44-48. If the user activates the link, the computer may perform authentication by “provid[ing] authentication information (such as an authentication cookie) to the electronic device to authenticate purchases.” EX1001, 8:62-64.

The ’924 patent further describes steps for performing authentication using a “hot cookie” that “may include information specifying the keyword, client, subscriber customer, and protocol” and “is stored locally on the device of the subscriber customer for a defined period of time.” EX1001, 14:3-9. To authorize the electronic device to perform a transaction, the system may validate the hot cookie on the electronic device. EX1001, 14:9-13. *See also* EX1003, ¶¶72-76.

B. Prosecution History

Prosecution of the ’924 patent was exceptionally short. *See generally*, EX1002. The Examiner issued only a single Office Action, rejecting only prosecution claims 2-11, 14-15, and 22-23 under 35 U.S.C. § 102(a)(2). EX1002, 76-79. In that Office Action, prosecution claims 25-31 were allowed over the prior art due to the combination of “*configuring a service subscriber associated with a*

telephone number, to be subscribed to receive additional content at the telephone number, in response to determining that the service subscriber has previously provided authentication information; [and] activating one or more customized webpages including at least one customized actionable item for performing an e-commerce transaction.” Id., 79. In response to the Office Action, the Applicant canceled prosecution claims 1-24 and added new prosecution claims 32-44, which were subsequently allowed by the Examiner. *Id.*, 64-69, 16-17.

Because the Examiner does not identify any one particular feature as being allowable over the prior art, it appears that the Examiner believed that the *combination* of these features was allowable over the prior art. However, all of these features were well-known in the prior art, as shown below. *See infra*, Section V. *See also* EX1003, ¶¶77-78; EX1003, ¶¶39-71.

C. Person of Ordinary Skill in the Art (“POSA”)

A POSA would have had a bachelor’s degree in Computer or Electrical Engineering, Computer Science, or equivalent discipline, and approximately two years’ experience in e-commerce, telecommunications, or computer networking. Additional education could substitute for professional experience, and significant work experience could substitute for formal education. EX1003, ¶36.

D. Claim Construction

Claims must be given their ordinary and customary meaning in light of the specification—“the meaning that the term would have to a person of ordinary skill in the art in question at the time of the invention.” *Phillips v. AWH Corp.*, 415 F.3d 1303, 1312-13 (Fed. Cir. 2005) (*en banc*); *see also* 37 C.F.R. § 42.100(b).

Petitioner submits that all claim terms should receive their plain and ordinary meaning in the context of the '924 patent specification.

III. IDENTIFICATION OF THE CHALLENGE (37 C.F.R. § 42.104(B))

Petitioner requests IPR based on the grounds summarized below.

Ground	35 U.S.C. §	Claims	References
1	103	1-20	Balasubramanian
2	103	1-20	Spindler, Anderson

IV. OVERVIEW OF THE ASSERTED ART

A. Balasubramanian (EX1005)

Balasubramanian published July 21, 2011, and is prior art to the '924 patent under 35 U.S.C. §§ 102(a)(1) and 102(a)(2).

Like the '924 patent, Balasubramanian is directed to “a system and method for facilitating electronic commerce over a network.” EX1005, Abstract.

Balasubramanian’s system includes a user device that facilitates conducting financial transactions with merchant devices and a service provider over a network.

Id., ¶¶21-22, 24, FIG. 1. For example, the user device allows “for viewing, searching, and/or purchasing items, products, and/or services over the network.”

Id., ¶24.

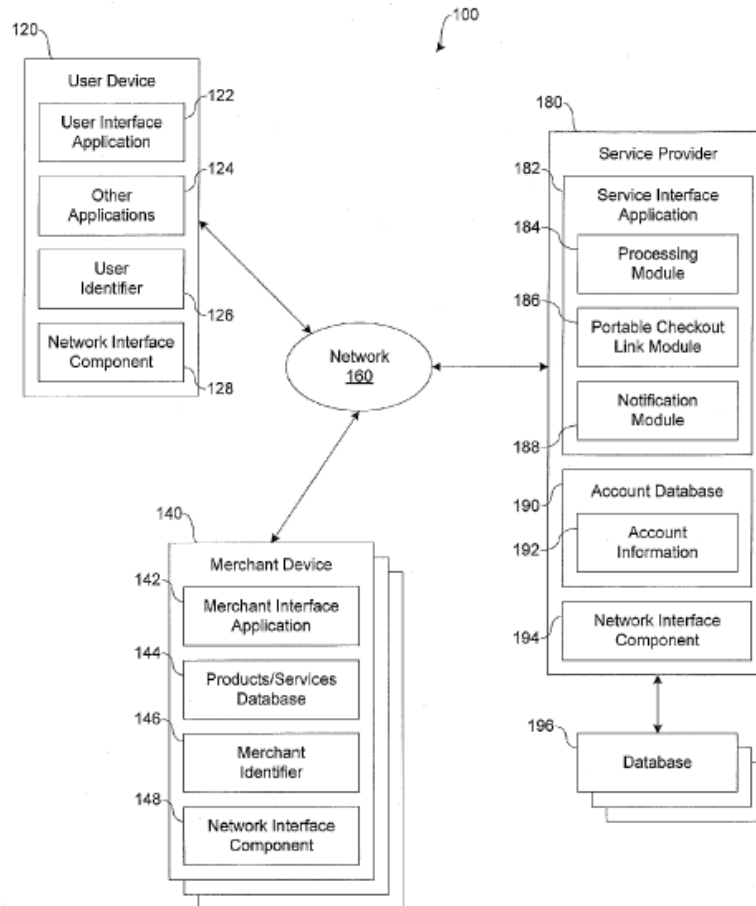


Fig. 1

EX1005, FIG. 1

When online shopping, users may place items in a virtual shopping cart, but “may withdraw from purchase or abandon the checkout prior to payment.”

EX1005, ¶6. When this occurs, the shopping cart may be deleted, resulting in lost revenue for the merchant and payment service provider. *Id.*

To solve this issue, Balasubramanian's service provider sends a notification to the user regarding the incomplete purchase transaction. EX1005, ¶¶9, 45, 47, 55, 72. The notification includes selectable links (e.g., "portable checkout link[s]" ("PCLs")) to incomplete and/or abandoned transactions, and may be sent by email, alert, text message, or voice message. *Id.*, ¶¶9, 20, 42, 48, 55, 72-74, 84. Selecting a link returns the user to the abandoned or incomplete transaction. *Id.*, ¶¶42, 45, 55, 74-76. The transaction can then be completed. *Id.*, ¶¶45, 55, 75-76, 79. *See also* EX1003, ¶¶79-81.

B. Spindler (EX1006)

1. Spindler is available as prior art to the '924 patent.

Spindler is available as prior art to the '924 patent at least under 35 U.S.C. § 102(a)(1). As discussed below in detail, the claims of the '924 patent are correctly entitled to a priority date no earlier than **September 28, 2023**, the filing date of a Preliminary Amendment in the '163 application that introduced new features. Spindler published on **January 6, 2022**, well over a year before this September 28, 2023, priority date and, therefore, is not subject to the exceptions set forth in 35 U.S.C. § 102(b)(1). Accordingly, Spindler is prior art to the '924 patent.

For an application to receive the benefit of a filing date of an earlier application, "each application in the chain leading back to the earlier application must comply with the written description requirement of 35 U.S.C. § 112."

Lockwood v. Am. Airlines, Inc., 107 F.3d 1565, 1571 (Fed. Cir. 1997). This requirement “reflects the basic premise of the patent system, viz., that one discloses an invention and ... one obtains a patent. *Quid pro quo.*” *Regents of Univ. of Minnesota v. Gilead Sciences*, 61 F.4th 1350, 1355 (Fed. Cir. 2023). That is not the case here.

The '924 patent claims priority to a filing date of September 25, 2019, and even further to a provisional application filed September 27, 2018. EX1001, (63), (60). The '924 patent was filed as the '163 application on March 30, 2023, as a continuation of U.S. Pat. App. No. 17/279,188 (“the '188 application”), which was filed on September 25, 2019, and issued as U.S. Patent No. 11,765,262. EX1001, (21), (22), (63), (60), 1:7-13; *see generally* EX1023. The '924 patent shares a common specification with the '188 application, including eight figures and related description. *See* EX1002, 210-217, 225-256; EX1023, 141-148, 171-200.

The '924 patent claims are directed towards a computer-implemented method, a system, and a storage medium that perform, generally: (1) configuring a service subscriber associated with a telephone number, (2) activating a customized webpage including a customized actionable item for performing an e-commerce transaction, and (3) generating and causing transmission of a third party message associated with the customized webpage and including the customized actionable item. EX1001, 20:46-65 (Claim 1). New matter was added to the claims of the

'924 patent by way of a Preliminary Amendment filed on September 28, 2023, during prosecution of the '163 application. EX1002, 131-38. The new matter is found at least in the element of a “*customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber.*”

In particular, the '924 patent recites that the “*customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber.*” The '188 priority application lacks written description support for this feature.

The '188 application describes a method that includes generating “a customized second document” “such as a webpage” that may “include[] information about one or more transactions ... of interest to the individual or subscriber customer.” EX1023, 177 (¶34), 182 (¶49), 142 (FIG. 2, step 220). However, the '188 application does not describe, in any way, any content related to “*prior actions associated with one or more prior transactions,*” as recited in each of independent claims 1, 8, and 15 of the '924 patent. In fact, the '188 application does not even use the terms “prior online actions” or “prior transactions” at all. EX1003, ¶90.

Nor can the “transactions” described in the '188 application correspond to any of these terms. Indeed, the “transactions” described in the '188 application are

limited to *future* transactions, “such as one or more *upcoming events* or other purchasable tickets, merchandise products, etc.” EX1023, 171-172 (¶¶7, 9), 177 (¶34), 178 (¶37), 182 (¶¶49, 52) (emphasis added). To this point, the ’188 application describes a subscription-based model wherein a subscriber-user is notified of future events by a specific entity (e.g., “an event organizer”) to which the user is subscribed. EX1023, 178 (¶38), 182 (¶49). Thus, the ’188 application describes a method in which a system determines future transactions *that may be of interest* to a subscriber, such as purchasing tickets for future events, and customizes content to provide those transactions to the subscriber. EX1003, ¶91.

In contrast, the “customized webpage” described and claimed by the ’924 patent includes a “*customized actionable item*” that “*corresponds to prior actions associated with one or more prior transactions performed by the service subscriber.*” EX1001, 20:56-59 (claim 1) (emphasis added). No reading of the ’188 application, however broad, provides written description support for the claimed “prior actions” and “prior transactions.” EX1003, ¶92.

As explained above, the ’188 application fails to provide any written description support for the claimed “*prior actions*” associated with “*prior transactions.*” To the extent Patent Owner attempts to argue that this feature would have been obvious over the ’188 application and therefore is supported by the ’188 application, such arguments are misplaced. *See Lockwood*, 107 F.3d at 1572 (“A

description which renders obvious the invention for which an earlier filing date is sought is not sufficient.”).

An application is entitled to an earlier priority date *only* where the claimed subject matter is common to both applications. *Transco Products Inc. v. Performance Contracting, Inc.*, 38 F.3d 551, 557 (Fed. Cir. 1994). Here, the ’188 application lacks written description support at least for the claimed “prior actions associated with one or more prior transactions performed by the service subscriber.” Accordingly, the ’924 patent is not entitled to priority as of the filing date of the ’188 application on September 25, 2019.

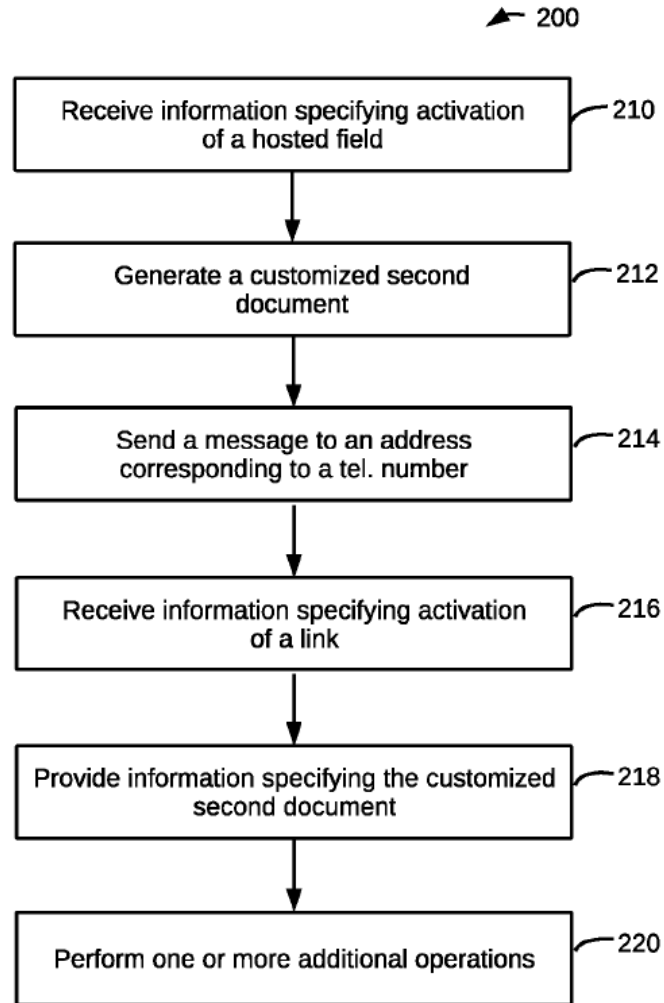
In addition, these features were not even included in the one claim originally filed with the ’163 application on March 30, 2023, but instead were only added by a Preliminary Amendment filed on September 28, 2023. *See* EX1002, 256, 133-38 (especially claims 25-31). Accordingly, these features, and thus all of independent claims 1, 8, and 15 of the ’924 patent, are entitled only to a priority date of **September 28, 2023**, at the earliest. Spindler, which is the publication of the ’188

application, published on January 6, 2022, more than one year prior to September 28, 2023, is therefore prior art.¹

2. Overview

As a member of the same patent family, Spindler discloses many of the same concepts as the '924 patent. Indeed, Spindler discloses a computer system that includes one or more electronic devices 110 connected via a network 116, to hosting computer 114 and cloud-based computer 112. EX1006, ¶31. Spindler's computer 112 performs method 200 for dynamically generating a customized document, shown in Figure 2 below. *Id.*, ¶48.

¹ Even if the claims are entitled to the March 30, 2023 filing date of the '163 application, Spindler is still prior art, having published on January 6, 2022, more than one year prior.



EX1006, FIG. 2.

Spindler's hosting computer 114 may host a third-party webpage that "allow[s] a user of electronic device 110-1 ... to indicate a willingness to receive one or more messages from computer 112 and that specifies [*sic*] a telephone number associated with electronic device 110-1." *Id.*, ¶¶32, 48, 57, 71.

In response to receiving this information from the hosted field at step 210, Spindler's computer 112 (in the form of an "Amplify Decision Delivery Processor (ADDP)") may check if the telephone number is included in a data structure (e.g.,

“with information about subscribers”) and, if not, “may send a text message ... to confirm that [the subscriber] want[s] to receive text messages.” EX1006, ¶¶38, 54, 71-73. Once the number is confirmed, Spindler’s computer 112 “may dynamically generate a customized second document (such as a webpage) that includes information about one or more transactions (such as one or more upcoming events) of interest to the individual or subscriber customer associated with the telephone number.” *Id.*, ¶¶34, 49, 59, FIG. 2, step 212. “The customized webpage may pull in or incorporate additional events that may be of interest to the given subscriber customer.” *Id.*, ¶68.

Computer 112 then “send[s] a message to an address corresponding to the telephone number” that “includes a link to the customized second document.” EX1006, ¶¶34, 50, 60, 84, FIG. 2, step 214. The message “may include a Short Message Service (SMS) message (which is sometimes referred to as a ‘text message’).” *Id.*, ¶¶34, 50.

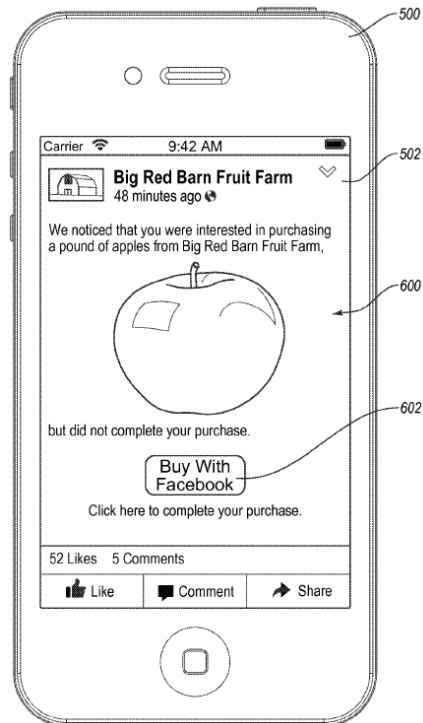
When the subscriber selects the link, computer 112 provides “authentication information (such as a cookie), that permits completion of a transaction. EX1006, ¶¶36, 53. Although “the customized second document may allow completion of a given transaction,” “a purchase request ... may be rejected by computer 112 if the authentication information is not stored on electronic device 110-1.” *Id.*, ¶¶37, 52, 93. *See also* EX1003, ¶¶82-86.

C. Anderson (EX1007)

Anderson published February 19, 2015, and is prior art to the '924 patent under 35 U.S.C. §§ 102(a)(1) and 102(a)(2).

Like the '924 patent, Anderson discloses “systems and methods of increasing the ease of making payments using e-commerce applications.” EX1007, ¶3. Anderson employs a “commerce application” accessed by a web browser or “special-purpose client application.” *Id.*, ¶41. As one exemplary commerce application, Anderson describes “a virtual shopping cart” containing “goods or services” selected for purchase by a user. *Id.*, ¶113. The user may complete the purchase by selecting “a user selectable element (e.g., button 510) operable by the user to ‘Check Out.’” *Id.*, ¶114.

If the transaction is not completed, the system provides another opportunity to complete the purchase. EX1007, ¶126. To do so, Anderson’s network application can send a text message to the user, where the message may “include details of items in the cart that was abandoned” along with “a selectable buy option (such as [a] buy button 602 ...) that allows the user to complete the abandoned transaction.” *Id.*, ¶127, FIG. 6. The selectable buy option may be “a deep link” that “directs the user to the virtual cart user interface.” *Id.*, ¶128. *See also* EX1003, ¶¶87-88.



EX1007, FIG. 6.

V. GROUND 1: BALASUBRAMANIAN RENDERS OBVIOUS CLAIMS 1-20.

A. Independent claim 1

1. [1.P] A computer-implemented method comprising:

Balasubramanian teaches the preamble. EX1003, ¶95. Balasubramanian's "service provider," which can be implemented as a computer system, "provide[s] processing for network-based transactions including online information and/or financial transactions on behalf of the user." EX1005, ¶40. Balasubramanian's service provider 180 implements the methods described with respect to Figures 2A-2C. EX1005, ¶¶62-86; EX1003, ¶95.

2. **[1.A] configuring a service subscriber associated with a telephone number, to be subscribed to receive additional content at the telephone number, in response to determining that the service subscriber has previously provided authentication information;**

Balasubramanian teaches element [1.A]. EX1003, ¶¶96-100.

First, Balasubramanian teaches an “*service subscriber [that] has previously provided authentication information.*”² In particular, Balasubramanian’s user is prompted “to establish a user account for login with the service provider.”

EX1005, ¶26. “When establishing a user account, the user may be asked to **provide personal information**, such as name, address, phone number, etc., and financial information, such as banking information, credit card information, etc.”

Id. (emphasis added). A user identifier 126, which is stored with the service provider, includes these “attributes related to the user” and the service provider utilizes the user attributes “to associate the user with a particular user account maintained by the service provider 180.” *Id.*, ¶¶28, 58, 65. The service provider maintains user accounts in an account database 190 that includes account information 192 associated with a user. *Id.*, ¶57. These identity attributes include “*authentication information*” because they can be used to authenticate the user, e.g., the service provider “verif[ies] the user account and user identity information

² Claim language is italicized throughout.

provide[d] by user 102 in the user login request by comparing the received user information with account information 192 stored as part of the user account in the account database 190.” *Id.*, ¶¶28, 65-66; EX1003, ¶97. For example, “[t]he user identifier 126 may include one or more attributes related to the user, such as personal information related to the user (e.g., one or more user names, passwords, photograph images, biometric ids, addresses, phone numbers, etc.),” and is used to associate the user with a user account. EX1005, ¶28. The information is “*previously provided*” because, as discussed above, it is provided at the time of registration and stored with the service provider. *Id.*, ¶¶26, 58; EX1003, ¶97. The user is a “*service subscriber*” because the user registers with and, as explained below, is subscribed to receive additional content from the service provider. EX1003, ¶97.

Second, Balasubramanian teaches that the “*service subscriber*” is “*associated with a telephone number*.” The user attributes received by the service provider include a **phone number**. EX1005, ¶¶26, 28; EX1003, ¶98.

Third, Balasubramanian teaches “determining that the service subscriber has previously provided authentication information.” In the method of Figure 2A, when the service provider processes a user login request, it “attempt[s] to locate and access an account related to the user in the account database.” EX1005, ¶66. “If the user is **determined to be an existing user**,” (i.e., “*the service subscriber*

has previously provided authentication information”), the service provider verifies the login information and proceeds with the method of Figure 2A. *Id.*; EX1003, ¶99.

Fourth, Balasubramanian teaches “*configuring [the] service subscriber ... to be subscribed to receive additional content at the telephone number, in response to [the] determining.*” As part of the method of Figure 2A, which continues “*in response to*” determining the user is an existing user, the service provider “store[s] transaction information related to [an] incomplete transaction ... so that the service provider 180 may remind the user to complete the incomplete transaction at another time.” EX1005, ¶70. Each reminder notification the service provider sends to the user regarding incomplete or abandoned purchase transactions represents the claimed “*additional content.*” *Id.*, ¶¶9, 20, 55, 72; EX1003, ¶100. As another example, the “*additional content*” can be alerts that the service provider sends to the user regarding out-of-stock items, price changes, and discounts and coupons. EX1005, ¶47; EX1003, ¶100. The user is “*configur[ed] ... to be subscribed to receive*” these notifications and alerts because the service provider 180 stores the incomplete transaction information “as part of the user account in the account database 190” for the purpose of providing periodic reminders to active user accounts. EX1005, ¶¶20, 66, 70; EX1003, ¶100. As Dr. Jansen explains in his declaration, a POSA would have found it to be obvious that the user receiving the

notification has agreed to receive messages, via the registration process, and thus “*subscribed to receive*” messages from the service provider. EX1003, ¶100.

Finally, Balasubramanian teaches that these alerts and notifications can be sent via a text message or a voice message, which a POSA would have understood would be “*receive[d] at the telephone number*” associated with the user. EX1005, ¶¶9, 20, 47, 55, 72; EX1003, ¶100.

3. [1.B.1] activating one or more customized webpages including at least one customized actionable item for performing an e-commerce transaction,

Balasubramanian teaches element [1.B.1]. EX1003, ¶¶101-106.

Balasubramanian teaches “*one or more customized webpages including at least one customized actionable item for performing an e-commerce transaction.*”

Balasubramanian’s service provider sends a notification to the user regarding prior incomplete or abandoned online purchase transactions via an email, a text message, or other means. EX1005, ¶¶9, 20, 47, 55, 63, 72. In particular, the service provider provides the user with an interactive list having selectable links (*i.e.*, portable checkout links (PCLs)) that link to online shopping carts for the incomplete and/or abandoned transactions. *Id.*, ¶¶42, 55, 73-74, 84. For example, Figure 3A below shows an example of the notification in the form of an email. *Id.*, ¶73, FIG. 3A. As Dr. Jansen explains, a POSA would have understood, or at least found obvious, that when the notification is sent in other ways, such as a text message, it would

also include an interactive list having selectable links. *Id.*; EX1003, ¶102. As explained in further detail below, a selectable link is “*at least one customized actionable item*” and an online shopping cart is “*one or more customized webpages.*”

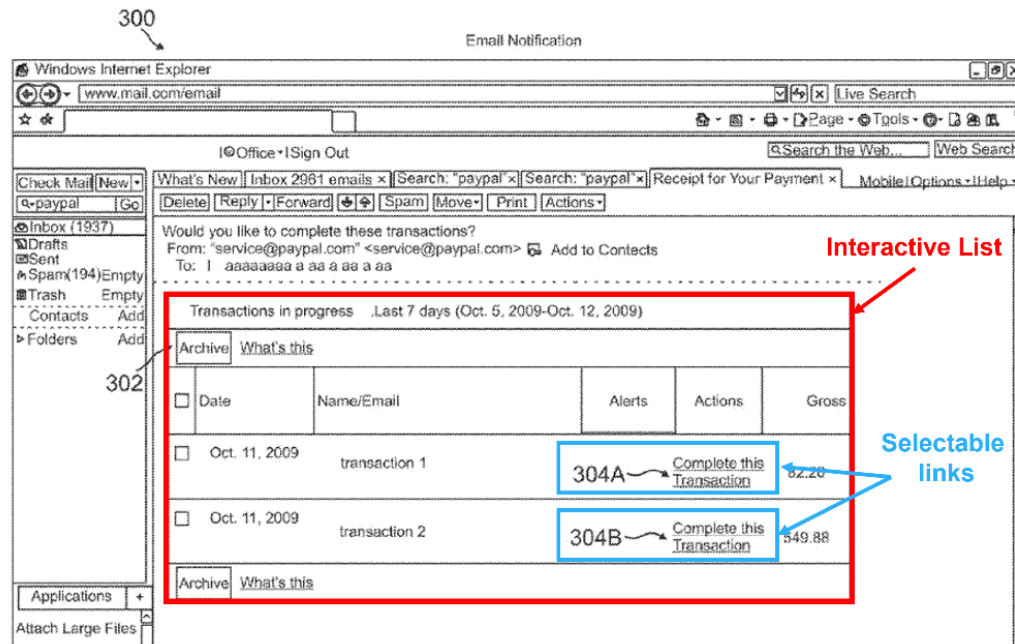


FIG. 3A

EX1005, FIG. 3A (annotated).

The '924 patent explains that an “actionable item” can be a link to perform actions. EX1001, 12:60-65 (“an actionable item, e.g., a link to purchase tickets or view a customized webpage”). Balasubramanian’s selectable links are “*actionable item[s]*” because they are portable checkout links (PCLs) that allow a user to review and request processing of incomplete and/or abandoned transactions (“*for performing an e-commerce transaction*”). EX1005, ¶¶42, 55-56, 74; EX1003, ¶103. Furthermore, because Balasubramanian’s selectable links correspond to the

user's previously incomplete or abandoned transactions, the selectable links are "*customized*" to the user. EX1005, ¶¶45, 75-76; EX1003, ¶103.

Regarding the "*one or more customized webpages*," Balasubramanian explains that "the PCL is adapted to direct the user to a specific [(*"customized"*)] shopping cart having a state that may be frozen, saved, and/or accessed using a link, such as a URL link." EX1005, ¶74. A POSA would have understood that the shopping cart, accessed using a URL link, is a "*webpage*." EX1003, ¶104.

Furthermore, the shopping cart is a "*webpage*" that "*includ[es]*" the PCL ("*actionable item*"). EX1003, ¶105. The PCL can be, e.g., a URL pointing to the shopping cart. EX1005, ¶¶42, 44; EX1003, ¶105. As Dr. Jansen explains in his declaration, a POSA would have understood that because a webpage is identified and accessed by its URL, it would have been obvious that the URL is "*includ[ed]*" as part of the webpage. EX1003, ¶105.

Finally, Balasubramanian's service provider "*activat[es]*" the "*one or more customized webpages*" by creating the virtual shopping cart and the corresponding PCL. EX1003, ¶106. As further required by independent claim 1, "the activating compris[es] generation of secure access information for performing the e-commerce transaction." As explained immediately below, Balasubramanian's service provider generates the PCL and corresponding "*secure access information*." See *infra* Section V.A.4. When the user selects the PCL, the user can

return and access a previously abandoned or incomplete purchase transaction and complete the transaction. EX1005, ¶¶42, 55, 75. A POSA would have understood that before the service provider sends the notification (with the PCL) to the user, the service provider would generate the PCL pointing to the virtual shopping cart so that the user can select the PCL and access the virtual shopping cart upon receiving the notification. EX1003, ¶106. *See also* Section V.A.4.

4. [1.B.2] the activating comprising generation of secure access information for performing the e-commerce transaction,

Balasubramanian teaches element [1.B.2]. EX1003, ¶¶107-109.

In Balasubramanian, a PCL is a unique URL with a token (“*secure access information*”). EX1005, ¶44 (“a unique URL with a token (i.e., PCL)”). Although this disclosure is in the context of a PCL generated when the user checks out from a merchant, a POSA would have found it obvious that this definition also applies when the service provider generates a PCL to send in a user notification. EX1003, ¶108. In particular, a POSA would have understood that a URL with a token provides secure access to online resources without needing to enter a username, a password, or other authentication information. EX1018, Abstract; EX1003, ¶108. Therefore, it would have been obvious that the PCLs in the notification also include a URL with a token, so that malicious access can be avoided. EX1003, ¶108.

Thus, when generating (“*activating*”) a PCL, the service provider generates a unique URL and a token (“*generation of secure access information*”) corresponding to the PCL. EX1003, ¶109. A POSA would have understood that the token associated with the URL provides the secure access and thus corresponds to “*secure access information.*” EX1003, ¶109. Furthermore, because the URL and the token are included in the PCL, they are “*for performing the e-commerce transaction*” enabled by the PCL, such as completing online transactions. EX1005, ¶¶44, 55, 75; EX1003, ¶109.

5. [1.B.3] wherein the at least one customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber;

Balasubramanian teaches element [1.B.3]. EX1003, ¶¶110-111.

As discussed above, Balasubramanian teaches that the selectable links (“*at least one customized actionable item*”) correspond to the user’s **previously** incomplete or abandoned transactions (“*prior actions associated with one or more prior transactions performed by the service subscriber*”). EX1005, ¶¶45, 75-76.

Furthermore, Balasubramanian’s user actions of viewing and searching for items, products, and services and creating the shopping cart (“*prior actions*”) are associated with the user’s **previously** incomplete or abandoned transactions (“*one or more prior transactions performed by the service subscriber*”). *Id.*, ¶24; EX1003, ¶111. When the user withdraws or abandons the checkout or the purchase

transaction (“*one or more prior transactions*”), the created shopping cart becomes incomplete or abandoned and is later pointed to by the selectable links. EX1005, ¶45; EX1003, ¶111. Thus, the user’s actions of viewing and searching for items, products, and services and creating the shopping cart (“*prior actions*”) result in and thus are associated with the withdrawn or abandoned checkout or the purchase transaction (“*one or more prior transactions*”). EX1003, ¶111.

6. **[1.C] generating, for the service subscriber, a third party message associated with the one or more customized webpages, the third party message including the at least one customized actionable item; and**

Balasubramanian teaches element [1.C]. EX1003, ¶¶112-114.

Balasubramanian’s service provider sends a notification (“*message*”) that includes PCLs (“*at least one customized actionable item*”) that lead the user to a virtual shopping cart (“*the one or more customized webpages*”). EX1005, ¶¶9, 20, 47, 55, 63, 72, 74. Thus, the notification is “*associated with the one or more customized webpages.*” EX1003, ¶113. Furthermore, the service provider is a third party because the incomplete or abandoned purchase transactions are between a user and a merchant (i.e., not the service provider). EX1005, Abstract, ¶¶8, 24, 32, 41, 57, 61. Because the notification is sent by the service provider, the notification is “*a third party message.*” EX1003, ¶113.

Furthermore, a POSA would have understood, or at least found obvious, that, to send the notification to the user, the service provider would first

“*generat[e]*” the notification. EX1003, ¶114. Because the user is the intended recipient, the notification is generated for the user (“*the service subscriber*”).

EX1005, ¶¶9, 20, 47, 55, 72; EX1003, ¶114.

7. [1.D] causing transmission of the generated third party message to the service subscriber.

Balasubramanian teaches elements [1.D]. EX1003, ¶¶115-116.

Balasubramanian’s service provider sends (“*caus[es] transmission of*”) a notification (“*generated third party message*”) to the user (“*service subscriber*”) regarding incomplete or abandoned purchase transactions. EX1005, ¶¶9, 20, 47, 55, 72; EX1003, ¶116.

B. Claim 2: wherein the at least one customized actionable item comprises data to access the one or more customized webpages, the data being configured to enable the service subscriber to purchase tickets, merchandise, or products or view the customized webpages depicting information about the tickets, merchandise, or products.

Balasubramanian teaches claim 2. EX1003, ¶¶117-118. As discussed above, Balasubramanian’s selectable links are “*actionable item[s]*” that include PCLs. EX1005, ¶¶42, 55-56, 74; EX1003, ¶117; *supra* Section V.A.3. A PCL is a unique URL with a token (“*data*”). EX1005, ¶44 (“a unique URL with a token (i.e., PCL)”). Balasubramanian explains that “the PCL is adapted to direct the user to a specific shopping cart [(“*one or more customized webpages*”)] having a state that may be frozen, saved, and/or accessed using a link, such as a URL link.” *Id.*, ¶74.

Thus, the unique URL or the token included in the PCL is the “*data*” for accessing the shopping cart (“*to access one or more customized webpages*”). EX1003, ¶117.

When the user selects the PCL, the user can return and access a previously abandoned or incomplete purchase transaction and complete the transaction. EX1005, ¶¶42, 55, 75. Thus, the unique URL or the token included in the PCL (“*the data*”) enables the user (“*the service subscriber*”) to complete the transaction to make a purchase (“*purchase ... products*”). In addition, because “the PCL directs the user to a portable shopping cart or a persistent shopping cart,” the unique URL with the token included in the PCL (“*the data*”) enables the user (“*service subscriber*”) to view the shopping cart (“*customized webpages*”) that shows the information of the products of the previously abandoned or incomplete purchase transaction (“*depicting information about the tickets, merchandise, or products*”). EX1005, ¶45; EX1003, ¶118.

C. Claim 3: wherein the third party message is associated with a third party ticket provider, a third party service provider, or a third party event provider.

Balasubramanian teaches claim 3. EX1003, ¶119. As discussed above, Balasubramanian’s service provider sends a notification (“*third party message*”) to the user regarding incomplete or abandoned purchase transactions. EX1005, ¶¶9, 20, 47, 55, 72; *supra* Sections V.A.6-V.A.7. The service provider is “*a third party service provider*” because the incomplete or abandoned purchase transactions are

between a user and a merchant, which are separate from the service provider.

EX1005, Abstract, ¶¶8, 24, 32, 41, 57, 61; *supra* Section V.A.6. Because the notification is sent by the service provider, the notification is associated with the service provider (“*associated with ... a third party service provider*”). EX1003, ¶119.

D. Claim 4: wherein configuring a service subscriber to receive additional content comprises configuring the service subscriber to receive, from one or more third party providers, third party messages comprising the at least one customized actionable item.

Balasubramanian teaches claim 4. EX1003, ¶120. As discussed above, Balasubramanian teaches configuring a service subscriber to receive additional content. *Supra* Section V.A.2. In particular, Balasubramanian’s user is prompted “to establish a user account for login with the service provider.” EX1005, ¶26. Balasubramanian’s service provider then verifies the user and “remind[s] the user to complete the incomplete transaction at another time.” *Id.*, ¶¶28, 65-66, 70. To remind the user, Balasubramanian’s service provider (“*one or more third party providers*”) sends notifications (“*third party messages*”) that include PCLs (“*comprising at least one customized actionable item*”) to the user (“*configuring the service subscriber to receive*”).” EX1005, ¶¶9, 20, 47, 55, 63, 72, 74; EX1003, ¶120.

E. Claim 5: wherein the at least one customized actionable item comprises a secure link to perform the e-commerce transaction for purchasing tickets, merchandise, or products.

Balasubramanian teaches claim 5. EX1003, ¶121. As discussed above, Balasubramanian's selectable links are "*actionable item[s]*" that include PCLs. EX1005, ¶¶42, 55-56, 74; *supra* Section V.A.3. A PCL is a unique URL with a token. EX1005, ¶44 ("a unique URL with a token (i.e., PCL)"). A POSA would have understood that a unique URL with a token is "*a secure link*" because it can provide secure access to online resources without needing to enter a username, a password, or other authentication information. EX1018, Abstract; EX1003, ¶121. Furthermore, when the user selects the PCL, the user can return and access a previously abandoned or incomplete purchase transaction and complete the transaction ("*perform the e-commerce transaction for purchasing tickets, merchandise, or products*"). EX1005, ¶¶42, 55, 75; EX1003, ¶121.

F. Claim 6: wherein the authentication information comprises an authentication cookie configured to be stored on an electronic device associated with the service subscriber.

Balasubramanian teaches claim 6. EX1003, ¶122. Balasubramanian's user is prompted "to establish a user account for login with the service provider," and "may be asked to provide personal information," which may be "packaged as a user identifier 126." EX1005, ¶26. The user identifier 126 is passed to the service provider to verify the user. *Id.*, ¶¶28, 58, 65-66. Thus, the user identifier 126

corresponds to the “*authentication information*” that is provided to the service provider for authentication. EX1003, ¶122. Furthermore, “the user identifier 126 ... may be implemented as ... cookies” (“*authentication cookie*”) associated with the user interface application 122. EX1005, ¶28. “The user identifier 126 may include one or more attributes related to the user” and thus is associated with the user (“*service subscriber*”). *Id.* Finally, Balasubramanian’s user device 120 includes the user identifier 126 and thus the user identifier 126 is stored on the user device 120 of the user (“*stored on an electronic device associated with the service subscriber*”). *Id.*; EX1003, ¶122.

G. Claim 7: wherein the third party message comprises a Short Message Service (SMS) message or a Multimedia Message Service (MMS) message.

Balasubramanian teaches claim 7. EX1003, ¶123 Balasubramanian teaches that the service provider sends alerts and notifications (“*third party message*”) via a text message (“*a Short Message Service (SMS) message*”) or a voice message. EX1005, ¶¶9, 20, 47, 55, 72; EX1003, ¶123.

H. Independent Claim 8

Independent claim 8 recites a system comprising a “*processor*” and a “*memory configured to store program instructions, wherein, when executed by the processor, the program instructions cause the processor to perform operations*” substantially the same as those recited in claim 1. EX1003, ¶124.

1. [8.P] A system comprising:

Balasubramanian discloses the preamble. EX1003, ¶125. Balasubramanian discloses **system 100** including user device 120, one or more merchant devices 140, and service provider 180. EX1005, ¶21, FIG. 1; EX1003, ¶125.

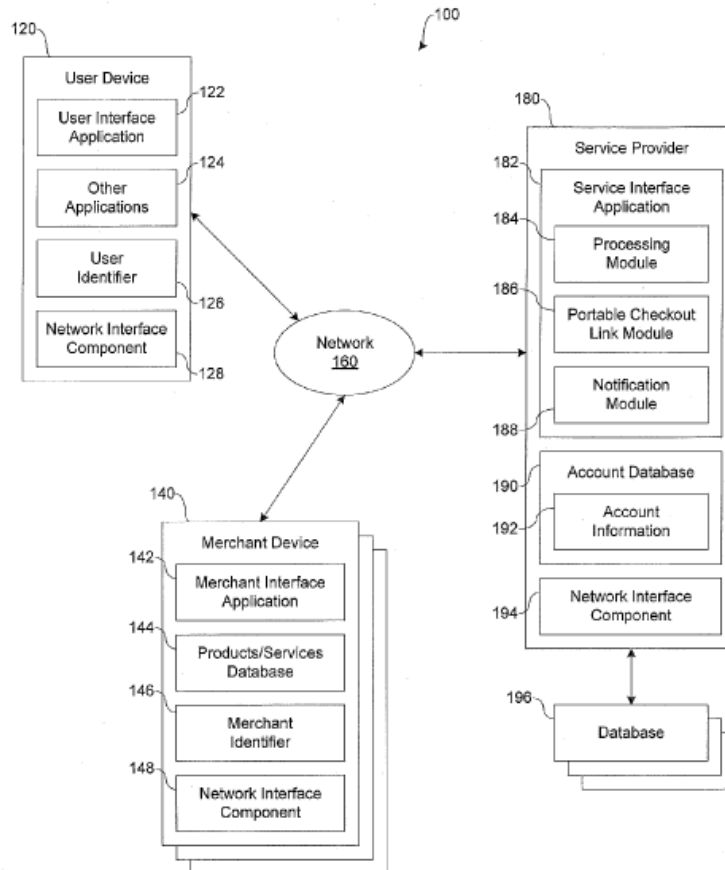


Fig. 1

EX1005, FIG. 1.

2. [8.A] a processor; and

Balasubramanian discloses element [8.A]. EX1003, ¶¶126-127. Balasubramanian's user device 120, one or more merchant devices 140, and service provider 180 can each be implemented as a computer system. EX1005,

¶92, FIG. 4. The computer system includes a processing component, such as a “processor, micro-controller, digital signal processor (DSP), etc.” EX1005, ¶93; EX1003, ¶127.

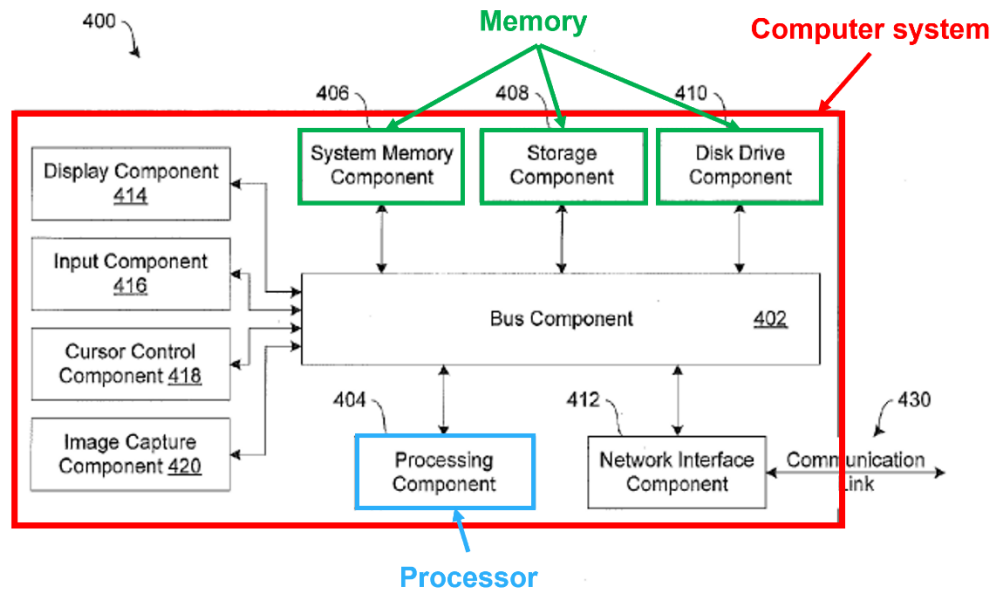


Fig. 4

EX1005, FIG. 4 (annotated).

3. [8.B] memory configured to store program instructions, wherein, when executed by the processor, the program instructions cause the processor to perform operations comprising:

Balasubramanian discloses element [8.B]. EX1003, ¶¶128-129.

Balasubramanian’s computer system includes “memory,” e.g., “system memory component 406 (e.g., RAM), static storage component 408 (e.g., ROM), disk drive component 410 (e.g., magnetic or optical).” EX1005, ¶93, FIG. 4.

Balasubramanian’s computer system “performs specific operations by processor

404 executing ... **instructions** contained in system memory component.” EX1005, ¶94; EX1003, ¶129.

4. [8.C]–[8.F]

Claim elements [8.C]–[8.F] correspond to claim elements [1.A]–[1.D], respectively. Balasubramanian discloses or renders obvious these elements for the same reasons explained above regarding claim 1. *Supra* Section V.A; EX1003, ¶130.

I. Claims 9-14

Claims 9-14 are system claims that otherwise recite limitations that are identical to the method steps recited in claims 2-7. Balasubramanian discloses or renders obvious these elements for the same reasons as respectively explained for claims 2-7 above. *Supra* Sections V.B-V.G; EX1003, ¶131.

J. Independent Claim 15

Independent claim 15 recites a “*non-transitory computer-readable storage medium for use in conjunction with a computer, the computer-readable storage medium storing program instructions that, when executed by the computer, cause the computer to carry out one or more operations*” substantially the same as those

recited in claim 1, with the subject matter of claim 2 incorporated into element [15.B.1];³ EX1003, ¶132.

1. **[15.P] A non-transitory computer-readable storage medium for use in conjunction with a computer, the computer-readable storage medium storing program instructions that, when executed by the computer, cause the computer to carry out one or more operations comprising:**

Balasubramanian discloses the preamble. EX1003, ¶¶133-134.

Balasubramanian's "computer system 400 performs specific operations by processor 404 executing one or more sequences of one or more instructions contained in system memory component 406." EX1005, ¶94. "Such instructions may be read into system memory component 406 from another computer readable medium, such as static storage component 408 or disk drive component 410." *Id.* A POSA would have understood that at least Balasubramanian's static storage component is a "*non-transitory computer-readable storage medium.*" EX1003, ¶134.

2. [15.A]–[15.D]

Claim elements [15.A]–[15.D] correspond to claim elements [1.A]–[1.D], respectively. Balasubramanian discloses or renders obvious these elements for the

³ Claim 15 is met when any one of the operations is carried out because claim 15 only requires "*caus[ing] the computer to carry out **one or more operations.***"

same reasons explained above regarding claim 1. *Supra* Section V.A; EX1003,

¶135. The only substantive difference is that in [15.B.1], the claim recites “*performing an e-commerce transaction to purchase tickets, merchandise, or products or view the one or more customized webpages depicting information about the tickets, merchandise, or products*” instead of just “*performing an e-commerce transaction*” recited in [1.B.1]. Balasubramanian explicitly teaches the additional features. EX1003, ¶135.

As discussed above, Balasubramanian’s selectable links are “*actionable item[s]*” that include PCLs. EX1005, ¶¶42, 55-56, 74; EX1003, ¶136; *supra* Section V.A.3. When the user selects the PCL, the user can return and access a previously abandoned or incomplete purchase transaction and complete the transaction. EX1005, ¶¶42, 55, 75. Thus, Balasubramanian’s PCLs are used to complete the transaction to make a purchase (“*purchase ... products*”). In addition, because “the PCL directs the user to a portable shopping cart or a persistent shopping cart,” the PCL is also used to view the shopping cart (“*customized webpages*”) that shows the information of the products of the previously abandoned or incomplete purchase transaction (“*depicting information about the tickets, merchandise, or products*”). EX1005, ¶45; EX1003, ¶136.

K. Claims 16-20

Claims 16-20 are and storage medium claims that otherwise recite limitations that are identical to the method steps recited in claims 3-7. Balasubramanian discloses or renders obvious these elements for the same reasons as respectively explained for claims 3-7 above. *Supra* Sections V.C-V.G. EX1003, ¶137.

VI. GROUND 2: THE COMBINATION OF SPINDLER AND ANDERSON RENDERS OBVIOUS CLAIMS 1-20.

A. Motivation to Combine

A POSA would have been motivated to modify Spindler in view of Anderson to arrive at the computer-implemented method, system, and non-transitory computer-readable storage medium claimed by the '924 patent. EX1003, ¶¶139-147.

Spindler and Anderson are in the same field of endeavor as each other and the problem addressed by the '924 patent, and are thus analogous art. EX1003, ¶140. The '924 patent purports to address the problem that “the popularity of such online transactions has resulted in increased incidents of fraud and other criminal activity,” which “constrains people's willingness to conduct transactions via networks,” and that a “one-size-fits-all approach ... often results in a cumbersome user experience.” EX1001, 1:24-40. The '924 patent is a continuation of U.S. Pat. No. 11,765,262 to Spindler et al. (“the '262 patent”), which published as U.S.

Patent Application Publication 2022/0006895 (“Spindler” herein). Spindler is identically directed towards “techniques for performing transactions using dynamically generated customized webpages” (e.g., “purchasing products or services”) that may include authenticating a user's electronic device (e.g., a computer or a cellular telephone). EX1006, ¶¶2, 3, 9, 31. Anderson is also directed towards techniques that “allow users to easily and quickly authenticate themselves [to] pay for [e-commerce] goods and/or services.” EX1007, ¶¶2, 12; EX1003, ¶140.

Spindler teaches a technique for dynamically generating customized content for a subscriber that “may provide an efficient and secure way for the individual to receive relevant content and to conduct one or more transactions.” EX1006, ¶46. Spindler’s technique alleviates “a cumbersome user experience” in which “visitors are forced to navigate through the content on a webpage or website in an attempt to find relevant or interesting information.” *Id.*, ¶6. Such an experience “restricts use and, thus, people’s willingness to conduct transactions.” *Id.* However, as discussed above, Spindler does not disclose applying its techniques to the well-known problem of *prior* potential or abandoned transactions. *Supra* Section IV.B.1. Thus, a POSA would have looked to the prior art for guidance as to specific techniques for extending Spindler’s teachings to such prior transactions. EX1003, ¶141. Anderson is such a reference.

Like Spindler, Anderson, which published well before Spindler, recognizes that a cumbersome user experience may frustrate users, “caus[ing] potential consumers to abandon their commerce transactions.” EX1007, ¶6. This prevents a user from completing a transaction “due to a lack of time, a loss of a network connection, or other reasons,” and thus the user’s shopping cart may be “abandoned.” *Id.*, ¶¶6, 125. Anderson, like Spindler, attempts to “increase[] the ease and efficiency of commerce payment” for online consumers. *Id.*, ¶11. A POSA reading Spindler thus would have been aware that not only may consumers feel restricted by and/or unwilling to suffer a cumbersome user experience, as taught by Spindler, but that such an experience may cause some consumers to completely abandon their transactions, as explicitly taught by Anderson. EX1003, ¶142. Accordingly, a POSA reviewing Spindler would have also been aware of Anderson’s concerns regarding abandoned transactions. EX1003, ¶142.

Anderson’s approach to solving the problem of abandoned transactions is similar to Spindler’s computer system. EX1003, ¶143. In particular, Anderson’s approach centers on an application in which a user selects items to be placed into a “virtual shopping cart.” EX1007, ¶113. If the shopping cart is abandoned, Anderson’s application may “send a purchase message to the user,” for example “via text message,” that may “include a selectable buy option ... that allows the user to complete the abandoned transaction.” *Id.*, ¶127. When the user receives the

message and selects the link, the user is directed back to the earlier “virtual cart user interface,” thereby “provid[ing] the user with another opportunity to complete the purchase of the items in the cart.” *Id.*, ¶¶126, 128; EX1003, ¶143.

Like Spindler, Anderson attempts to simplify the online transaction process for consumers. EX1007, ¶9; EX1006, ¶6; EX1003, ¶144. Like Spindler, Anderson collects information regarding a user’s interests (e.g., Spindler’s “transactions of interest,” Anderson’s virtual shopping cart created by the user). EX1007, ¶113; EX1006, ¶11; EX1003, ¶144. Anderson and Spindler each generate a message that includes a link to allow the user to complete transactions related to those interests. EX1007, ¶¶126-128; EX1006, ¶34; EX1003, ¶144. Much like Spindler’s customized “actionable item” that may be, for example, a link to purchase tickets, Anderson’s virtual shopping cart includes a similar “selectable buy option” having a customized function to “allow[] the user to complete the abandoned transaction.” EX1006, ¶84; EX1007, ¶127; EX1003, ¶144. Anderson also describes various options for sending the message to the user, including sending the link by text message, as in Spindler. EX1007, ¶127; EX1006, ¶34; EX1003, ¶144. Given the similarities of the techniques described by Spindler and Anderson, a POSA would not have encountered any unreasonable technical challenges in modifying Spindler in view of Anderson. EX1003, ¶144.

A POSA would have had a reasonable expectation of success in modifying Spindler in view of Anderson because the modification would have involved only the routine application of a known content generation and messaging scheme (e.g., Spindler's text message with a link to complete a transaction) to the specific, well-known application of recapturing an abandoned virtual shopping cart, as taught by Anderson. EX1007, ¶125; EX1003, ¶145.

In the Spindler-Anderson combination, a POSA would have been motivated to send Spindler's text messages not only in response to *future* possible transactions of interest (e.g., upcoming events), but also in response to *past* possible transactions (e.g., an abandoned shopping cart). EX1003, ¶146. A POSA would have known that Spindler's customized second document and text messages could readily be generated in the case of an abandoned virtual shopping cart, as explicitly taught by Anderson. EX1003, ¶146. Anderson describes sending similar messages, including customized content, to a user in a specific application (e.g., an abandoned shopping cart) using the same means as those described by Spindler (e.g., text message). EX1003, ¶146. Anderson describes that the advantages of such a technique are to “allow[] the user to complete the abandoned transaction” and to “allow a merchant to recapture abandoned carts.” EX1007, ¶¶125, 127; EX1003, ¶146. Modifying Spindler in view of Anderson would have yielded the predictable result of a computer system that customizes and sends transaction

information to a user based on past transactions, such as an abandoned virtual shopping cart. EX1003, ¶146. A POSA would have understood that Anderson's application would have provided a user with "another opportunity to complete the purchase of items" in an abandoned shopping cart and provided merchants an opportunity to recapture abandoned transactions. EX1003, ¶146. A POSA would have also understood that these benefits could be realized in Spindler simply by extending Spindler's technique to also generate and send customized content in the case of recognizing an abandoned virtual shopping cart. EX1003, ¶146.

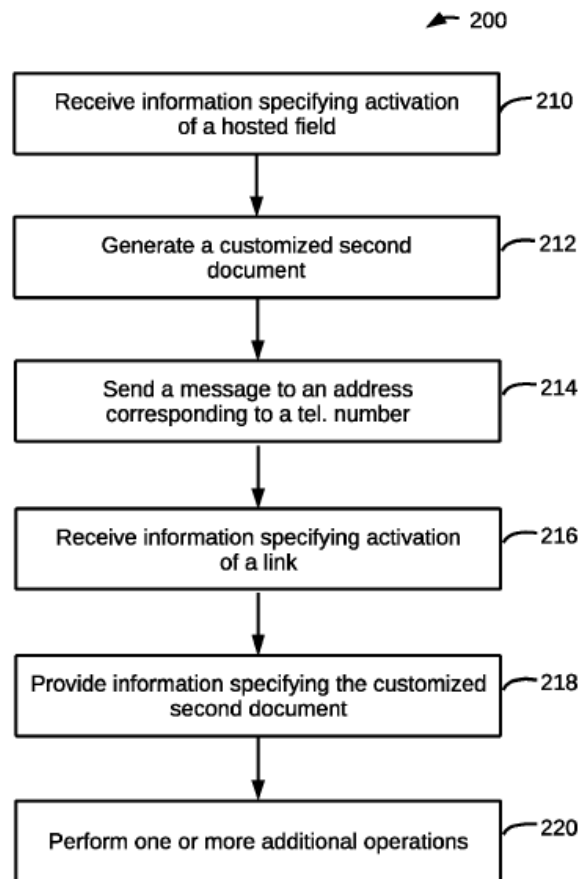
A POSA would have found it obvious to modify Spindler in view of Anderson to arrive at the configuration of elements recited by the claims of the '924 patent, as explained in detail below. EX1003, ¶147.

B. Independent claim 1

1. [1.P] A computer-implemented method comprising:

Spindler discloses the preamble. EX1003, ¶¶148-149.

Specifically, Spindler's "method 200" "may be performed by a computer" ("*computer-implemented method*"). EX1006, ¶48, FIG. 2. By performing method 200, Spindler's cloud-based computer 112 "dynamically generates [the] customized second document." EX1006, ¶28; EX1003, ¶149.



EX1006, FIG. 2.

2. [1.A] configuring a service subscriber associated with a telephone number, to be subscribed to receive additional content at the telephone number, in response to determining that the service subscriber has previously provided authentication information;

Spindler renders obvious element [1.A]. EX1003, ¶¶150-155.

First, Spindler discloses “a service subscriber associated with a telephone number.” EX1003, ¶151. Spindler's computer “receives information” from a user (“service subscriber”) that “specifies a willingness to receive one or more messages from the computer and specifies a **telephone number**.” EX1006, ¶28. In

Spindler, the “user of electronic device 110-1” provides the system with “a telephone number associated with [that] electronic device 110-1,” and “[s]uch user may be called a **subscriber customer**.” *Id.*, ¶32; EX1003, ¶151.

Second, Spindler discloses “*configuring [the] service subscriber ... to be subscribed to receive additional content at the telephone number.*” EX1003, ¶152. After receiving the customer’s telephone number, Spindler's computer may attempt to confirm the information. EX1006, ¶85. “When the telephone number details are confirmed, they may become a **subscriber** customer in a data structure.” *Id.* The information from the user also “indicate[s] a willingness to **receive one or more messages**” (“*additional content*”). *Id.*, ¶32. Thus, after providing a telephone number to Spindler’s system, and upon verification of that information by Spindler’s system, a customer may be “*subscribed to receive additional content at the telephone number,*” as claimed. EX1003, ¶152.

Although Spindler does not expressly disclose that the “*configuring [the] service subscriber*” is “*in response to determining that the service subscriber has previously provided authentication information,*” Spindler nonetheless renders this element obvious. EX1003, ¶153. In Spindler, the information provided for initially subscribing to the system may include a “third-party API platform identifier and the subscriber customer telephone number.” EX1006, ¶85. Once this information is

confirmed by Spindler's computer system, the customer "may become a subscriber customer." *Id.*; EX1003, ¶153.

Spindler also discloses the use of authentication information, such as, for example, an authentication cookie. Spindler's cookie is "**authentication information**" stored on the user's electronic device for the purpose of validating "the identity of the client" to "allow[] access 536 to complete a purchase." EX1006, ¶¶53, 92. Spindler explains that the use of such authentication information prevents misuse by a fraudulent user. EX1006, ¶78; EX1003, ¶154.

Thus, it would have been obvious to modify Spindler's use of identifiers, such as an API identifier and a customer telephone number, at the time of subscriber registration to also include authentication information, such as an authentication cookie, to prevent fraud. EX1003, ¶155. Such a modification would not require significant modification and would amount to nothing more than using a cookie or other authentication information to authenticate the user or electronic device at the time of subscription. EX1003, ¶155. Spindler recognizes that such modifications would be straightforward, explaining that "many modifications and variations will be apparent to practitioners skilled in the art, and the general principles defined herein may be applied to other embodiments and applications without departing from the spirit and scope of the present disclosure." EX1006, ¶144. Accordingly, it would have been obvious to modify Spindler to include the

use of authentication information, for example, a cookie or other user authentication information, at the time of subscribing. EX1003, ¶155; *Boston Sci. Scimed, Inc. v. Cordis Corp.*, 554 F.3d 982, 991 (Fed. Cir. 2009) (“Combining two embodiments disclosed adjacent to each other in a prior art patent does not require a leap of inventiveness.”).

3. [1.B.1] activating one or more customized webpages including at least one customized actionable item for performing an e-commerce transaction,

Spindler discloses or at least renders obvious element [1.B.1]. EX1003, ¶¶156-158.

First, Spindler discloses “*activating one or more customized webpages.*” EX1003, ¶157. In particular, after receiving (and confirming) the telephone number information, Spindler’s computer 112 “dynamically generates” (“*activat[es]*”) a “customized second document.” EX1006, ¶28. Spindler’s customized second document may be a “webpage” and may “include[] information about one or more transactions ... of interest to an individual,” and thus represents the claimed “*one or more customized webpages.*” *Id.*, ¶¶28, 49, Claim 4. EX1003, ¶157. Claim 1 specifically recites that the claimed “*activating*” “*compris[es]* *generation of secure access information for performing the e-commerce transaction,*” which Spindler discloses through generation of a hot cookie, as explained below in detail in Section VI.B.4. Thus, Spindler’s generation of the

second document and generation of a hot cookie correspond to this step. EX1003, ¶157.

Second, Spindler discloses or at least suggests that its customized second document (“*one or more customized webpages*”) “*includ[es] at least one customized actionable item for performing an e-commerce transaction.*” EX1003, ¶158. Spindler’s second document allows the subscriber to complete “a given [online] transaction ..., such as purchasing one or more tickets to an upcoming event.” EX1006, ¶52; *see also id.*, ¶¶9, 37, Claim 5. Spindler also discloses “an actionable item” such as, “e.g., a link to purchase tickets or view a customized webpage,” the link being sent to the subscriber as part of the message. *Id.*, ¶84. Upon selecting the link from the message, “the subscriber customer can send a command... to ... purchase tickets” to the service provider “for fulfillment and payment services.” *Id.* Spindler expressly characterizes the resulting transaction as an *e-commerce transaction*: the unpacked webpage “may provide options to navigate through and choose to commence an **e-commerce transaction**,” and the subscriber “may activate a command to authorize 440 an **e-commerce transaction**.” *Id.*, ¶¶83, 90. Further, as explained above, a POSA would have known that such a link would include, for example, a URL pointing to the webpage, and that such a URL would also be included in the webpage. *See supra* Section V.A.3; EX1003, ¶158. A POSA would have understood, or at least found it

obvious, to include such a link to purchase tickets (“*actionable item*”) as part of the customized second document in order to facilitate the disclosed ticket purchasing functionality. EX1003, ¶158.

4. [1.B.2] the activating comprising generation of secure access information for performing the e-commerce transaction,

Spindler discloses element [1.B.2]. EX1003, ¶¶159-161.

Spindler discloses that “*the activating compris[es] generation of secure access information for performing the e-commerce transaction.*” EX1003, ¶160.

For example, Spindler’s computer may also “provide authentication information (such as an authentication cookie) to the [subscriber’s] electronic device to authenticate purchases.” EX1006, ¶53. This cookie may be generated and stored on the subscriber’s electronic device when the user subscribes, and the customized document is generated. *See id.*, ¶¶72-75. The cookie may be used to “confirm[] the identity of the client and further allows access 536 to complete a purchase.” *Id.*, ¶92. Validation of this cookie “may allow financial information ... to process and pass authorization and processing,” and “information stored in the hot cookie allows commerce to be activated at 614.” *Id.*, ¶93.

Spindler’s providing authentication information in the form of a cookie corresponds to the claimed “*generation of secure access information.*” EX1003, ¶161. Spindler’s completing a transaction in response to validation of the cookie

corresponds to the claimed “*performing the e-commerce transaction.*” EX1003,

¶161. Thus, Spindler discloses this claim element. EX1003, ¶161.

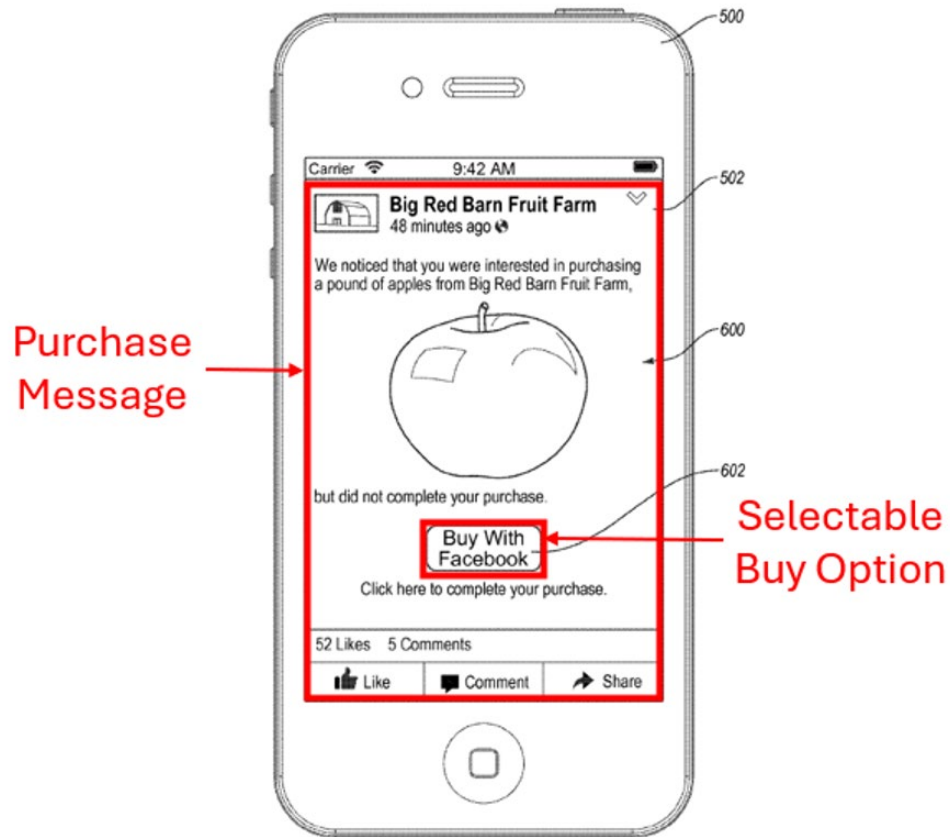
5. [1.B.3] wherein the at least one customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber;

The Spindler-Anderson combination teaches element [1.B.3]. EX1003, ¶¶162-168.

As discussed in Section IV.B.1, Spindler fails to explicitly disclose that “*the at least one customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber.*” EX1003, ¶163.

Anderson, however, teaches this limitation. EX1003, ¶164. Anderson describes a network application that “provide[s] for recapturing of abandoned carts.” EX1007, ¶125. When a user adds items to a virtual shopping cart but fails to complete the transaction (“*prior actions associated with one or more prior transactions performed by the service subscriber*”), Anderson’s application “can store the detailed information in the transaction database 232 as an un-completed transaction.” *Id.*, ¶126. If the user does not complete the transaction, the application “can provide the user with another opportunity to complete the purchase of the items in the cart” by “send[ing] a purchase message to the user.” *Id.*, ¶¶126-127. The message may “include details of items in the cart that was

abandoned (name of items, price of items, etc.)” as well as “a selectable buy option ... that allows the user to complete the abandoned transaction.” *Id.*, ¶127, FIG. 6.



EX1007, FIG. 6 (annotated).

Activating the selectable buy option may return the user to the earlier virtual shopping cart (second user interface 508). EX1007, ¶¶128, 113, FIG. 5B. EX1003, ¶165.

Anderson’s selectable buy option (“*the at least one customized actionable item*”) “*corresponds to*” the user’s prior cart-building actions and to the resulting stored un-completed transaction, because the message is populated with the specific items the user previously selected and the option returns the user to the

specific cart the user previously assembled, allowing the user to complete the purchase of items previously added to the virtual cart. *Id.*, ¶¶127-128; EX1003, ¶166.

It would have been obvious to a POSA to modify Spindler in view of Anderson to send Spindler's messages in the case of an abandoned shopping cart, as taught by Anderson. *See* Section VI.A; EX1003, ¶167. In the resulting combination, in response to determining that a virtual shopping cart has been abandoned as taught by Anderson, Spindler's computer would generate a customized second document (e.g., a customized webpage) listing the items in the abandoned shopping cart and then send a message to the user with a link (a "*customized actionable item*") to the customized second document. The customized second document ("*customized webpage*") allows the user to complete the transaction. *See above* Section VI.B.3; EX1003, ¶167. Thus, the "*customized actionable item*" in Spindler-Anderson "*corresponds to*" the items in the abandoned shopping cart (the claimed "*prior actions associated with one or more prior transactions performed by the service subscriber*"). EX1003, ¶167.

Thus, as explained above in Section VI.A, a POSA would have found it obvious to modify Spindler in view of Anderson to include a customized actionable item corresponding to prior actions associated with one or more prior transactions performed by the service subscriber, as claimed. EX1003, ¶168.

6. **[1.C] generating, for the service subscriber, a third party message associated with the one or more customized webpages, the third party message including the at least one customized actionable item; and [1.D] causing transmission of the generated third party message to the service subscriber**

Spindler discloses elements [1.C] and [1.D]. EX1003, ¶¶169-171.

First, Spindler discloses “*generating, for the service subscriber, a third party message associated with the one or more customized webpages*” and “*causing transmission of the generated third party message to the service subscriber.*” EX1003, ¶170. Specifically, after dynamically generating the customized second document, Spindler’s computer “sends a message,” for example, a “text message” (e.g., “a Short Message Service (SMS) message”), to the subscriber (“*service subscriber*”) at “an address corresponding to the telephone number” (“*causing transmission of the ... message*”). EX1006, ¶¶28, 34. The message may “include[] a link to the customized second document” (thereby being “*associated with the one or more customized webpages*”). *Id.*, ¶50. Spindler’s message may be sent from the service provider (e.g., “Amplify”) on behalf of a third party client (e.g., “a third-party ticket provider or any third-party service or event provider”). *Id.*, ¶¶67, 80; *see also id.*, ¶¶82, 84; EX1003, ¶170.

Second, Spindler discloses that “*the third party message includ[es] the at least one customized actionable item.*” EX1003, ¶171. Spindler’s message includes

the “actionable item, e.g., a link to purchase tickets or view a customized webpage.” EX1006, ¶84; EX1003, ¶171.

C. Claim 2

The Spindler-Anderson combination teaches claim 2. EX1003, ¶¶172-174.

First, Spindler discloses that “*the at least one customized actionable item comprises data to access the one or more customized webpages.*” EX1003, ¶173.

Spindler’s actionable item is “a link to purchase tickets or view a customized webpage.” EX1006, ¶84. A POSA would have understood that such a link comprises data — e.g., a URL — by which the customized webpage is accessed. EX1003, ¶173. Spindler confirms that the link is the sole means of access: “[a] given subscriber customer cannot hit their webpage without a specific link that is provided to the given subscriber customer,” and “there may not be another way to access the customized webpage.” EX1006, ¶68.

Second, Spindler discloses that “*the data [is] configured to enable the service subscriber to purchase tickets, merchandise, or products or view the customized webpages depicting information about the tickets, merchandise, or products.*” EX1003, ¶174. Spindler’s link enables precisely these alternatives: it is a link “to purchase tickets **or view a customized webpage**, such that the subscriber customer can send a command 516b using the 3P service 526 to view the customized webpage or purchase tickets or etc. which is sent to Amplify 528

for fulfillment and payment services.” EX1006, ¶84. Spindler’s transactions are for “one or more upcoming events or other purchasable **tickets, merchandise, products, etc.**” *Id.*, ¶7. And activating the link “unpacks 416 the client **ticket purchase opportunities** inside a Web browser,” which “may provide options to navigate through and choose to commence an e-commerce transaction.” *Id.*, ¶83. EX1003, ¶174.

D. Claim 3

The Spindler-Anderson combination teaches claim 3. EX1003, ¶¶175-176.

Spindler discloses that “*the third party message is associated with a third party ticket provider, a third party service provider, or a third party event provider.*” EX1003, ¶176. Spindler states that “a ‘client’ may be a **third-party ticket provider or any third-party service or event provider.**” EX1006, ¶67. Spindler’s messages are sent on behalf of, and carry the inventory of, that client: the micro-website “may include client ticket purchase opportunities for the subscriber customer,” *id.*, ¶82, and the client, “such as an event organizer” supplies the events and inventory associated with a vendor ID. *Id.*, ¶¶80, 89; EX1003, ¶176.

E. Claim 4

The Spindler-Anderson combination teaches claim 4. EX1003, ¶¶177-180.

Spindler discloses that “*configuring [the] service subscriber to receive additional content comprises configuring the service subscriber to receive, from*

one or more third party providers, third party messages comprising the at least one customized actionable item.” EX1003, ¶178.

Spindler’s subscriber customers hold subscriptions with multiple clients. “[T]he ADDP may review subscriber customer subscriptions (such as **the event organizers or client to which a given subscriber customer has subscriptions**).” EX1006, ¶79. Spindler checks “whether the customer is currently subscribed or unsubscribed to Amplify 444 **for a current client**,” *id.*, ¶87, and flags the subscriber customer to the client so that “the client 404 thereafter may have access to the subscriber customer 414.” *Id.*, ¶88. Content delivery is then matched across clients: the system decides “which **partner’s** events, which specific events, single event, events list,” and “[t]he customized webpage may pull in or incorporate additional events that may be of interest to the given subscriber customer.” *Id.*, ¶¶68, 89. Each such client is a “third-party ticket provider or any third-party service or event provider.” *Id.*, ¶67. Accordingly, Spindler’s subscriber customer is configured to receive, from one or more third party providers, third party messages containing the actionable item. EX1003, ¶179.

In the combination of Spindler-Anderson, the messaging system of Spindler is merely modified so that the actionable item is used for *prior* events (e.g., an abandoned shopping cart). *See supra*, Section VI.A. Thus, in the combination of

Spindler-Anderson, the subscriber customer would also be configured to receive third party messages containing the actionable item. EX1003, ¶180.

F. Claim 5

The Spindler-Anderson combination teaches claim 5. EX1003, ¶¶181-182.

Spindler discloses that “*the at least one customized actionable item comprises a secure link to perform the e-commerce transaction for purchasing tickets, merchandise, or products.*” EX1003, ¶182. In particular, Spindler discloses that the “actionable item” may be, e.g., “a link to purchase tickets or view a customized webpage, such that the subscriber customer can send a command ... to purchase tickets.” EX1006, ¶84. Spindler also discloses various security techniques (e.g., a “hot cookie,” “biometric authentication,” “facial recognition,” “fingerprint recognition”) that protect against “fraudulent use of a link” and verify the identity of the user device, thereby making the link secure. *Id.*, ¶¶78, 91-92; EX1003, ¶182.

G. Claim 6

The Spindler-Anderson combination teaches claim 6. EX1003, ¶¶183-184.

Spindler discloses that “*the authentication information comprises an authentication cookie configured to be stored on an electronic device associated with the service subscriber.*” EX1003, ¶184. Spindler’s computer “may provide ... **authentication information (such as an authentication cookie)** to electronic device 110-1 to authenticate completion of a given transaction.” EX1006, ¶¶36, 53.

That cookie is configured to be stored on the subscriber's device: "the ADDP may create a 'hot' cookie that **goes onto the given subscriber customer's electronic device (e.g., cellular telephone)** for future payments," and "[t]he hot cookie is **stored locally on the device of the subscriber customer** for a defined period of time." *Id.*, ¶¶75, 92. The cookie contains subscriber-specific credentials — "the keyword, client, subscriber customer, and protocol." *Id.*, ¶92, FIG. 7; EX1003, ¶184.

H. Claim 7

The Spindler-Anderson combination teaches claim 7. EX1003, ¶¶185-186.

Spindler discloses that "*the third party message comprises a Short Message Service (SMS) message or a Multimedia Message Service (MMS) message.*"

EX1003, ¶186. Spindler's message "may include a **Short Message Service (SMS) message** (which is sometimes referred to as a 'text message')." EX1006, ¶¶34, 50.

Spindler expressly contemplates MMS as well: "different communication channels may be used in other embodiments, e.g., email, Enhanced Messaging Service (EMS), and/or **Multimedia Messaging Service (MMS).**" *Id.*, ¶66; EX1003, ¶186.

I. Independent Claim 8

Independent claim 8 recites a system comprising a "*processor*" and a "*memory configured to store program instructions, wherein, when executed by the*

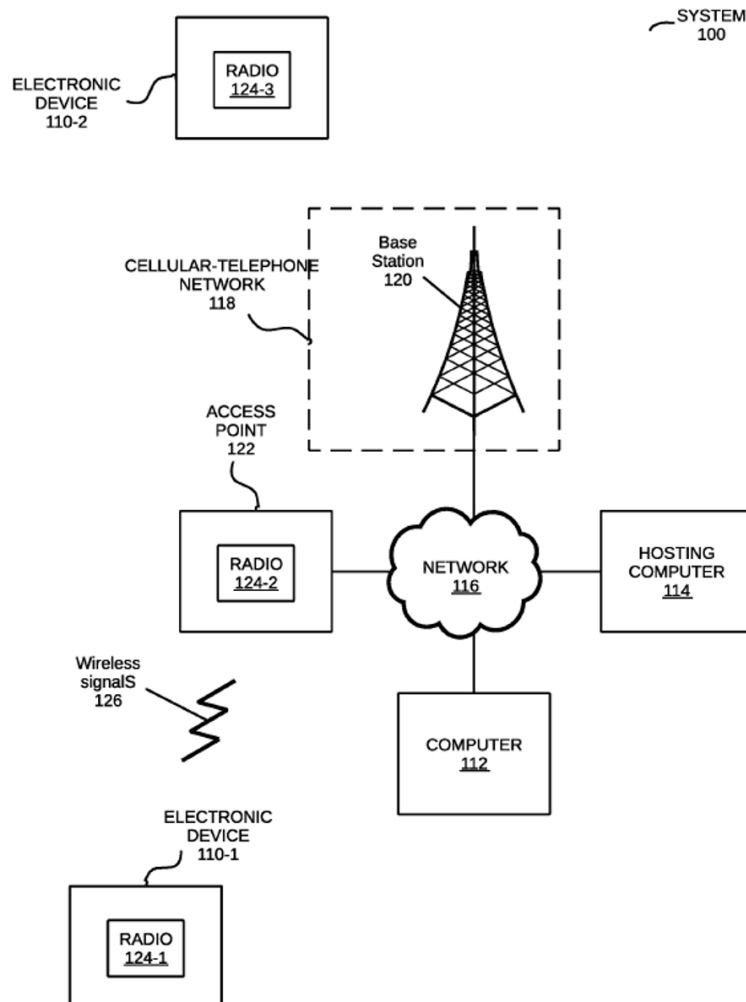
processor, the program instructions cause the processor to perform operations”

substantially the same as those recited in claim 1. EX1003, ¶187.

1. [8.P]

Spindler discloses the preamble. EX1003, ¶¶188-189.

Spindler discloses **system 100** including various electronic devices 110, hosting computer 114, network 116, and cloud-based computer 112 that may perform method 200. EX1006, ¶31, FIG. 1; EX1003, ¶189.

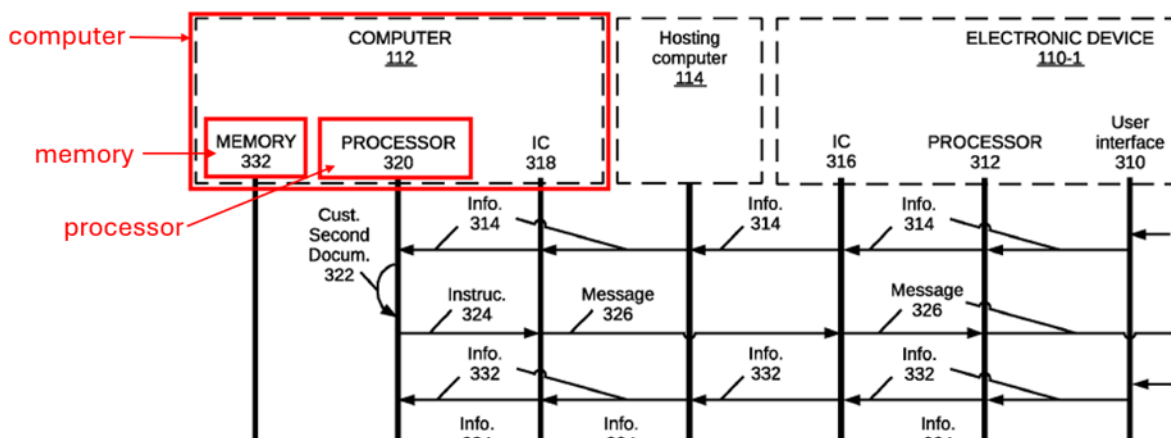


EX1006, FIG. 1.

2. [8.A]

Spindler discloses element [8.A]. EX1003, ¶¶190-191.

Spindler’s cloud-based computer 112 may include **processor 320** that “may dynamically generate a customized second document” and “may instruct 324 interface circuit 318 to send a message ... to an address corresponding to the telephone number.” EX1006, ¶¶59-60, FIG. 3; EX1003, ¶191.



EX1006, FIG. 3 (abridged, annotated).

3. [8.B]

Spindler discloses element [8.B]. EX1003, ¶¶192-193.

Spindler discloses that computer 112 may include **memory 332**. EX1006, ¶113, FIG. 3 above. The memory may be “*configured to store program instructions*” such that, “when the program instructions are executed by the processor, they cause the computer to perform” the actions in method 200. *Id.*, ¶113; *see also id.*, ¶¶98, 112; EX1003, ¶193.

4. [8.C]–[8.F]

Claim elements [8.C]–[8.F] correspond to claim elements [1.A]–[1.D], respectively. The Spindler-Anderson combination discloses or renders obvious these elements for the same reasons explained above regarding claim 1. *Supra* Section VI.B; EX1003, ¶194.

J. Claims 9-14

Claims 9-14 are system claims that otherwise recite limitations that are identical to the method steps recited in claims 2-7. The Spindler-Anderson combination discloses or renders obvious these elements for the same reasons as respectively explained for claims 2-7 above. *Supra* Sections VI.C–VI.H; EX1003, ¶195.

K. Independent Claim 15

Independent claim 15 recites a “*non-transitory computer-readable storage medium for use in conjunction with a computer, the computer-readable storage medium storing program instructions that, when executed by the computer, cause the computer to carry out one or more operations*” substantially the same as those recited in claim 1, with the subject matter of claim 2 incorporated into element [15.B.1]. EX1003, ¶196.

1. [15.P]

Spindler discloses the preamble. EX1003, ¶¶197-198.

Spindler discloses “*a non-transitory computer-readable storage medium for use in conjunction with a computer, the computer-readable storage medium storing program instructions that, when executed by the computer, cause the computer to carry out*” the operations in method 200. EX1006, ¶127; *see also id.*, ¶13; EX1003, ¶198.

2. [15.A]-[15.D]

Claim elements [15.A]-[15.D] correspond to claim elements [1.A]-[1.D], respectively. The Spindler-Anderson combination discloses or renders obvious these elements for the same reasons explained above regarding claim 1. *Supra* Section VI.B; EX1003, ¶199. The only substantive difference is that in [15.B.1], the claim recites “*performing an e-commerce transaction to purchase tickets, merchandise, or products or view the one or more customized webpages depicting information about the tickets, merchandise, or products*” instead of just “*performing an e-commerce transaction*” recited in [1.B.1]. Spindler explicitly discloses the additional features. EX1003, ¶199.

In particular, Spindler’s customized second document “includes information about one or more transactions ... of interest” to the subscriber. EX1006, ¶34. Spindler’s actionable item is “a link to **purchase tickets or view a customized**

webpage,” such that Spindler's transactions are for “**purchasable tickets, merchandise, products, etc.**” *Id.*, ¶¶7, 84; EX1003, ¶200.

L. Claims 16-20

Claims 16-20 are storage medium claims that otherwise recite limitations that are identical to the method steps recited in claims 3-7. The Spindler-Anderson combination discloses or renders obvious these elements for the same reasons as respectively explained for claims 3-7 above. *Supra* Sections VI.D-VI.H. EX1003, ¶201.

VII. GROUNDS FOR STANDING (37 C.F.R. § 42.104(A))

Petitioner certifies that the '924 patent is available for IPR and Petitioner is not barred or estopped from requesting IPR of any '924 patent claim.

VIII. MANDATORY NOTICES (37 C.F.R. § 42.8(A)(1))

Real Party-in-Interest (37 C.F.R. § 42.8(b)(1)): The real party-in-interest is Salesforce, Inc.

Related Matters (37 C.F.R. § 42.8(b)(2)): The '924 patent is at issue in pending litigations *IQX Corp. v. Salesforce, Inc.*, Civil Action No. 7:26-cv-00213 (W.D. Tex.), filed May 28, 2026, and *IQX Corp. v. Intuit Inc.*, Civil Action No. 2-26-cv-00351 (E.D. Tex.), filed April 30, 2026.

U.S. Patent Nos. 12,368,799; 12,200,165; and 12,438,978 are also at issue in one or both of the above litigation proceedings and are being challenged in the below concurrently filed IPRs:

Patent No.	Case No.
12,368,799	IPR2026-00475
12,200,165	IPR2026-00477
12,438,978	IPR2026-00478

The '924 patent claims the benefit of U.S. Patent No. 11,765,262.

U.S. Patent Nos. 12,200,165; 12,368,799; 12,126,752; 12,438,978;
11,949,806; 12,041,197; and 12,647,506, and pending U.S. Patent Application
Nos. 19/680,798 and 19/645,697, claim the benefit of the '924 patent.

Lead and Back-up Counsel (37 C.F.R. § 42.8(b)(3)):

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Service Information (37 C.F.R. § 42.8(b)(4)): Please direct all correspondence regarding this Petition to counsel at the above addresses and PTAB@sternekessler.com. Petitioner consents to service by email at the addresses above.

Procedural Statements: This Petition is filed in accordance with 37 C.F.R. § 42.106(a). Concurrently filed herewith are a Power of Attorney and Exhibit List under 37 C.F.R. §§ 42.10(b) and 42.63(e), respectively. The required fee is paid through Deposit Acct. No. 19-0036 (Customer ID No. 45324). The Office is authorized to charge any fee deficiency, or credit any overpayment, to Deposit Acct. No. 19-0036 (Customer ID No. 45324).

IX. CONCLUSION

The challenged claims are unpatentable and IPR is warranted.

Respectfully submitted,

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APPENDIX A: LISTING OF CLAIMS

Claim 1

Element	
[1.P]	A computer-implemented method comprising:
[1.A]	configuring a service subscriber associated with a telephone number, to be subscribed to receive additional content at the telephone number, in response to determining that the service subscriber has previously provided authentication information;
[1.B.1]	activating one or more customized webpages including at least one customized actionable item for performing an e-commerce transaction,
[1.B.2]	the activating comprising generation of secure access information for performing the e-commerce transaction,
[1.B.3]	wherein the at least one customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber;
[1.C]	generating, for the service subscriber, a third party message associated with the one or more customized webpages, the third party message including the at least one customized actionable item; and
[1.D]	causing transmission of the generated third party message to the service subscriber.

Claim 2

Element	
[2]	The computer-implemented method of claim 1, wherein the at least one customized actionable item comprises data to access the one or more customized webpages, the data being configured to enable the service subscriber to purchase tickets, merchandise, or products or view the customized webpages depicting information about the tickets, merchandise, or products.

Claim 3

Element	
[3]	The computer-implemented method of claim 1, wherein the third party message is associated with a third party ticket provider, a third party service provider, or a third party event provider.

Claim 4

Element	
[4]	The computer-implemented method of claim 1, wherein configuring a service subscriber to receive additional content comprises configuring the service subscriber to receive, from one or more third party providers, third party messages comprising the at least one customized actionable item.

Claim 5

Element	
[5]	The computer-implemented method of claim 1, wherein the at least one customized actionable item comprises a secure link to perform the e-commerce transaction for purchasing tickets, merchandise, or products.

Claim 6

Element	
[6]	The computer-implemented method of claim 1, wherein the authentication information comprises an authentication cookie configured to be stored on an electronic device associated with the service subscriber.

Claim 7

Element	
[7]	The computer-implemented method of claim 1, wherein the third party message comprises a Short Message Service (SMS) message or a Multimedia Message Service (MMS) message.

Claim 8

Element	
[8.P]	A system comprising:
[8.A]	a processor; and
[8.B]	memory configured to store program instructions, wherein, when executed by the processor, the program instructions cause the processor to perform operations comprising:
[8.C]	configuring a service subscriber associated with a telephone number, to be subscribed to receive additional content at the telephone number, in response to determining that the service subscriber has previously provided authentication information;
[8.D.1]	activating one or more customized webpages including at least one customized actionable item for performing an e-commerce transaction,
[8.D.2]	the activating comprising generation of secure access information for performing the e-commerce transaction,
[8.D.3]	wherein the at least one customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber;
[8.E]	generating, for the service subscriber, a third party message associated with the one or more customized webpages, the third party message including the at least one customized actionable item; and
[8.F]	causing transmission of the generated third party message to the service subscriber.

Claim 9

Element	
[9]	The system of claim 8, wherein the at least one customized actionable item comprises data to access the one or more customized webpages, the data being configured to enable the service subscriber to purchase tickets, merchandise, or products or view the customized webpages depicting information about the tickets, merchandise, or products.

Claim 10

Element	
[10]	The system of claim 8, wherein the third party message is associated with a third party ticket provider, a third party service provider, or a third party event provider.

Claim 11

Element	
[11]	The system of claim 8, wherein configuring a service subscriber to receive additional content comprises configuring the service subscriber to receive, from one or more third party providers, third party messages comprising the at least one customized actionable item.

Claim 12

Element	
[12]	The system of claim 8, wherein the at least one customized actionable item comprises a secure link to perform the e-commerce transaction for purchasing tickets, merchandise, or products.

Claim 13

Element	
[13]	The system of claim 8, wherein the authentication information comprises an authentication cookie configured to be stored on an electronic device associated with the service subscriber.

Claim 14

Element	
[14]	The system of claim 8, wherein the third party message comprises a Short Message Service (SMS) message or a Multimedia Message Service (MMS) message.

Claim 15

Element	
[15.P]	A non-transitory computer-readable storage medium for use in conjunction with a computer, the computer-readable storage medium storing program instructions that, when executed by the computer, cause the computer to carry out one or more operations comprising:
[15.A]	configuring a service subscriber associated with a telephone number, to be subscribed to receive additional content at the telephone number, in response to determining that the service subscriber has previously provided authentication information;
[15.B.1]	activating one or more customized webpages including at least one customized actionable item for performing an e-commerce transaction to purchase tickets, merchandise, or products or view the one or more customized webpages depicting information about the tickets, merchandise, or products,
[15.B.2]	the activating comprising generation of secure access information for performing the e-commerce transaction,
[15.B.3]	wherein the at least one customized actionable item corresponds to prior actions associated with one or more prior transactions performed by the service subscriber;
[15.C]	generating, for the service subscriber, a third party message associated with the one or more customized webpages, the third party message including the at least one customized actionable item; and
[15.D]	causing transmission of the generated third party message to the service subscriber.

Claim 16

Element	
[16]	The non-transitory computer-readable storage medium of claim 15, wherein the third party message is associated with a third party ticket provider, a third party service provider, or a third party event provider.

Claim 17

Element	
[17]	The non-transitory computer-readable storage medium of claim 15, wherein configuring a service subscriber to receive additional content comprises configuring the service subscriber to receive, from one or more third party providers, third party messages comprising the at least one customized actionable item.

Claim 18

Element	
[18]	The non-transitory computer-readable storage medium of claim 15, wherein the at least one customized actionable item comprises a secure link to perform the e-commerce transaction for purchasing tickets, merchandise, or products.

Claim 19

Element	
[19]	The non-transitory computer-readable storage medium of claim 15, wherein the authentication information comprises an authentication cookie configured to be stored on an electronic device associated with the service subscriber.

Claim 20

Element	
[20]	The non-transitory computer-readable storage medium of claim 15, wherein the third party message comprises a Short Message Service (SMS) message or a Multimedia Message Service (MMS) message.

CERTIFICATE OF WORD COUNT (37 C.F.R. § 42.24(d))

1. This Petition for *Inter Partes* Review complies with the type-volume limitation of 14,000 words, comprising 11,434 words, excluding the parts exempted by 37 C.F.R. § 42.24(a)(1).

2. This Petition for *Inter Partes* Review complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word 2016 in 14-point Times New Roman font.

Respectfully submitted,

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CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(e)), 42.105(a))

I certify that the above-captioned **PETITION FOR *INTER PARTES***
REVIEW FOR U.S. PATENT NO. 11,876,924 and associated Exhibits 1001-
1007, 1012, 1014, 1017-1019, 1023-1026, 1037-1045 were served in their
entireties upon the Patent Owner on September 24, 2026, via FedEx® Express at
the following addresses:

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