UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HOME DEPOT USA, INC., and
HOME DEPOT SOLUTIONS LLC
Petitioner,

v.

INNOVAPORT, LLC
Patent Owner.

Case IPR2024-00011

U.S. Patent No. **9,990,670**
Issue Date: June 5, 2018
Title: APPARATUS AND METHOD FOR PROVIDING PRODUCT LOCATION INFORMATION TO CUSTOMERS IN A STORE

DECLARATION OF DON TURNBULL, PHD

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V. Ground 1: Shanman Renders Obvious Claims 1, 2, 4, 6-10, 12 and 14 39

A. Claim 1 39

1. [1pre] A method of providing product location information within a store, the method comprising the steps of: 39

2. [1a] providing at least one information storage device including a database, wherein the at least one information storage device is configured to be at least indirectly in communication with at least one other device that includes at least one user interface, and wherein at least one of the at least one information storage device and the at least one other device with respect to which the at least one information storage device is configured to be at

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least indirectly in communication is or includes a mobile device; 40

3. [1b] wherein the at least one information storage device includes both product location information and additional product-related information linking a product with another product in a cross-referential manner; 41

4. [1c] receiving a product location inquiry signal regarding the product, the product location inquiry signal being at least indirectly based upon a product location inquiry received by way of the at least one user interface; 44

5. [1d] processing the product location inquiry signal at a signal processing device to determine a processed product location inquiry signal; 46

6. [1e] querying the at least one information storage device to obtain portions of the product location information and additional product-related information in response to the processed product location inquiry signal; 48

7. [1f] providing a product location information signal that is at least indirectly responsive to the processed product location inquiry signal; 50

8. [1g] wherein the product location information signal is configured to enable, at least indirectly, a providing of an output signal at an output device as a response to the product location inquiry that includes location information concerning the product and also provides at least one suggestion related to the other product. 51

B. Claim 2. The method of claim 1, wherein the product location information signal is configured to enable, at least indirectly, the providing of the output signal at the least one user interface, which includes the output device in addition to an input device. 52

C. Claim 4. The method of claim 2, wherein the at least one user interface includes a mobile user interface. 52

D. Claim 6. The method of claim 4, wherein the product location information signal is configured to enable, at least indirectly, the at least one user interface to provide information concerning one or more products that are being specially promoted or that are located close by the at least one user interface. 53

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E. Claim 7. The method of claim 4, wherein the product location information signal is configured to enable, at least indirectly, the providing of the output signal so that the output signal provides at least one further suggestion to a customer in accordance with one or more customer preferences.....55

F. Claim 8. The method of claim 4, wherein the product location information signal is configured to enable, at least indirectly, the at least one user interface to provide further additional product-related information, and wherein the further additional product-related information includes at least one of: product promotion information; a current stock of the product; a price of the product; a presence or absence of the product within the store; a time at which the product should be available at the store if the product is currently absent from the store; and an alternate way of obtaining the product if the product is currently absent from the store. 56

G. Claim 9. The method of claim 8, wherein the further additional product-related information relates to either the time at which the product should be available at the store if the product is currently absent from the store, or the alternate way of obtaining the product if the product is currently absent from the store.....59

H. Claim 10. The method of claim 8, wherein the further additional product-related information relates to either the current stock of the product, or the presence or absence of the product within the store...59

I. Claim 12. The method of claim 4, further comprising one or both of: receiving an additional inquiry signal that relates to something other than a product location-type inquiry; or obtaining identification information concerning the customer that at least in part allows for the providing of an additional suggestion to the customer. 60

J. Claim 14. The method of claim 1, wherein either (a) the mobile device is able to provide at least some of the information to the at least one user interface, or (b) at least a first one of the at least one user interface is in wireless communication with either a central hub or at least a second one of the at least one user interface, or (c) one or more words associated with the product location inquiry received by way of the at least one user interface are determined by way of a voice recognition process.....62

VI. Ground 2: Ogasawara and Beach Render Obvious Claims 1, 2, 4, 6-10, 12 and 14.....64

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A. Claim 1 64
1. [1pre] A method of providing product location information within a store, the method comprising the steps of: 64
2. [1a] providing at least one information storage device including a database, wherein the at least one information storage device is configured to be at least indirectly in communication with at least one other device that includes at least one user interface, and wherein at least one of the at least one information storage device and the at least one other device with respect to which the at least one information storage device is configured to be at least indirectly in communication is or includes a mobile device 64
3. [1b] wherein the at least one information storage device includes both product location information and additional product-related information linking a product with another product in a cross-referential manner; 67
4. [1c] receiving a product location inquiry signal regarding the product, the product location inquiry signal being at least indirectly based upon a product location inquiry received by way of the at least one user interface; 71
5. [1d] processing the product location inquiry signal at a signal processing device to determine a processed product location inquiry signal.....72
6. [1e] querying the at least one information storage device to obtain portions of the product location information and additional product-related information in response to the processed product location inquiry signal 73
7. [1f] providing a product location information signal that is at least indirectly responsive to the processed product location inquiry signal; 75
8. [1g] wherein the product location information signal is configured to enable, at least indirectly, a providing of an output signal at an output device as a response to the product location inquiry that includes location information concerning the product and also provides at least one suggestion related to the other product. 76

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