UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TWITTER, INC.,

Petitioner

- vs. –

VIDSTREAM, LLC,

Patent Owner

Case IPR2017-00830
Patent 9,083,997

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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I. Introduction

In instituting trial, the Board correctly found that Twitter had presented (on that record) a reasonable likelihood of prevailing. Patent Owner's Response and evidence do not change that conclusion.

Faced with the overwhelming evidence that independent claims 20 and 31 are unpatentable, Patent Owner musters only one substantive argument to establish patentability. Patent Owner concedes the existence of a workable Nassiri and Bradford combination, as the Petition proposed, to teach the "link included in a graphical user interface" and "wherein the content capture user interface is provided within a frame…" limitations. Its only argument is against the motivation to combine the teachings, but that argument is wholly inconsistent with the art and a POSITA's knowledge. Further, the argument rests on a mischaracterization of the claims and the prior art, a fundamental misunderstanding of technical concepts, and an artificially hamstrung interpretation of what a POSITA would have known at the time of the '997 Patent. None of Patent Owner's arguments should prevent the Board from confirming that the combination of Nassiri and Bradford displays a link to a video recorder in a web page, or graphical user interface, that a user can select to invoke a video recorder within a frame of the web page, as in the independent challenged claims.

Further, Patent Owner's narrow reading of the prior art cannot avoid a

finding that including a video in a "linear television programming" as recited in certain dependent claims was obvious in 2012. Finally, Patent Owner's arguments cannot prevent the Board from finding that Bradford is prior art, as conclusive evidence establishes that the book was published prior to the '997 Patent's priority date.

A preponderance of the evidence shows that all challenged claims are unpatentable, and the Board should issue a final written decision cancelling all claims.

II. A Preponderance of the Evidence Demonstrates the Unpatentability of Every Challenged Claim.

A. Nassiri and Bradford teach "in response to a user selection of a link included in a graphical user interface that includes display elements hosted on the web server system" and "wherein the content capture user interface is provided within a frame displayed in the first graphical user interface" as recited.

Patent Owner concedes that Nassiri and Bradford provide a workable combination that would teach "in response to a user selection of a link included in a graphical user interface that includes display elements…" and "wherein the content capture user interface is provided within a frame displayed in the first graphical user interface" as in claim 20, and analogously in claim 31. Patent Owner Response ("POR") at 26-30. Its only argument is that a POSITA would not have been motivated to combine Nassiri with well-known website design teachings in Bradford, allegedly due to "user confusion." That argument should be rejected.

The contested portion of limitation [20.1.3] requires "a link included in a graphical user interface that includes display elements hosted on the web server system…" with similar language in [31.1.3]. Patent Owner's first argument is premised on a misconception that the claims require "a link to an iframe" (POR at 22) but the claims do not recite a link to "an iframe," they require only that a "link" is "included in a graphical user interface" and that, in response to selection of the link, a "content capture user interface is provided within a frame displayed in the first graphical user interface." The Nassiri and Bradford combination `teaches such a link and provision of a content capture user interface, as demonstrated in the Petition and Dr. Almeroth's declaration.

As cited in the Petition, Nassiri describes a "video recorder accessible through the embedded or stand alone link," that the "link may, in some examples, be provided in a page," and that the user may "follow the embedded...link and utilize the video recorder functionality." Petition at 27-28, *citing* Ex-1009, ¶¶[0026], [0018-0019]. Nassiri further discloses that users may request the video recorder by "clicking on a link displayed on another of the enterprise's sites..." Ex-1009, ¶[0030]. Thus, Nassiri teaches "a link included in a graphical user interface" as recited, and one that is "displayed" contrary to Patent Owner's contentions (POR at 22-23) – because Nassiri discloses a user may access the video recorder by "clicking on a link ***displayed***…" Ex-1009, ¶[0030]; Ex-1036,

¶¶12-14; Ex-1035, 97:9-18. Nassiri then teaches that the "video recorder may be displayed" and that an "HTML iframe may be used to embed a video recorder in a web page provided by the enterprise computing system." Petition at 31, *citing* Ex-1009, ¶¶[0019], [0026]. Thus, Nassiri teaches "the content capture user interface is provided within a frame displayed in the first graphical user interface" as recited.

Patent Owner further seeks to sow confusion by making arguments inconsistent with Nassiri's teaching of embedded links. For example, Patent Owner contends that "Nassiri's 'embedded link' is the web address for the video capture interface" and allegedly "the link is ***never*** displayed on the webpage or selected by a user." POR at 23. But Patent Owner fails to acknowledge the disclosure where Nassiri explains how a user may "follow the embedded...link and utilize the video recorder functionality." Ex-1009, ¶[0026]. A technical dictionary explains that a "user activates a link by clicking on the linked element…" and that an "embedded hyperlink" may be a "link to a resource that is embedded within text." Ex-1044 at 8. Thus, a POSITA would have immediately understood Nassiri's "embedded link" to be "displayed on the webpage" so that the user can "follow the embedded...link." Ex-1036, ¶¶15-18. Dr. Olivier agreed that to "follow a link" a user would have to "see something displayed that they could select" or "click." Ex-1035, 97:9-18. Further, Patent Owner and its expert misinterpret the "src" attribute in Nassiri as the "embedded link," but a POSITA

would not have understood information in a "src" attribute to correspond to a *link* as Patent Owner alleges, which is likewise inconsistent with Nassiri as well. Ex-1036, ¶¶16-18. Patent Owner's incomplete consideration of Nassiri, combined with its expert's misunderstanding of fundamental technical concepts, cannot save patentability of its claims.

Patent Owner's arguments should further be disregarded because it attacks references in isolation, when it is the ***combined teachings*** of the references that show obviousness of the claims. For example, Patent Owner faults Nassiri for not disclosing the "optional 'name' attribute." for an iframe tag. POR at 23-24. But Nassiri provides an "***example*** of iframe code," and a POSITA would have understood Nassiri to not be limited to only that iframe code. Ex-1036, ¶19. Rather, a POSITA would have known of the attributes of an iframe tag, including the 'name' attribute, as Bradford confirms, and as detailed in the Petition. *Id.* Thus, when Patent Owner asserts that "adding a name attribute to the iframe of Nassiri does not provide for a link to this iframe," its consideration of the prior art is simply incomplete. POR at 26. Nassiri discloses a video recorder accessible via a link, and when the teachings of Nassiri are considered with those of Bradford, a POSITA would have understood how to implement a "link which when clicked could update only a portion of the webpage" as Bradford indicates the "name" attribute "can be used to identify a particular inline frame among other inline

frames" so that another web page can be loaded into the particular inline frame. Ex-1010, p. 161; Ex-1036, ¶20. Patent Owner's piece-meal attempts at taking down the prior art are unsuccessful.

Finally, Patent Owner argues that a POSITA[1] would not have been motivated to modify Nassiri as taught by Bradford, as allegedly, "modifying Nassiri as suggested would directly and needlessly interfere with Nassiri's purpose." POR at 25. Patent Owner's arguments are unsupported and hardly convincing.

Notwithstanding its criticisms of Nassiri, Patent Owner and its expert **concede** that Nassiri and Bradford could be combined. They provide examples of exactly how Nassiri's webpage would appear with a link to an iframe that can be targeted via a name attribute (as taught by Bradford), confirming the Petition's initial analysis. Ex-1035, 118:9-21. The example at page 29 of the POR (and Dr.

[1] Dr. Olivier's arguments, and Patent Owner's reliance upon these arguments, seem to be the result of a fundamental misunderstanding of the POSITA's role. While Dr. Olivier confirms that the "name attribute" was not new in 2012, he also asserts that a POSITA "may or may not have known about a name attribute" in 2012. Ex-1035, 113:16-20. But a POSITA "is presumed to be aware of all the pertinent prior art." *Standard Oil Co. v. American Cyanamid Co.*, 774 F.2d 448, 454 (Fed. Cir. 1985).

Olivier's declaration (Ex-2008) at ¶¶77-78) is (in part) consistent with how a POSITA would have implemented the teachings of Nassiri and Bradford together as the Petition proposed: a link to video recorder software is displayed on a webpage (the text "Do you want to load the video capture software?"), and an iframe is provided on the webpage that, when the link is clicked, displays a video recorder within the iframe on the same webpage. As detailed in the Petition, "Bradford provides a coding example of providing updated content in an iframe in response to a user selecting/clicking a link included in the currently displayed webpage" and as further explained by Dr. Almeroth, in combination with Nassiri, "the link to the executable instructions for video recording on a webpage would target an iframe on the webpage using the target attribute, and the video recorder would be loaded inside the inline frame of the webpage having the name specified in the target attribute." Petition at 30, *citing* Ex-1007, ¶137; *see also* Ex-1036, ¶20.

Thus, Patent Owner concedes the Nassiri/Bradford implementation teaches the claim limitations, and is disputing **only** a motivation to apply the teachings accordingly. POR at 30-33. Allegedly, the "large blank space in the middle of the webpage would be confusing to users and would not facilitate the capture of promotional videos, which is a goal of Nassiri, and instead, "would give the impression to users that an error had occurred." POR at 29. Both concerns are misplaced.

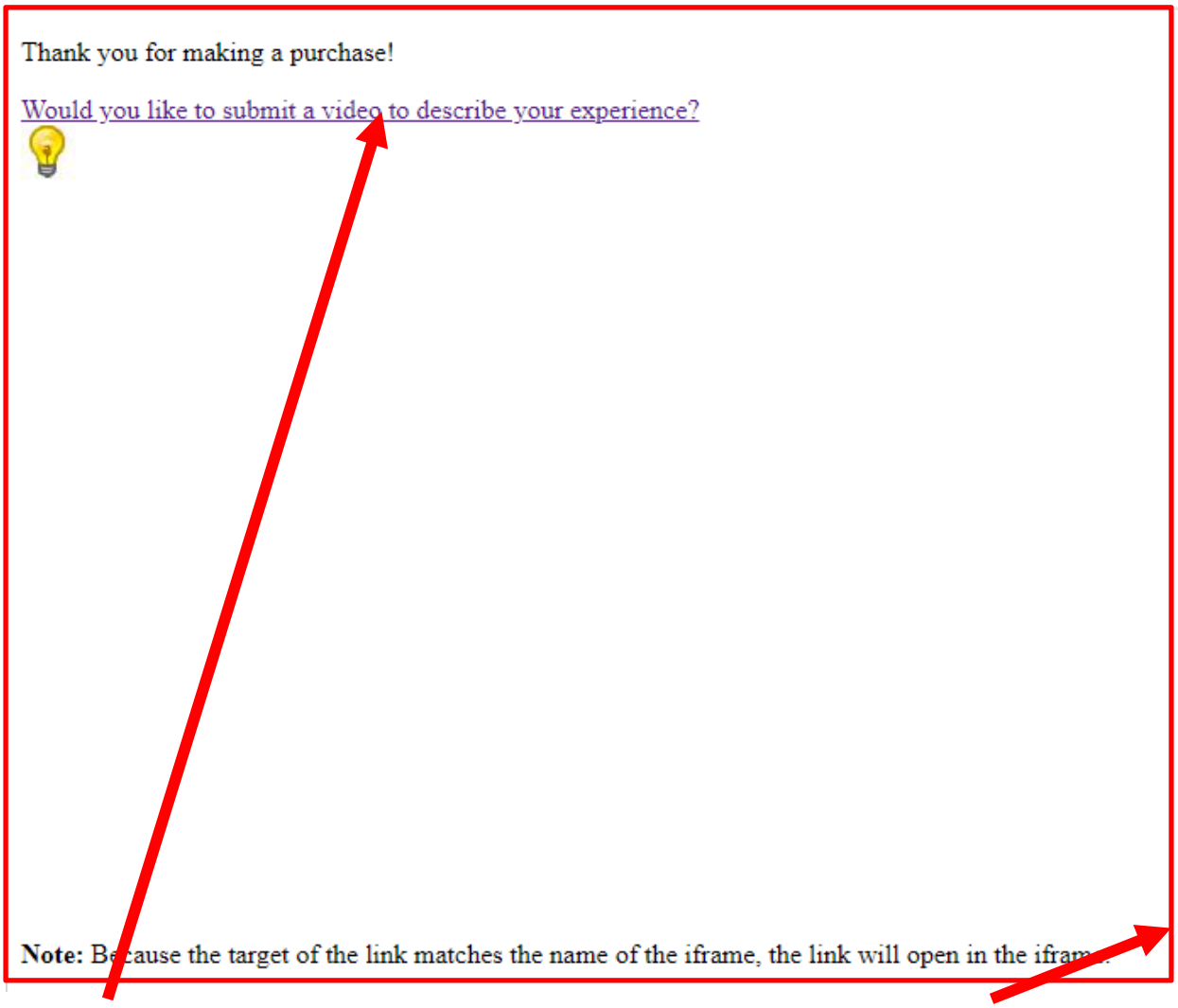
Dr. Olivier's examples are not the only examples of combining Nassiri's teachings with Bradford's, and a POSITA could have eliminated the problems alleged by Patent Owner. Ex-1036, ¶¶21-24. All of the problems could have been easily resolved by a POSITA having experience in web design (i.e., a POSITA under Dr. Almeroth's proposed level of skill, but not Dr. Olivier's). Ex-1036, ¶39. The modifications would have been trivial. Ex-1036, ¶43. First, a POSITA would have recognized that the positioning of the iframe and the link are easily changed, such that the link would be above the iframe. Ex-1036, ¶¶25-26. Second, a POSITA would have recognized that the iframe does not need a border; indeed, Patent Owner's expert added that border for purposes of his illustration. Ex-1036, ¶¶27-29. These two changes would involve no more than a minute of a POSITA's time, and if changed accordingly, the "large blank space" would no longer be in the middle of the webpage or apparent to the user, and there would be no reason to believe that the webpage would be "confusing to users" or give the "impression to users that an error had occurred." Ex-1036, ¶29; Ex-2008, ¶79.

Minor additional modifications to Patent Owner's example code would make the webpage consistent with the examples provided in Nassiri and Nassiri's purpose. Ex-1036, ¶¶30-43. For example, Nassiri states "after making a purchase, a purchaser may receive a link to access the video recorder, and may, in some examples, see a prompt asking them to describe their experience." Ex-1009,

¶[0030]. In a real-world example, consider a purchase of an item from an e-commerce site: after completing the purchase, consistent with Nassiri, content above the link could read, for example, "Thank you for making a purchase", and a link could read, "Would you like to submit a video to describe your experience?" The iframe could appear below the link, and could initially be populated with a placeholder image or placeholder text, with the code and webpage appearing as follows:

```
<!DOCTYPE html>
<html>
<body>

<p>Thank you for making a purchase!</p>

<a href="demo_iframe.htm" target="iframe_a">Would you like to submit a video to
describe your experience?</a>

<iframe style="height:460px; width:820px; border:0px" border=0
frameborder=0 width="820" height="460"
src="https://www.w3schools.com/images/lamp.jpg" name="iframe_a"></iframe>

<p><b>Note:</b> Because the target of the link matches the name of the iframe, the
link will open in the iframe.</p>

</body>
</html>
```

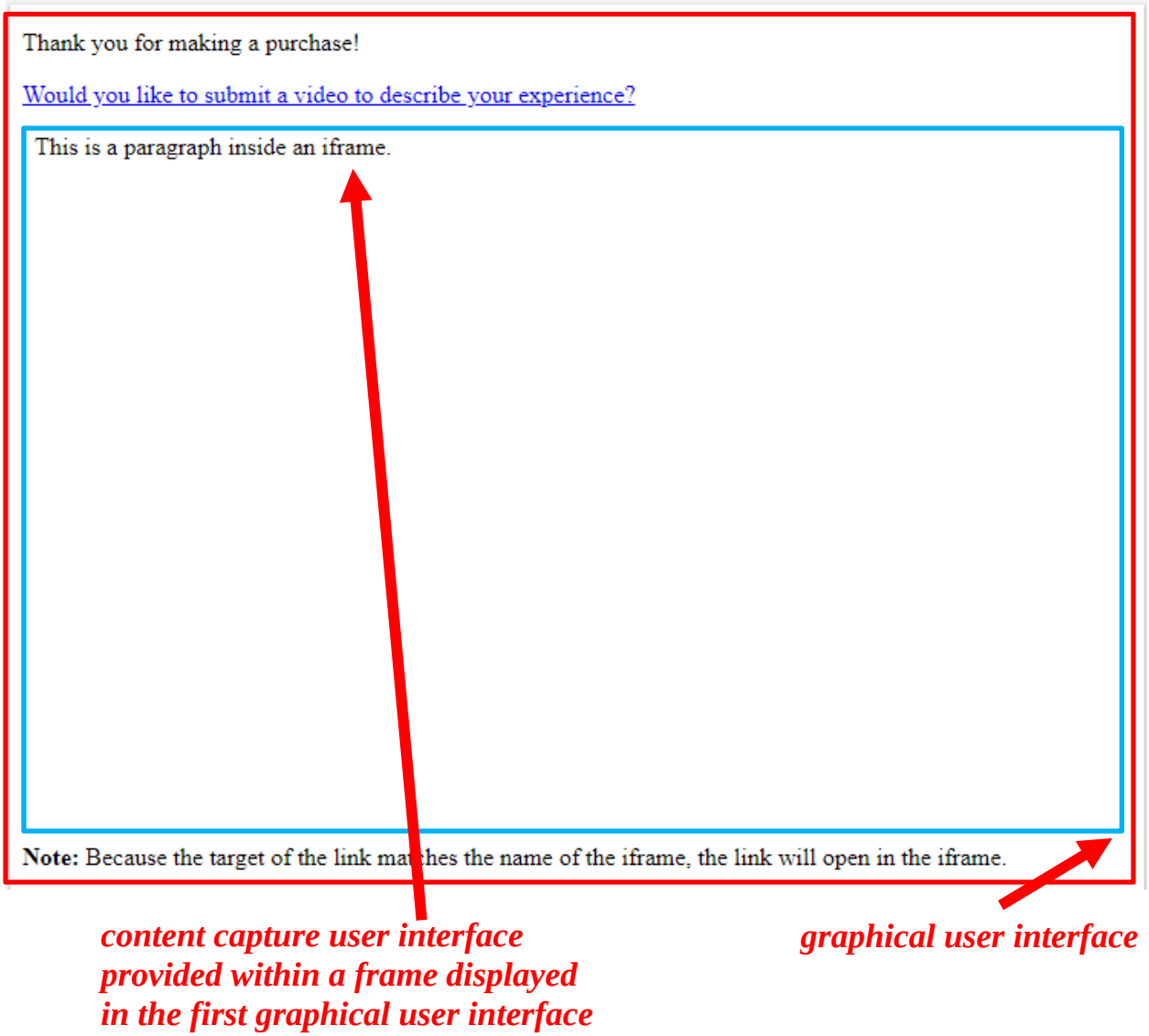
Ex-1036, ¶37



Ex-1036, ¶38

This link is "included in a graphical user interface that includes display elements hosted on the web server system" as recited. Ex-1036, ¶39. Upon clicking the displayed link ("the contributor may make the request by, for example, clicking on a link displayed…"), the video recorder interface would appear in the iframe below, satisfying limitation [20.2.1], "wherein the content capture user interface is

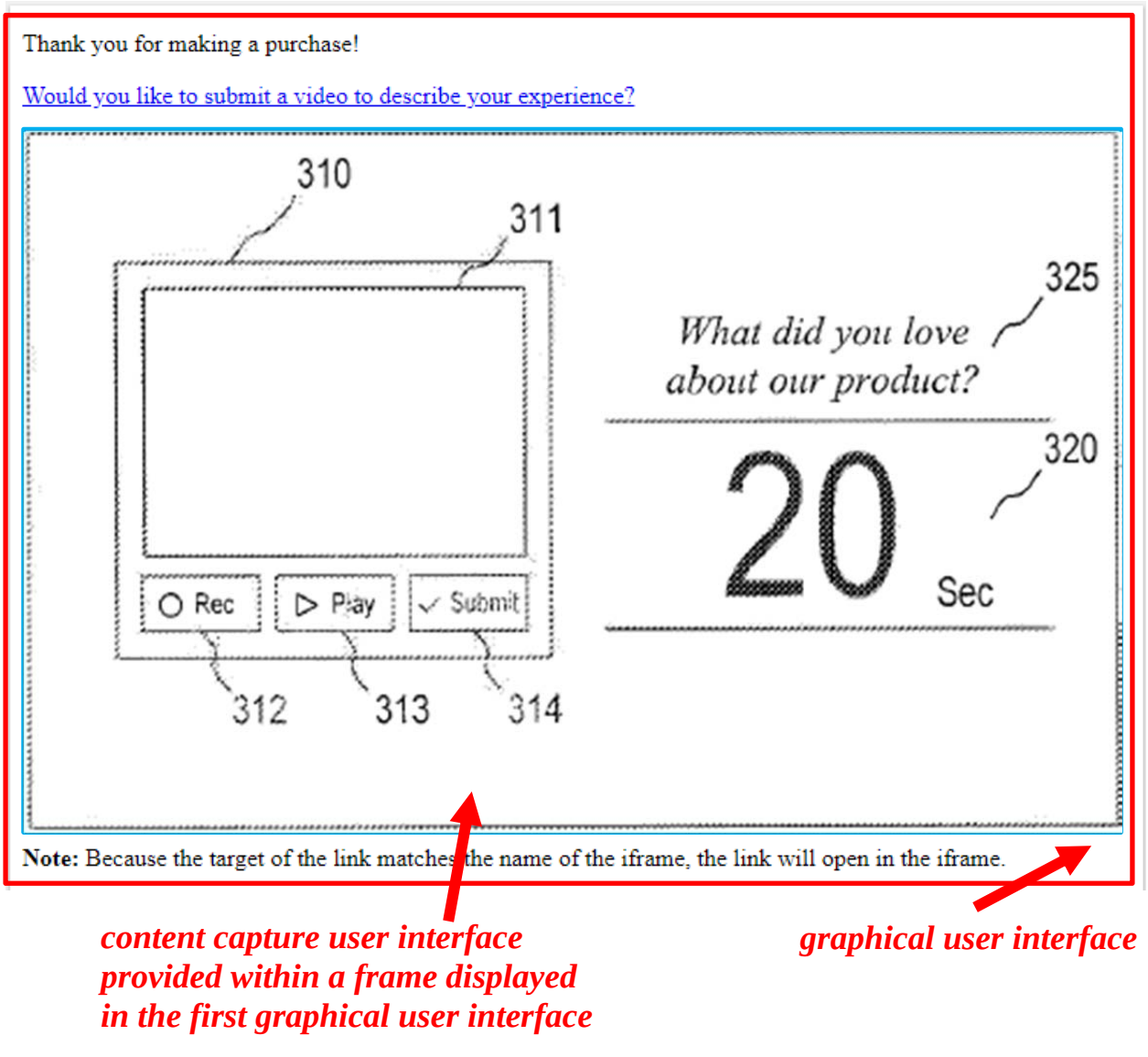
provided within a frame displayed in the first graphical user interface" (and the analogous limitation [31.2.1]), and the webpage would appear as follows (with Nassiri's video recorder replacing the text "This is a paragraph inside an iframe."):



Ex-1036, ¶41

See also Ex-1036, ¶32. When the video recorder interface of Nassiri's Figure 3 is inserted into the image to replace the text "This is a paragraph inside an iframe,"

the webpage would appear as follows:



Ex-1036, ¶42

In this example, there is initially no "blank space in the middle of the webpage," either there is a placeholder image, or any blank space is at the bottom. These changes would be simple to implement for a POSITA (under Dr. Almeroth's definition), and well within the range of what a POSITA would consider as "a

person of ordinary creativity, not an automaton…" *KSR Intern. Co. v. Teleflex, Inc.*, 550 U.S. 398, 421 (2007). Further, the Board can "consider the inferences and creative steps" a POSITA would employ. *Id.* at 418. When the teachings are combined, the system of Nassiri still operates for its intended purpose: Dr. Olivier admits that Nassiri would still be able to receive videos from contributors. Ex-1035, 132:16-23.

By implementing the Nassiri and Bradford teachings accordingly, users would not have the impression that an error had occurred, nor would users be confused. Moreover, this webpage would be easy for users to use to request a video recorder, should they wish to "describe their experience" as Nassiri states. A POSITA would not have expected these changes to "negatively impact the number of user promotional videos captured by Nassiri" or "stop the user in his tracks." POR at 29-30; Ex-1036, ¶¶29, 35, 44.

Further, there is no evidence to show that these modifications "would have inhibited and slowed the loading of a video recorder." POR at 30. And Patent Owner's later arguments are simply conjecture or misunderstand the combination. For example, Patent Owner takes issue with Dr. Almeroth's finding that the combination would save resources (POR at 30-33), but this argument is premised on its expert's misunderstanding of what Nassiri's "embedded link" is. If configured according to Patent Owner's own admitted example, the video recorder

would only be requested and invoked for users who wished to record a video, and in other instances, resources on the video host computing system would not be used. Patent Owner and Dr. Olivier also mistakenly ignore that resources would also be saved on the user's computer. As Dr. Almeroth stated, "[l]oading an entirely new webpage is slower and requires more resources…than loading a portion of a webpage, e.g., loading only the iframe portion." Ex-1007, ¶106. But Patent Owner and Dr. Olivier myopically focus on the resources "required to receive, process, and redistribute videos" on the video host computing system: they fail to consider the resources saved on the client device. Of course, resource utilization on both sides is always a consideration in designing client-server systems. Ex-1036, ¶¶44-45. And a POSITA would have understood that, in any event, a small percentage of users would actually submit a video testimonial, and thus, reducing the number of times the video recorder is instantiated would markedly improve the performance of the video host computing system. *Id*.

Further, having the video recorder appear in an iframe with other content hosted by the enterprise is what Nassiri envisioned: "the iframe generated on the website points a user to another site, in this example a site hosted by the video host computing system 120, however, it may appear within the context of a web page or other content hosted by the enterprise computing system 110 using the iframe." Ex-1009, ¶19; Petition at 19, 26-27. As shown above, the iframe appears within

the context of the purchase confirmation page hosted by the e-commerce site.

Finally, Patent Owner's attempts to malign the Nassiri/Bradford combination are inconsistent with its own disclosure. Although the '997 Patent purports to provide an "easy-to-use interface," it also has a large blank space as shown in Figure 1B that "perform[s] no function when the webpage with the iframe first loads." Ex-1035, 125:13-23; POR at 29. Likewise, a POSITA would have not have expected that a blank space in the proposed Nassiri/Bradford combination would have confused users, stopped them in their tracks, or anything else that Patent Owner proposes. Either the '997 Patent and the Nassiri/Bradford combination are both flawed, or neither is. Patent Owner cannot have it both ways.

In sum, a POSITA would have found it obvious to combine the teachings of Nassiri and Bradford and would have been motivated to do so. Thus, the combination of Nassiri and Bradford teach limitations [20.1.3] and [20.2.1] of claim 20, as well as limitations [31.1.3] and [31.2.1] of claim 31. Patent Owner does not contest the teachings or obviousness of combining Zhu, which is cited as teaching the provision "through a communication interface…" as recited. Accordingly, the Board should confirm that claims 20-27, 29, 31-32, and 34-35 are unpatentable over the Nassiri, Bradford, and Zhu combination.

B. A POSITA Would Have Been Motivated to Combine Nassiri, Bradford, and Tosh.o.

Patent Owner does not contest that Tosh.o teaches "inclusion in a linear

television program" as recited in claims 28, 30, and 33. Rather, Patent Owner attempts, unsuccessfully, to pick apart Twitter's proposed reasons to combine the teachings of Nassiri, Bradford, and Tosh.o. None of Patent Owner's arguments should sway the Board.

Patent Owner first argues that Tosh.o contains no suggestion of automated selection. But Nassiri does not require automation, nor does the claim. Ex-1035, 101:6-12, 103:9-13; Ex-1036, ¶¶49-53. Next, Patent Owner argues that the reviewers of Tosh.o would not "find anything of interest in Nassiri's customer videos." POR at 37. But the genre that Nassiri provides as an example does not limit its teachings: Nassiri broadly "may facilitate video capture, management and/or sharing." Ex-1036, ¶53. Such videos could include videos on any topic, including those of interest to Tosh.o viewers. *Id.* And Nassiri describes submission of video to YouTube, the source of Tosh.o's videos, which would thus "broaden the distribution of the videos" as previously argued. *See* Ex-1009, ¶56 ("share captured videos on…YouTube…"); Ex-1007, ¶¶256-257 (*citing* Ex-1009, ¶3); Ex-1036, ¶52. Patent Owner's myopic focus on isolated portions of Nassiri, ignoring its teachings, cannot save patentability. The reasons provided in the Petition to combine Nassiri, Bradford, and Tosh.o remain valid, and the Board should confirm claims 28, 30, and 33 as unpatentable.

C. Bradford is a Prior Art Printed Publication

Patent Owner alleges Bradford does not qualify as a printed publication prior to the May 9, 2012 priority date. But its argument ignores the clear evidence of Bradford's publication. As established in the Petition, Bradford was published in November 2011, prior to the '997 Patent's priority date, and qualifies as § 102 prior art. Petition at 5; Ex-1015, ¶2. Twitter's evidence was not timely objected to, and its witness Mr. Bader was not cross-examined.

Twitter herewith submits the Copyright Office's certificate of registration for Bradford, confirming its publication in November 2011. Ex-1041.

Certificate of Registration

This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Acting United States Register of Copyrights and Director

Registration Number
TX 7-482-555

Effective date of registration:
January 18, 2012

Title

Title of Work: HTML5 Mastery

Completion/ Publication

Year of Completion: 2011

Date of 1st Publication: November 8, 2011 **Nation of 1st Publication:** United States

International Standard Number: ISBN 978-1-4302-3861-4

Ex-1041 (annotated)

17 U.S.C. § 410(c) states "[i]n any judicial proceedings the certificate made before or within five years after first publication of the work ***shall constitute prima facie evidence*** of the validity of the copyright and ***of the facts stated in the certificate***." "Publication" is the "distribution of copies or phonorecords of a work to the public by sale…" 17 U.S.C. § 101. As stated in the Petition, Bradford was on sale on Amazon as of December 6, 2011. Ex-1016.

Bradford's certificate was made in January 2012, within five years of its November 2011 publication. Ex-1041. Thus, the certificate constitutes *prima facie* evidence of Bradford's November 2011 publication (a fact stated in the certificate) and its qualification as § 102 prior art. *See CA, Inc. v. Simple.com, Inc.*, 780 F.Supp.2d 196, 307-308 (E.D. NY Mar. 5, 2009) (copyright certificate is prima facie evidence that reference is a printed publication under § 102 as of the specified publication date (citing 17 U.S.C. § 410(c) and *Ex Parte Research and Mfg. Co.*, 1989 Pat. App. LEXIS 2, at *12–15 (B.P.A.I. Mar. 9, 1989))).

Further, the copy of Bradford that was submitted with its copyright registration was transferred to the Library of Congress, which maintains the deposit copies of materials that have had their copyrights registered. *See* 17 U.S.C. § 407(a)-(b). The Library of Congress's copy of Bradford is submitted herewith as Exhibit 1042. The Petition and expert declaration cite teachings on pages 157-163 and 284 of Bradford. Those pages of Exhibit 1042 are identical to those in

Bradford's "2015 Version" Patent Owner complains of. Ex-1043. Further, the "2015 Version" is a later *printing* of Bradford, not a different *version* or *edition* of Bradford with different content.

Thus, Bradford was a printed publication as of November 2011 under §102, and the Board should find that Bradford remains prior art to the '997 Patent.

III. Conclusion

Because a preponderance of the evidence shows unpatentability of claims 20-35, the Board should issue a final written decision cancelling all claims.

Respectfully submitted,

/ David L. McCombs/
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Dated: August 10, 2018

CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. § 42.24, the undersigned attorney for the Petitioner, Twitter, Inc., declares that the argument section of this Reply (Sections I-III) has a total of 3,574 words, according to the word count tool in Microsoft Word™.

/David L. McCombs /
David L. McCombs
Counsel for Petitioner
Registration No. 32,271

PETITIONER'S EXHIBIT LIST

August 10, 2018

Ex-1001	U.S. Patent No. 9,083,997 to Harwell *et al.*
Ex-1002	Prosecution File History of U.S. Patent No. 9,083,997
Ex-1003	U.S. Patent No. 8,311,382 to Harwell *et al.*
Ex-1004	Prosecution File History of U.S. Patent No. 8,311,382
Ex-1005	U.S. Patent No. 8,464,304 to Harwell *et al.*
Ex-1006	Prosecution File History of U.S. Patent No. 8,464,304
Ex-1007	Declaration of Dr. Kevin C. Almeroth Under 37 C.F.R. § 1.68
Ex-1008	Curriculum Vitae of Dr. Kevin C. Almeroth
Ex-1009	U.S. Patent Publication No. 2012/0254925 to Nassiri
Ex-1010	Excerpts from "HTML5 Mastery Semantics, Standards, and Styling," by Bradford *et al.*
Ex-1011	1st Declaration of Dr. Ingrid Hsieh-Yee regarding Ex-1010
Ex-1012	U.S. Patent Publication No. 2006/0259588 to Lerman
Ex-1013	U.S. Patent Publication No. 2010/0180330 to Zhu
Ex-1014	U.S. Patent Publication No. 2008/0209451 to Michels
Ex-1015	Declaration of David Bader regarding Ex-1010
Ex-1016	Affidavit of Christopher Butler, Internet Archive regarding Ex-1010
Ex-1017	Stelter, Brian, "Their Pain is His Gain," The New York Times, August 22, 2010, pages AR15 and AR19.

Ex-1018	2nd Declaration of Dr. Ingrid Hsieh-Yee regarding Ex-1017
Ex-1019	Order (Document 99), *Youtoo Technologies, LLC v. Twitter, Inc.*, Case No. 3:16-CV-0764 (N.D.Tex. July 18, 2017) (Godbey, J).
Ex-1020	Order (Document 95), *Youtoo Technologies, LLC v. Twitter, Inc.*, Case No. 3:16-CV-0764 (N.D. Tex. May 31, 2017) (Godbey, J).
Ex-1021	Motion to Hold Youtoo Technologies, LLC in Contempt and to Issue Sanctions (Document 97), *Youtoo Technologies, LLC v. Twitter, Inc.*, Case No. 3:16-CV-0764 (N.D. Tex. July 11, 2017).
Ex-1022	Intellectual Property Assignment Agreement between Youtoo Technologies, LLC and Heartland Bank (May 14, 2014).
Ex-1023	Twitter, Inc.'s Motion for Order (I) Holding that the Automatic Stay Does Not Apply Pursuant to 11 U.S.C. § 362(b)(4), or Alternatively, (II) Lifting the Automatic Stay for Cause Under § 362(d)(1) and Waiving the 14-Day Stay Under Bankruptcy Rule 4001(a)(3), Brief in Support Thereof, and Notice of Opportunity for Hearing (Document 21), *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court Feb. 2, 2018).
Ex-1024	Youtoo Technologies, LLC's Response and Objection to Twitter, Inc's Motion to Lift the Automatic Stay (Document 25), *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court Feb. 16, 2018).
Ex-1025	Trustee's Objection to Creditor, Twitter, Inc's Motion for Relief or to Lift the Automatic Stay with Notice of Hearing (Document 27), *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court Feb. 16, 2018).
Ex-1026	Twitter, Inc.'s Reply in Support of its Motion for Order (I) Holding that the Automatic Stay Does Not Apply Pursuant to 11 U.S.C. § 362(b)(4), or Alternatively, (II) Lifting the Automatic Stay for Cause Under § 362(d)(1) and Waiving the 14-Day Stay Under Bankruptcy Rule 4001(a)(3), Brief in Support, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court Feb. 21, 2018).

Ex-1027	Twitter, Inc.'s Notice Of Intent To Present Witnesses And Exhibits At The Hearing On March 21, 2018, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court March 1, 2018).
Ex-1028	Notice Of Debtor's Witness And Exhibit List For Hearing On Document No. 21, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court March 1, 2018).
Ex-1029	Motion to Sell Property Free and Clear of Liens, Claims and Encumbrances Combined with Brief and with Notice of Opportunity for Hearing and Notice of Hearing, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court March 13, 2018).
Ex-1030	Order, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court March 27, 2018).
Ex-1031	Twitter, Inc.'s Limited Objection to Motion to Sell Property Free and Clear of Liens, Claims and Encumbrances Combined with Brief and with Notice of Opportunity for Hearing and Notice of Hearing and Brief in Support, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court April 3, 2018).
Ex-1032	Agreed Order on Trustee's Motion to Sell Property Free and Clear of Liens, Claims and Encumbrances, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court April 10, 2018).
Ex-1033	Agreed Order Granting, In Part, Twitter, Inc.'s Motion for Relief From the Automatic Stay, *In re Youtoo Technologies, LLC, Debtor*, Case No. 17-14849 (W.D. Okla. Bankruptcy Court April 11, 2018).
Ex-1034	Deposition Exhibit
Ex-1035	Deposition Transcript of Dr. James Olivier
Ex-1036	Reply Declaration of Dr. Kevin C. Almeroth Under 37 C.F.R. § 1.68
Ex-1037	[intentionally omitted]
Ex-1038	[intentionally omitted]
Ex-1039	[intentionally omitted]

Ex-1040	[intentionally omitted]
Ex-1041	Certificate of Registration, Registration Number TX 7-482-555, January 18, 2012, HTML5 Mastery
Ex-1042	"HTML5 Mastery Semantics, Standards, and Styling," by Bradford *et al.* (obtained from Library of Congress)
Ex-1043	Declaration of Raghav Bajaj
Ex-1044	Microsoft Computer Dictionary (excerpts)
Ex-1045	[intentionally omitted]
Ex-1046	HTML a tag, https://www.w3schools.com/tags/tag_a.asp
Ex-1047	HTML iframe tag, https://www.w3schools.com/tags/tag_iframe.asp

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Twitter, Inc.	§	IPR2017-00830
Petitioner	§	
	§	U.S. Patent No. 9,083,997
	§	
	§	

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6, that service was made on the counsel of record for Vidstream LLC as detailed below.

Date of service	August 10, 2018
Manner of service	Electronic mail to eagle.robinson@nortonrosefulbright.com; eric.hall@nortonrosefulbright.com; eric.green@nortonrosefulbright.com.
Documents served	Petitioner's Reply to Patent Owner's Response Exhibits 1034-1036, 1041-1044, and 1046-1047
Persons served	Eagle Robinson Eric Hall Eric Green

/ David L. McCombs/
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