

Patent No. 12,368,799 – Petition for *Inter Partes* Review

Filed on behalf of Intuit Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTUIT INC.,

Petitioner,

v.

IQX CORP.,

Patent Owner.

Inter Partes Review No. IPR2027-00018

Patent 12,368,799 B2

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT 12,368,799**

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EXHIBIT LIST (37 C.F.R. § 42.63(e))

Exhibit	Description
1001	U.S. Patent No. 12,368,799 (“’799 patent”)
1002	File History of U.S. Patent No. 12,368,799
1003	Declaration of Benjamin Bederson, Ph.D.
1004	Curriculum Vitae of Benjamin Bederson, Ph.D.
1005	U.S. Provisional Patent Application No. 62/737,315
1006	International Publication No. WO 2020/068911 A1
1007	U.S. Patent No. 11,765,262
1008	U.S. Patent No. 12,126,752
1009	U.S. Patent Application Publication No. 2007/0150588 to Ghadialy et al. (“Ghadialy”)
1010	U.S. Patent Application Publication No. 2012/0310752 to Gaddis (“Gaddis”)
1011	U.S. Patent Application Publication No. 2018/0365723 to Lentz (“Lentz”)
1012	U.S. Patent Application Publication No. 2005/0228899 to Wendkos et al. (“Wendkos”)
1013	U.S. Patent Application Publication No. 2005/0278231 to Teeter (“Teeter”)
1014	ETSI TS 123 040 V3.5.0 (2000-07), Universal Mobile Telecommunications System (UMTS); Technical realization of the Short Message Service (SMS) (3G TS 23.040 version 3.5.0 Release 1999)
1015	U.S. Patent Application Publication No. 2003/0040300 to Le Bodic et al.

Exhibit	Description
1016	GSMA RCC.71, RCS Universal Profile Service Definition Document, Version 2.0 (June 28, 2017)
1017	Google Messages Help, “Turn on RCS chats in Google Messages” (Internet Archive capture dated March 3, 2024)
1018	Google, RCS Business Messaging Developer Docs, “Events” (Internet Archive capture dated May 27, 2022)
1019	U.S. Patent No. 9,298,844 to Graff et al.
1020	U.S. Patent No. 11,720,919 to Longo et al.
1021	Yotpo Support, “Setting User Actions with Yotpo SMS & Email Texts as Rules in Segments” (Internet Archive capture dated April 20, 2024)
1022	Daniel Billsus & Michael J. Pazzani, Learning Collaborative Information Filters, in Recommender Systems: Papers from the 1998 AAAI Workshop, AAAI Technical Report WS-98-08, at 24-28 (AAAI 1998)
1023	Xiaoyuan Su & Taghi M. Khoshgoftaar, A Survey of Collaborative Filtering Techniques, Advances in Artificial Intelligence, vol. 2009, Article ID 421425 (2009)
1024	U.S. Patent Application Publication No. 2016/0342997 to De Tella et al.
1025	Facebook for Developers, Messenger Platform Documentation, “Checkbox Plugin” (Internet Archive capture dated February 23, 2017)
1026	U.S. Patent Application Publication No. 2015/0100483 to Schoenberg
1027	Shopify Help Center, “Abandoned checkouts” (Internet Archive capture dated August 26, 2019)
1028	Postscript, “Guide to Abandoned Cart Automations” (Internet Archive capture dated November 29, 2021)

Exhibit	Description
1029	Tyche Softwares, “Woocommerce Abandon Cart Pro” (Internet Archive capture dated September 21, 2014)
1030	U.S. Patent No. 12,200,165 to Spindler et al.
1031	U.S. Application No. 18/896,197, as filed September 25, 2024
1032	Plaintiff iQX Corp.’s Infringement Contentions, Claim Chart for U.S. Patent No. 12,368,799 in <i>iQX Corp. v. Intuit Inc.</i> , No. 2:26-cv-00351-JRG-RSP (E.D. Tex. July 10, 2026)

I. INTRODUCTION

In accordance with 35 U.S.C. §§ 311-319 and 37 C.F.R. §§ 42.100 *et seq.*, Petitioner Intuit Inc. (“Intuit” or “Petitioner”) requests *inter partes* review (“IPR”) of claims 1-30 of United States Patent No. 12,368,799 (“’799 patent”). EX1001. The ’799 patent is assigned to iQX Corp. (“Patent Owner”) according to USPTO assignment records.¹

II. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to 37 C.F.R. § 42.104(a) that the ’799 patent is available for IPR and that Petitioner is not barred or estopped from requesting an IPR of the challenged claims.

III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to 37 C.F.R. §§ 42.22(a)(1) and 42.104(b)(1)-(2), Intuit challenges claims 1-30 of the ’799 patent. This petition, supported by the Declaration of Dr. Benjamin Bederson, requests cancellation of claims 1-30 as unpatentable under 35 U.S.C. § 103. EX1003, ¶¶1-3. The grounds are:

Ground 1	Claims 1-30	Obvious under 35 U.S.C. § 103 over Ghadially in view of Gaddis, Lentz, and the General Knowledge of a POSITA
Ground 2	Claims 1-30	Obvious under 35 U.S.C. § 103 over Wendkos in view of Teeter, Lentz, and the General Knowledge of a POSITA

¹ Petitioner reserves the right to challenge iQX Corp.’s standing to assert the ’799 patent in any litigation.

IV. OVERVIEW OF THE '799 PATENT

A. Background

The '799 patent adds nothing novel or non-obvious to the prior art. The challenged claims recite a third-party marketing service that places a sign-up field in a merchant's webpage, captures the shopper's electronic address and assent to receive messages, assembles a shopper-specific page of offers, and texts or emails the shopper a link to that page so the shopper can buy. Each of those functions, and the EMS and RCS messaging formats the dependent claims recite, was well known in online marketing and e-commerce long before the '799 patent. EX1003, ¶¶48-49, 90, 92.

B. '799 Patent Specification

The '799 patent is directed to a computer that “dynamically generates a customized second document.” EX1001, 7:31-32, Fig. 2.

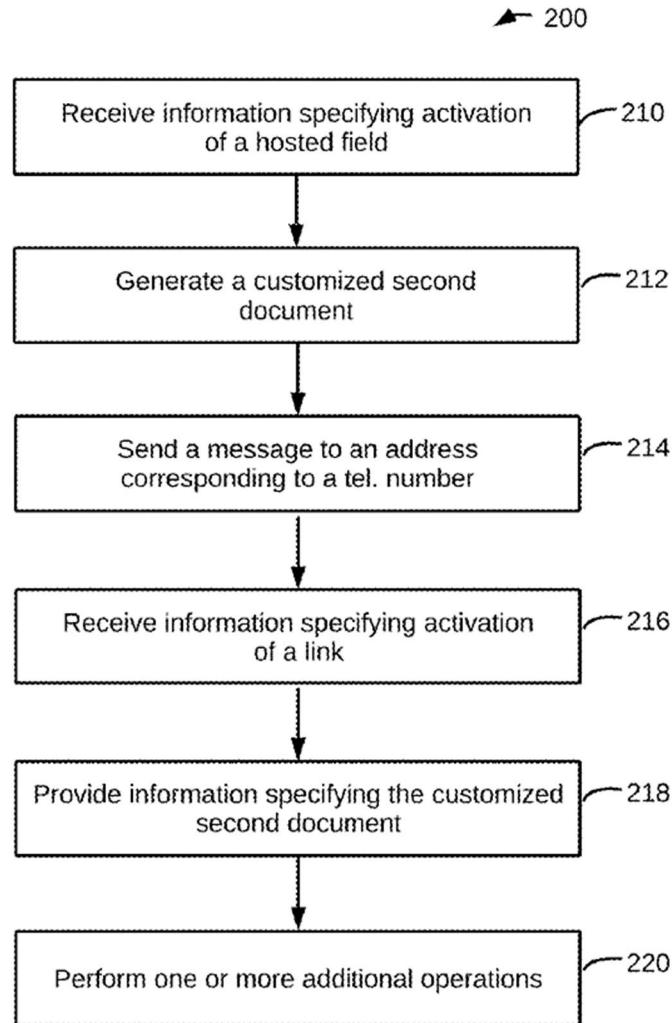


FIG. 2

The computer provides a hosted field “for inclusion in a webpage associated with a third party” and receives information specifying activation of that field, which “specifies a willingness to receive one or more messages from the computer and specifies a telephone number.” *Id.*, 7:33-37, 8:54-58; Fig. 2 (operation 210).

In response, the computer “dynamically generate[s] a customized second document” with information about transactions “of interest to an individual or subscriber customer associated with the telephone number,” sends a message

containing “a link to the customized second document,” and, upon activation of the link, provides that document for display. *Id.*, 9:11-37, 12:28-48; Fig. 2 (operations 212-218).

The customized webpage “may be created de novo for each subscriber customer,” and a “given subscriber customer cannot hit their webpage without a specific link that is provided to the given subscriber customer.” *Id.*, 14:27-32.

C. Summary of the Prosecution History

The Examiner allowed claims 1-30 in a first action mailed April 9, 2025. EX1002, 172-78. After Applicant’s request for continued examination citing U.S. Patent No. 11,170,380 (“Long”), the Examiner rejected the claims as anticipated by, or obvious over, Long in view of U.S. Patent No. 10,298,739 (“Lee”). EX1002, 288-94, 300-09. Applicant amended independent claims 1, 12, and 22, arguing that Long’s input field “is not ‘hosted’ nor for inclusion in a ‘document associated with a third party,’” does not indicate a “willingness to receive one or more messages,” and “makes no reference to a second document.” EX1002, 417-20, 424-26; EX1003, ¶¶56-57. Applicant separately argued only dependent claims 2-3, contending Lee neither schedules RCS messages nor classifies users. EX1002, 427-28; EX1003, ¶58.

The Examiner then allowed claims 1-30 on June 9, 2025, based solely on limitations of the independent claims. EX1002, 449, 453-55.

D. Priority Date

Priority is determined claim by claim. A claim is entitled to the filing date of an earlier application only if each application in the chain leading back to that application describes the claimed subject matter; a description that would merely render the claimed subject matter obvious is not enough. 35 U.S.C. § 120; *Lockwood v. Am. Airlines, Inc.*, 107 F.3d 1565, 1571-72 (Fed. Cir. 1997). Petitioner bears the burden of persuasion on unpatentability, while the burden of producing evidence that a claim is entitled to an earlier filing date shifts to Patent Owner once Petitioner has come forward with prior art that predates the claim’s filing date. *See Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.*, 800 F.3d 1375, 1378-80 (Fed. Cir. 2015).

The ’799 patent’s priority chain passes through a continuation-in-part: The ’197 application, filed September 25, 2024, is a continuation-in-part of Application No. 18/483,670 (“’670 application”), and the ’041 application is a continuation of the ’197 application. EX1001, Cover, 1:7-17; EX1031, 97. The applications from International Application No. PCT/US2019/052847 (“PCT application”) through the ’670 application share substantially the same disclosure, reflected in the published PCT application (WO 2020/068911), U.S. Patent No. 11,765,262, and U.S. Patent No. 12,126,752, which issued from the ’670 application; the 2018 provisional is an earlier, shorter version of that disclosure. EX1005; EX1006; EX1007; EX1008; EX1003, ¶¶62-65.

Applicant added new matter in the '197 application. That new matter includes Figs. 9-18 and the sections on silent network authentication, automated message distribution, the access and security automation layer, abandoned user journeys, and Rich Communication Services, which appears in none of the earlier applications. EX1001, 1:27-30, 1:60-4:36, 4:64-5:32, 5:38-7:30, 22:4-45:24, Figs. 9-18; EX1031, ¶¶138-217, Figs. 9-18; EX1003, ¶¶45, 66-67.

The following claims recite limitations described only in that new matter: claims 2-5, 13-15, and 23-25 (an RCS message, including one sent according to a schedule based on a classification of the user), EX1001, 6:54-59, 23:61-24:43, 39:32-40:4, 40:58-41:19, 41:58-42:39; claims 7, 17, and 26 (typing indicators), *id.*, 23:22-24, 39:41-51, 41:52-57; claims 9, 19, and 28 (a security layer providing augmented access or navigation attributes), *id.*, 22:8-12, 31:26-35; claims 10, 20, and 29 (resuming an online user journey), *id.*, 37:47-60, 40:38-42; and claims 11, 21, and 30 (engagement characteristics determined using machine learning), *id.*, 36:46-56. Because no earlier application describes those limitations, those claims are entitled to an effective filing date no earlier than September 25, 2024. EX1003, ¶¶68, 70.

Every reference was published, or (for Lentz) effectively filed, before the September 27, 2018 provisional, so the September 25, 2024 date matters only to the

knowledge of a POSITA, assessed as of that date for the claims identified above.

See supra Section III; *infra* Sections VII.A.8.c, VII.A.8.f; EX1003, ¶¶27, 70-71.

V. LEVEL OF ORDINARY SKILL IN THE ART

Petitioner submits that a person having ordinary skill in the art as of the effective filing date of the challenged claims (“POSITA”) would have a bachelor’s degree in computer science, computer engineering, electrical engineering, or a comparable discipline, together with approximately two years of professional experience in the design, development, or implementation of web-based or mobile messaging, electronic commerce, or online transaction systems. Additional education could have substituted for professional experience, and significant work experience could have substituted for formal education. EX1003, ¶¶31-32.

VI. CLAIM CONSTRUCTION

For the purposes of this Petition, all claims are interpreted with their ordinary and customary meaning as understood from the perspective of a POSITA. EX1003, ¶¶74-75.

VII. GROUNDS FOR INVALIDITY

A petition for IPR must demonstrate “a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” 35 U.S.C. § 314(a). This petition exceeds the threshold.

A. Ground 1: Claims 1-30 Are Obvious Over Ghadially in View of Gaddis, Lentz, and the General Knowledge of a POSITA

1. Ghadially

Ghadially, titled “Apparatus and Method for Providing a Marketing Service,” was filed December 8, 2006, and published June 28, 2007, and is prior art under at least 35 U.S.C. § 102(a)(1). EX1009, Cover. Ghadially was not cited during prosecution of the ’799 patent.

Ghadially is directed to a “consumer marketing service,” hosted on a server separate from the merchant’s web server, that allows personalized or tailored advertising material to be sent to consumers. EX1009, ¶¶14-18, Fig. 1; EX1003, ¶¶133-134.

Ghadially’s service comprises several computer modules, including a preferences module that collects the user’s preferences regarding “products, events, sales, or any other topics of interest” and “a desired delivery option, such as via E-Mail, IM, RSS, SMS, or a Web portal.” EX1009, ¶¶19, 23. That capture occurs at a “sign-up” page that “can be incorporated within the source web page, such as via iframe,” and that “is provided by a consumer marketing service 208, but is integrated with the web site 204”—i.e., the merchant’s website—“so as to appear seamless from the standpoint of the consumer,” and through which the consumer opts in to receive targeted messages. EX1009, ¶¶20-21, 39-40, Figs. 2-4.

Ghadialy's service tracks each consumer with cookies and Web beacons, infers preferences using "a collaborative filtering technique," throttles message frequency based on engagement, and offers sign-up topics including "[p]roducts in a user's shopping cart that go on sale." EX1009, ¶¶20-23, 27, 30, Table 1; EX1003, ¶¶135-137.

Figure 2 depicts a consumer signing up for alerts through a sign-up page, which a consumer marketing service provides and integrates with the merchant web site, and the service later sending consumer personalized message. EX1003, ¶138; EX1009, ¶¶38-42, Fig. 2.

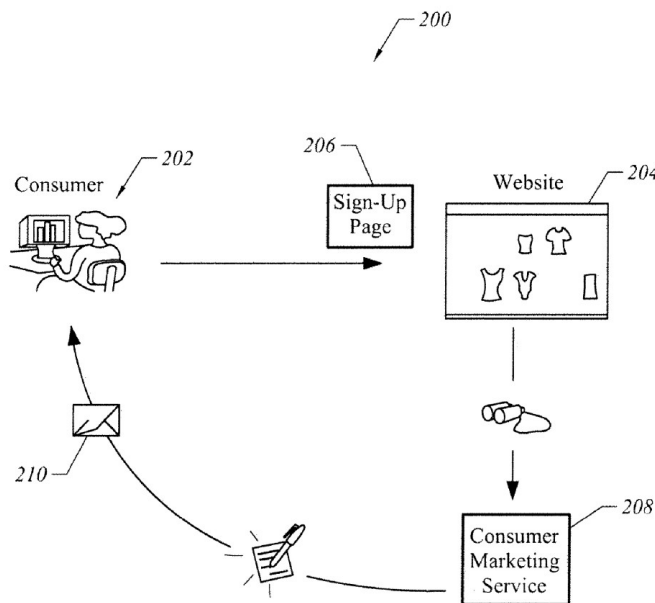


FIG. 2

2. Gaddis

Gaddis, titled "System, Method, and Computer Program Product for Data Entry Free Electronic Purchasing," was filed June 6, 2011, and published December

6, 2012, and is prior art under at least 35 U.S.C. § 102(a)(1). EX1010, Cover. Gaddis was not cited during prosecution of the '799 patent.

In Gaddis, an “Offer Provider” (either a merchant or “a third party service provider representing multiple merchants”) transmits a promotional message to a user’s “Electronic Communications Account,” including “email, text-SMS, instant messaging-IM, and social networking webpages.” EX1010, ¶¶8, 39. “Embedded within the communication is a Promotionally Enabled Link or PEL (e.g., email link, SMS link, or link posted on a User’s social media site ...) permitting the User to purchase the services and/or product without entering any alpha numeric data.” EX1010, ¶8.

Gaddis discloses that the PEL is customer-specific and encrypted: each user is “assigned a unique User ID” that “is encrypted,” and the link carries “the encrypted User identification (UserId) specific to the User.” EX1010, ¶¶34, 42, 52-53, 57, 59-60, 64, claims 5, 19; EX1003, ¶¶144, 146. A recipient other than the intended user who activates the link is invited to purchase instead through “the merchant’s normal Internet purchase procedure,” and one who “attempts to place an order” is “directed to the Offer Provider’s other venues for electronic purchasing” rather than transacting on the user’s accounts. EX1010, ¶¶10, 59; EX1003, ¶¶148, 301.

Activating the PEL re-directs the user “to a webpage hosted by the service provider and created specifically for the merchant’s advertisement and the User,” which can include the merchant’s logos and “the User’s name,” and from which the user places the order. EX1010, ¶¶58-59, Figs. 2A-2B, 4B, 10. Because “the User’s shipping and billing information is already on file,” the user completes the purchase “while not being required to (log in or) enter any of their personal data.” EX1010, ¶¶39, 49.

Figure 4B depicts Gaddis’s preferred embodiment: the merchant or service provider emails the user a deal, the user’s click on the link re-directs the user to a webpage hosted by the service provider, and after the user selects the product and confirms the order, the service provider notifies the merchant, which processes the order. EX1003, ¶147; EX1010, ¶59, Fig. 4B.

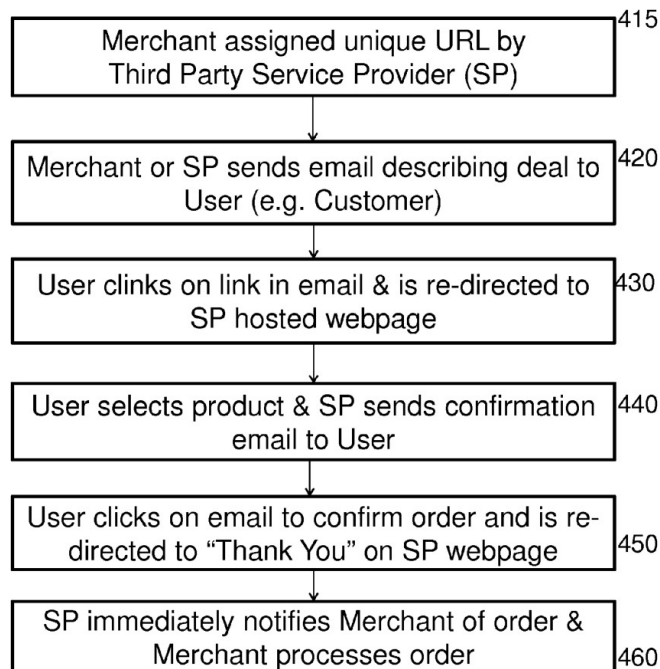


FIG. 4B

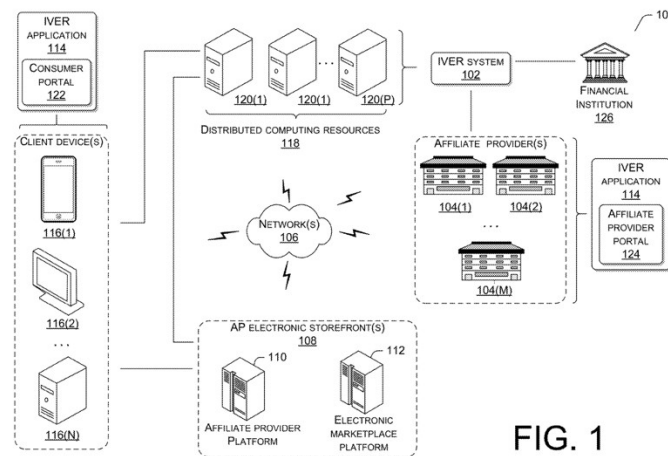
3. Lentz

Lentz, titled “Integrated Value Exchange and Referral System,” was filed June 15, 2018, and published December 20, 2018, and is prior art under at least 35 U.S.C. § 102(a)(2). EX1011, Cover. Lentz was not cited during prosecution of the ’799 patent.

Lentz discloses an “Integrated Value Exchange and Referral (IVER) system” that presents affiliate provider merchants’ product and service offerings to consumers through a consumer portal, each offering including a “product-service link” (e.g., a URL) that “re-directs a client device 116 from a presentation of the IVER application 114 to a presentation of an electronic storefront associated with the product-service offering.” EX1011, ¶58; *see also id.*, Abstract, ¶¶25-28, Fig. 1.

“[E]ach product-service link provides a unique and shareable association between the consumer and product-service offering,” and the link may present “a benefit (i.e. reward, commission, or discount) that is unique to the consumer.” EX1011, ¶58; EX1003, ¶¶153-154.

Figure 1 depicts the IVER system connecting affiliate providers and their electronic storefronts with consumers’ client devices running the IVER application. EX1003, ¶154; EX1011, ¶¶55-58, Fig. 1.



A consumer may refer an offering to another consumer, and the IVER system delivers the referral to the recipient’s device as an SMS, MMS, RCS, or e-mail message, accompanied by a “referral data packet” that “facilitates tracking progress of a transaction (i.e. purchase event)” by the recipient. EX1011, ¶¶32-34, 73-74; EX1003, ¶155.

Lentz also discloses machine-learning-based targeting. Its consumer module “employ[s] one or more machine learning algorithms to generate a consumer

analysis model” from the consumer’s transaction history, viewed offerings, and profile data, yielding a “Consumer Applicability (CA) score” used to “selectively prioritize a presentation of product-service offerings.” EX1011, ¶¶39, 49, 52-53, 90, 175-177; EX1003, ¶156. Lentz’s system also recommends to merchants the “time of day or day of the week that is most likely to trigger the consumer to initiate and/or complete a corresponding purchase agreement.” EX1011, ¶40; EX1003, ¶158.

Lentz tracks each offering through purchase-event statuses (“pending,” “fulfilled,” “approved,” or “abandoned”). EX1011, ¶¶60, 62; *see also id.*, ¶¶34, 91, 143-144, Fig. 16 (“pending,” “paid,” “approved,” or “abandoned”); EX1003, ¶159.

4. Motivation to Combine Ghadially with Gaddis

A POSITA would have been motivated to combine Ghadially with Gaddis. Both address turning a marketing message delivered to a consumer’s electronic account into a completed online sale. *See* EX1009, ¶¶4, 18, 42; EX1010, ¶¶4-7, 39; EX1003, ¶177. Each is reasonably pertinent to the inventor’s problem of converting a marketing message into a completed online transaction. EX1001, 1:34-56, 9:11-37, 12:28-48; EX1003, ¶178. That known problem itself supplies a reason to combine the references. *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 420 (2007).

Both also disclose a service acting for one or more merchants that sends messages carrying a link over channels including email and SMS. EX1009, ¶¶18, 23, 29; EX1010, ¶¶8, 39, 53-54; EX1003, ¶180. Ghadially’s link navigates the

consumer to the merchant’s site “to complete an on-line purchase.” EX1009, ¶42. Gaddis discloses building a destination page for the individual consumer, using an encrypted, customer-specific PEL delivered by email or SMS that opens a service-provider-hosted page “created specifically for the merchant’s advertisement and the User,” from which the user completes the purchase with no data entry. EX1010, ¶¶39, 52, 57-59; EX1003, ¶181. The combination uses Gaddis’s customer-specific link and page, and a consumer without stored payment data proceeds to the merchant’s ordinary checkout, as Gaddis provides for other recipients. EX1010, ¶59; EX1003, ¶186.

A POSITA would have recognized that implementing Ghadialy’s navigation link as Gaddis’s customer-specific link furthers Ghadialy’s objective of navigating the consumer to “complete an on-line purchase.” EX1009, ¶42; EX1003, ¶¶182-183. A POSITA would also have had a reasonable expectation of success because both references disclose the same architecture and delivery channels, and the result would be the predictable use of prior art elements according to their established functions. EX1009, ¶¶18, 23; EX1010, ¶¶8, 39, 53-54; *KSR*, 550 U.S. at 417; EX1003, ¶184.

5. Motivation to Combine Ghadialy and Gaddis with Lentz

A POSITA would also have been motivated to combine Ghadialy and Gaddis with Lentz, which likewise presents a consumer with merchant offerings selected

for that consumer, delivers them to the consumer’s device, and redirects the consumer through a link into a purchase. EX1011, Abstract, ¶¶3, 25-28, 33, 40, 49-53, 58; EX1009, ¶¶18, 42; EX1010, ¶¶7-8, 39; EX1003, ¶187. All three deliver offers over interchangeable channels from a finite, well-catalogued set, and Lentz identifies RCS alongside SMS, MMS, and e-mail—channels that provide the same offering content regardless of who initiates the message. EX1009, ¶23; EX1010, ¶39; EX1011, ¶¶33-34, 73; *see KSR*, 550 U.S. at 416-17, 421; EX1003, ¶¶189-190.

Ghadialy and Lentz both tailor messaging based on user engagement data. EX1003, ¶191. Ghadialy adjusts frequency from the consumer’s open rate, and Lentz applies machine-learning models built from the consumer’s historical activity to determine what to offer and when to send it. EX1009, ¶¶23, 30; EX1011, ¶¶37-40, 52, 90. A POSITA would have had good reason to incorporate Lentz’s techniques, because Lentz recommends transmitting the offering at the time “most likely to trigger the consumer to initiate and/or complete a corresponding purchase agreement,” which is the outcome Ghadialy aims to achieve using purchase-status data. EX1011, ¶¶40, 60, 91; EX1009, ¶¶22-23, 42; EX1003, ¶¶191-192. A POSITA would have reasonably expected success because Ghadialy’s notification module “can dynamically change ... a message format and a delivery option,” and Lentz applies known machine-learning techniques to the consumer data Ghadialy already

collects. EX1009, ¶¶22-23, 30; EX1011, ¶39; *see KSR*, 550 U.S. at 416-17; EX1003, ¶¶190, 193.

6. Independent Claim 1

a. Ghadialy discloses 1[pre]

Ghadialy discloses “[a] system comprising.” EX1003, ¶¶206-208. Ghadialy’s Fig. 1 “illustrates a computer system 100,” which “is a client-server computer network that includes at least one client computer 102 and multiple server computers, including server computers 104 and 106.” EX1009, ¶¶14, 16-17, Fig. 1. One server computer is the merchant’s web site, and another runs the marketing campaigns. *Id.*, ¶¶16-17. A POSITA would have understood that this client-server computer network comprises “[a] system.” EX1009, ¶¶14-17, Figs. 1, 5; EX1003, ¶¶207-208.

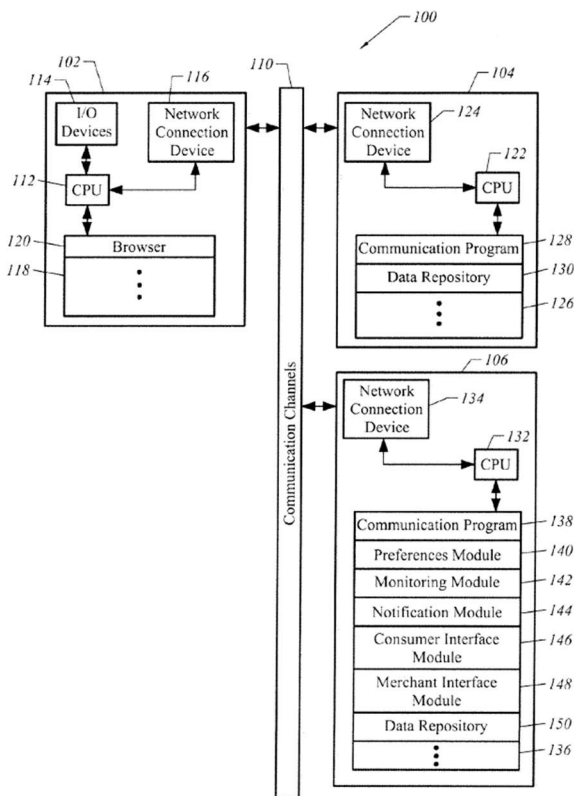


FIG. 1

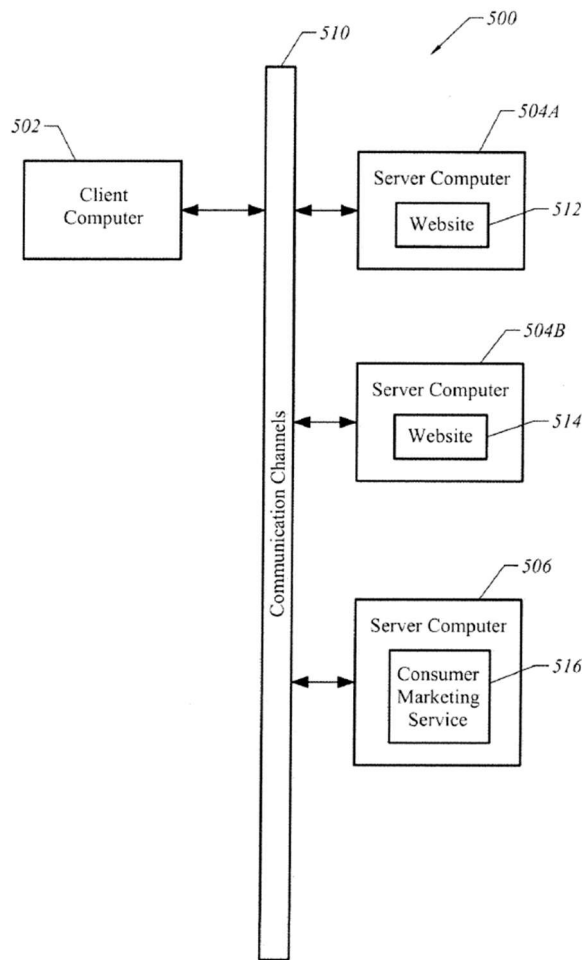


FIG. 5

b. Ghadially discloses 1[a]

Ghadially discloses “**a processor.**” EX1003, ¶¶209-210. The server computer that carries out the recited operations “includes conventional server computer components, including a CPU 132.” EX1009, ¶17, Fig. 1. A POSITA would have understood that Ghadially’s CPU comprises “**a processor.**” EX1003, ¶210.

c. Ghadially discloses 1[b]

Ghadially discloses **“memory configured to store program instructions, wherein, when executed by the processor, the program instructions cause the processor to perform operations comprising”** the operations recited in 1[c] through 1[g]. EX1003, ¶¶211-212. “[T]he memory 136 also stores a set of computer programs implementing the operations described herein,” which the CPU executes. EX1009, ¶¶6, 17, 53, Fig. 1; EX1003, ¶¶211-212.

d. Ghadially discloses 1[c]

Ghadially discloses **“providing a hosted input field for inclusion in a first document associated with a third party.”** EX1003, ¶¶213-219. Ghadially’s consumer marketing service runs on a server separate from the merchant’s web site, so the merchant is a “third party” relative to the service, and the merchant’s “source web page” is the first document associated with a third party. EX1009, ¶¶16-18, 21, Fig. 1. The service supplies the sign-up interface for inclusion in that page: “[t]o allow faster and easier integration with the merchant’s web site, an appropriate Hypertext Markup Language (‘HTML’) tag can be incorporated in a source web page that forms the web site,” and “the ‘sign-up’ page can be incorporated within the source web page, such as via iframe.” EX1009, ¶21.

The input field is provided by the marketing service rather than served by the merchant’s web server: The “‘sign-up’ page 206 is provided by a consumer

marketing service 208, but is integrated with the web site 204 so as to appear seamless from the standpoint of the consumer 202.” EX1009, ¶¶39-40, Fig. 2.

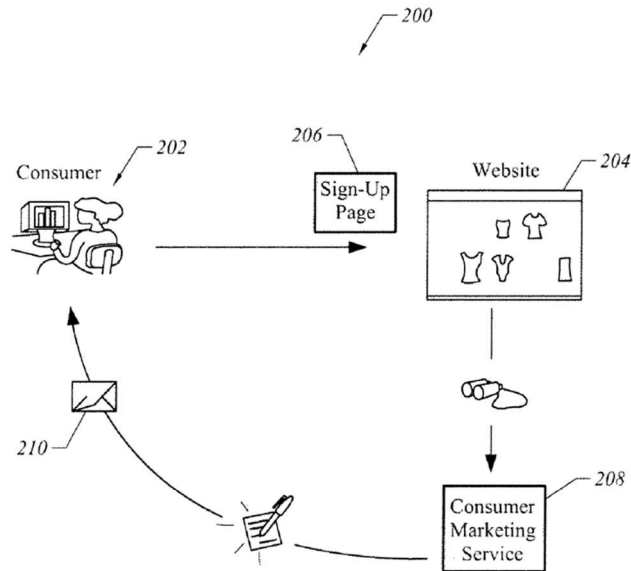


FIG. 2

That interface comprises input fields and selectable options through which the consumer designates the topic of interest, supplies an address, and selects “a desired delivery option” for the resulting messages. EX1009, ¶¶20, 40; Fig. 3 (sign-up screen); Fig. 4 (annotated user interface).

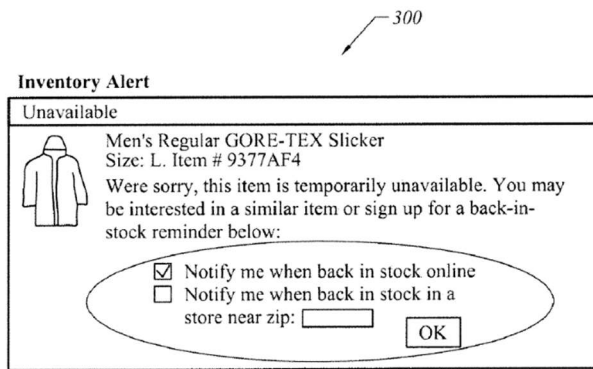


FIG. 3

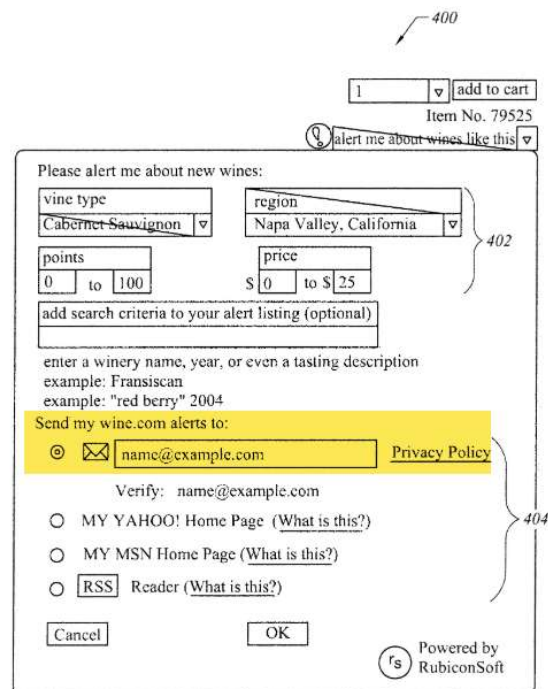


FIG. 4

Fig. 4 shows the input field: an email entry text box labeled “Send my wine.com alerts to” among delivery options. EX1009, ¶40, Fig. 4; EX1003, ¶¶217. Ghadially’s consumer marketing service hosts that form and operates “on behalf of” multiple merchants. EX1009, ¶¶18, 44-46, 49, Fig. 5; EX1003, ¶¶218-219. A POSITA would have understood that this field comprises “a hosted input field for inclusion in a first document associated with a third party.” EX1009, ¶¶21, 39; EX1003, ¶219.

e. Ghadially in view of Gaddis discloses 1[d]

Ghadially in view of Gaddis renders obvious, “receiving, information indicating activation of the hosted input field in the first document, wherein the information comprises an electronic address associated with an electronic device and an indication of a willingness to receive one or more messages.”

EX1003, ¶¶220-227. In Ghadially, activation of the hosted field is the consumer's sign-up, for example, for a “‘Back-in-Stock’ notification”; the submission then goes to the marketing service, which stores it “in a preference profile.” EX1009, ¶¶19-20, 39; EX1003, ¶221.

This captured information includes an indication of willingness and the electronic address, as Fig. 4 illustrates: the consumer asks to be alerted (“Please alert me about new wines”), enters an email address, and submits the form. EX1009, ¶¶20, 39-40, Figs. 3-4; EX1003, ¶222. Fig. 3 likewise depicts express opt-in checkboxes:

300

Inventory Alert

Unavailable

 Men's Regular GORE-TEX Slicker
Size: L. Item # 9377AF4
Were sorry, this item is temporarily unavailable. You may be interested in a similar item or sign up for a back-in-stock reminder below:

☒ Notify me when back in stock online
☐ Notify me when back in stock in a store near zip:

OK

FIG. 3

EX1009, ¶¶20, 39, Fig. 3 (annotated); EX1003, ¶222.

Ghadially separately discloses allowing the “ the user to opt out of receiving further messages,” which confirms that sign-up is an affirmative act granting permission that opt-out revokes. EX1009, ¶24; *see also id.*, ¶47 (“permission-based

marketing methodology”). The notification module then the alerts to the consumer “via E-Mail, IM, RSS, SMS, or a Web portal,” as requested. EX1009, ¶¶23, 29-30, 40; Fig. 4; EX1003, ¶222.

FIG. 4

A POSITA would have understood that the submitted contact address comprises “an electronic address,” and the assent “an indication of a willingness to receive one or more messages.” EX1003, ¶225. The email address entered in Fig. 4 is “an electronic address associated with an electronic device,” because Ghadially delivers alerts to that address for reading on client computer, which “can be, for example, a desktop computer, a laptop computer, a palm-sized computer, a personal digital

assistant, or a cellular telephone.” EX1009, ¶¶14-15, 23, 40, Fig. 4; EX1003, ¶¶224-225. Patent Owner’s infringement contentions are consistent, reading this limitation on a subscriber’s “email address and/or mobile phone number” submitted through a signup form. EX1032, 4.

Alternatively, a telephone number that receives SMS alerts also comprises “an electronic address associated with an electronic device,” because the channels connecting client computer to the service carry information via “E-Mail, Instant Messaging (‘IM’), ... and Short Message Service (‘SMS’).” EX1009, ¶¶14-15, 23; EX1003, ¶226. That telephone number is the electronic address for the dependent claims reciting RCS and EMS messages. *See infra* Sections VII.A.8.a, d, e.

To the extent “electronic address” requires a telephone number, Gaddis discloses SMS delivery to “a cell phone number.” EX1010, ¶¶54, 62-63; Figs. 6A (“SMS/Text me at xxx-xxx-x987”), 7; EX1003, ¶226.

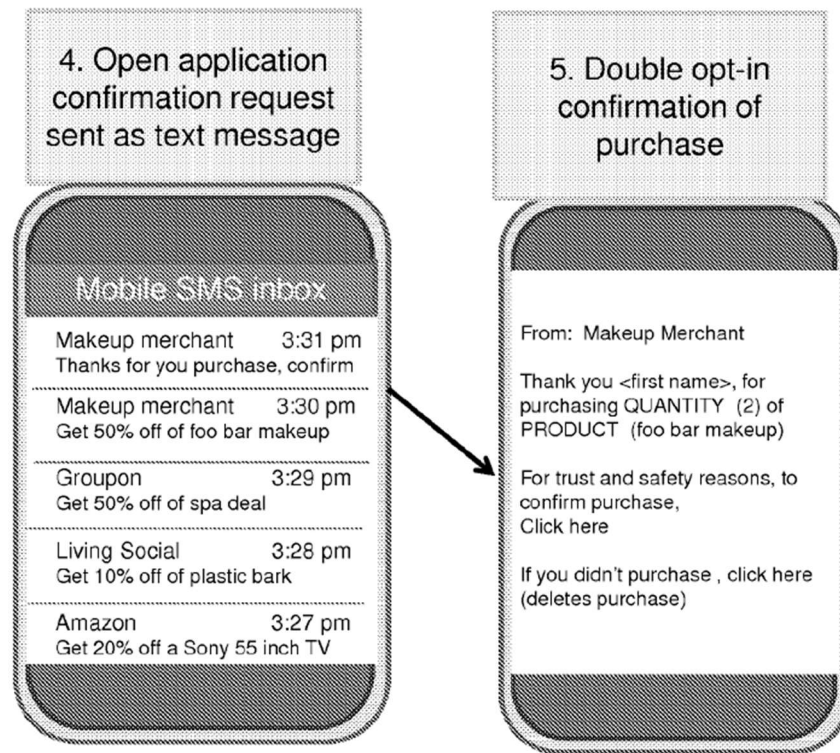


FIG. 7

A POSITA would have been motivated to capture the consumer's mobile number when the consumer selects Ghadially's SMS delivery option because SMS delivery requires it. EX1009, ¶¶14, 23; EX1010, ¶54; EX1003, ¶227.

f. Ghadially in view of Gaddis discloses 1[e]

Ghadially in view of Gaddis discloses “**generating, a second document that includes information about one or more events of interest for a user associated with the electronic address, the second document being customized to the user.**” EX1003, ¶¶228-234. Ghadially's monitoring module identifies content matching the user's preferences regarding “products, events, sales, or any other topics of interest,”

including “[g]eneral events in a particular neighborhood” and “[p]roducts in a user’s shopping cart that go on sale,” and presents it in “a consumer Web portal ... personalized or tailored for the user.” EX1009, ¶¶19-20, 26, 34, Table 1. A POSITA would have understood that a page whose content is selected according to the user’s preferences, and personalized for that user, is a document “customized to the user” that includes information about “events of interest” for that user. EX1003, ¶¶230, 232.

Even if Ghadialy did not describe a separate webpage customized to the individual consumer as the destination of the message link, Gaddis does. EX1003, ¶231. Gaddis discloses:

The information exchanged between the merchant as Offer Provider and the service provider enables the service provider to create a webpage specific to a merchant comprising the merchant’s identifying information, such as logos or trademarks, and the User’s name. The service provider can also create a webpage specific to each User’s requirements (e.g., web browser, electronic communications device and account) by methods well known in the art.

EX1010, ¶58. That page is generated for the particular user and offer, presents the offer details, and addresses the user “by their name or a unique greeting.” EX1010, ¶¶48, 59, Figs. 2A-2B; EX1003, ¶231.

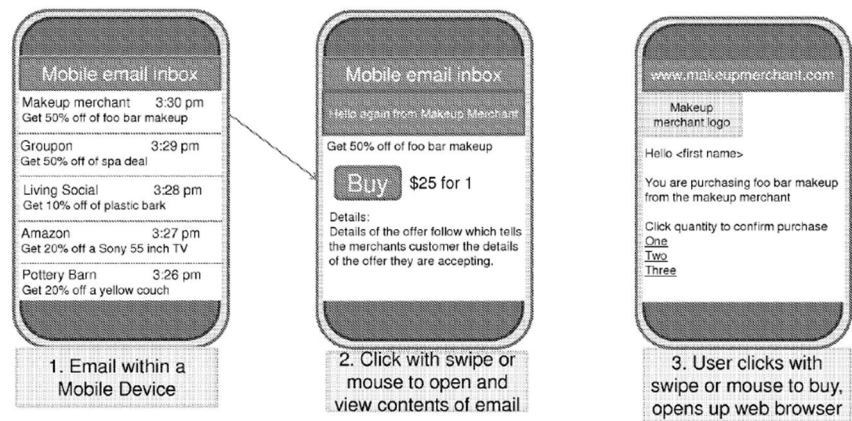


FIG. 2A

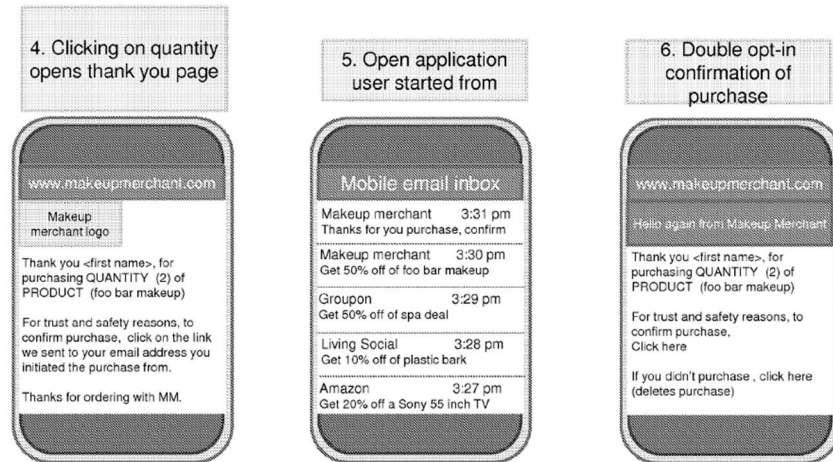


FIG. 2B

In the combination, the second document presents the content Ghadially identified for the user (for example, a sale or event matching the user's preferences) on a page customized to that user as described in Gaddis. EX1003, ¶232. A POSITA would understand the topic of Ghadially's alerts (e.g. a sale or a product's return to stock) is an "event" under the term's plain meaning and consistent with the '799 patent's description of the second document's content as information about

“transactions (such as one or more upcoming events).” EX1009, ¶¶19-20, Table 1; EX1001, 9:13-16. A POSITA would understand that the customized page is generated in connection with the alert, so that the link sent in the alert identifies that page. EX1010, ¶¶57-59 (link parameters identify the deal, merchant, and user); EX1003, ¶233.

A POSITA would have been motivated to use Gaddis’s user-specific page as the destination of Ghadialy’s alert for the reasons given in Section VII.A.4. EX1009, ¶¶29, 42; EX1010, ¶¶58-59; EX1003, ¶234.

g. Ghadialy in view of Gaddis discloses 1[f]

Ghadialy in view of Gaddis discloses **“sending a message to the electronic address, wherein the message comprises a link to the second document, the link being configured to enable the user to access the second document to execute one or more transactions associated with the one or more events.”** EX1003, ¶¶235-239. Ghadialy’s notification module alerts the user by “transmitting the messages to the user” over the selected delivery option. EX1009, ¶¶23, 28-29.

The message includes a navigation link, “such that, when the user clicks on the navigation link, the user can be navigated to the merchant’s web site.” EX1009, ¶29; *see also id.*, ¶42 (consumer “is navigated to the web site ... so as to complete an on-line purchase”).

Gaddis discloses the same step with the customized page as the link target: its email or SMS message embeds a customized PEL that redirects the user “to a webpage hosted by the service provider and created specifically for the merchant’s advertisement and the User.” EX1010, ¶¶39, 59, Fig. 4B; EX1003, ¶237.

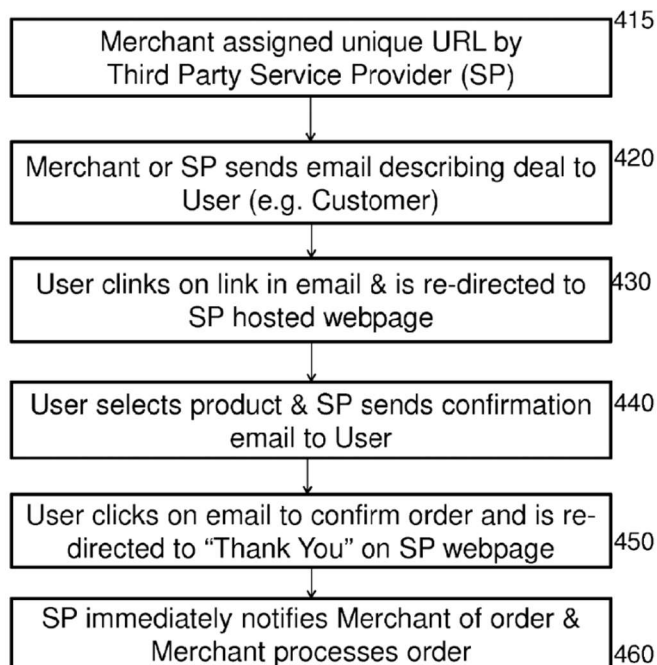


FIG. 4B

A POSITA combining the references would have sent Ghadialy’s personalized alert over the consumer’s chosen channel with Gaddis’s link to the customer-specific offer page, and would have understood that this message meets this limitation. *See supra* Section VII.A.4; EX1003, ¶238.

The link also opens a continuing path to the transaction. After the user reaches Gaddis’s page, “[t]he User subsequently clicks (click 2) 440 to place the order,” selecting attributes such as quantity, and then confirms the purchase with a further click (click 3). EX1010, ¶59, Fig. 4B. That is unlike the flow the applicant

distinguished during prosecution, in which “the user interaction concludes immediately following either of these confirmations.” EX1002, 426; EX1003, ¶¶239, 247.

h. Ghadialy in view of Gaddis discloses 1[g]

Ghadialy in view of Gaddis discloses “**in response to determining activation of the link has occurred, causing provision of the second document to the electronic address, wherein the second document is configured to facilitate completion of a given transaction in the one or more transactions.**” EX1003, ¶¶240-248.

Gaddis’s embedded link carries parameters identifying the deal, the merchant, and “the encrypted User identification (UserId) specific to the User.” EX1010, ¶¶57, 59, 64; EX1003, ¶242.

After clicking the PEL, users are “re-directed to a webpage hosted by the service provider and created specifically for the merchant’s advertisement and the User.” EX1010, ¶59, Fig. 4B; *see also id.*, ¶64, Fig. 10. Because the PEL “redirects to the service provider” and the destination page is “hosted by the service provider and created specifically for ... the User,” the service provider necessarily receives the click-generated request, identifies the user, and serves that user’s page, which a POSITA would have understood comprises “determining activation of the link has

occurred” and “causing provision of the second document.” EX1010, ¶¶34, 58-59; EX1003, ¶¶243-244.

The second document is provided to the electronic address: the user activates the link on the device that received the message at that address, opening the page on that device. EX1010, ¶¶53-54, 59, Figs. 2A, 5 (“User clicks with swipe or mouse to buy, opens up web browser confirming purchase”). In the combination, the alert and its link are sent by SMS to the telephone number identified for 1[d] (or, alternatively, to the email address) and opened on the consumer’s device. EX1009, ¶¶15, 23; EX1003, ¶245. A POSITA would have understood that serving the page to the device on which the user activated the link delivered to the electronic address comprises “causing provision of the second document to the electronic address.” EX1003, ¶245.

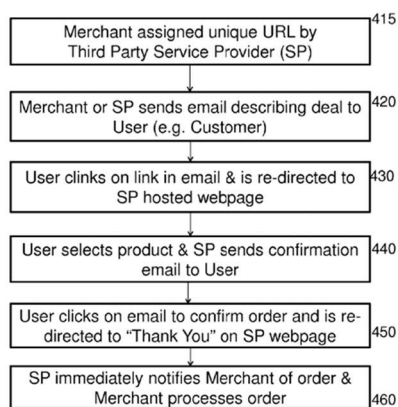


FIG. 4B

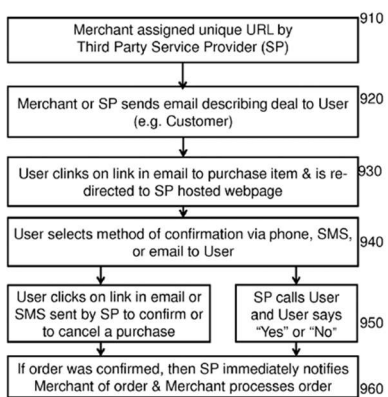


FIG. 9

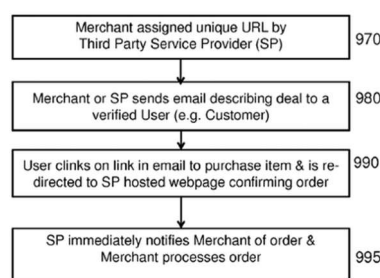


FIG. 10

A POSITA would have been motivated to route Ghadialy’s navigation link through the marketing service as Gaddis does, because Ghadialy’s service already authors the link and tracks each consumer with Web beacons and cookies, and

routing the link through the service lets it identify the clicking consumer and serve that consumer's page. EX1009, ¶¶21-23, 29; EX1010, ¶¶57-59; *see KSR*, 550 U.S. at 417; EX1003, ¶246.

The page provided is configured to facilitate completion of the transaction. Ghadialy's consumer is navigated to the merchant's site "so as to complete an on-line purchase," and Gaddis's page describes the product and lets the user click to select attributes such as quantity, shipping preference, color, or size. EX1009, ¶¶16, 29, 42; EX1010, ¶¶48, 59, Figs. 2A-2B; EX1003, ¶247.

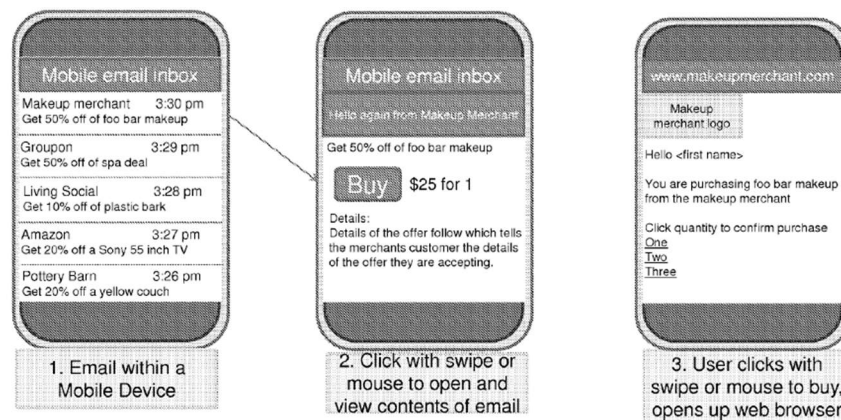


FIG. 2A

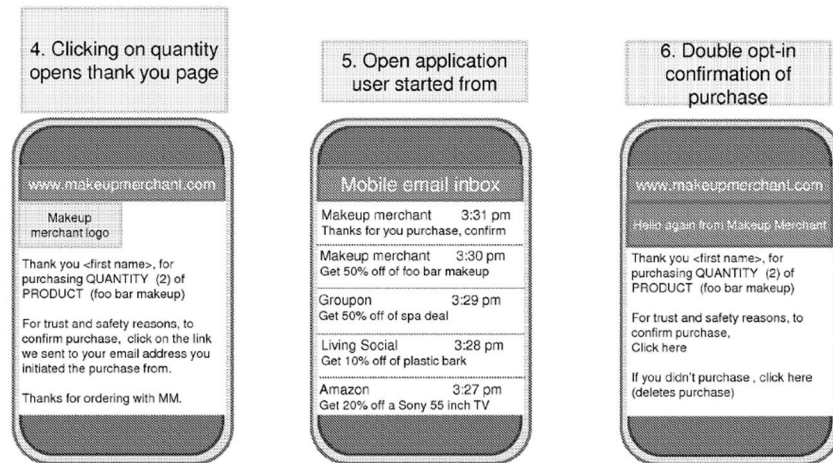


FIG. 2B

The service provider then notifies the merchant “so that they may process the User’s order and payment.” EX1010, ¶¶59, 63; EX1003, ¶249.

7. Independent Claims 12 and 22

Claim 12 recites a “**computer-implemented method**,” and claim 22 a “**non-transitory computer-readable storage medium**,” each comprising the same five operations as claim 1 and including limitations word-for-word identical to 1[c]-1[g]. Ghadially in view of Gaddis therefore discloses 12[a]-12[e] and 22[a]-22[e] for the reasons given for 1[c]-1[g]. *See supra* Section VII.A.6; EX1003, ¶¶249-250.

Ghadially discloses “[a] **computer-implemented method**”: its “operational scenario 200” is carried out by modules stored in memory and executed by a CPU. EX1009, ¶¶17-18, 38-43, Figs. 1-2. A POSITA would have understood that these operations comprise “[a] computer-implemented method.” EX1003, ¶¶251-252.

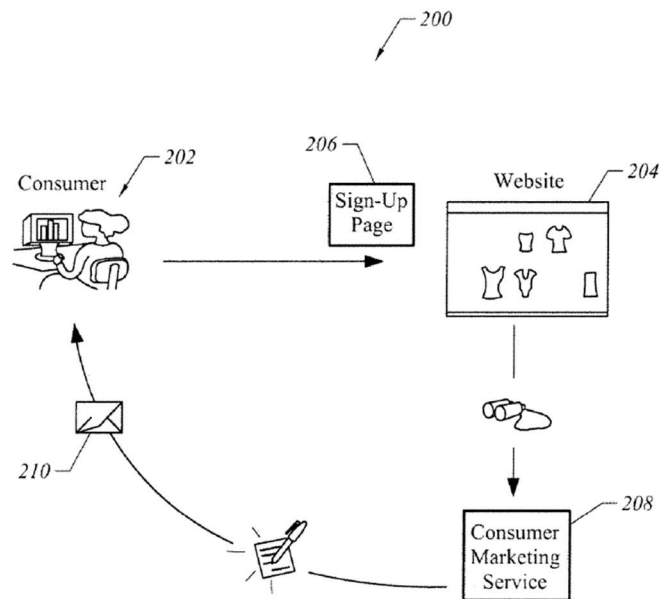


FIG. 2

Ghadialy discloses “[a] **non-transitory computer-readable storage medium for use in conjunction with a processor, the computer-readable storage medium storing program instructions that, when executed by the processor, cause the processor to carry out operations comprising,**” for the reasons given for 1[pre]-1[b]. *See supra* Section VII.A.6; EX1003, ¶253. Ghadialy further discloses “a computer storage product with a computer-readable medium having executable instructions or computer code thereon,” including hard disks, optical media, ROM, and RAM, each of which a POSITA would have understood to be “[a] non-transitory computer-readable storage medium.” EX1009, ¶¶6, 53; EX1003, ¶¶254-255.

8. Dependent Claims

a. Ghadially in view of Gaddis and Lentz discloses claims 2, 13, and 23

Claims 2, 13, and 23 add that **“the message comprises a Rich Communication Services (RCS) message provided to the electronic address according to a schedule generated based at least in part on a determined classification of the user.”** EX1003, ¶¶257-266.

Ghadially adjusts each consumer’s message delivery based on a comparison that classifies the user. It collects “a desired message frequency,” such as a number of messages per day, week, or month, or messages “restricted to particular days of a week.” EX1009, ¶¶23, 31. For each user, the preferences module compares the rate at which the user opens previously sent messages “with respect to an average or typical rate,” and when the user opens them “at a lower rate than the average rate,” the notification module throttles back the frequency of that user’s subsequent messages. EX1009, ¶¶23, 30; EX1003, ¶¶259-260. A POSITA would have understood that this comparison classifies the user, and that the resulting delivery pattern comprises “a schedule generated based at least in part on a determined classification of the user.” EX1003, ¶261.

Lentz discloses the RCS channel, listing “a Rich Communication Service (RCS) message” among the media by which the IVER system delivers a referred offering to the recipient’s device, and those media are interchangeable carriers for

the same offering content. EX1011, ¶¶33-34, 73; *see supra* Sections VII.A.3, VII.A.5. Here the electronic address is the mobile telephone number. *See supra* Section VII.A.6.e; EX1003, ¶262. A POSITA would have been motivated to deliver Ghadialy’s scheduled, engagement-adjusted messages over Lentz’s RCS channel, because Ghadialy’s notification module “can dynamically change either of, or both, a message format and a delivery option for subsequent messages.” EX1009, ¶30; *see supra* Section VII.A.5; EX1003, ¶264.

Lentz confirms that a POSITA would have timed delivery based on what the system learned about the consumer, recommending transmission at the time “most likely to trigger the consumer to initiate and/or complete a corresponding purchase agreement.” EX1011, ¶¶37-40; *see supra* Sections VII.A.3, VII.A.5; EX1003, ¶263. A POSITA would have been motivated to use such a recommended send time, with Ghadialy’s engagement-based frequency, to generate the combined system’s delivery schedule, because both serve the goal of timing messages so that the consumer acts on them. EX1009, ¶¶23, 30; EX1011, ¶40; *see supra* Section VII.A.5; EX1003, ¶264. Lentz also clusters consumers into subsets for targeting, and a POSITA would have found it obvious to generate the delivery schedule for each such group. EX1011, ¶¶41, 49; EX1003, ¶¶263-264. Unlike Lee, which the applicant said “does not ‘schedule’ the RCS message,” the combination schedules

each user's messages by engagement classification. EX1002, 427-428; EX1003, ¶¶58, 265.

b. Ghadialy in view of Gaddis and Lentz discloses claims 3, 14, and 24

Claims 3, 14, and 24 add that **“the classification of the user comprises criteria corresponding to an application, a website, or a service associated with the electronic address.”** EX1003, ¶¶267-273.

Ghadialy's open-rate “classification,” identified for claim 2, is measured on messages delivered through the consumer's chosen delivery service, such as email, which a POSITA would have understood are criteria corresponding to the messaging service associated with the electronic address. EX1009, ¶¶23, 30; EX1003, ¶¶269, 272.

Ghadialy performs “segmentation analysis” based on the user's interest expressed at a particular merchant's web site, and uses cookies “to track the identity of the user for subsequent processing,” which a POSITA would have understood are criteria corresponding to a website associated with the address the user supplied at sign-up. EX1009, ¶¶19, 21, 37, 40, 47-48; EX1003, ¶¶270, 272.

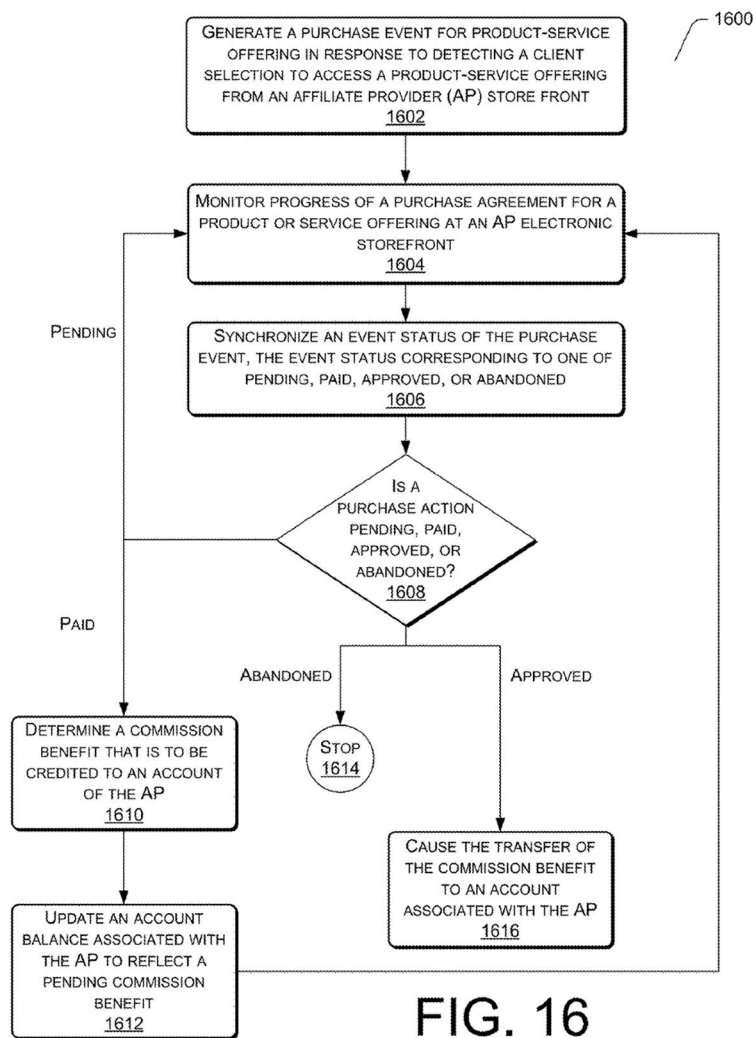
Lentz further discloses criteria corresponding to an application: its client analysis model is built from data gathered as the system “monitor[s] the consumer's use of the IVER application,” including “product search terms,” and the IVER application is native to, or accessed from, the consumer's device. EX1011, ¶¶26-

27, 38, 40. A POSITA would have understood that such a classification comprises criteria corresponding to an application associated with the consumer's device and electronic address. EX1003, ¶¶271-272.

c. Ghadialy in view of Gaddis and Lentz discloses claim 4

Claim 4 depends from claim 2 and adds that the classification indicates whether the user is **“a message recipient that has selected a link provided by the system ... and completed at least one prior transaction,” “a message recipient that has selected a link ... but has not completed a transaction,” or “a message recipient that has not selected a link provided by the system.”** EX1003, ¶¶274-279.

The combined system knows each recipient's state with respect to the link. Gaddis's link carries the recipient's encrypted identifier and has “special capabilities to ... track and report on User actions,” and on each purchase the service provider reports the UserID, deal, quantity, and link channel to the merchant. EX1010, ¶¶34, 59, 63-64, Figs. 4B, 10. A POSITA would have understood that this data allows the service provider to determine whether each user (i) clicked and purchased, (ii) clicked but did not purchase, or (iii) never clicked. EX1003, ¶276. Ghadialy's Web beacons and cookies likewise track opens, cart additions, and purchases. EX1009, ¶¶21-23.



Lentz confirms that a POSITA would have tracked recipients in these categories, assigning each link selection a purchase-event status. *See supra* Section VII.A.3; EX1011, ¶¶60, 62, 137, 143; EX1003, ¶277.

A POSITA would have been motivated to use Lentz’s categories as the “classification” underlying claim 2, because whether a recipient clicked and purchased is a more direct measure of the engagement on which Ghadially already bases its schedule, and Lentz recommends timing offerings to “trigger the consumer

to initiate and/or complete” a purchase. EX1009, ¶¶23, 30; EX1011, ¶40; *see KSR*, 550 U.S. at 417; EX1003, ¶278.

Classifying recipients this way was also routine marketing practice by claim 4’s effective filing date, which is no earlier than September 25, 2024. *See supra* Section IV.D. A POSITA would have recognized claim 4’s classification as conventional segmentation, applied to the click and purchase data the combined system already collects. EX1003, ¶279.

d. Ghadially in view of Gaddis and Lentz discloses claims 5, 15, and 25

Claims 5, 15, and 25 add that the message comprises an RCS message and that the operations further comprise “**requesting and receiving authorization data corresponding to an identity of the user before causing provision of the second document to the electronic address.**” EX1003, ¶¶280-85. Lentz discloses the RCS channel. *See supra* Section VII.A.8.a; EX1011, ¶¶33, 73.

Gaddis discloses requesting and receiving identity-based authorization data before serving the page. Gaddis identifies “a need ... to authenticate the User prior to sending the advertisement,” and its single-click method applies to a user verified because the user “has already logged into the merchant’s website, has saved their username and password ..., and/or is verified by cookies.” EX1010, ¶¶5, 11, 61. Login requires receipt of the user’s credentials; Gaddis defines each “User” as one “who receives promotional offers due to authentication through previous

registration, account creation and opt in for promotions from Offer Provider”; and in its single-click method Gaddis transmits the advertisement “to established, verified Users.” EX1010, ¶¶5, 37, 39, 61, 64, Fig. 10. Verification is therefore complete before the link is activated and the user-specific page is served, and a POSITA would have understood that verifying a user by saved credentials or cookies involves obtaining them from the user’s browser. EX1003, ¶¶283-284. The PEL also carries “the encrypted User identification (UserId) specific to the User.” EX1010, ¶¶59-60, 64, claim 5.

A POSITA would have understood that the request for and receipt of the user’s credentials at login, together with the encrypted user identifier, before the user-specific page is served, comprises “requesting and receiving authorization data corresponding to an identity of the user before causing provision of the second document.” A POSITA would have been motivated to include that step for the reason Gaddis gives, namely authenticating the user before a purchase is charged to the user’s accounts. EX1010, ¶¶5, 10, 39; EX1003, ¶286.

e. Ghadially in view of Gaddis and Lentz discloses claims 6 and 16

Claims 6 and 16 add that “**the message is an Enhanced Messaging Service (EMS) message.**” EX1003, ¶¶286-291. Ghadially delivers its personalized message, which may include a navigation link, by SMS, and Gaddis delivers its link

by SMS text message to the user’s cell phone number. *See supra* Sections VII.A.4-5; EX1009, ¶¶14, 23, 29; EX1010, ¶¶8, 39, 50, 54, 62, Fig. 7.

The ’799 patent states that “while SMS messaging was used in the preceding discussion, different communication channels may be used in other embodiments, e.g., email, Enhanced Messaging Service (EMS), and/or MMS,” treating EMS as a drop-in alternative to SMS with no change to any other recited operation. EX1001, 14:18-21. Nor did the applicant identify the message format as the advance during prosecution. *See supra* Section IV.C; EX1002, 424-28; EX1003, ¶288.

EMS is an extension of SMS that uses the same short-message infrastructure and subscriber telephone number, and was standardized before the ’799 patent’s earliest claimed priority date. EX1014, §§ 3.10, 9.2.3.24.10.1; EX1015, ¶¶6-8, 10, 33, 44, 64; EX1003, ¶289.

A POSITA would have found it obvious, with a reasonable expectation of success, to deliver Ghadialy’s alert as an EMS message, a substitution of one known text-messaging format for another that predictably delivers the same alert to the same telephone number. *See KSR*, 550 U.S. at 416-17; EX1003, ¶290.

f. Ghadialy in view of Gaddis and Lentz discloses claims 7, 17, and 26

Claims 7, 17, and 26 add that the message “**comprises content including send and receive indicators provided in a user interface of a mobile computing device ... depicting real time typing between a message provider and the mobile**

computing device or between another computing device and the mobile computing device.”

The ’799 patent explains, the recited “typing indicators” are a standard feature of RCS messaging and are “generated and provided according to the RCS messaging protocol.” EX1001, 39:36-51.

Lentz discloses an RCS channel. *See supra* Section VII.A.8.a; EX1011, ¶¶33, 73. A POSITA implementing Lentz’s RCS delivery would have found it obvious to present the message with RCS’s standard typing indicators, requiring no change to any element of the combination. EX1003, ¶¶294-295.

Typing indicators appear in no pre-CIP disclosure, so claims 7, 17, and 26 are entitled to an effective filing date no earlier than September 25, 2024, by which time standard RCS messaging displayed real-time typing indicators and read receipts. *See supra* Section IV.D; EX1016, 12, 45-46, 152, 155-56; EX1017, 1-2; EX1018, 1-4; EX1003, ¶¶295-296.

g. Ghadialy in view of Gaddis discloses claims 8, 18, and 27

Claims 8, 18, and 27 add that the link is further configured to “**allow users other than the user to access the second document to browse the second document while prohibiting execution of the one or more transactions through the link for the users other than the user.**” EX1003, ¶¶298-303.

Gaddis's link is shareable but restricted: a forwarded recipient who clicks it sees "the same webpage ... as for the original intended User," yet cannot order through it, instead being told "if you are not {User First Name}, then click here" and "directed to the Offer Provider's other venues for electronic purchasing." EX1010, ¶¶10, 59; EX1003, ¶¶300-301. Nor can the forwarded recipient complete a transaction by clicking the order button, because the order confirmation is sent only to the original user's account, "not to the friend's SMS or email account." EX1010, ¶¶10, 49-50; EX1003, ¶301. A POSITA would have understood that a link through which a forwarded recipient may view the page but must leave it and separately be authenticated meets this limitation. EX1003, ¶302.

h. Ghadially in view of Gaddis discloses claims 9, 19, and 28

Claims 9, 19, and 28 add that **"the link is further configured with a security layer to provide augmented access or navigation attributes to the user."** EX1003, ¶¶304-309.

Gaddis discloses a link configured with a security layer: each user's "unique User ID" "is encrypted by methods well known in the art" and travels in the link itself, as "'custhash=9098788492' is the encrypted User identification (UserId) specific to the User." EX1010, ¶¶52, 59, 64. The programming code "include[s] a module for the merchant or Offer Provider to encrypt and decrypt the UserIds as

needed,” and Gaddis claims “encrypted links unique to each User.” EX1010, ¶¶53, 60, claim 19; EX1003, ¶306.

That security layer gives the identified user augmented access: a purchase charged to the user’s accounts on file “without entering any alpha numeric data, such as account login and password,” which no one else presenting the same link can complete. EX1010, ¶¶8, 10, 49-50, 59. A POSITA would have understood that the encrypted, user-bound link, which grants the identified user a no-data-entry purchase path while diverting others to ordinary authentication, meets this limitation. EX1003, ¶¶307-308.

In rejecting claim 9 over Long, the Examiner found this limitation met where a server can “authenticate the user based on a user identifier,” such as “a user phone number, a sender phone number, a device identifier of the user mobile device,” and the applicant did not contest that reading. EX1002, 304-05, 424-28. Under that reading, Gaddis independently and alternatively meets this limitation through two separate disclosures: (1) its encrypted, user-specific identifier, which the Offer Provider decrypts before processing the purchase; and (2) its verified-user path, through which a previously verified user completes a purchase with a single click. EX1010, ¶¶11, 34, 59-61, 64, claim 15; EX1003, ¶308.

i. Ghadialy in view of Gaddis discloses claims 10, 20, and 29

Claims 10, 20, and 29 add that **“the link is further configured to enable the user to resume an online user journey associated with the given transaction.”** EX1003, ¶¶310-316.

Ghadialy’s sign-up topics include a “[r]eminder about a shopping cart” and “[p]roducts in a user’s shopping cart that go on sale,” each concerning an online shopping journey the consumer began but did not finish, which Ghadialy’s service tracks with Web beacons and cookies. EX1009, ¶¶20-22, Table 1; EX1003, ¶312. Ghadialy’s alerts include a navigation link to the merchant’s website where the consumer can “complete an on-line purchase,” and a POSITA would have understood that, applied to a cart reminder, that link returns the consumer to the merchant’s site to purchase the products in the cart. *See supra* Section VII.A.6.g; EX1009, ¶¶29, 42-43; EX1003, ¶¶313-314.

Gaddis also discloses a link through which a known user purchases without re-entering data, because “the User’s shipping and billing information is already on file.” EX1010, ¶¶39, 49. A POSITA would have been motivated to configure Ghadialy’s cart-reminder link that way to further Ghadialy’s stated objective of having the consumer “complete an on-line purchase.” EX1009, ¶42; *see supra* Section VII.A.4; EX1003, ¶¶315-316.

The combination meets this limitation even if **“resume an online user journey”** requires returning the consumer to the page at which the earlier session ended: the consumer’s journey stopped at the cart, and a link returning the consumer to that cart returns the consumer to that point; directing the link to the last tracked page would also have been a routine design choice. EX1009, ¶¶20-22; EX1003, ¶315. The ’799 patent’s own mechanism for resuming a journey likewise starts from a cookie: when the customized link is selected, “a hot cookie on the mobile device belonging to the user can trigger” a security check that generates a pass status “that enables the browser (or application) to open up to the last page in which the subscriber was navigating at a time of abandoning a particular user journey.” EX1001, 37:47-60; EX1009, ¶21; EX1003, ¶311.

j. Ghadially in view of Gaddis and Lentz discloses claims 11, 21, and 30

Claims 11, 21, and 30 add that **“the second document comprises user-targeted content based on one or more prior engagement characteristics associated with the electronic address, wherein the prior engagement characteristics are determined using machine learning.”** EX1003, ¶¶317-324.

Lentz’s consumer module employs machine-learning algorithms, including “naive Bayes, Bayesian networks, decision trees, neural networks,” to generate a consumer analysis model from the consumer’s prior engagement. *See supra* Section VII.A.3; EX1011, ¶¶39, 44, 52, 90, 175.

Lentz uses that model to generate a “Consumer Applicability (CA) score” and a consumer storefront that “selectively prioritize[s]” offerings by score. EX1011, ¶¶53, 176-177, Fig. 20.

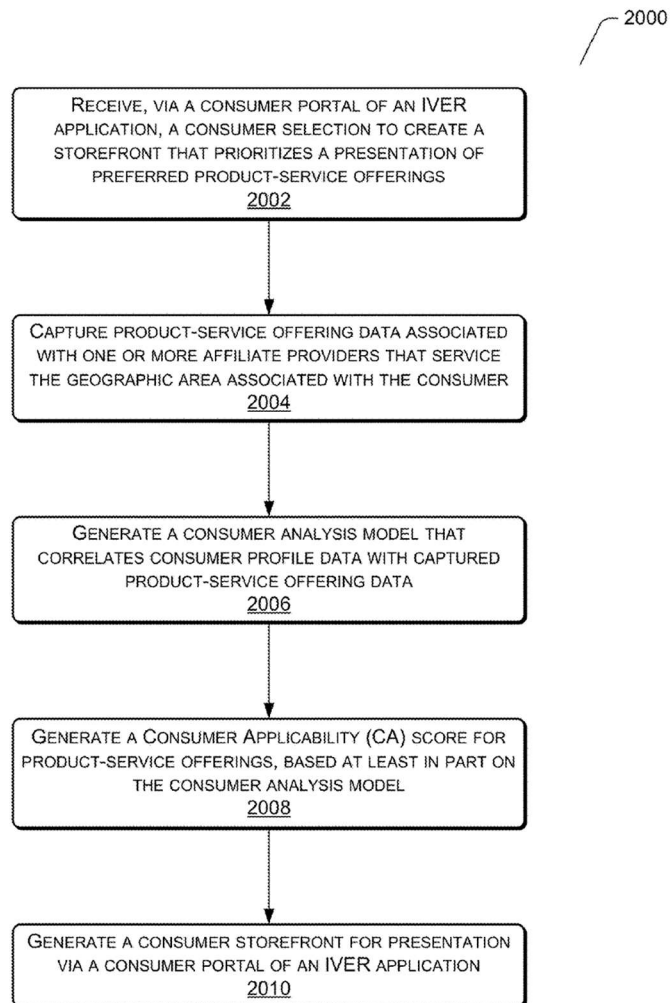


FIG. 20

A POSITA would have been motivated to generate the customized second document using Lentz’s machine-learning-derived prioritization, because Ghadially already selects the content of its personalized communications by ranking candidate

recommendations against the consumer’s preferences and behavior, and Lentz’s machine-learning model is a more capable means of performing that same ranking. EX1009, ¶¶26-27, 31-32; EX1011, ¶¶52-53, 90, 175-177; *see supra* Section VII.A.5; EX1003, ¶321.

Ghadialy itself infers user preferences from prior engagement using “a collaborative filtering technique,” and ties those preferences to the user who supplied the electronic address. EX1009, ¶¶19, 22, 27, 40. A POSITA would have understood that filtering is a machine-learning technique, and that Lentz’s trained models are known means of performing that same function. EX1023, 2, 8-9; EX1022, 1-2; EX1011, ¶¶39-40, 90; EX1003, ¶¶322-323.

B. Ground 2: Claims 1–30 Are Obvious Over Wendkos, Teeter, Lentz, and the General Knowledge of a POSITA

1. Wendkos

Wendkos, titled “Systems and Methods for Producing, Managing, Delivering, Retrieving, and/or Tracking Permission Based Communications,” was filed February 28, 2005, and published October 13, 2005, and is prior art under at least 35 U.S.C. § 102(a)(1). EX1012, Cover. Wendkos was not cited during prosecution of the ’799 patent.

Wendkos addresses a problem the ’799 patent identifies, people’s reluctance to transact over networks, by requiring “indisputable permission arrangements between senders and recipients” and providing subscribers with “encrypted,

recipient-specific URL[s]” containing “content related to the sender’s product or services.” EX1001, 1:40-45; EX1012, ¶¶5-14, 17, 23-24, 29; EX1003, ¶¶161-164.

Figure 3 depicts the platform, including a “[c]ampaign manager 302 ... used to establish an electronic communications campaign,” a “BrowserMail application 310 ... used to enable a recipient to view a received communication using his Web browser 314,” and a “subscription manager 346 ... through which a recipient is able to modify his communications preferences 350.” EX1012, ¶¶85-86, Fig. 3. The campaign manager lets a merchant tailor campaigns to its needs, including by assigning the “list of recipients,” “assign[ing] the message” (which can be personalized for each recipient), scheduling delivery, and “select[ing] [the preferred] type of delivery method.” EX1012, ¶¶30, 121, 244, 246, 250, 256; *see also id.*, ¶¶28, 118, 506-508; EX1003, ¶¶165-166.

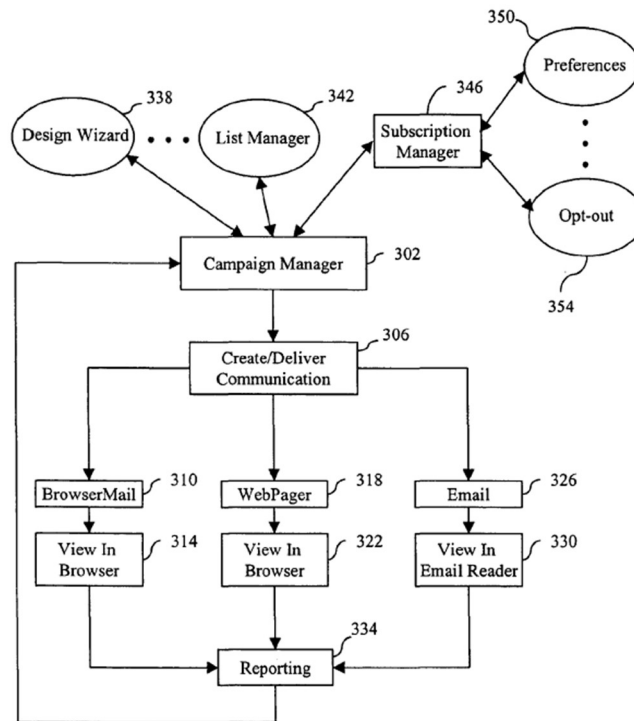


FIG. 3

Wendkos discloses three delivery methods. Two deliver communications from senders to recipients: (1) BrowserMail, “enabl[ing] a recipient to view a received communication using his Web browser”; and (2) “a traditional email application,” “enabl[ing] a recipient to view a received email (in an inbox) using his email reader.” EX1012, ¶85. The third, an alert system named “WebPager,” notifies recipients of updates to subscribed Web pages, “enabl[ing] a recipient to receive an update alert and to view an updated Web page or Web site using his Web browser.” *Id.*; EX1003, ¶¶164-166.

For secure access and authentication, a business publishes “a subscription form on [the business’s] Web site,” and customers “complete and submit the form

and then download and install the invention’s utility program and personal security key.” EX1012, ¶24. The utility program, a “Permission Messaging Platform (PMP),” “provides recipients with various subscription management tools” and facilitates receipt of senders’ communications. EX1012, ¶¶26, 80, 96-98; EX1003, ¶¶163, 165, 168.

A business’s “target audience uses” the subscription forms “to subscribe to communications and simultaneously grant their permission to receive the communications.” EX1012, ¶18. Figures 5B and 5C show forms for subscribing to communications from one sender or multiple senders, respectively:

512

TrueFire Newsletter: Subscription Form

LOGO

There are two ways to receive your TFU newsletters: by traditional email to your inbox, or by using our BrowserMail application which instantly notifies you when a new edition is available and displays it in your Web browser without cluttering up your inbox.

First Name

Last Name

Email

I prefer delivery by BrowserMail ☐

FIG. 5B

514

Subscription Form

LOGO

There are two ways to receive messages from your selected senders: by traditional email to your inbox, or by using our BrowserMail application which instantly notifies you when a new edition is available and displays it in your Web browser without cluttering up your inbox.

TrueFire ☐	Market GHI ☐
ABC News Company ☐	Hobbies, Inc. ☐
Electronics, Inc. ☐	Vacations, Inc. ☐
DEF Sports Company ☐	Legal Company ☐
Samantha's Jewellery ☐	GHI Magazine ☐
⋮	⋮

First Name

Last Name

Email

I prefer delivery by BrowserMail ☐

FIG. 5C

2. Teeter

Teeter, titled “Method of Recovery of Electronic Shopping Cart Information for Reinitiation of the Check-Out Process,” was filed June 14, 2005, and published December 15, 2005, and is prior art under at least 35 U.S.C. § 102(a)(1). EX1013, Cover. Teeter was not cited during prosecution of the ’799 patent.

Teeter discloses a process by which merchants send customers “personalized message[s]” containing links that “initiate the checkout process” for the merchant’s products. EX1013, ¶¶14, 17; EX1003, ¶¶172-174. Teeter’s abandoned-shopping-cart recovery functionality provides customers links via “e-mail message or other electronic communication” to reinitiate the purchase of products they added to their online shopping carts without submitting the order. EX1013, ¶6; EX1003, ¶¶172. Teeter discloses that the “consumer’s e-mail address can be successfully captured prior to abandonment” by a “registration e-mail address collection form field.” EX1013, ¶13; EX1003, ¶172.

3. Lentz

Lentz is described in Section VII.A.3, *supra*, and is relied on in this ground as set out below.

4. Motivation to Combine Wendkos with Teeter

A POSITA would have been motivated to combine Wendkos with Teeter. Both give merchants enhanced marketing capabilities through customized communications to consumers, and both obtain the customer’s e-mail address for

those communications through forms on the merchant’s website, in Wendkos together with the customer’s express permission. EX1012, ¶¶18, 24, 92; EX1013, ¶¶12-14, 17, Fig. 1B; EX1003, ¶194. Each is also analogous art: each is in the ’799 patent’s field of endeavor—permission-based electronic marketing communications—and reasonably pertinent to the inventor’s problem of obtaining a consumer’s authorization to receive messages and using those messages to drive online transactions. EX1001, 1:34-56, 7:33-37, 8:54-58, 9:11-37; EX1003, ¶195.

Wendkos’ communications may include content “that must be purchased (or rented)” and “promotional offers.” EX1012, ¶¶81, 91. A POSITA would have recognized that Teeter’s abandoned-shopping-cart e-mails, whose hyperlinks load a shopper’s previously chosen products for purchase, could implement that sale. EX1013, ¶¶6, 14, 17; EX1003, ¶196.

A POSITA would have had good reason to do so, because additional opportunities to initiate checkout further Wendkos’ objective of making “response and conversion rates ... significantly higher.” EX1012, ¶237; EX1003, ¶197. A POSITA would also have had a reasonable expectation of success, because both references deliver recipient-specific links to consumers. EX1012, ¶¶23, 85, 103, 293; EX1013, ¶¶14-15, 23, Fig. 2. Teeter’s recovery system also “may be implemented and managed by a third party as a service to the merchant,” the role Wendkos’ PMP servers play. EX1013, ¶30; EX1012, ¶135. The result would be a

combination of prior art elements according to known methods to yield predictable results. *See KSR*, 550 U.S. at 416; EX1012, ¶293; EX1013, ¶¶6, 23; EX1003, ¶198.

5. Motivation to Combine Wendkos with Teeter and Lentz

A POSITA would also have been motivated to combine Wendkos and Teeter with Lentz because Wendkos and Teeter likewise deliver merchant offerings to the consumer’s device and carry the consumer through a link into a purchase. *See supra* Section VII.A.5; EX1012, ¶¶14, 23-24; EX1013, ¶¶14, 17; EX1003, ¶¶199-200. Wendkos delivers by email and BrowserMail, identifies “a mobile (cellular) telephone” as a recipient device, and collects the subscriber’s “phone number,” and Lentz identifies RCS expressly alongside SMS, MMS, and e-mail as a known medium for delivering a referred product-service offering to a consumer’s device. EX1012, ¶¶82, 85, 92; EX1011, ¶¶33, 73; *see KSR*, 550 U.S. at 416-17; EX1003, ¶201.

Where Wendkos updates mailing lists “with response data generated from a communications campaign,” Lentz applies trained machine-learning models built from the consumer’s historical activity to determine what to offer and, from the same time-of-day and day-of-week activity data, recommends when to send it. EX1012, ¶114; EX1011, ¶¶37-40, 52, 90; EX1003, ¶202. A POSITA would have had good reason to incorporate Lentz’s techniques, because Lentz recommends transmitting the offering at the time “most likely to trigger the consumer to initiate and/or

complete a corresponding purchase agreement,” the outcome Wendkos and Teeter seek, and Lentz’s per-offering purchase statuses complement the data Wendkos tracks. EX1011, ¶¶40, 60, 91; EX1012, ¶¶31, 122-124, 237, 395, 558-59, 563; EX1013, ¶¶4-6; EX1003, ¶¶202-203. A POSITA would have reasonably expected success, because Lentz applies known machine-learning techniques to the kind of subscriber response data Wendkos already collects. EX1011, ¶39; EX1012, ¶¶114, 395; *see KSR*, 550 U.S. at 416-17; EX1003, ¶204.

6. Independent Claim 1

a. Wendkos discloses 1[pre]

Wendkos discloses “**a system**”: “a communications system 100” including “PMP servers 108” connected to the Internet, through which senders send electronic communications to recipients. EX1012, ¶¶81, 83-84; EX1003, ¶¶326-328. Figures 1 and 2 show communications system and PMP servers:

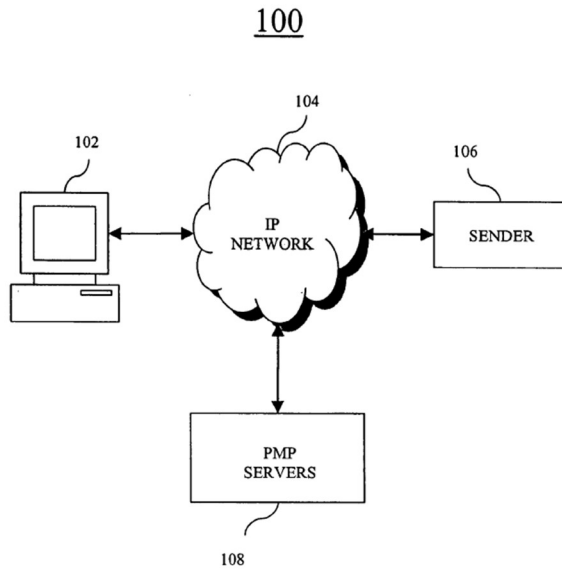


FIG. 1

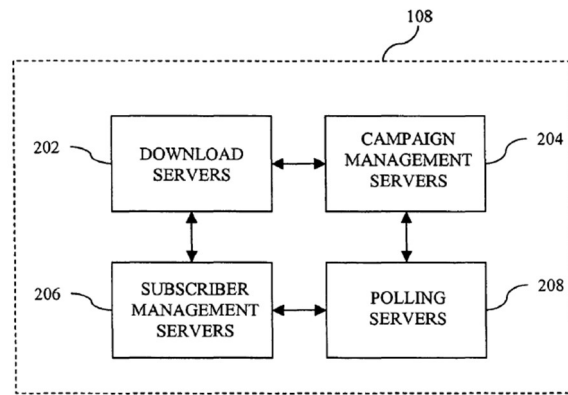


FIG. 2

EX1012, Figs. 1-2.

b. Wendkos discloses 1[a]

Wendkos discloses “a processor.” EX1003, ¶¶329-330. The PMP servers perform computing functions: they “provide and manage the PMP utility program,” “host and manage” the sender and subscription tools, and “receive and manage the private communications with recipients.” *See supra* Section VII.B.6.a; EX1012, ¶¶83-84; *see also id.*, ¶233 (“BrowserMail servers are Linux/MySQL/Apache platforms.”). A POSITA would have understood that servers performing these functions necessarily include a processor (*e.g.*, CPU) that executes the software implementing them. EX1003, ¶¶329-330.

c. Wendkos discloses 1[b]

Wendkos discloses “**memory configured to store program instructions, wherein, when executed by the processor, the program instructions cause the processor to perform operations comprising**” the operations recited in 1[c] through 1[g]. EX1003, ¶¶331-332. PMP servers store communications, “recipient-specific data,” and software, and a POSITA would have understood that they include memory storing the program instructions performing the operations mapped below. EX1012, ¶¶54, 84, 96, 114, 118, claim 19; EX1003, ¶¶331-332.

d. Wendkos discloses 1[c]

Wendkos discloses “**providing a hosted input field for inclusion in a first document associated with a third party.**” EX1003, ¶¶333-338. PMP servers “may be owned, maintained, and/or operated independently of the senders and recipients using them.” EX1012, ¶135. A sender “(e.g., a business or organization) publishes a subscription form on its Web site.” *Id.*, ¶24. The sender is therefore a “third party” relative to the operator of PMP servers, and the sender’s Web page is the “first document associated with a third party.” *See* EX1001, 7:33-37, 8:54-58 (describing a “webpage associated with a third party (i.e., that is other than a provider of the communication technique)”); EX1003, ¶334.

The subscription forms include input fields. Figure 5B shows “opt-in form 512,” which recipients use “to subscribe to communications from a particular sender,” with an “Email” field; Figure 5C shows “opt-in form 514,” used to

“subscribe to communications from more than one sender.” EX1012, ¶¶92-93, Figs. 5B-5C; EX1003, ¶335.

512

TrueFire Newsletter: Subscription Form

LOGO

There are two ways to receive your TFU newsletters: by traditional email to your inbox, or by using our BrowserMail application which instantly notifies you when a new edition is available and displays it in your Web browser without cluttering up your inbox.

First Name

Last Name

Email

I prefer delivery by BrowserMail ☐

FIG. 5B

514

Subscription Form

LOGO

There are two ways to receive messages from your selected senders: by traditional email to your inbox, or by using our BrowserMail application which instantly notifies you when a new edition is available and displays it in your Web browser without cluttering up your inbox.

TrueFire	☐	Market GHI	☐
ABC News Company	☐	Hobbies, Inc.	☐
Electronics, Inc.	☐	Vacations, Inc.	☐
DEF Sports Company	☐	Legal Company	☐
Samantha's Jewelry	☐	GHI Magazine	☐
⋮		⋮	
⋮		⋮	

First Name

Last Name

Email

I prefer delivery by BrowserMail ☐

FIG. 5C

PMP servers provide that input field for inclusion in the sender's Web page: the subscription forms are “integrated into the HTML of your website pages,” and the form code routes submissions to the sender's account on the platform. EX1012, ¶¶84, 281 464, 467, 476, 489-490; EX1003, ¶¶336. To the extent Wendkos' form code is viewed as a stand-alone page, embedding a platform-supplied sign-up field in a merchant's page was a well-known technique that Wendkos itself teaches. EX1012, ¶467; EX1003, ¶¶338.

Wendkos further teaches posting the form to a landing page the platform hosts, which confirms the platform receives the submitted data. EX1012, ¶¶272,

277-279, 281, 504. Patent Owner reads this limitation on a platform-supplied signup form whose HTML embed code the merchant is instructed to “[p]aste ... into your website where you want the form to appear.” EX1032, 1-3. Under that reading, Wendkos discloses this limitation, because its form code is supplied by the platform, included in the sender’s Web page, and routes submissions to PMP servers. EX1012, ¶¶135, 467, 476, 489-490; EX1003, ¶¶336-337.

To the extent “hosted” requires that the field itself be served by the platform rather than the sender’s web server, it would have been obvious to deliver Wendkos’ form into the sender’s page as an inline frame or a script served from PMP servers, which a POSITA would have known was the conventional way for a third-party service to place its fields in a merchant’s page. EX1003, ¶338. Doing so required only conventional web programming, because Wendkos’ form code already identifies the sender’s list on the platform and routes each submission to PMP servers. EX1012, ¶¶476, 489-490; EX1003, ¶338.

e. Wendkos discloses 1[d]

Wendkos discloses **“receiving, information indicating activation of the hosted input field in the first document, wherein the information comprises an electronic address associated with an electronic device and an indication of a willingness to receive one or more messages.”** EX1003, ¶¶339-343. Activation of the hosted input field is the recipient’s submission of the subscription form. In

step 502, “a recipient requests to receive electronic communications,” such as “by completing an online subscription form,” and the process continues “after one or more requests (e.g., via an online subscription form) have been submitted.”

EX1012, ¶¶92, 95, Fig. 5A.

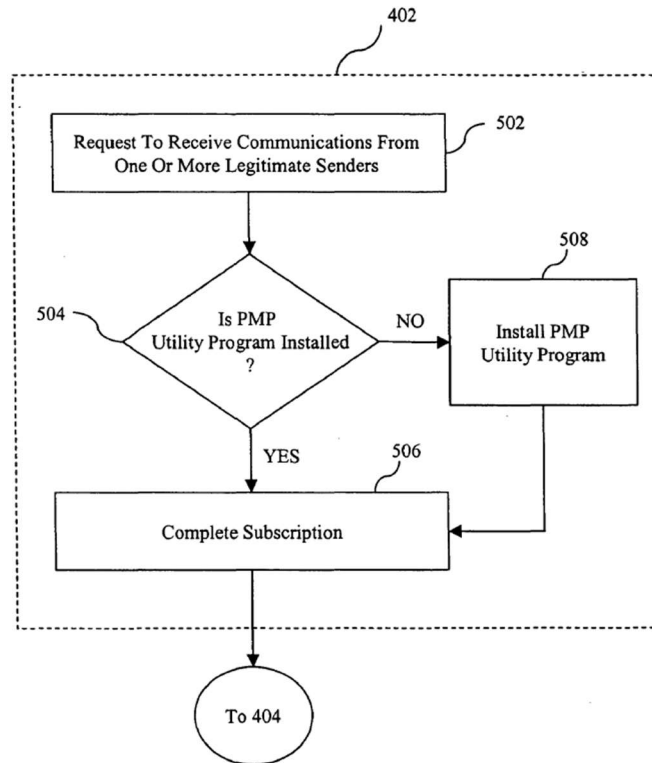


FIG. 5A

PMP servers receive the submitted information, which “is deposited into your account.” EX1012, ¶¶117, 476, 489-490. And when a new subscriber opts-in to a list, “a Confirmation Message is immediately sent by email to the email address used in the subscription form.” *Id.*, ¶478.

The submitted information comprises “an indication of a willingness to receive one or more messages.” Recipients use the subscription forms “to subscribe

to communications and simultaneously grant their permission to receive the communications,” and in the subscription process “agree to receive the communication.” EX1012, ¶¶18-19; *see also id.*, ¶14 (requiring “permission arrangements”); EX1003, ¶342.

The submitted information also comprises “an electronic address associated with an electronic device”: the recipient provides an “email address (or other unique identifier), and phone number,” and PMP servers delivers communications to that email address, which the subscriber reads on a device that may be “a mobile (cellular) telephone.” EX1012, ¶¶19, 82, 85, 92, 117, 238, 476; EX1003, ¶343. Patent Owner’s infringement contentions are consistent, reading this limitation on a subscriber’s “email address and/or mobile phone number.” EX1032, 4. Alternatively, a POSITA would have understood that the phone number collected during subscription could be a mobile telephone number, which is such an address, and it would have been obvious to send the message to is as discussed below in 1[f]. EX1012, ¶¶19, 82, 92; EX1003, ¶343.

f. Wendkos in view of Teeter discloses 1[e]

Wendkos in view of Teeter discloses “**generating, a second document that includes information about one or more events of interest for a user associated with the electronic address, the second document being customized to the user.**” EX1003, ¶¶344-349.

Wendkos generates “the electronic communication as a Web page” and provides “the published Web page to the recipient,” viewed in a browser at a recipient-specific URL. EX1012, ¶¶23, 39, 51, 103, claim 1. PMP servers facilitate personalization of those pages: “[c]ommunications can include personalized text and images by merging recipient-specific data that exists in an sender’s list.” *Id.*, ¶¶28, 103, 118, 506-508.

Teeter discloses the page content: a link in a personalized e-mail directs the shopper to a landing page, “the shopping cart review page,” displaying “the contents of the abandoner’s shopping cart,” while the e-mails may carry “an incentive such as a special offer or coupon.” EX1013, ¶¶14, 17, 23, 25, Fig. 2. The shopper’s pending items in that cart, with any accompanying offer, are an “event[] of interest for [the] user,” and the page is “customized to the user.” EX1003, ¶¶346-347.

A POSITA would have recognized that PMP servers could generate Teeter’s cart-recovery page using Wendkos’ existing personalization and hosting functions. Teeter’s system “may be implemented and managed by a third party as a service to the merchant,” which stores the cart data on its session server. EX1013, ¶¶13-14, 26-30; EX1003, ¶348.

Wendkos’ PMP servers are such a third-party platform. EX1012, ¶135. The PMP servers merge the shopper’s cart data into a recipient-specific page, as Wendkos does with other “recipient-specific data that is stored by the PMP servers,”

and publish that page at a unique URL that the platform “automatically hosts.” EX1012, ¶¶103, 118, 272. That Teeter’s example landing page retrieves the cart “from the e-commerce web site’s server,” EX1013, ¶23, does not change the analysis, because the same cart information resides on the third-party’s session server, *id.*, ¶¶14, 27, 29-30, and Teeter leaves the landing page to “whatever page the merchant chooses,” *id.*, ¶23. EX1003, ¶348.

A POSITA would have been motivated to add Teeter’s cart-recovery page to Wendkos’ platform as the second document, because Wendkos already uses the platform to disseminate merchants’ “sales bulletins, pricing schedules, ... [and] promotional offers” with recipient-specific content, and Teeter’s page is the known means of giving merchants “a second chance to get consumers to complete their sales” lost to cart abandonment. EX1012, ¶¶81, 118; EX1013, ¶¶4, 17; *see supra* Section VII.B.4; EX1003, ¶349.

g. Wendkos in view of Teeter discloses 1[f]

Wendkos in view of Teeter discloses “**sending a message to the electronic address, wherein the message comprises a link to the second document, the link being configured to enable the user to access the second document to execute one or more transactions associated with the one or more events.**” EX1003, ¶¶350-355.

PMP servers send communications to the email address the subscriber entered in the subscription form. *See supra* Section VII.B.6.e; EX1012, ¶¶117, 238, 478.

To the extent the electronic address is the recipient's mobile telephone number, it would have been obvious to send the same message and link to that number as a text message, because Wendkos collects that number and identifies the mobile telephone as a recipient device, and delivering the same content over a known messaging channel to the address the recipient supplied yields predictable results. EX1012, ¶¶82, 92; EX1003, ¶352. Those messages carry links to pages the platform hosts, including landing pages the "Landing Page URL tool automatically hosts," which a POSITA would have personalized for each recipient using Wendkos' recipient-specific merge data. *See supra* Section VII.B.6.f; EX1012, ¶¶103, 118, 272, 337; EX1003, ¶¶348, 351.

Teeter discloses the same step with the customized cart page as the link target: Its personalized e-mail includes "a hypertext link to initiate the checkout process" that redirects the shopper to the landing page displaying that shopper's cart. *See supra* Section VII.B.6.f; EX1013, ¶¶14-16, 23, Fig. 2; EX1003, ¶353. The e-mail may provide "[a] link to view the contents of the abandoned shopping cart 212 or proceed to checkout 214." *Id.*, ¶24, Fig. 3; EX1003, ¶354.

As shown in Figures 1B and 1C, when the consumer selects the link, "the contents of the consumer's shopping cart, prior to abandonment, are again accessible

and the consumer may modify or add to the contents, or proceed directly to checkout.” *Id.*, ¶17.

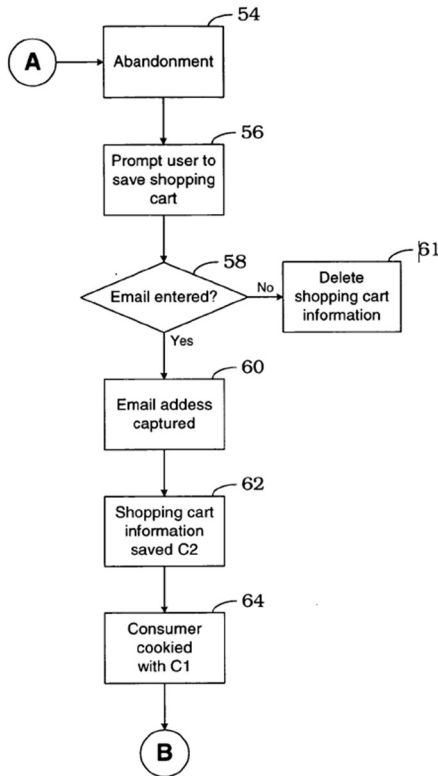


Fig. 1B

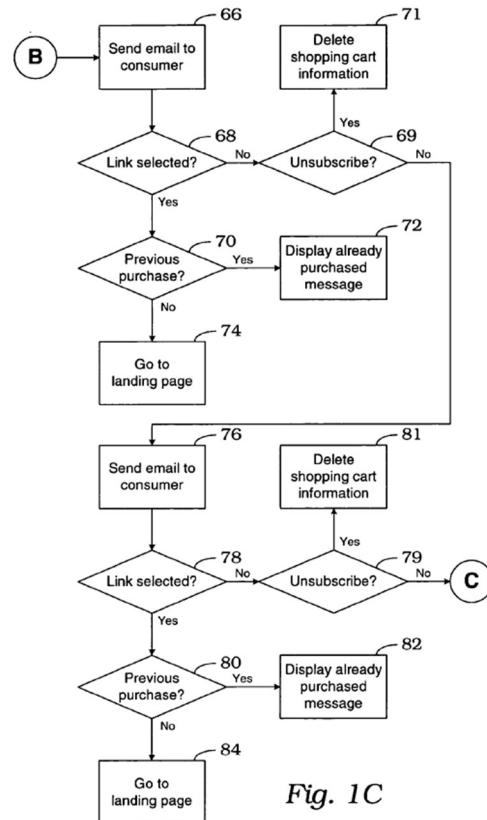


Fig. 1C

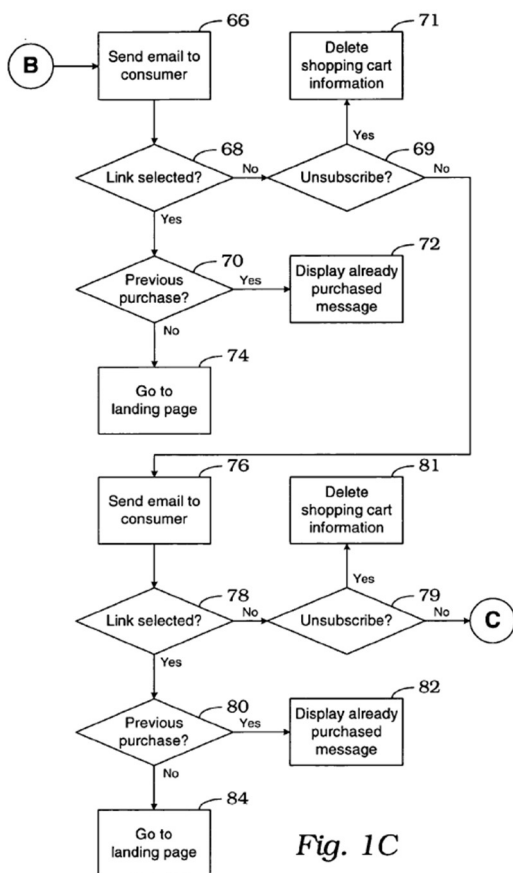
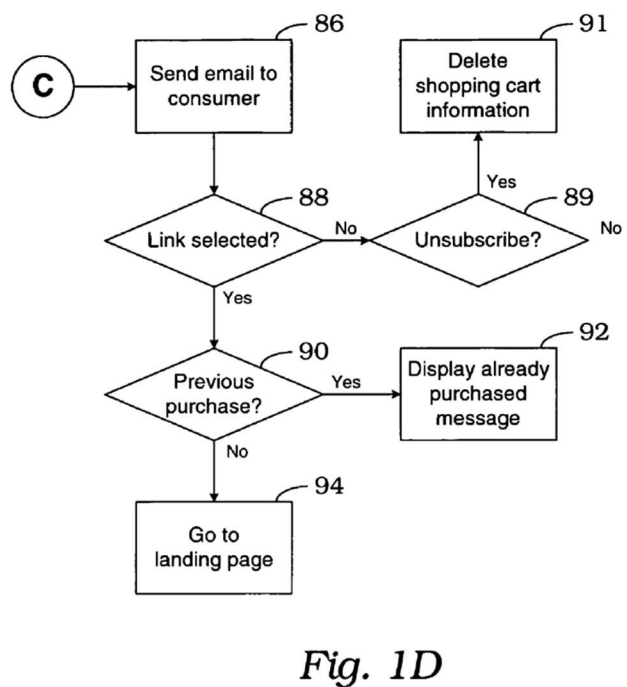
A POSITA combining the references would have sent Wendkos’ email to the subscriber’s email address (or, alternatively, a text message to the subscriber’s mobile telephone number) with Teeter’s cart-specific link to the platform-hosted cart page described for 1[e], and would have understood that this message meets this limitation. *See supra* Sections VII.B.4, VII.B.6.f; EX1003, ¶355. The link facilitates the transaction: from the cart page, the consumer may “proceed directly

to checkout,” where payment information is collected before the order is submitted. EX1013, ¶¶11, 17; *see supra* Section VII.B.4; EX1003, ¶354.

h. Wendkos in view of Teeter discloses 1[g]

Wendkos in view of Teeter discloses **“in response to determining activation of the link has occurred, causing provision of the second document to the electronic address, wherein the second document is configured to facilitate completion of a given transaction in the one or more transactions.”** EX1003, ¶¶356-362. Wendkos’ PMP servers detect when a recipient activates a link in a communication: Reports show “the numbers of specific clickthroughs (i.e., how many recipients clicked on a specific link in the communication),” and a more detailed report “may indicate the number of times that each particular link provided in the communication has been clicked, and by which recipients.” EX1012, ¶¶122-123. The platform will “parse and track the links in your own HTML,” and its Target Activity Report lists “each email respondent on your open list, the number of links they clicked on and which links in your message they clicked on.” *Id.*, ¶¶542, 562-563. These reports apply to email delivery, because “all reports and statistics are consistent across all three delivery methods (email, BrowserMail and WebPager).” *Id.*, ¶524. Wendkos also tracks clicks on its platform-hosted landing pages. *Id.*, ¶¶339-340; EX1003, ¶357.

Teeter acts in response to determining that the link has been activated: If “the consumer selects the hyperlink, decision block 78, the consumer is directed to the landing page to initiate the check out process.” EX1013, ¶15. If “the consumer clicks on the hypertext link, the shopping cart is reinitiated on the e-commerce web site.” *Id.*, ¶14. Fig. 1C shows the same branching: decision block 68 (“Link selected?”) leads to block 74 (“Go to landing page”), with an intermediate check at block 70 (“Previous purchase?”) that shows an “already purchased” message at block 72 instead. *Id.*, Fig. 1C (blocks 66-84); *see also id.*, Fig. 1D (blocks 86-94).



A POSITA would have understood that detecting the shopper's selection of the link comprises "determining activation of the link has occurred," and that directing the shopper to the landing page in response comprises "causing provision of the second document." EX1013, ¶¶14-15, 30, Figs. 1C-1D; EX1003, ¶359.

The second document is provided to the electronic address: Teeter delivers "a message containing a hyperlink to the e-commerce website to the collected e-mail address," and upon "selecting the hyperlink," returns "the user to the e-commerce website with the previously abandoned item restored." EX1013, claim 1(e)-(g); *see also id.*, ¶14. Wendkos likewise sends communications by email to the address entered in the subscription form. *See supra* Section VII.B.6.e; EX1012, ¶¶117, 478. The user activates the link from the email, which opens the page on the same device; to the extent the electronic address is the recipient's mobile telephone number, the link sent to that number for the reasons given for 1[f] is activated on, and opens the page on, the recipient's mobile telephone. EX1012, ¶¶82, 92; EX1003, ¶362. The '799 patent describes the claimed step the same way. *See supra* Section VII.A.6.h; EX1001, 9:31-37, 14:1-7. A POSITA would therefore have understood that serving the page to the device on which the user activated the link delivered to the electronic address meets this limitation. EX1003, ¶360.

The second document is configured to facilitate completion of the transaction. Teeter's landing page "usually will be the shopping cart review page so that the

contents of the abandoner’s shopping cart may be recovered and the order placed,” from which the consumer proceeds to checkout. EX1013, ¶¶11, 17, 23; *see supra* Section VII.B.6.g; EX1003, ¶361. Wendkos’ platform-hosted landing pages likewise may be used for “order forms.” EX1012, ¶337.

A POSITA combining the references would have tracked activation of Teeter’s cart link through PMP servers and, in response, served or redirected the shopper to the cart page described for 1[e], which meets this limitation. *See supra* Sections VII.B.4, VII.B.6.f. A POSITA would have been motivated to make Teeter’s cart-recovery link a tracked link through which PMP servers detect the click and provide the cart page, because Wendkos already tracks every link for individual recipients, and Teeter’s landing page is the known means of returning the shopper to complete the order. EX1012, ¶¶122-123, 542, 563; EX1013, ¶¶15, 23, 30; *see supra* Section VII.B.4; EX1003, ¶362.

7. Independent Claims 12 and 22

Claim 12 recites a “**computer-implemented method**,” and claim 22 a “**non-transitory computer-readable storage medium**,” each comprising the same five operations as claim 1 and including limitations word-for-word identical to 1[c]-1[g]. Wendkos in view of Teeter discloses 12[a]-12[e] and 22[a]-22[e] for the reasons given for 1[c]-1[g], respectively. *See supra* Section VII.B.6; EX1003, ¶363.

Wendkos discloses “[a] **computer-implemented method.**” EX1003, ¶364. Wendkos’ operations are methods performed by “a server,” i.e., PMP servers, including “receiving, by a server, information that is associated with the generation of the electronic communication” and “determining, by the server, whether the recipient has granted permission to receive the electronic communication.” EX1012, ¶¶15, 44-53, claims 1, 18; *see also id.*, ¶¶84, 233.

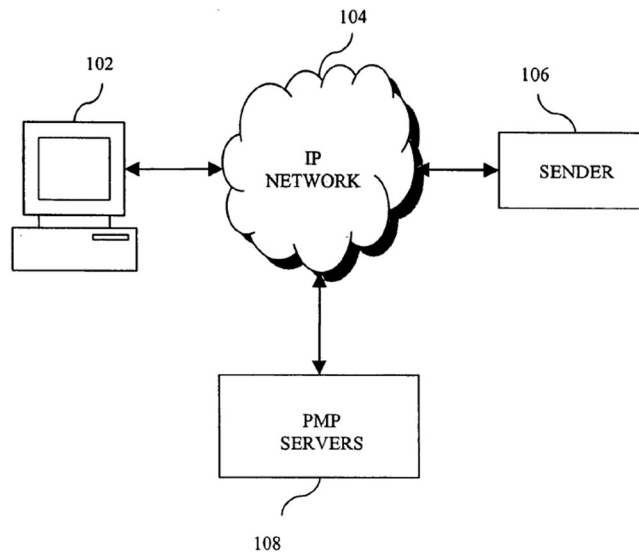


FIG. 1

Wendkos also discloses “[a] **non-transitory computer-readable storage medium for use in conjunction with a processor, the computer-readable storage medium storing program instructions that, when executed by the processor, cause the processor to carry out operations comprising,**” for the reasons given for 1[pre]-1[b]. *See supra* Section VII.B.6. Wendkos discloses “computer program

products” and server applications “coded in PHP, C++ and Objective C,” which a POSITA would have understood are stored on a non-transitory medium. EX1012, ¶¶15, 233; EX1003, ¶365.

8. Dependent Claims

a. Wendkos in view of Teeter and Lentz discloses claims 2, 13, and 23

Claims 2, 13, and 23 add that **“the message comprises a Rich Communication Services (RCS) message provided to the electronic address according to a schedule generated based at least in part on a determined classification of the user.”** EX1003, ¶¶367-373.

Wendkos’ “campaign scheduler” lets senders schedule campaigns, and Wendkos stores for each recipient “profile data ..., his communications preferences, and response metrics,” including opens and clickthroughs, which a POSITA would have recognized as allowing communications to be scheduled based on each recipient’s classification. EX1012, ¶¶24, 31, 143, 249-250, 252, 594; EX1003, ¶368.

Teeter supplies that schedule: its recovery e-mails go out “at intervals selected by the merchant” (e.g., “3 hours after abandonment,” then “48 hours” and “7 days”). EX1013, ¶¶15-17, 24-25, Figs. 1C, 3. That schedule, which turns on the consumer’s status, is “a schedule generated based at least in part on a determined classification of the user.” EX1013, ¶15, Fig. 1C (blocks 68, 76); EX1003, ¶369.

Lentz discloses the RCS channel for the reasons given for Ground 1, and a POSITA would have been motivated to deliver Wendkos’ scheduled communications over it. *See supra* Section VII.A.8.a; EX1011, ¶¶33, 73; EX1012, ¶30; EX1003, ¶370. Here the electronic address is the mobile telephone number. *See supra* Section VII.B.6.e.

Lentz’s send-time recommendation, made from the consumer’s activity data, confirms that a POSITA would have timed delivery based on consumer data, and a POSITA would have been motivated to use it with Wendkos’ campaign scheduler and engagement tracking to generate the delivery schedule, because both serve the goal of timing messages so that the consumer acts on them. *See supra* Section VII.A.8.a; EX1011, ¶¶37-40; EX1012, ¶¶24, 31, 249-250; EX1003, ¶371. Lentz’s grouping of consumers for targeting, and the standardization of RCS by September 25, 2024, apply equally here, and it would have been obvious to generate the delivery schedule for each group of recipients. *See supra* Sections IV.D, VII.A.8.a; EX1011, ¶¶33, 41, 49, 73; EX1003, ¶¶371-372.

b. Wendkos in view of Teeter and Lentz discloses claims 3, 14, and 24

Claims 3, 14, and 24 add that “**the classification of the user comprises criteria corresponding to an application, a website, or a service associated with the electronic address.**” EX1003, ¶¶374-379. Wendkos discloses this limitation. Senders target communications using a subscriber’s “campaign activity,” such as

“how many HTML emails were opened and of those, how many recipients clicked on the links within the message,” which a POSITA would have understood are criteria corresponding to the subscriber’s use of the communications service (e.g., email or BrowserMail) associated with the electronic address. EX1012, ¶¶395, 558-559; EX1003, ¶¶375. Wendkos also segments lists by “the source of their subscription” (a website) and sends campaigns separately to BrowserMail and email subscribers (a service). EX1012, ¶¶256, 490; EX1003, ¶¶375-376.

Teeter’s session server likewise records, for each visitor to the merchant’s website, “a unique customer id, the page currently being viewed, and the time initiated,” distinguishing a customer who “is new to the web site” from “a returning customer,” and ties the consumer’s stored shopping cart to the consumer’s “e-mail address” and “unique cart identifier.” EX1013, ¶¶12-13, 18, 29; EX1003, ¶376.

Lentz discloses criteria corresponding to an application. Lentz’s client analysis model is built from data gathered as the system “monitor[s] the consumer’s use of the IVER application,” including “product search terms” and “a time of day or day of the week that the product-search was initiated.” EX1011, ¶40. The IVER application is installed on, or accessed from, the consumer’s client device. EX1011, ¶¶26-27. A POSITA would have understood that a classification built from the consumer’s activity within that application comprises criteria corresponding to an

application associated with the consumer’s device and electronic address. EX1003, ¶¶377-378.

c. Wendkos in view of Teeter and Lentz discloses claim 4

Claim 4 depends from claim 2 and adds that the classification indicates whether the user is “**a message recipient that has selected a link provided by the system ... and completed at least one prior transaction,**” “**a message recipient that has selected a link ... but has not completed a transaction,**” or “**a message recipient that has not selected a link provided by the system.**” EX1003, ¶¶380-384. Wendkos tracks each recipient’s opens and clickthroughs “down to the recipient level.” *See supra* Section VII.B.8.a; EX1012, ¶¶24, 31. A POSITA would have recognized that Wendkos distinguishes “a message recipient that has not selected a link provided by the system” from one that has. EX1003, ¶381.

Teeter supplies the remaining classifications: after a consumer selects the e-mailed link, Teeter determines whether the consumer has made a “Previous purchase,” displaying an “already purchased” message to a consumer who has and the landing page to one who has not, and it collects “successful order completion” data from each page, “including the confirmation page.” EX1013, ¶¶14-15, 18, 26, 30, Figs. 1C-1D (blocks 68-74). Together with Wendkos’ tracking of “specific ‘clickthroughs,’” EX1012, ¶31, this allows a recipient to be classified as one “that

has selected a link ... and completed at least one prior transaction” or one that “has selected a link ... but has not completed a transaction.” EX1003, ¶382.

Teeter also treats a consumer who has not selected the link differently, sending that consumer a further e-mail. EX1013, ¶15, Fig. 1C (blocks 68, 76); EX1003, ¶369. Figures 1A-1C show Teeter’s abandonment and post-click determinations:

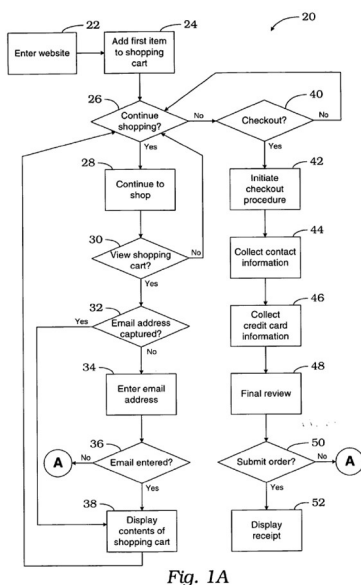


Fig. 1A

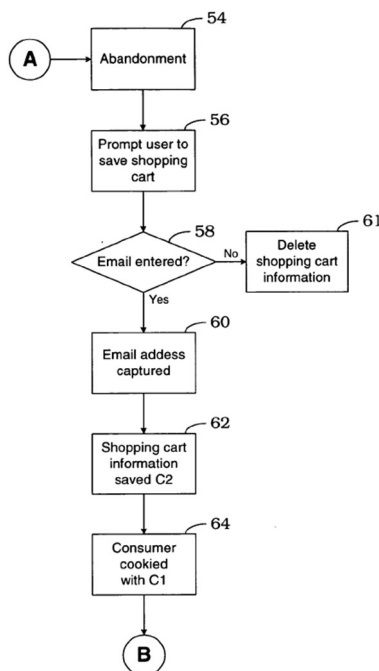


Fig. 1B

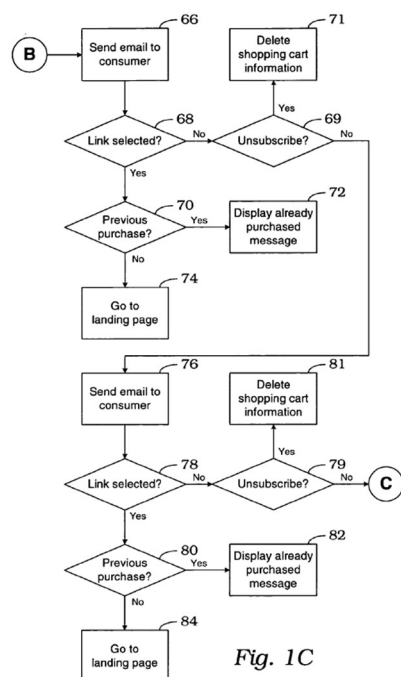


Fig. 1C

d. Wendkos in view of Teeter and Lentz discloses claims 5, 15, and 25

Claims 5, 15, and 25 add that the message comprises an RCS message and that the operations further comprise “**requesting and receiving authorization data corresponding to an identity of the user before causing provision of the second document to the electronic address.**” EX1003, ¶¶385-388. Lentz discloses the

RCS channel. *See supra* Section VII.A.8.a; EX1011, ¶¶33, 73. Here the electronic address is the mobile telephone number. *See supra* Section VII.B.6.e.

Wendkos claims the steps of “generating a personal security key by the utility program; and using the personal security key *to verify that the recipient should be provided access* to the electronic communication *prior* to the step of *providing the published Web page to the recipient.*” EX1012, claim 6 (depending from claims 1 and 5). A POSITA would thus have understood that Wendkos teaches requesting and receiving authorization data (verification through the personal security key) corresponding to the recipient’s identity before providing the published Web page, and would have applied the same verification before providing the combined system’s cart page. EX1003, ¶¶386-387. Wendkos likewise authenticates a subscriber who clicks the “Subscription Preferences” link before providing the preferences page: “Once authenticated, the subscriber can modify any or all of their preferences.” EX1012, ¶470; *see also id.*, ¶480; EX1003, ¶¶386-387.

e. Wendkos in view of Teeter and Lentz discloses claims 6 and 16

Claims 6 and 16 add that “**the message is an Enhanced Messaging Service (EMS) message.**” EX1003, ¶¶389-393. Wendkos identifies “a mobile (cellular) telephone” as a recipient device and collects the subscriber’s phone number, so a POSITA would have understood that Wendkos’ communications and Teeter’s

hyperlinks could be sent to a subscriber’s mobile phone via SMS. EX1012, ¶¶82, 92; EX1003, ¶390.

The ’799 patent treats EMS as a drop-in alternative to SMS, and the applicant never identified message format as the advance. *See supra* Section VII.A.8.e; EX1001, 14:18-21; EX1002, 424-28; EX1003, ¶391. A POSITA would have found it obvious, with a reasonable expectation of success, to deliver Wendkos’ communication as an EMS message, a substitution of one known text-messaging format for another standardized before the claimed priority date that predictably delivers the same communication and link to the same telephone number. *See KSR*, 550 U.S. at 416-17; EX1014, §§ 3.10, 9.2.3.24.10.1; EX1015, ¶¶6-8, 10, 33, 44, 64; EX1003, ¶¶391-392.

f. Wendkos in view of Teeter and Lentz discloses claims 7, 17, and 26

Claims 7, 17, and 26 add that the message “**comprises content including send and receive indicators provided in a user interface of a mobile computing device ... depicting real time typing between a message provider and the mobile computing device or between another computing device and the mobile computing device.**” EX1003, ¶¶394-396. Wendkos in view of Teeter and Lentz renders these claims obvious for the reasons given for Ground 1, which rest on Lentz’s RCS channel, the ’799 patent’s own description of typing indicators as a feature of RCS messaging, the state of RCS messaging by September 25, 2024, and

the prosecution history, and which apply equally to Wendkos’ messages delivered by RCS. *See supra* Sections IV.D, VII.A.8.f; EX1001, 39:36-51; EX1011, ¶¶33, 73; EX1002, 304, 424-28; EX1003, ¶¶394-395.

g. Wendkos in view of Teeter discloses claims 8, 18, and 27

Claims 8, 18, and 27 add that the link is further configured to “**allow users other than the user to access the second document to browse the second document while prohibiting execution of the one or more transactions through the link for the users other than the user.**” EX1003, ¶¶397-400. Wendkos’ referral tool lets recipients “send a copy of the HTML message to a friend,” who may view it and its links but is not a subscriber. EX1012, ¶¶134, 517, 519, 522. Purchases through a communication, by contrast, are billed with the recipient’s own “permission (explicitly or implicitly) to bill a previously established financial account with the PMP servers.” *Id.*, ¶91. A POSITA would have found it obvious to configure the cart link the same way, so that a friend may browse the cart page but cannot complete the purchase on the subscriber’s account. *Id.*, ¶¶519, 522; EX1003, ¶¶398-399.

h. Wendkos in view of Teeter discloses claims 9, 19, and 28

Claims 9, 19, and 28 add that “**the link is further configured with a security layer to provide augmented access or navigation attributes to the user.**” EX1003, ¶¶401-405.

Wendkos' BrowserMail functionality allows "a recipient to view a received communication using his Web browser," which a POSITA would have understood provides "augmented access or navigation attributes." EX1012, ¶¶85, 233; EX1003, ¶403. BrowserMail requires the recipient to "download a personal BrowserMail key and utility," and its communications are published to "an encrypted URL which can only be viewed by the recipient." EX1012, ¶¶37, 236; *see also id.*, ¶¶17, 23, 41, 103, 125. A POSITA would thus have understood that the recipient-specific, encrypted URLs opened through BrowserMail are configured with a security layer. EX1003, ¶¶402, 404.

Wendkos also offers a Web-based login to the recipient's "private account" as an alternative means of verifying the recipient, and each PMP utility program carries a "unique ID" that can be "used to identify and verify the recipient in communications with the PMP servers," EX1012, ¶¶99, 134, which is consistent with how the Examiner read this limitation. *See supra* Section VII.A.8.h; EX1002, 304-05; EX1003, ¶¶386, 403-404.

i. Wendkos in view of Teeter discloses claims 10, 20, and 29

Claims 10, 20, and 29 add that **"the link is further configured to enable the user to resume an online user journey associated with the given transaction."** EX1003, ¶¶406-409.

Teeter discloses a link configured to enable the user to resume an online user journey associated with the given transaction. EX1003, ¶¶406-407. Teeter’s abandoned-shopping-cart functionality “enables a consumer to recover an abandoned shopping cart” by sending a message that “contains a hypertext link for the consumer to *return to the merchant’s website* and complete the purchase.” EX1013, ¶17 (emphasis added). Teeter confirms activation of the link results in “the contents of the consumer’s shopping cart, prior to abandonment, [becoming] *again accessible* and the consumer may modify or add to the contents, or proceed directly to checkout.” *Id.* (emphasis added). A POSITA would have understood that the links in messages sent to consumers via functionality in Teeter are configured to enable the consumer to resume an online user journey associated with the given transaction. EX1003, ¶408.

j. Wendkos in view of Teeter and Lentz discloses claims 11, 21, and 30

Claims 11, 21, and 30 add that “**the second document comprises user-targeted content based on one or more prior engagement characteristics associated with the electronic address, wherein the prior engagement characteristics are determined using machine learning.**” EX1003, ¶¶410-414.

Lentz discloses the machine-learning limitation: its consumer module employs “machine learning algorithms to generate a consumer analysis model” from

the consumer's prior engagement. *See supra* Section VII.A.8.j; EX1011, ¶¶39, 44, 52, 90, 175; EX1003, ¶411.

Lentz uses that model to generate a “Consumer Applicability (CA) score” and a consumer storefront that “selectively prioritize[s]” offerings by score. EX1011, ¶¶53, 176-177, Fig. 20.

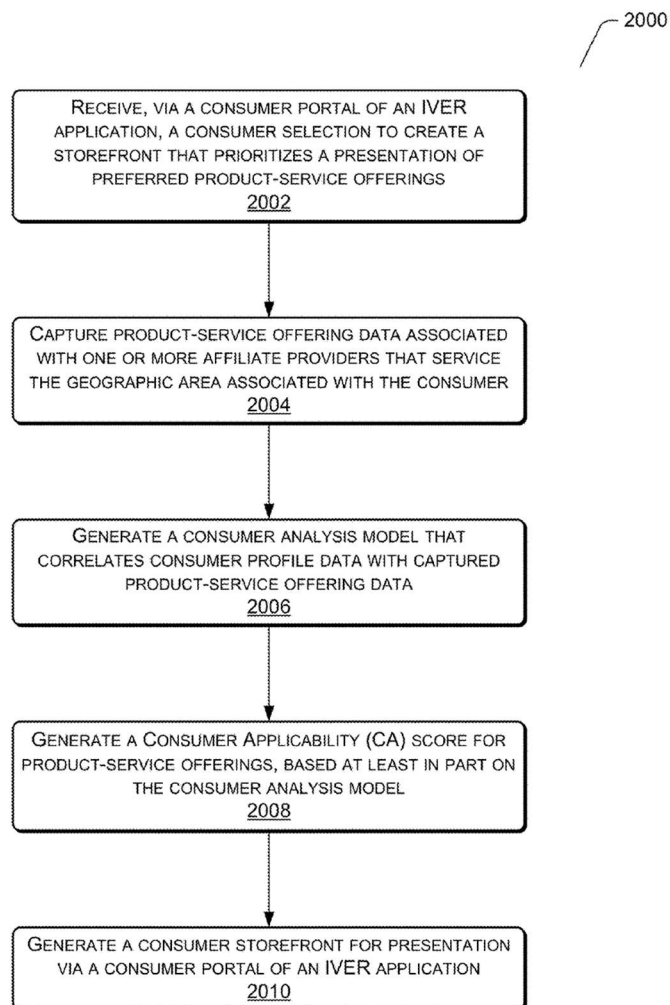


FIG. 20

A POSITA would have been motivated to generate the customized second document using Lentz’s machine-learning prioritization, because Wendkos already targets its communications using campaign activity, and Lentz’s machine-learning model is a more capable means of performing that analysis. EX1012, ¶¶114, 395; EX1011, ¶¶52-53, 90, 177; EX1003, ¶413.

Wendkos automatically updates mailing lists with response data, such as how many times a recipient opens or responds to a communication, to “profile the recipient,” and maintains each user’s profile in a database. EX1012, ¶¶24, 27, 114; EX1003, ¶412. A POSITA would have understood that Lentz’s machine-learning models are known means of performing that same profiling. EX1011, ¶¶39-40, 90; EX1003, ¶413.

VIII. MANDATORY NOTICES

A. Real Party-in-Interest (37 C.F.R. § 42.8(b)(1))

Petitioner Intuit Inc. is the real party-in-interest. Petitioner certifies that no other party exercised control or could have exercised control over, or contributed to any funding of, the preparation or filing of this Petition. Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney is attached hereto.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

Patent Owner asserts U.S. Patent Nos. 12,368,799 and 11,876,924 against Petitioner in *IQX Corp. v. Intuit Inc.*, No. 2:26-cv-00351-JRG-RSP (E.D. Tex., filed April 30, 2026). Petitioner is concurrently filing a petition for *inter partes* review

of U.S. Patent No. 11,876,924 (IPR2027-00017), which issued from an application in the '799 patent's priority chain.

Patent Owner also asserts U.S. Patent Nos. 12,368,799 and 11,876,924 against Salesforce, Inc. in *IQX Corp. v. Salesforce, Inc.*, No. 7:26-cv-00213-DC-DTC (W.D. Tex., filed May 28, 2026). Salesforce has filed four petitions for *inter partes* review involving iQX Corp: *Salesforce, Inc. v. IQX Corp.*, IPR2026-00475 (P.T.A.B., filed Sept. 24, 2026), challenging U.S. Patent No. 12,368,799; *Salesforce, Inc. v. IQX Corp.*, IPR2026-00476 (P.T.A.B., filed Sept. 24, 2026), challenging U.S. Patent No. 11,876,924; *Salesforce, Inc. v. IQX Corp.*, IPR2026-00477 (P.T.A.B., filed Sept. 24, 2026), challenging U.S. Patent No. 12,200,165; and *Salesforce, Inc. v. IQX Corp.*, IPR2026-00478 (P.T.A.B., filed Sept. 24, 2026), challenging U.S. Patent No. 12,438,978.

C. Designation of Lead and Backup Counsel (37 C.F.R. § 42.8(b)(3)) and Service of Information (37 C.F.R. § 42.8(b)(4))

Petitioner designates Jessica L. Benzler (Reg. No. 73,137) as lead counsel and Michael J. Sacksteder (*pro hac vice* forthcoming) and Geoffrey R. Miller (*pro hac vice* forthcoming) as back-up counsel.

Service of any documents may be made to:

FENWICK & WEST, LLP
One Front Street, 33rd Floor
San Francisco, CA 94111
Tel: (415) 875-2300

Fax: (650) 938-5200

Email: intuit-iqx@fenwick.com

D. Fees for *Inter Partes* Review (37 C.F.R. § 42.15(a))

The Director is authorized to charge the fee specified by 37 C.F.R. § 42.15(a) to Deposit Account No. 19-2555.

Dated: October 19, 2026

Respectfully submitted,

FENWICK & WEST LLP

/Jessica L. Benzler/

Jessica L. Benzler

Reg. No. 73,137

Attorneys for Petitioner
Intuit Inc.

**CERTIFICATE OF COMPLIANCE
WITH TYPE-VOLUME LIMITATION**

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that this Petition complies with the 14,000-word type-volume limitation. The Petition contains 13,987 words, excluding the parts of the Petition exempted from the type-volume limitation.

Dated: October 19, 2026

FENWICK & WEST LLP

/Jessica L. Benzler/

Jessica L. Benzler

Reg. No. 73,137

Attorneys for Petitioner

Intuit Inc.

CERTIFICATION OF SERVICE ON PATENT OWNER
(37 C.F.R. §§ 42.6(e), 42.105)

The undersigned hereby certifies that the foregoing Petition for *Inter Partes* Review of U.S. Patent No. 12,368,799 and accompanying Exhibits 1001-1032 are being served via FedEx Priority Overnight on October 19, 2026, upon Patent Owner by serving the correspondence address of record with the USPTO as follows:

105822 –
Aurora
Consulting LLC
Ashley Sloat
810 Cottageview Drive, Suite G10
Traverse City, MI 49684

Further, a courtesy copy of this Petition for *Inter Partes* Review was sent via Federal Express to Patent Owner’s litigation counsel:

Reza Mirzaie
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FENWICK & WEST LLP

/Jessica L. Benzler/

Jessica L. Benzler
Reg. No. 73,137

Attorneys for Petitioner
Intuit Inc.

Appendix: List of Challenged Claims

'799 Patent, Claim 1	
[1.pre]	A system comprising:
[1.a]	a processor; and
[1.b]	memory configured to store program instructions, wherein, when executed by the processor, the program instructions cause the processor to perform operations comprising:
[1.b.i]	providing a hosted input field for inclusion in a first document associated with a third party;
[1. b.i.1]	receiving, information indicating activation of the hosted input field in the first document, wherein the information comprises an electronic address associated with an electronic device and an indication of a willingness to receive one or more messages;
[1.b.ii]	generating, a second document that includes information about one or more events of interest for a user associated with the electronic address, the second document being customized to the user;
[1. b.ii.1]	sending a message to the electronic address, wherein the message comprises a link to the second document, the link being configured to enable the user to access the second document to execute one or more transactions associated with the one or more events; and
[1. b.ii.2]	in response to determining activation of the link has occurred, causing provision of the second document to the electronic address, wherein the second document is configured to facilitate completion of a given transaction in the one or more transactions.
'799 Patent, Claim 2	
[2]	The system of claim 1, wherein the message comprises a Rich Communication Services (RCS) message provided to the electronic address according to a schedule generated based at least in part on a determined classification of the user.

'799 Patent, Claim 3	
[3]	The system of claim 2, wherein the classification of the user comprises criteria corresponding to an application, a website, or a service associated with the electronic address.
'799 Patent, Claim 4	
[4.pre]	The system of claim 2, wherein the classification of the user indicates whether the user is:
[4.a]	a message recipient that has selected a link provided by the system to the electronic address and completed at least one prior transaction;
[4.b]	a message recipient that has selected a link provided by the system to the electronic address, but has not completed a transaction; or
[4.c]	a message recipient that has not selected a link provided by the system to the electronic address.
'799 Patent, Claim 5	
[5.pre]	The system of claim 1, wherein the message comprises a Rich Communication Service (RCS) message and the operations further comprise:
[5.a]	requesting and receiving authorization data corresponding to an identity of the user before causing provision of the second document to the electronic address.
'799 Patent, Claim 6	
[6]	The system of claim 1, wherein the message is an Enhanced Messaging Service (EMS) message.
'799 Patent, Claim 7	
[7]	The system of claim 1, wherein the message comprises content including send and receive indicators provided in a user interface of a mobile computing device associated with the electronic address, the indicators depicting real time typing between a message provider and the mobile computing device or between another computing device and the mobile computing device.

'799 Patent, Claim 8	
[8.pre]	The system of claim 1, wherein the link is further configured to:
[8.a]	allow users other than the user to access the second document to browse the second document while prohibiting execution of the one or more transactions through the link for the users other than the user.
'799 Patent, Claim 9	
[9]	The system of claim 1, wherein the link is further configured with a security layer to provide augmented access or navigation attributes to the user.
'799 Patent, Claim 10	
[10]	The system of claim 1, wherein the link is further configured to enable the user to resume an online user journey associated with the given transaction.
'799 Patent, Claim 11	
[11]	The system of claim 1, wherein the second document comprises user-targeted content based on one or more prior engagement characteristics associated with the electronic address, wherein the prior engagement characteristics are determined using machine learning.
'799 Patent, Claim 12	
[12.pre]	A computer-implemented method comprising:
[12.a]	providing a hosted input field for inclusion in a first document associated with a third party;
[12.b]	receiving, information indicating activation of the hosted input field in the first document, wherein the information comprises an electronic address associated with an electronic device and an indication of a willingness to receive one or more messages;
[12.c]	generating, a second document that includes information about one or more events of interest for a user associated with the electronic address, the second document being customized to the user;

[12.c.i]	sending a message to the electronic address, wherein the message comprises a link to the second document, the link being configured to enable the user to access the second document to execute one or more transactions associated with the one or more events; and
[12.c.ii]	in response to determining activation of the link has occurred, causing provision of the second document to the electronic address, wherein the second document is configured to facilitate completion of a given transaction in the one or more transactions.
'799 Patent, Claim 13	
[13]	The computer-implemented method of claim 12, wherein the message comprises a Rich Communication Services (RCS) message provided to the electronic address according to a schedule generated based at least in part on a determined classification of the user.
'799 Patent, Claim 14	
[14]	The computer-implemented method of claim 13, wherein the classification of the user comprises criteria corresponding to an application, a website, or a service associated with the electronic address.
'799 Patent, Claim 15	
[15.pre]	The computer-implemented method of claim 12, wherein the message comprises a Rich Communication Service (RCS) message and the method further comprises:
[15.a]	requesting and receiving authorization data corresponding to an identity of the user before causing provision of the second document to the electronic address.
'799 Patent, Claim 16	
[16]	The computer-implemented method of claim 12, wherein the message is an Enhanced Messaging Service (EMS) message.
'799 Patent, Claim 17	
[17]	The computer-implemented method of claim 12, wherein the message comprises content including send and receive indicators provided in a user interface of a mobile computing device associated with the electronic address, the indicators depicting real

	time typing between a message provider and the mobile computing device or between another computing device and the mobile computing device.
'799 Patent, Claim 18	
[18.pre]	The computer-implemented method of claim 12, wherein the link is further configured to:
[18.a]	allow users other than the user to access the second document to browse the second document while prohibiting execution of the one or more transactions through the link for the users other than the user.
'799 Patent, Claim 19	
[19]	The computer-implemented method of claim 12, wherein the link is further configured with a security layer to provide augmented access or navigation attributes to the user.
'799 Patent, Claim 20	
[20]	The computer-implemented method of claim 12, wherein the link is further configured to enable the user to resume an online user journey associated with the given transaction.
'799 Patent, Claim 21	
[21]	The computer-implemented method of claim 12, wherein the second document comprises user-targeted content based on one or more prior engagement characteristics associated with the electronic address, wherein the prior engagement characteristics are determined using machine learning
'799 Patent, Claim 22	
[22.pre]	A non-transitory computer-readable storage medium for use in conjunction with a processor, the computer-readable storage medium storing program instructions that, when executed by the processor, cause the processor to carry out operations comprising:
[22.a]	providing a hosted input field for inclusion in a first document associated with a third party;
[22.b]	receiving, information indicating activation of the hosted input field in the first document, wherein the information comprises an

	electronic address associated with an electronic device and an indication of a willingness to receive one or more messages;
[22.c]	generating, a second document that includes information about one or more events of interest for a user associated with the electronic address, the second document being customized to the user;
[22.c.i]	sending a message to the electronic address, wherein the message comprises a link to the second document, the link being configured to enable the user to access the second document to execute one or more transactions associated with the one or more events; and
[22.c.ii]	in response to determining activation of the link has occurred, causing provision of the second document to the electronic address, wherein the second document is configured to facilitate completion of a given transaction in the one or more transactions.
'799 Patent, Claim 23	
[23]	The non-transitory computer-readable storage medium of claim 22, wherein the message comprises a Rich Communication Services (RCS) message provided to the electronic address according to a schedule generated based at least in part on a determined classification of the user.
'799 Patent, Claim 24	
[24]	The non-transitory computer-readable storage medium of claim 23, wherein the classification of the user comprises criteria corresponding to an application, a website, or a service associated with the electronic address.
'799 Patent, Claim 25	
[25.pre]	The non-transitory computer-readable storage medium of claim 22, wherein the message comprises a Rich Communication Service (RCS) message and the operations further comprise:
[25.a]	requesting and receiving authorization data corresponding to an identity of the user before causing provision of the second document to the electronic address.

'799 Patent, Claim 26	
[26]	The non-transitory computer-readable storage medium of claim 22, wherein the message comprises content including send and receive indicators provided in a user interface of a mobile computing device associated with the electronic address, the indicators depicting real time typing between a message provider and the mobile computing device or between another computing device and the mobile computing device.
'799 Patent, Claim 27	
[27.pre]	The non-transitory computer-readable storage medium of claim 22, wherein the link is further configured to:
[27.a]	allow users other than the user to access the second document to browse the second document while prohibiting execution of the one or more transactions through the link for the users other than the user.
'799 Patent, Claim 28	
[28]	The non-transitory computer-readable storage medium of claim 22, wherein the link is further configured with a security layer to provide augmented access or navigation attributes to the user.
'799 Patent, Claim 29	
[29]	The non-transitory computer-readable storage medium of claim 22, the link is further configured to enable the user to resume an online user journey associated with the given transaction.
'799 Patent, Claim 30	
[30]	The non-transitory computer-readable storage medium of claim 22, wherein the second document comprises user-targeted content based on one or more prior engagement characteristics associated with the electronic address, wherein the prior engagement characteristics are determined using machine learning.