

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TWITTER, INC.

Petitioner

v.

VIDSTREAM, LLC

Patent Owner

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Case IPR2017-00830  
U.S. Patent No. 9,083,997  
(Claims 20-35)

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**PATENT OWNER VIDSTREAM LLC's SUR-REPLY  
IN SUPPORT OF PATENT OWNER RESPONSE**

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<b>No.</b>	<b>Description</b>
2001	Declaration of Michael I. Shamos, Ph.D.
2002	Joint Claim Construction and Prehearing Statement, <i>Youtoo Technologies, LLC v. Twitter, Inc.</i> , Civil Action No. 3:16-cv-00764-N (filed January 26, 2017)
2003	Official Notice of Bankruptcy Case Filing, U.S. Bankruptcy Court for the Western District of Oklahoma, Case No., 17-14849 (filed November 30, 2017)
2004	Complete Scan of Bradford version from which Ex. 1010 was excerpted
2005	The LG Local Bibliographic Record and Local Data Fields, 2011 Update Number 4, Library of Congress (November 2011) (obtained from <a href="https://www.loc.gov/aba/publications/FreeDCM/DCM_2011-04.pdf">https://www.loc.gov/aba/publications/FreeDCM/DCM_2011-04.pdf</a> )
2006	Transcript of Deposition of Scott Bennett, Ph.D. in IPR2017-01131
2007	CV of Scott Bennett, Ph.D. excerpted from Ex. 1012 in IPR2017-01131
2008	Declaration of James Olivier, Ph.D.
2009	Transcript of First Deposition of Kevin C. Almeroth, Ph.D.
2010	Transcript of Second Deposition of Kevin C. Almeroth, Ph.D.

## I. INTRODUCTION

Petitioner's Reply (Paper 53) improperly adds new arguments and evidence that should be disregarded. Petitioner did not seek leave under §42.123(b) for untimely supplemental information, but nevertheless submits multiple new exhibits and theories with its Reply to, among other things:

- attempt to show that Exhibit 1010 qualifies as a printed publication;
- add a new theory of what Nassiri meant by “embedded link;” and
- add new examples and modifications to support modifying Nassiri with Bradford.

All grounds asserted in the Petition rely on Bradford (Ex. 1010) to supply deficiencies of Nassiri (Ex. 1009). Yet Petitioner still has not shown that Ex. 1010—which was made in 2015—qualifies as a printed publication as of May 2012. All asserted grounds fail for this reason alone.

Nassiri and Bradford also fail to disclose or render obvious multiple features of each of independent claims 20 and 31. Those deficiencies are not remedied by Petitioner's new theories and untimely supplemental information (even if considered). Thus, even if Bradford were prior art, all asserted grounds still fail to show unpatentability of any challenged claim.

Patent Owner (“PO”) therefore respectfully asks that claims 20-35 be upheld.

**II. ALL CLAIMS SHOULD BE UPHELD BECAUSE ALL GROUNDS RELY ON EXHIBIT 1010, WHICH WAS NOT PUBLISHED IN 2011**

For the reasons in PO's Response, Petitioner's first attempt to establish Bradford as a printed publication fell short. *See* POR ("POR") at 1-14. Petitioner now attempts to supplement that first attempt with untimely new arguments and evidence, *i.e.*,: (1) a date of first publication asserted in a copyright registration as purported *prima facie* evidence of publication, (2) a copy of Bradford currently in the Library of Congress ("LoC") stacks as allegedly corresponding to the copyright registration certificate, and (3) a declaration from Petitioner's counsel that certain parts of Ex. 1042 do not differ from certain parts of Ex. 1010's 2015 version of Bradford. These new arguments and evidence should be disregarded. Even if considered, Petitioner's untimely evidence and arguments *still* fail to establish Bradford as a printed publication.

**A. Exhibits 1041-1043 and Petitioner's Arguments Based Thereon Should Be Disregarded As Untimely**

Petitioner offers Exhibits 1041, 1042, and 1043 and the arguments spanning pages 17-19 in support of a substantive issue on which Petitioner bore the burden of showing with the Petition, whether Ex. 1010 qualifies as a printed publication under §102. *See, e.g., Dropbox, Inc. v. Synchronoss Tech., Inc.*, IPR2016-00851, slip op. at 19 (PTAB Oct. 5, 2017) (Paper 40) (citing §312(a)(3)(A)) ("[I]t is Petitioner's burden to establish sufficient evidence that Exhibit [1010] is what its Petition and

supporting declarations purport it to be.”). Nevertheless, Exhibits 1041-1043 were not submitted until August 10, 2018 with Petitioner’s Reply. And, despite being reminded in the POR that permission is required for supplemental information under §42.123(b),<sup>1</sup> Petitioner has not sought permission for Exhibits 1041-1043 and could not reasonably contend that they “could not have been obtained earlier” without also conceding that Bradford does not qualify as a printed publication. §42.123(b). Thus, Exhibits 1041-1043 and the related arguments should be disregarded. *Dropbox*, slip op. at 20-21 (“Petitioner’s evidence [purportedly showing publication] ... filed with its Reply is untimely”).

**B. Exhibits 1041-1043 Do Not Show That Exhibit 1010 Was Published Prior To May 9, 2012**

Petitioner’s must show that Exhibit 1010—the document on which the Petition relies—qualified as a “printed publication” before May 9, 2012. *Dropbox*, slip op. at 19 (“At the outset, Petitioner has failed to show that Exhibit 1006 is the version of Kistler that was published in ACM TRANSACTIONS ON COMPUTER SYSTEMS.”). Petitioner’s burden cannot be met by showing that another version of Bradford was published. In *Dropbox*, the Board rejected a similar attempt to rely on

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<sup>1</sup> See POR at 4, fn1.

a different version of a purported prior art document. *See Dropbox*, slip op. at 19.

Addressing *timely* supplemental evidence, the Board explained:

Petitioner served a supplemental declaration ... that describes Exhibit 1027 as being a copy of the actual ACM-published version of Kistler, as received by the University of Minnesota Library, but Petitioner does not address Exhibit 1006 [the version relied upon in the Petition] or describe its contents in relation to Exhibit 1027.

*Id.* As in *Dropbox*, Petitioner has not addressed the contents of Ex. 1010 (made in 2015) relative to any version of Bradford shown to have been published before May 9, 2012. *See* POR at 1-14. No pre-May 9, 2012 version of Bradford was filed with the Petition. *Dropbox*, slip op. at 19. And, as explained below, Petitioner's new Exhibits do not show that Exhibit 1042 was published before May 9, 2012.

As the Board explained in *Dropbox*:

[I]t is not Patent Owner's burden to show differences between the prior art Petitioner relies on in Exhibit 1006 and the actual document that Petitioner asserts is the published journal article in Exhibit 1027. Instead, it is Petitioner's burden to establish sufficient evidence that Exhibit 1006 [on which the Petition relied] is what its Petition and supporting declarations purport it to be. 35 U.S.C. §312(a)(3)(A).

*Dropbox*, slip op. at 19-20. The Board was "not persuaded by Petitioner's argument that Patent Owner elevates form over substance in urging us not to rely on Exhibit 1027 to show that Exhibit 1006 is a printed publication." *Id.* at 20. "[T]he issue is



the statutory requirement under 35 U.S.C. §312(a)(3)(A) that a petitioner provide copies of the printed publications relied upon that accompany the petition.” *Id.* Here, as in *Dropbox*, “[i]n both form and substance, Petitioner did not comply with this requirement.” *Id.* (“Indeed, Petitioner does not seek to replace the original submission of Exhibit 1006 with the supplemental evidence Exhibit 1027 or explain how Exhibit 1006 is a true copy from the source Petitioner identifies, the ACM publication.”). Ultimately, even if considered, Exhibits 1041-1043 cannot show publication before May 9, 2012 of Exhibit 1010, which was not printed until 2015. *See* POR at 2 (citing Ex. 2004 at 324/326).

**C. Even If Exhibits 1041-1043 And The Related Arguments Had Been Timely Submitted, They Still Do Not Establish That Any Bradford Version In the Record Would Qualify As A Printed Publication**

Petitioner argues that Exhibit 1041 should constitute *prima facie* evidence of publication of Bradford because the “date of first publication” listed in the copyright registration certificate is, Petitioner contends, an assertion of *fact* entitled to deference pursuant to 17 U.S.C. §410(c). Petitioner’s argument is mistaken because “publication” in the context of §102 is a conclusion of law, not of fact. *See, e.g., SRI Intern., Inc. v. Internet Sec. Sys., Inc.*, 511 F.3d 1186, 1192 (Fed. Cir. 2008) (citing *Cooper Cameron Corp. v. Kvaerner Oilfield Prods.*, 291 F.3d 1317, 1321 (Fed. Cir. 2002)) (“Whether an anticipatory document qualifies as a ‘printed publication’ under §102 is a legal conclusion based on underlying factual

determinations.”). Petitioner has not shown what “publication” means in the context of copyright registration certificates; if it means merely that some version was shipped to a library, that would be insufficient to show public accessibility required of printed publications under §102. Thus, even if Exhibit 1041 had been timely submitted, its legal conclusion of publication is **not** an assertion of fact and thus **not prima facie** evidence that a 2011 version of Bradford was a printed publication.

The district court and B.P.A.I. decisions cited by Petitioner do not compel a different conclusion. Procedurally, neither is binding here. Substantively, both fail to recognize that publication here is a conclusion of law, not fact. Further, even if these decisions were binding and well-reasoned, Petitioner has not established that *any* record version of Bradford is the one addressed by Ex. 1041.

Exhibit 1042 is a version of Bradford purportedly in the Library of Congress (“LoC”) on July 24, 2018. Ex. 1042 at 1/161. Petitioner argues, without evidence, that Exhibit 1042 was submitted with the application for Exhibit 1041. Reply at 28. Instead of evidence, Petitioner cites 17 U.S.C. §407(b), which states that “[t]he required copies [of a copyrighted work] shall be deposited in the Copyright Office for the use or disposition of the Library of Congress.” But this does not require those copies to be transferred to the LoC, or that the LoC use those copies. Nor does this statute preclude the LoC from obtaining additional copies from other sources. Indeed, the only testimony from any person at the LoC **does not support** Petitioner’s

implications. *See* Ex. 1042 at 1/161 (***not*** asserting that Ex. 1042 is a copy submitted with Ex. 1041). Petitioner’s contention that “the copy of Bradford that was submitted with its copyright registration was transferred to the Library of Congress” is mere attorney argument, unsupported by evidence. As such, Exhibit 1041 has ***not*** been shown to correspond to Exhibit 1042 (nor Exhibit 1010) and thus cannot support prior publication of Exhibits 1042 or 1010.

**D. Even If Exhibit 1041 Could Be *Prima Facie* Evidence That Some Version of Bradford Published In 2011, That Is Rebutted Here**

The district court in *CA, Inc.* relied on the absence of evidence that references had *not* been published before the critical date. *See CA, Inc. v. Simple.com, Inc.*, 780 F.Supp. 2d 196, 307-308 (E.D.N.Y. Mar. 5, 2009) (noting patentee “failed to put forth any evidence that the references in question were not published as of the dates on their copyright certificates” and relying on “unrebutted *prima facie* evidence”). Likewise, the BPAI recognized that “this *prima facie* evidence may be rebutted by convincing factual evidence to the contrary.” *Ex Parte Res. and Mfg. Co.*, 1989 Pat.App. LEXIS 2, at \*12-15 (B.P.A.I. Mar. 9, 1989).

Even if, despite the foregoing reasons, Exhibit 1041 were considered *prima facie* evidence that some version of Bradford published in 2011, any inference that Exhibit 1010 published in 2011 is rebutted by the evidence of record, *e.g.*, by Exhibit 1010 itself:

Made in the USA  
Middletown, DE  
13 December 2015

POR at 2 (citing Ex. 2004 at 324/326). Further, the only purported library catalog of record reflecting indexing and shelving dates indicates that its version of Bradford was *not* indexed and shelved before June 22, 2012. *See* POR at 4-6 (citing Ex. 2005 at 24/49 and 29/49; Ex. 2008, ¶16; Ex. 1011 at 7/54 (¶14), 4/54 (¶8), and 53/54; Ex. 2006 at 18:4-11; Ex. 2007).

For these reasons, Petitioner has *not* shown that Exhibit 1010 (or any record version of Bradford) would qualify as a printed publication. Because all instituted grounds depend on Nassiri and Bradford (POR at 14), all challenged claims should be upheld for this reason alone.

**III. GROUNDS 1-2: NASSIRI AND BRADFORD DO NOT RENDER OBVIOUS PROVIDING A CONTENT CAPTURE USER INTERFACE WITHIN DISPLAYED INSTANCES OF A FIRST [GUI] ... IN RESPONSE TO A USER SELECTION OF A LINK INCLUDED IN A GRAPHICAL USER INTERFACE ... WHEREIN THE CONTENT CAPTURE USER INTERFACE IS PROVIDED WITHIN A FRAME DISPLAYED IN THE FIRST [GUI]**

Petitioner contends that PO's "only argument is that a POSITA would not have been motivated to combine Nassiri with ... Bradford." Reply at 2. This misstates PO's Response, which explains in detail that:

- "Nassiri does not disclose a link to an iframe" (POR at 22-23);

- “Nassiri’s iframe cannot be targeted by a link” (*id.* at 23-24);
- “Nassiri does **not** disclose or suggest a link on the same webpage as its iframe that could be clicked to populate or update the iframe” (*id.* at 24-25);
- “A POSITA would not have modified Nassiri based on the teachings of Bradford as the Petitioners have described” (*id.* at 26-30); and
- “Dr. Almeroth’s asserted motivations for his proposed modifications to Nassiri simply did not exist in Nassiri’s system” (*id.* at 30-33).

At the outset, Petitioner’s reply arguments depend entirely on a *narrow construction* of “link”—first offered in the Reply—that requires a link to be displayed for manual selection by a user. Reply at 4 (citing Ex. 1036, ¶¶15-18). The only support cited for this construction is a 2002 dictionary definition of “embedded **hyperlink**” and Dr. Olivier’s testimony. Reply at 14 (citing Ex. 1044 at 8 and Ex. 1035 at 97:9-18);. Exhibit 1044 should be disregarded because it:

- was first submitted with Petitioner’s Reply, without authorization under 37 C.F.R. 42.123(b), and is therefore untimely;
- defines terms—“embedded **hyperlink**” and “**hyperlink**”—that are not in the challenged claims or Nassiri (which use “link,” **not** “hyperlink”).

Ex. 1044 at 4-6/8; *see also* Ex. 2010 at 57:11-23 (Dr. Almeroth concedes he does not know whether Nassiri uses “hyperlink”);

- was outdated by 2012 (Ex. 1044 at 2/8 (“2002”); *see also* Ex. 2010 at 47:24-50:20 (Dr. Almeroth concedes rapid evolution of Internet from 2002-2012 and possibility of new terms coming into usage and evolving meaning of terms); and
- is incomplete and omits terms that would be relevant to understand distinctions between “hyperlink” from “link.” Ex. 1044 at 5-6/6 (with definition of “hyperlink:” “*Also called:* hot link, hypertext link, link. *See also* anchor (definition 2), HTML, hypermedia, hypertext, URL”).

And Petitioner misconstrues Dr. Olivier’s testimony as purportedly requiring a “link” to always be selectable by a user. *See, e.g.*, Reply at 4 (citing Ex. 1035 at 97:9-18). To the contrary, Dr. Olivier explained why a POSITA needed context to understand the term “embedded hyperlink” because, for example, “there is obviously different understandings of what ‘embedded’ means in these two patents we’re talking about [the ’997 Patent and Nassiri].” Ex. 1035 at 93:21-94:12; *see also id.* at 94:13-95:14. Petitioner’s counsel then read to Dr. Olivier the definition of “embedded hyperlink” from Exhibit 1044, and Dr. Olivier’s subsequent testimony about a user selecting a link to follow that link was in the context of *that definition*, which requires a link to be embedded within text or associated with an image (which

text or image would need to be selected to follow the link). *Id.* at 95:15-97:18, *especially* at 95:23-25 (“an embedded hyperlink is a link to a resource that *is embedded within text or is associated with an image or an image map*” (emphasis added)).

Even if considered, that Exhibit 1044 needed to characterize the “link” in this definition shows that a “link” need *not* be “embedded within text” or “associated with an image.” To the contrary, Dr. Almeroth conceded that the URL in the ‘src’ or “source” tag of Nassiri’s iframe is a “link:”

Well, so to be clear, it’s not a hyperlink or a link in the context of something that you would click on. *You can consider it a -- a link in the context of it’s something that provides a link to another document or object.*

Ex. 2010 at 65:19-66:22. This iframe ‘src’ tag is exactly what Nassiri calls an “embedded link.” Specifically, as Nassiri explains: “executable instructions for video capture 115 ... may or may not be embedded within the executable instructions for website display.” Ex. 1009, ¶[0018]. Nassiri then describes a standalone link example in paragraph [0018] and, in paragraph [0019], an alternative way to “embed a video recorder in a web page” using an iframe. *Id.*, ¶[0019]. That is the one and only way Nassiri describes to embed a video recorder and, thereafter, Nassiri refers back to “*the* embedded or standalone link” (*id.*, ¶[0026]). Nassiri simply does not disclose a separate “embedded hyperlink” that is selectable by a user. *Apple*, 2018

Pat. App. LEXIS 4314, \*15-16 (“[T]he Court cautions us against ‘the temptation to read into the prior art the teachings of the invention in issue.’” (citation omitted)).

Stripped of its untimely and improperly narrow attempt to construe “link” using a narrow definition of “embedded hyperlink,” Petitioner’s reply arguments fail to cure the fact that Nassiri does *not* disclose a link that is selectable by a user to load the video recorder in Nassiri’s iframe, or the deficiencies in the proposed combination explained in detail by Dr. Olivier. *See* POR at 26-33 (citing Ex. 2008, ¶¶57-89). Rather, Petitioner again supplements the theories in the Petition with additional “examples” and “[m]inor additional modifications.” Reply at 8-9 (citing Ex. 1036, ¶¶21-29 and ¶¶30-43). These new theories should be disregarded as untimely.

Even if considered, these new theories are insufficient to bridge the logical gaps in Petitioner’s original theories. For example, Dr. Almeroth contends that user confusion could be mitigated by initially populating the iframe with “a placeholder image (e.g., an advertisement) or placeholder text,” but does not assert that such a placeholder would use fewer resources than populating the iframe as Nassiri does—with the video recorder interface itself. Ex. 1036, ¶36. Dr. Almeroth conceded, for example, that an image of Nassiri’s FIG. 3 would require “tens of *kilo*bytes” (Ex. 2010 at 107:20-24) whereas the client-side software Nassiri already loads into the iframe would need as little as “at least a couple hundred bytes” (*id.* at 106:1-17).



Thus, replacing Nassiri's video recorder with an image even as simple as Nassiri's FIG. 3 interface would require more system resources for the placeholder. Further, the additional examples provided by Dr. Almeroth on pages 20, 23, 25, 29, 31, and 32 of Exhibit 1036 *still* suffer from the problem Dr. Olivier explained: confusingly large and unnecessary blank spaces. *See* Ex. 2008, ¶¶59, 79. And Petitioner's reference to the '997 Patent (Reply at 15) confirms that hindsight is the only guide for modifying Nassiri with Bradford. In so doing, Petitioner conspicuously omits Dr. Olivier's testimony on this point that the approach of the '997 Patent was "counterintuitive" at the relevant time. Ex. 1035 at 125:13-126:1.

For at least these reasons, Petitioner's reply arguments and evidence—even if considered—do not undermine Dr. Olivier's detailed explanation of why it would not have been obvious to modify Nassiri with Bradford as alleged in the Petition.

#### IV. CONCLUSION

For the foregoing reasons, Petitioner has failed to invalidate any of the challenged claims on any of the instituted Grounds.

Dated: September 14, 2018

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

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**CERTIFICATE OF WORD COUNT**

Pursuant to 37 C.F.R. § 42.24(a)(i), the undersigned certifies that this Paper—exclusive of the table of contents, table of authorities, certificate of service, and this certificate of word count—includes 2,969 words.

/Eagle H. Robinson/  
Eagle H. Robinson (Reg. No. 61,361)

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on September 14, 2018, complete copies of Patent Owner VidStream LLC's Sur-Reply in Support of Patent Owner Response and the accompanying Exhibit 2010 were served on the following:

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