Novocus Legal
INTELLECTUAL ASSET MANAGEMENT

EOU – Claim Chart

US Patent 5995099 – WORK SAMPLE

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PROJECT INFORMATION

The client has asked Novocus Legal LLP to prepare evidence of use claim charts for a Horstmann patent bearing patent number - 5,995,099

The invention relates generally to a method that establishes page links between pages on the Internet. Individual sites (collections of pages) include dedicated links pages that consolidate links to other sites. The links page associated with a given site (the first site) includes an "add link" button that, when selected, allows an owner of a second site to add a link to the links page. The new link can be used to establish a link from the links page to the second site. To ensure reciprocity, the method also includes prompting the owner of the second site for a link back to a page of the first site and later checking the second site for the link back.

CLIENT INPUT

Client believes that WordPress makes use of similar linking methods. The client believes that WordPress is infringing upon patent US5995099 issued to Horstmann.

PROJECT PROCEDURE

The patent in question has been studied in detail along with product in question (WordPress). Technical features of the product have then been mapped over the claims of US Patent 5995099.

A tabular representation along with colour coding of correspondingly relevant sections from patent claims and product features has been chosen. This format would aid in visual comprehension of the claim to product overlap.

INVENTION SUMMARY

This invention comprises following key components:

1. A first site
2. A second site
3. A first entity
4. A second entity

These components can perform following functions:

1. The invention relates to a method of establishing a bidirectional link between the first site and the second site.

2. The first site can be controlled by the first entity that maintains authority over the first site and that lacks authority over the second site.

3. The method may include outputting a page A of the first-site to the second entity that maintains authority over the second site and that lacks authority over the first site.

4. The page A prompts the second entity to output first link information to initiate the bidirectional link between the first and second sites.

5. The method may include receiving the first link information from the second entity.

6. The method may include soliciting second link information from the second entity.

7. The second link information can be indicative of a page B of the second site that may or may not include a third link information depending upon verification of page B.

8. The third link information is only available after verification.

POINTS OF MAPPING

The product to be mapped in this case is WordPress Tool primarily. The technical feature to be mapped is reciprocal page linking wherein, the establishing reciprocal links is automated and involves user controlled verification.

For the purpose of establishing infringement and technical overlaps, we may consider any and all tools that can be used on a WordPress based website and have been allowed by WordPress platform.

The above mentioned point of infringement is illustrated in following patent claim to product technical features maps.

MAPPED PRODUCT AND MAPPING FEATURES

The invention has been mapped onto a plugin supported and hosted by WordPress called Wp-Trafficfeed (referred to as product). This plugin can be installed directly onto a WordPress based website. WordPress also has hosted this product as a relevant and valid plugin for link exchange over its website. It can be found on (https://wordpress.org/plugins/link-exchange-true-automatic-link-exchange-trafficfeed/)

The product automates the process of reciprocal link exchange. A summary of product operating procedure is mentioned below:

The product allows user of a WordPress website to automate process of link exchange. The product would allow user to select categories of type of links that user would be interested in. The product would then search and present user with various links pertaining to selected categories. User can select links that he/she wants to exchange link with.

The product would contact other users or webmasters of links or websites selected by the user. The product would present a link from the first user's website to users or webmasters of selected links. These users or webmasters may solicit the link from the first user shared by the product. These webmasters or users may approve or disapprove link exchange as per their wish.

Once the users/webmasters of selected links approve the first link, they would need to provide a link from their website to share with the first user. Also, they would specify a location on their website where they would place the first user's link.

This terminates the process of link exchange.

The product would then after sometime, verify and validate if users/webmasters of selected links are maintaining the link exchanged on a relevant page. The page relevance would be determined using specific keywords that first user has specified while making selections.

If relevant links are found missing or at improper places on selected users/webmasters websites then first user would get an intimation to take action. The product provides a separate section for link monitoring purposes.

The product also provides flexibility to the user to perform this process manually or automatically.

Due to all the above features and product working, we feel that this product is infringing upon US Patent 5995099. Also, WordPress may not be directly involved in process of link exchange in a manner similar to US Patent 5995099, but it supports and hosts a product that does.

TABULAR REPRESENTATION OF MAPPING

Claim Number	Claim Text	Interpretation/Mapped text
1	A method of establishing a bidirectional link between a first site and a second site, wherein the first site is controlled by a first entity that maintains authority over the first site and that lacks authority over the second site, the method comprising	Use this plugin to control all aspects of your link exchange, automatic backlink generation, regular link exchange, ABC exchange or link ads (sales and purchases) and much more. (https://wordpress.org/plugins/link-exchange-true-automatic-link-exchange-trafficfeed/) Product working is demonstrated through Pictures 1-38.
	outputting a page A of the first-site to a second entity that maintains authority over the second site and that lacks authority over the first site, wherein page A prompts the second entity to output first link information to initiate the bidirectional link between the first and second sites	The product Wp-Trafficfeed outputs a page from the first site to the user of second site. This second user does not have any authority over first site. The outputted page from first site prompts user of second site to initiate a bidirectional link between first and second sites. In this case, First site would be site that has been searched by the product and user of second site is user of the product. (Refer Pictures 1 - 38)
	receiving the first link information from the second entity	The product receives information based on which first link is retrieved

		from the second entity. The user would select keywords based on which first link information would be outputted. Also, the product requires the second entity to select a link for initiating bi-directional link from a variety of links available on the first site. (Refer Pictures 11-13).
	soliciting second link information from the second entity, the second link information indicative of a page B of the second site that will include third link information but that does not include the third link information; and	The product would require the user (second entity in this case) to provide a space on second website at a place where all exchanged links would be placed. Also, the user would be required to select page links from his website for placing the same on target website. These links would be the ones that he wishes to be placed upon the target site. The product also provides a check mark option for selecting links/pages. (Refer Figures 11-14 and Figures 21, 22, 25, 26).
	after (c), verifying that page B includes the third link information	The product would verify if user has provided space for links and also that exchange partners have approved the same and have been providing space for links at relevant places. Refer Pictures 35-38.

		The product also manages link exchange requests received from other websites.
27.	A method of verifying a bidirectional link between first and second sites, the bidirectional link including first link information directing the first site to the second site and second link information directing the second site to the first site, the method comprising	The product uses color coding classified into red, yellow and green colors for verification of incoming and outgoing exchanges. The product provides a tab for link monitoring and management. (Refer Pictures 35-37) Red arrows signifies rejection of outgoing links. Yellow arrows signifies pending approvals for incoming and outgoing links. Green arrows signifies active incoming and outgoing links.
	outputting the first link information; determining whether the first link information corresponds to an existing resource on the second site	The product automatically checks the first link information and determines if it corresponds to existing resource on second website.
	outputting third link information indicative of a page B of the second site that is indicated to include the second link information directing the second site to the first site	Also, the product will monitor if links of user placed of other sites are placed as specified. It would also check if links are working correctly.
	verifying that page B includes the second link information, (a) through (d) being performed automatically without human intervention.	The product will perform all these activities without human intervention.

VISUAL REPRESENTATION OF CLAIM CHART

PICTURE 1: WORDPRESS PLATFORM PROVIDES A LIST OF ALL INSTALLED PLUG-INS
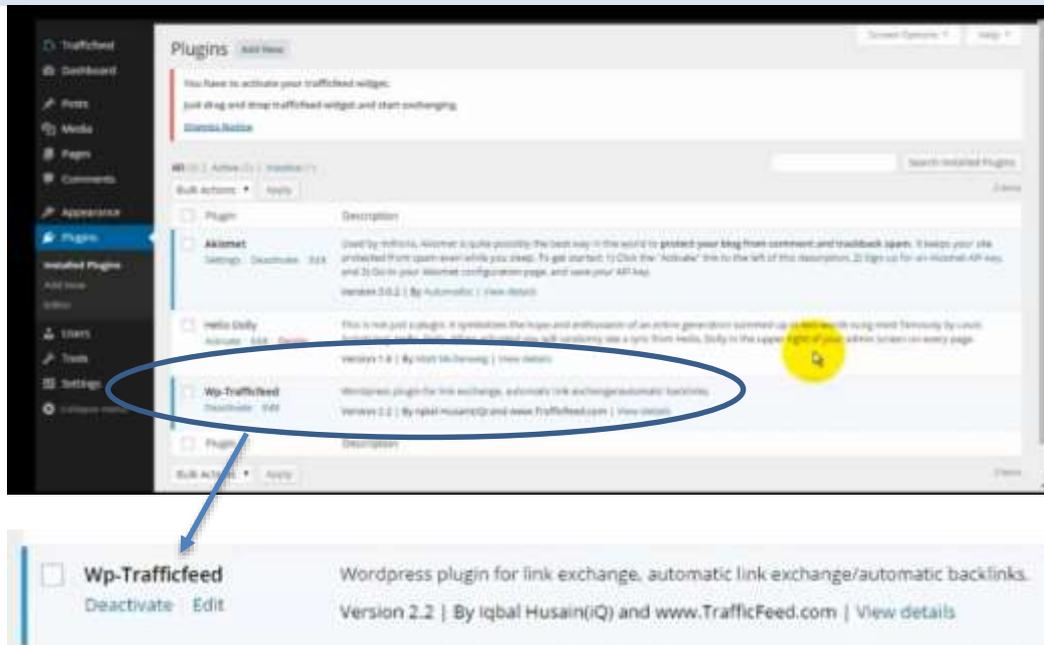
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PICTURE 2: WORDPRESS PLATFORM PROVIDES AN OPTION OF ADDING SUPPORTED PLUG-INS

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PICTURE 3: PRODUCT CAN BE SEARCHED USING WORDPRESS PLATFORM
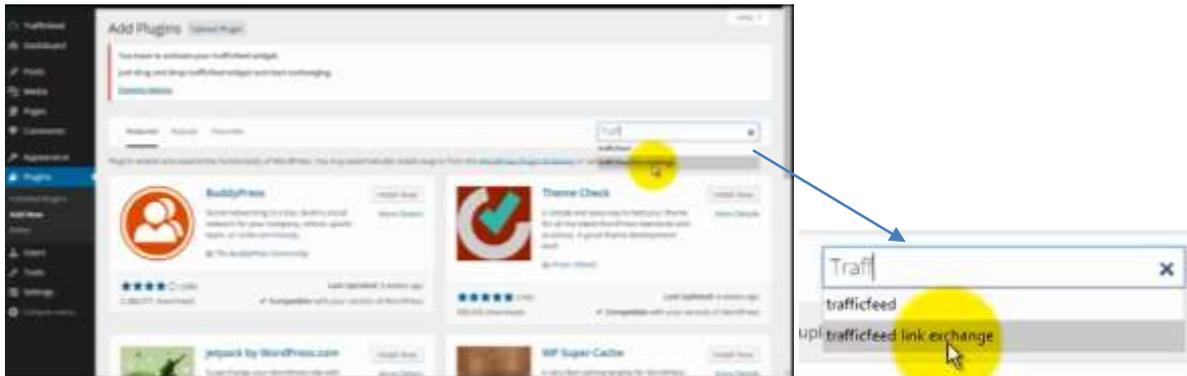
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PICTURE 4: PRODUCT GOES BY NAME OF WP-TRAFFICFEED IN WORDPRESS PLUG-IN LIST
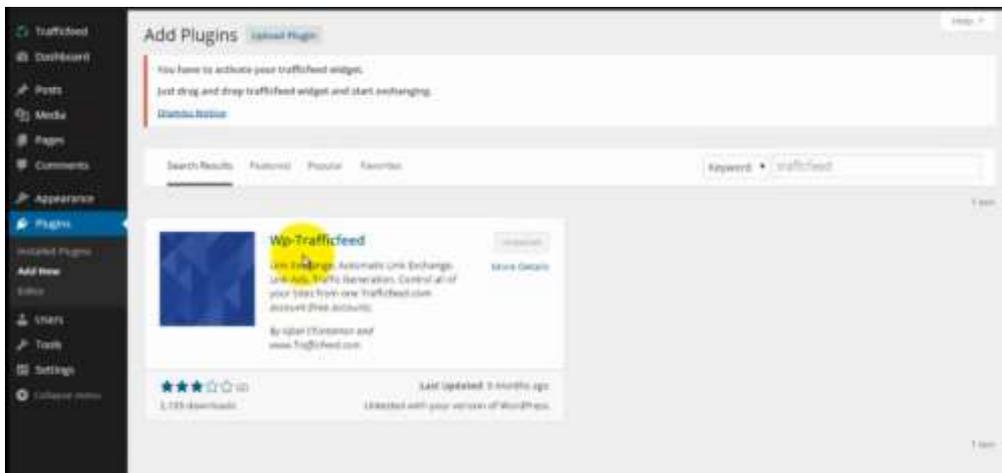
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PICTURE 5: PRODUCT CAN BE INSTALLED AS A WORDPRESS PLUG-IN
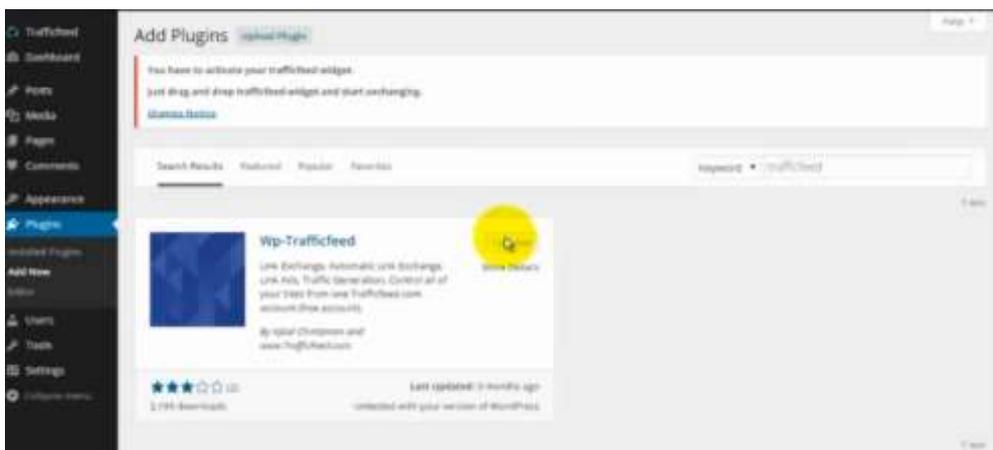
BACK TO TABLE

PICTURE 6: PRODUCT PROVIDES A PLATFORM THAT CAN BE USED ON MULTIPLE SITES
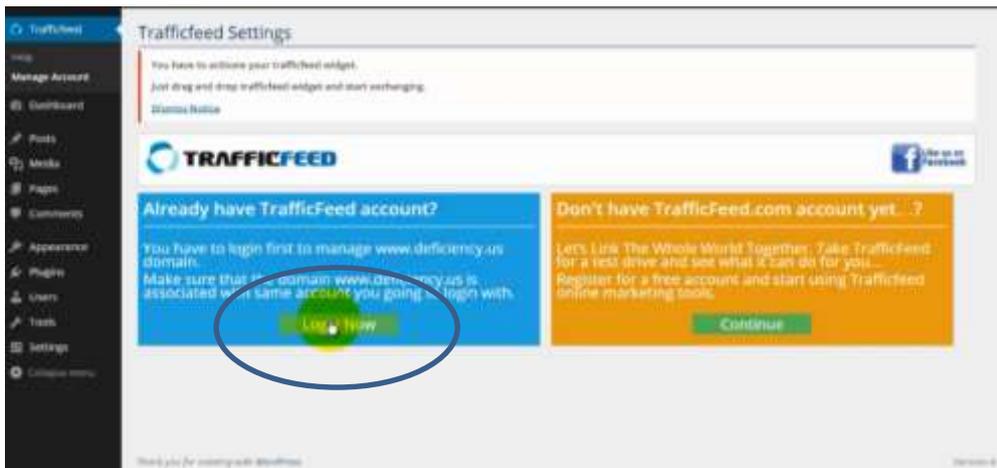
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PICTURE 7: PRODUCT WOULD PROVIDE OPTION TO MAKE AN ACCOUNT ONTO PLATFORM
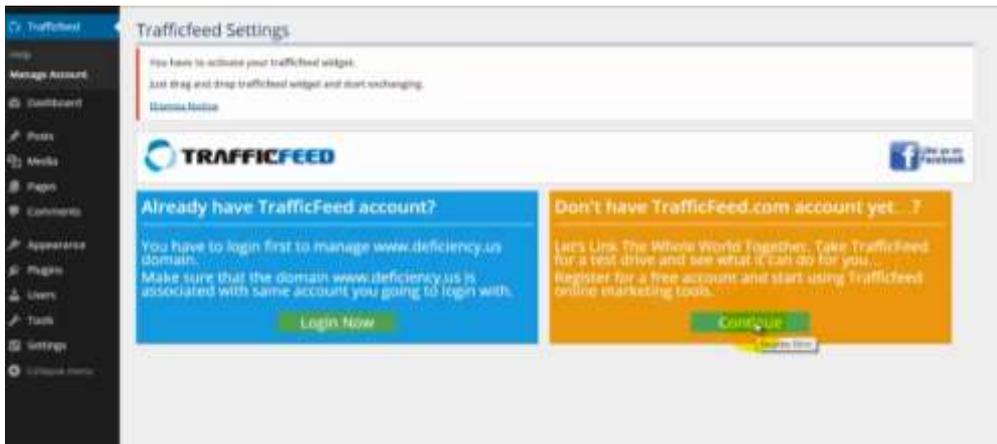
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PICTURE 8: PRODUCT REQUIRES USER DETAILS
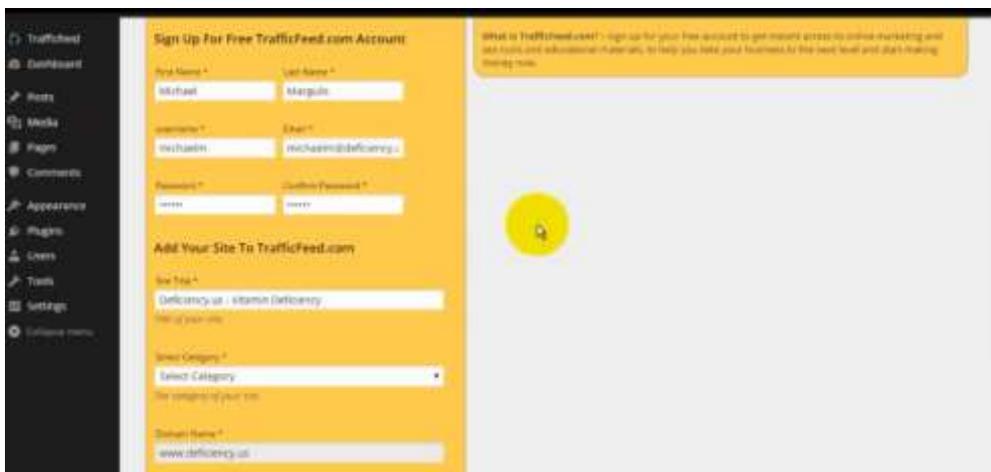
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PICTURE 9: PRODUCT REQUIRES USER WEBSITE DETAILS AND DESCRIPTION
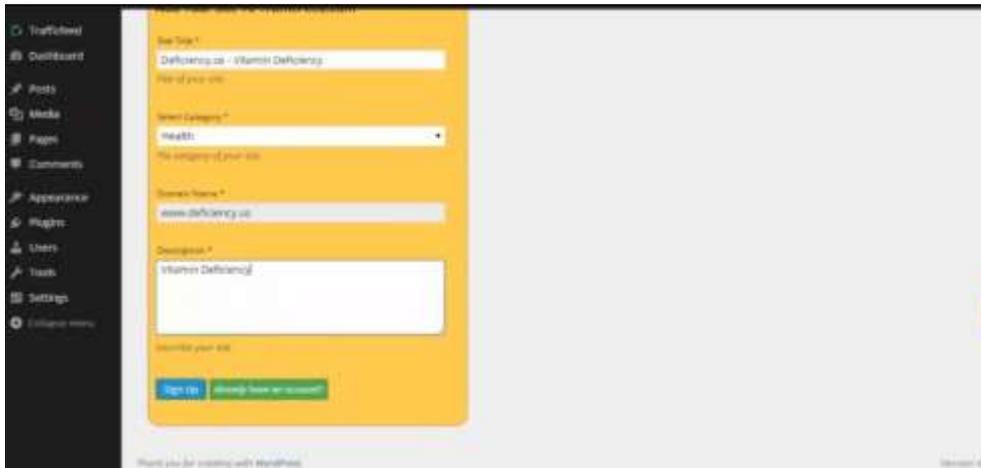
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PICTURE 10: PRODUCT REQUIRES USER AUTHENTICATION

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PICTURE 11: PRODUCT PROVIDES USER WITH LINKS THAT ARE MOST RELATED TO WEBSITE
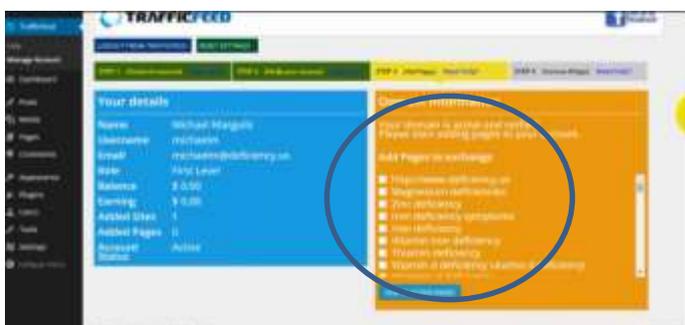
BACK TO TABLE

PICTURE 12: USER CAN SELECT LINKS FOR LINK EXCHANGE

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PICTURE 13: PRODUCT WILL ADD SELECTED PAGES
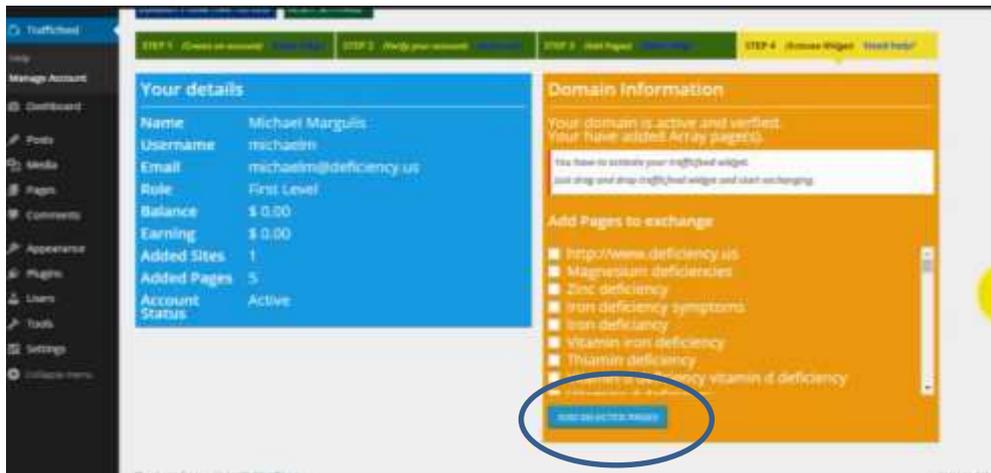
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PICTURE 14: WORDPRESS INTERFACE WITH PRODUCT PRESENT AS A WIDGET

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PICTURE 15: WORDPRESS INTERFACE WITH PRODUCT PRESENT AS WEBSITE LAYOUT WIDGET
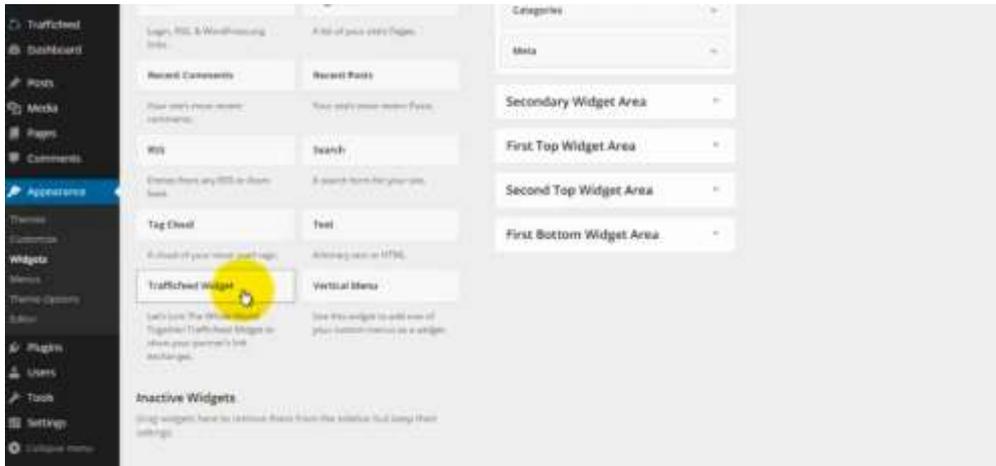
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PICTURE 16: WORDPRESS INTERFACE WHERE PRODFUCT CAN BE MOVED AS PER USER DISCRETION
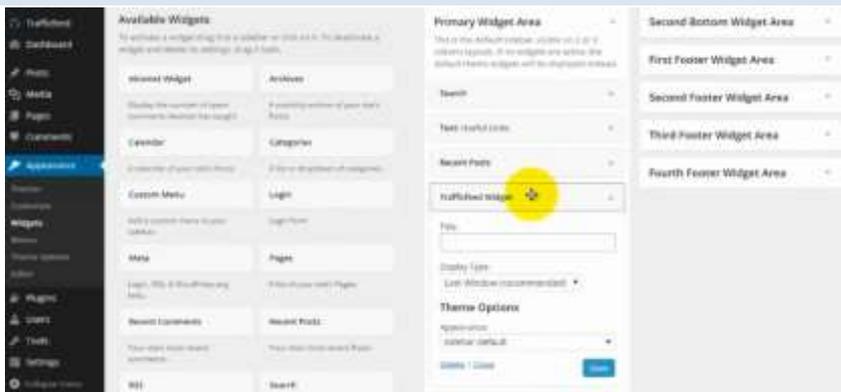
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PICTURE 17: WORDPRESS INTERFACE WITH PRODUCT PLACED AS PER USER SATISFACTION

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PICTURE 18:

Link window provides option for placing exchanged links at separate places on website. Link Directory lists all links on same page.

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PICTURE 19:

User can provide a heading for links that have been exchanged in order to maximise link exchange benefit
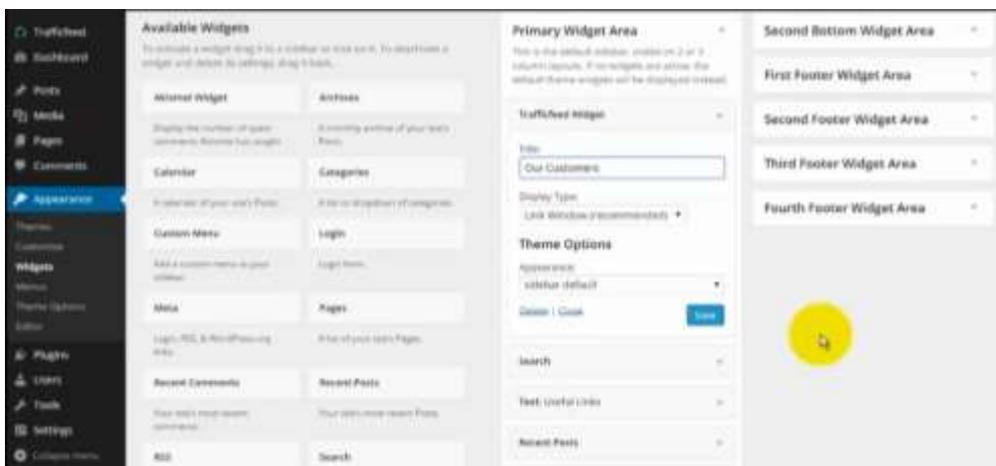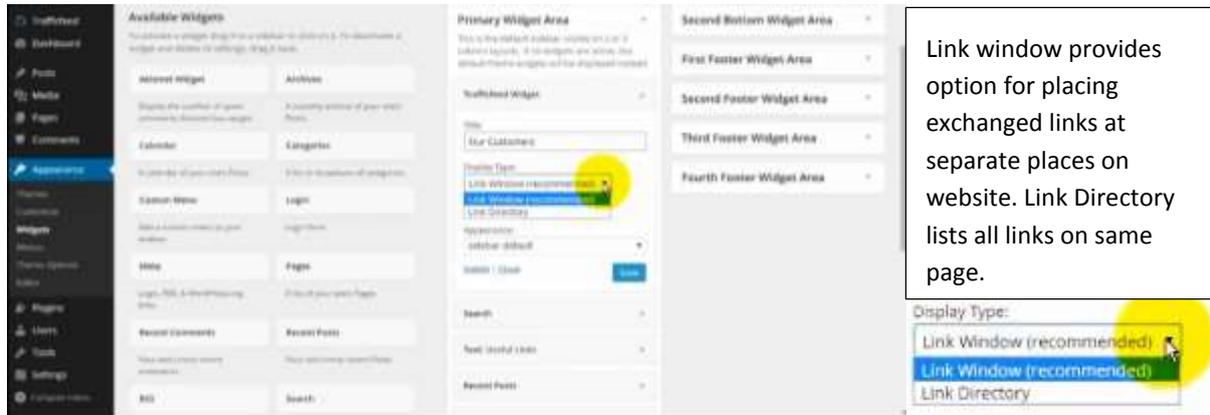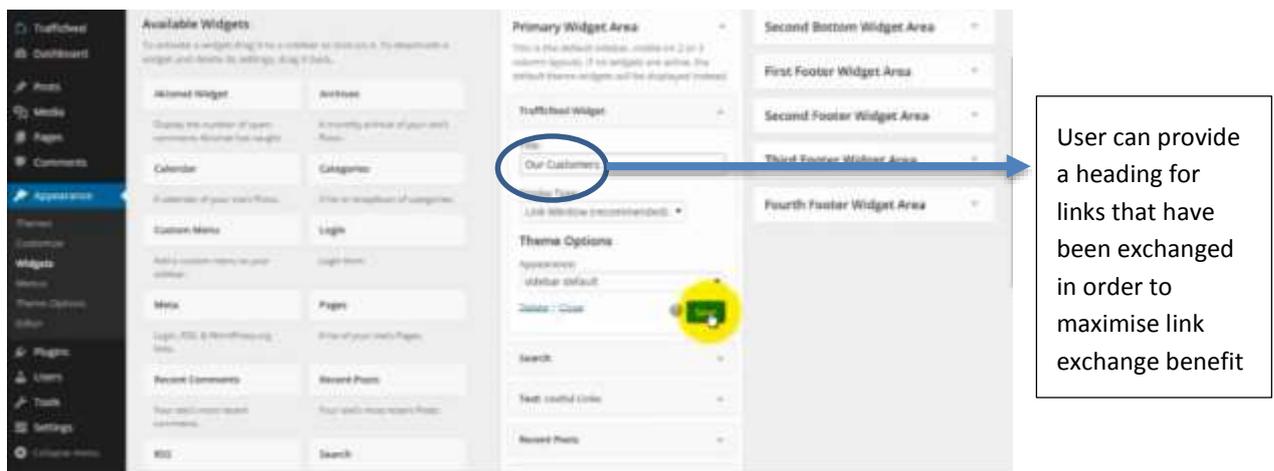
BACK TO TABLE

PICTURE 20: USER HAS COMLETE CONTROL OVER WHERE TO PLACE LINKS AFTER EXCHANGE

The product allows complete user control regarding link placement on website
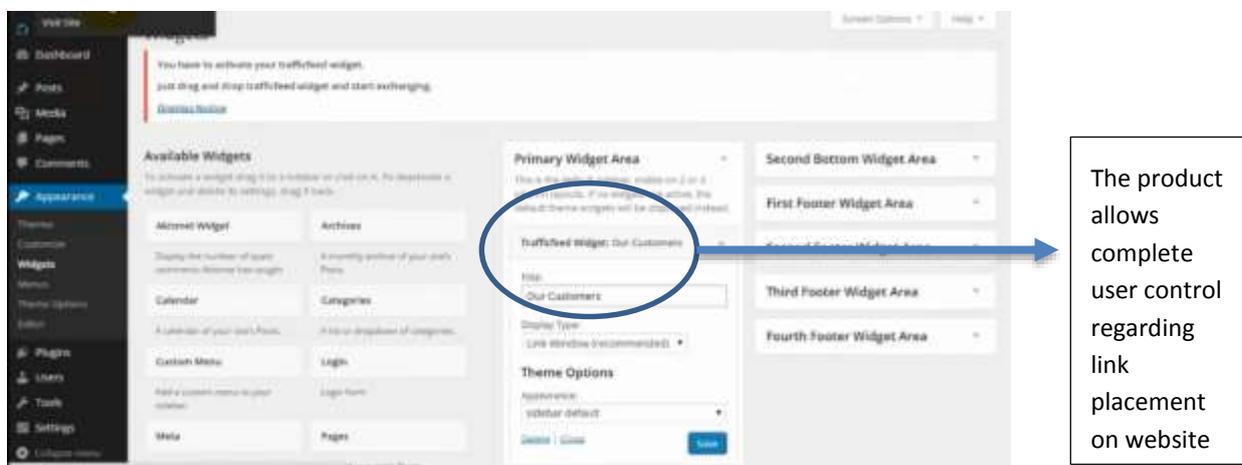
PICTURE 21:

Approved links will appear here.

PICTURE 22: PRODUCT PROVIDES VARIOUS OPTIONS FOR AUTOMATED LINK EXCHANGE
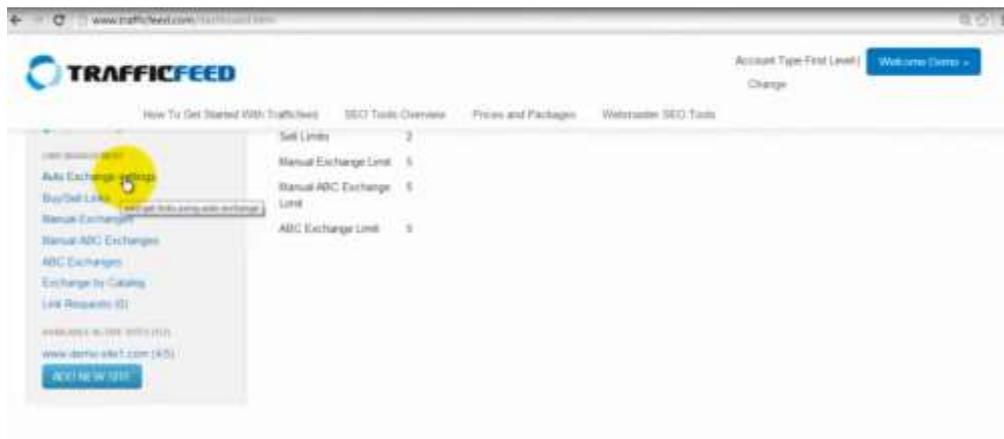
PICTURE 23: PRODUCT PROVIDES A PLATFORM FOR GETTING AUTOMATED LINKS
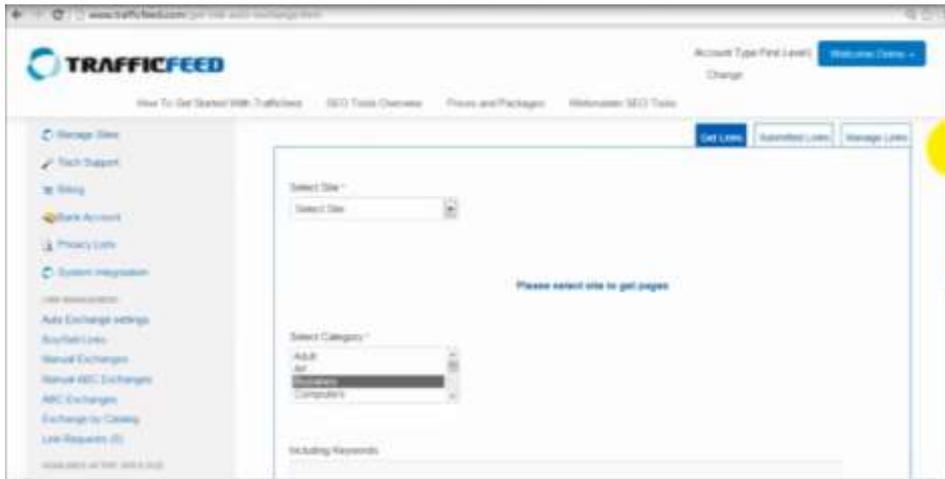
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PICTURE 24: PRODUCT PROVIDES AN OPTION TO SELECT A WEBSITE FOR LINK EXCHANGE IN CASE A USER HAS MULTIPLE SITES
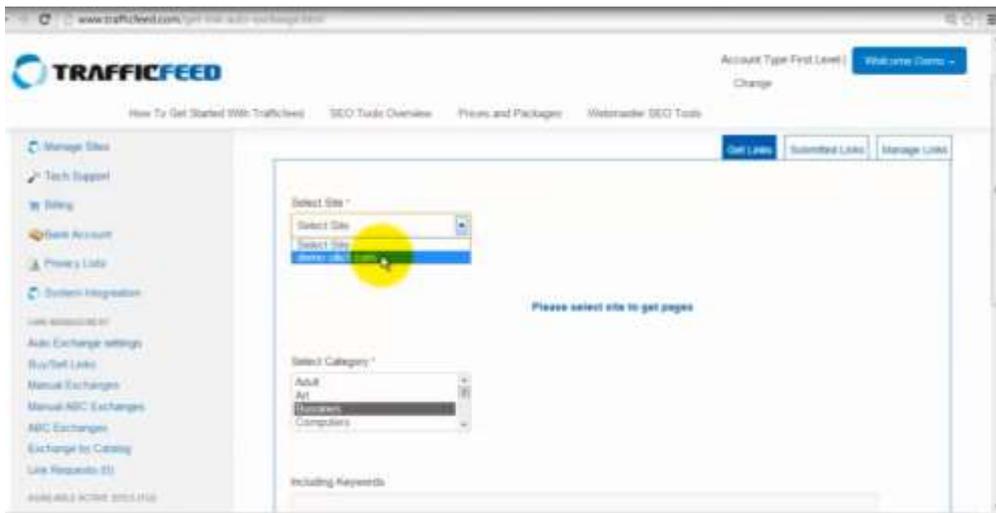
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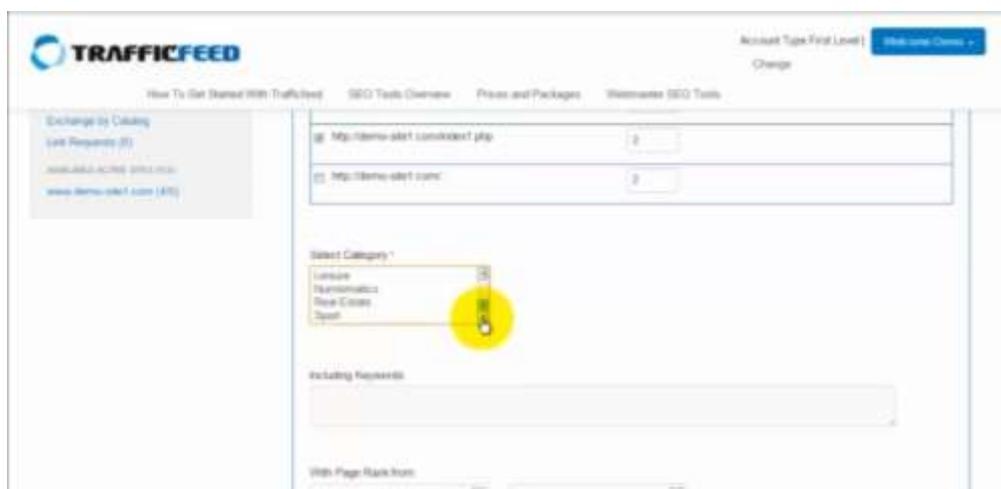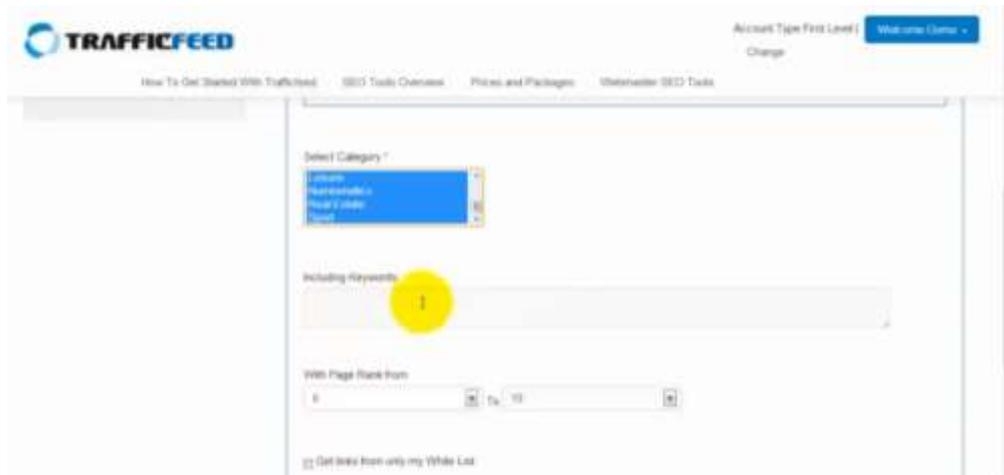PICTURE 25: PRODUCT WILL LIST ALL PAGES OF A WEBSITE FOR USER TO SELECT THE PAGE WHERE LINK WOULD BE DISPLAYED
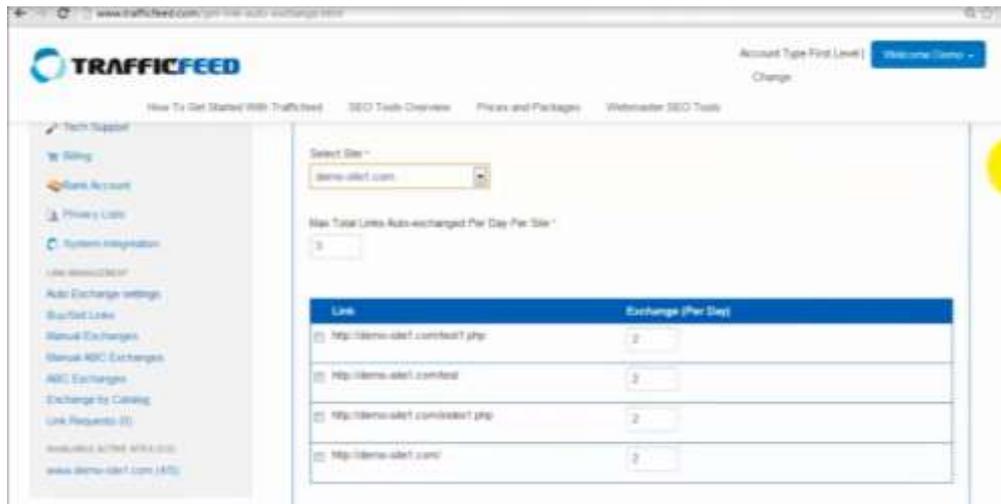
BACK TO TABLE

PICTURE 26: PRODUCT WILL LIST ALL PAGES OF A WEBSITE FOR USER TO SELECT THE PAGE WHERE LINK WOULD BE DISPLAYED
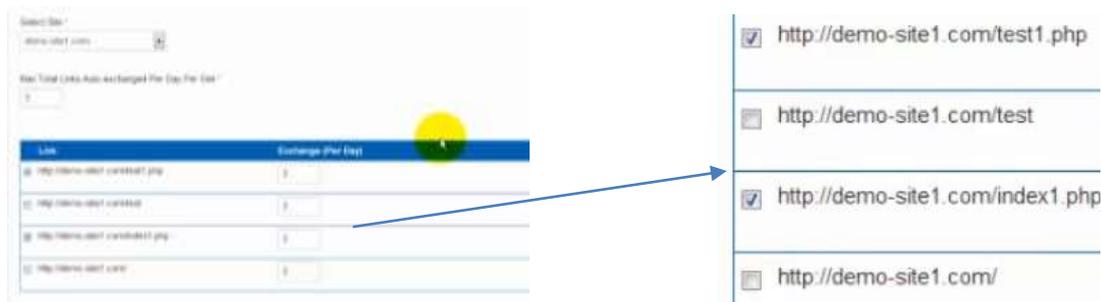
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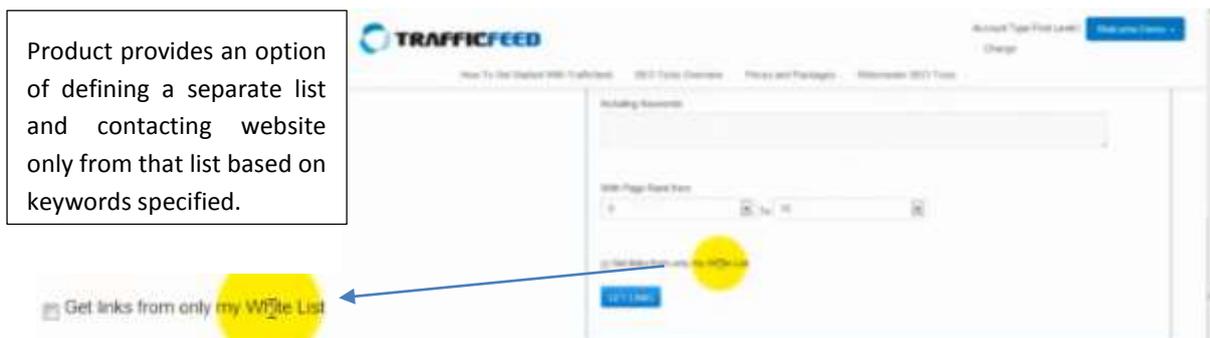## PICTURE 27: PRODUCT ENABLES DEFINING CATEGORY OF A WEBSITE FOR LINK EXCHANGE

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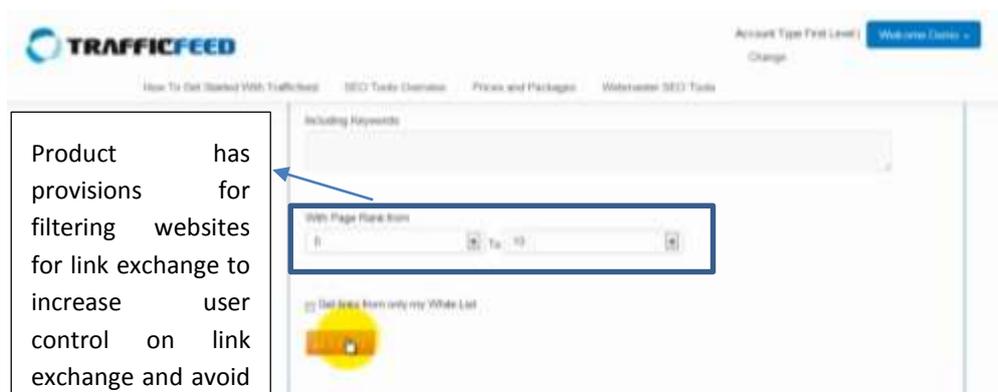PICTURE 28: PRODUCT ENABLES FINDING LINKS FOR EXCHANGE USING SPECIFIC SET OF KEYWORDS

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PICTURE 29: PRODUCT ENABLES FINDING LINKS FROM A PRESET LIST

Product provides an option of defining a separate list and contacting website only from that list based on keywords specified.

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PICTURE 30:

Product has provisions for filtering websites for link exchange to increase user control on link exchange and avoid

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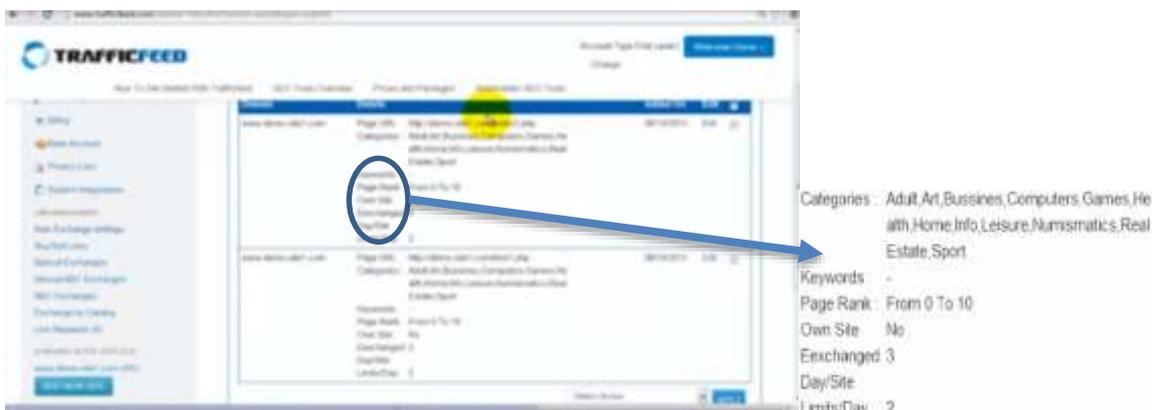PICTURE 31: PRODUCT AUTOMATICALLY CONTACTS USERS OF WEBSITES FOR LINK EXCHANGE
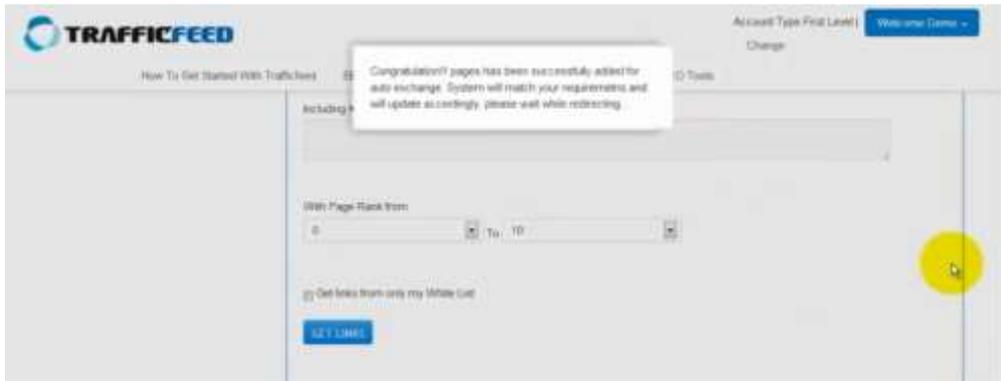
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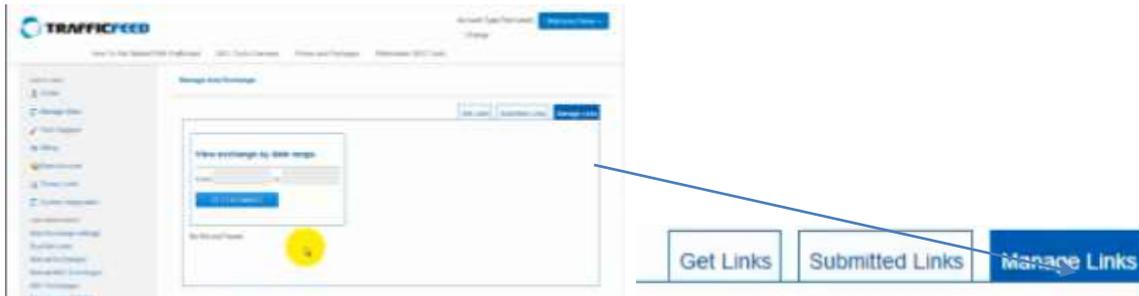## PICTURE 32: PRODUCT PROVIDES SEPARATE PLATFORM FOR LINK SUBMISSION MONITORING
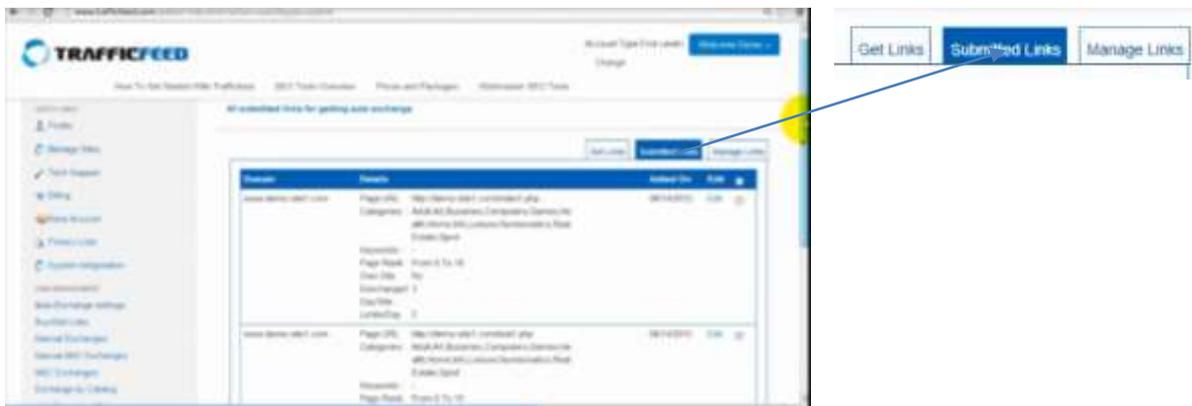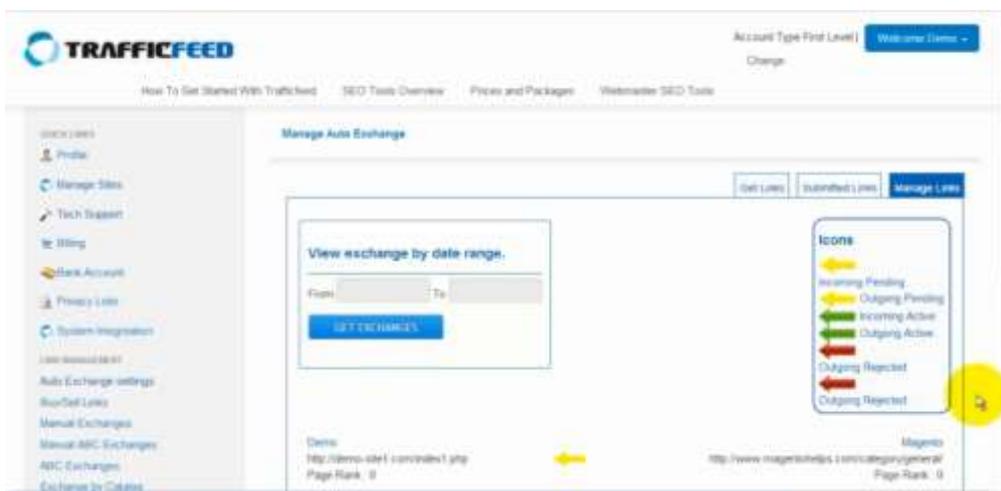

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PICTURE 33: LINK SUBMISSION DETAILS

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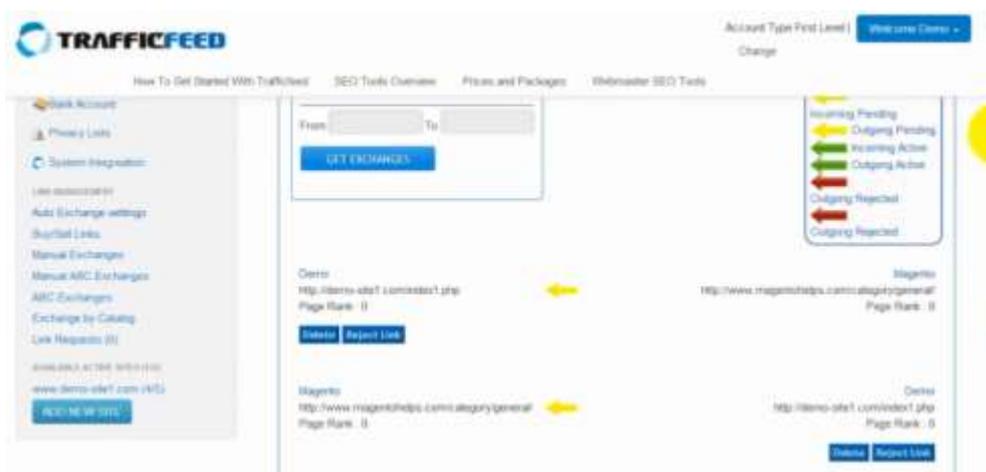## PICTURE 34: PRODUCT PROVIDES A SPECIFIC TAB FOR LINK MANAGEMENT AND MONITORING

PICTURE 35: LINK EXCHANGE MANAGEMENT BY DATE
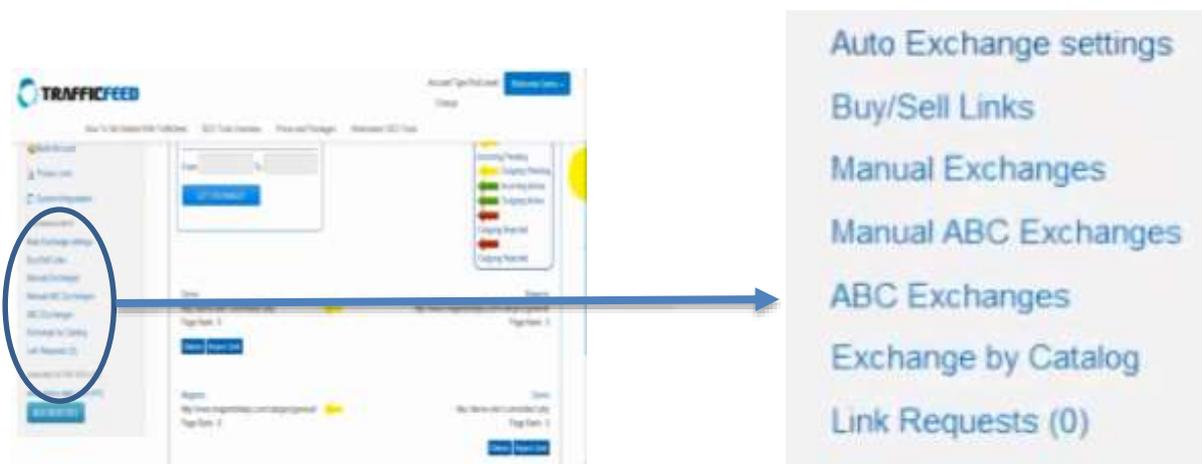
PICTURE 36: LINK MANAGEMENT AND MONITORING

PICTURE 37: LINK MANAGEMENT

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PICTURE 38: LINK REQUESTS

SUMMARY AND COMMENTS

This document with help of various pictures, research papers and videos depicts and elaborates how Wordpress might be infringing upon intellectual property of Horstmann.

CONCLUSION

The infringement analysis report drafted above gives a glimpse of the technologies in competition and their features thereof. However patent infringement deduction is subject to interpretation by a judicial body. Stated in this document is a discussion of technical issues; this is an opinion with regard to matters adjudicated within the USPTO only. Please note, only a Markman hearing can interpret claim language.

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