

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

In re *Inter Partes* Review of:

U.S. Patent No. 7,170,519

For: Computer-Implemented System and  
Method for Generating Data Graphical  
Displays

---

**DECLARATION OF STEPHEN GRAY**

**Mail Stop PATENT BOARD**  
Patent Trial and Appeal Board  
US Patent and Trademark Office  
PO Box 1450  
Alexandria, Virginia 22313-1450

## **Table of Contents**

I.	Introduction.....	7
II.	Legal Understandings .....	9
A.	Legal Standard for Prior Art.....	9
B.	Legal Standards for Anticipation and Obviousness .....	9
C.	Legal Standards for Claim Construction.....	14
III.	TECHNICAL BACKGROUND .....	19
A.	Internet and Web Technology .....	20
B.	HTTP .....	21
C.	Client-Server Computing .....	22
D.	Style Sheets .....	23
E.	Markup Language.....	25
IV.	OVERVIEW OF THE CITED PRIOR ART .....	26
A.	Davis (EX 1005).....	26
B.	Rousseeuw (Ex. 1008).....	30
C.	Excel (Ex. 1007).....	37
D.	Harold (Ex. 1006).....	48
E.	Krause (Ex. 1009).....	50
V.	OVERVIEW OF THE ‘519 PATENT .....	52
VI.	LEVEL OF ORDINARY SKILL .....	58
VII.	Claim Construction.....	58
A.	Means-Plus-Function Terms .....	58
	“data source generating means” – Claims 27 and 49.....	59

“graph generator module” – Claims 34.....	61
VIII. Application of the prior art to the claims.....	64
IX. Claims 1-4, 12-18, 21, 27, 29, 30, 34-47, 49, 51-53, and 56 are obvious over Davis and Harold .....	65
A. Motivation to Combine Davis and Harold .....	65
B. Analysis .....	66
Claim 1 [pre] .....	66
Claim element 1[a] .....	68
Claim element 1[b].....	72
Claim element 1[c] .....	73
Claim element 1[d].....	79
Claim element 1[e].....	79
Claim element 1[f].....	88
Claims 2 and 3 .....	91
Claim 4 .....	93
Claim element 5a.....	97
Claim element 5b.....	101
Claim element 5c.....	104
Claim 6 .....	107
Claim 14 .....	109
Claim 15 .....	111
Claim 16 .....	115
Claim 17 .....	116

Claim 18 .....	119
Claim 21 .....	121
Claim 27 .....	124
Claim 29 .....	128
Claim 30 .....	130
Claim 34 .....	130
Claims 35-38 and 42-46, and 49 .....	137
Claim 47 .....	140
Claim 39 .....	140
Claim 51 .....	141
Claims 52 and 53.....	144
Claim 56 .....	148
X.    Claims 22-26 are obvious in view of Davis, Rousseeuw, and Krause.....	148
A.    Motivation to Combine Davis/Harold with Rousseeuw and Krause.....	148
B.    Analysis .....	162
Claim 22 .....	162
Claim 23 .....	165
Claim 24 .....	166
Claim 25 .....	167
Claim 26 .....	167
XI.    Claims 7-11 are obvious in view of Davis in view of excel.....	168
A.    Motivation to Combine Davis/Harold and Excel2000.....	168

Claim element 7[a] .....	173
Claim element 7[b] .....	175
Claim element 7[c] .....	176
Claim 8 .....	183
Claim 9 .....	183
Claim 10 .....	184
Claim 11 .....	184

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

### LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

### FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

### E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.