Patent
Attorney's Docket No. 0026-0130

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of	)	MAIL STOP Appeal Brief-Patents
	)	
Daniel EGNOR et al.	)	Group Art Unit: 2163
	)	
Application No.: 11/024,967	)	Examiner: S. Hwa
	)	
Filed: December 30, 2004	)	Confirmation No. 7261
	)	
For: AUTHORITATIVE DOCUMENT IDENTIFICATION	)	
	)	

U.S. Patent and Trademark Office
Customer Window, Mail Stop Appeal Brief - Patents
Randolph Building
401 Dulany Street
Alexandria, VA 22314

REPLY BRIEF UNDER 37 CFR § 41.41

Sir:

This Reply Brief is submitted in response to the Supplemental Examiner's Answer, dated March 3, 2009.

I. STATUS OF CLAIMS

Claims 1-29 are pending in this application. Claims 1-29 were rejected in the final Office Action, dated March 28, 2008, and are the subject of the present appeal. These claims were reproduced in the Claim Appendix of the Appeal Brief filed on September 29, 2009.

II. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

A. Claims 1-4, 6-8, 10, 12-18, 20-22, 24 and 26-28 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Patent No. 6,643,640 B1 to Getchius (hereinafter "GETCHIUS") in view of U.S. Patent Application No. 2002/0133374 to Agoni (hereinafter "AGONI").

B. Claims 5, 9, 11, 19, 23 and 25 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over GETCHIUS in view of AGONI and further in view of U.S. Patent Application No. 2004/0064334 A1 to Nye (hereinafter "NYE").

C. Claim 29 has been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over GETCHIUS in view of NYE.

III. ARGUMENTS

In the "Response to Arguments" section of the Examiner's Answer (pp. 22-44), the Examiner reiterates many of the allegations that are presented in the "Grounds of Rejection" section of the Examiner's Answer and in the final Office Action, dated March 28, 2008. Thus, Appellants' arguments presented in the Appeal Brief, filed September 29, 2008, are applicable to those allegations. Appellants submit the following additional remarks.

1. Claims 1-3 and 12-13.

Examiner's Point (1):

In providing reasons to combine GETCHIUS and AGONI, the Examiner alleges (Examiner's Answer, p. 23):

> As discussed above, a person of an ordinary skill in the art at the time the invention was made would recognize the advantage of Agoni to add the Agoni's teaching of case control panel identifies the client name for each case. The case control panel also displays case ID, number of days since last communication, and also whether there are any unread message (e.g. signal) associated with the case (page 16, paragraph 0144), because that would allow cross-referencing of other tables and facilitate speedy search (page 15, 0134) and genuinely improve and enhance the quality of service rendered by the professional and received by the client (page 2, paragraph 0012) as taught by Agoni.

Appellants respectfully submit that the Examiner's allegation does not address the features of claim 1.

Appellants' Response to Point (1):

Appellants argued that GETCHIUS and AGONI do not disclose or suggest determining a measure of authoritativeness of candidate documents (that were all associated with the same geographic location) for a business at that geographic location based on signals associated with the candidate documents, as recited in claim 1. The Examiner admits that GETCHIUS does not disclose "identifying signals associated with candidate documents," as recited in claim 1 (final Office Action, p. 4). The Examiner's

does not explain how AGONI could be combined with GETCHIUS to remedy this admitted deficiency of GETCHIUS. Instead, the Examiner alleges that the combination of GETCHIUS and AGONI would allow cross-referencing and facilitate a speedy search.

Furthermore, Appellants submit that one of ordinary skill in the art at the time of the invention would not find it obvious to combine GETCHIUS and AGONI, because such a combination is illogical. For example, the Examiner relies on the *control panel of attorney case records*, as disclosed in paragraph [0144] of AGONI, as allegedly corresponding to signals associated with the candidate document, as recited in claim 1 (see, for example, final Office Action, p. 4 and Examiner's Answer, p. 23). The Examiner also relies on *query terms*, as disclosed in col. 28, lines 7-11 of GETCHIUS, as allegedly corresponding to candidate documents, as recited in claim 1 (see, for example, final Office Action, pp. 3-4 and Examiner's Answer, p. 24). Therefore, keeping this interpretation in mind, combining the *control panel of attorney case records* of AGONI with the *query terms* of GETCHIUS, and applying this combination to the above-noted feature of claim 1, lead to the illogical feature of determining a measure of authoritativeness of *query terms* (that were all associated with the same geographic location) for a business at that geographic location based on a *control panel of attorney case records* associated with the *query terms*. Appellants submit that one of ordinary skill in the art at the time of the invention would not seek to modify GETCHIUS to obtain such a feature.

Examiner's Point (2):

The Examiner relies on Fig. 34 of GETCHIUS for allegedly disclosing "candidate *query terms* for a business" and points to the example of the "MA AND

RESTAURANTS AND FLOWERSHOPS" query disclosed in Fig. 34 of GETCHIUS (Examiner's Answer, p. 24).

Appellants' Response to Point (2):

Appellants respectfully submit that the "MA AND RESTAURANTS AND FLOWERSHOPS" query is not a candidate query for a business. In other words, the "MA AND RESTAURANTS AND FLOWERSHOPS" query is not a query for a specific business, but is rather a query to identify businesses that match the query. Therefore, Fig. 34 of GETCHIUS does not disclose or suggest determining a measure of authoritativeness of candidate *queries* (that were all associated with the same geographic location) for a business at that geographic location based on signals associated with the candidate *queries*, as would be required by claim 1 based on the Examiner's interpretation of the *query* of GETCHIUS as allegedly corresponding to the term "documents," as recited in claim 1.

Examiner's Point (3):

Appellants argued that *query terms* cannot be reasonably held to correspond to candidate documents for a business, as recited in claim 1, and that *categories of business listings* cannot be reasonably held to correspond to a business, as recited in claim 1. In response to this argument, the Examiner alleges that GETCHIUS teaches that various business listings may be grouped together in categories (Examiner's Answer, p. 25). The Examiner further alleges that each business listing may be represented as a document stored in the primary and secondary databases (Examiner's Answer, p. 25).

Appellants' Response to Point (3):

Appellants respectfully submit that these allegations do not address Appellants' arguments. For example, the Examiner did not explain why *query terms*, as disclosed by GETCHIUS, could be reasonably interpreted as candidate documents for a business, as recited in claim 1 or why *categories of business listings*, as disclosed by GETCHIUS, could be reasonably interpreted as a business, as recited in claim 1.

Examiner's Point (4):

In response to Appellants' argument that AGONI does not disclose or suggest "identifying signals associated with the candidate documents," as recited in claim 1, the Examiner relies on paragraph [0018] and paragraph [0144] of AGONI for allegedly disclosing this feature (Examiner's Answer, p. 27).

Appellants' Response to Point (4):

Paragraph [0144] of AGONI was addressed on p. 12 of the Appeal Brief. Appellants will additionally address paragraph [0018] of AGONI.

Paragraph [0018] of AGONI discloses a service system that includes profile data representing characteristics of service providers, a search engine responsive to search criteria to search the profile data, a communication module that makes the results available to a client, a case communication module to receive status data from a selected service provider, and a billing module. The search criteria can include a first importance level assigned to first profile criteria and a second importance level assigned to second profile criteria. The result data is presented such that a first group of service providers that match the first profile criteria is presented at the front of the list of results. The communication module receives candidate data representing a candidate set of service

providers comprising one or more service providers identified by the result data, the communication module receiving and storing the service summary data representing needed services and making the service summary data available to each of the candidate set of service providers.

The Examiner appears to be alleging that the *candidate set of service providers* disclosed by this section of AGONI corresponds to candidate documents, as recited in claim 1. However, this section of AGONI does not disclose or suggest identifying signals associated with the *candidate set of service providers*, as would be required by claim 1 based on the Examiner's interpretation of AGONI. Instead, this section of AGONI discloses receiving status data from a selected service provider selected from the candidate set of service providers.

If the Examiner interprets *receiving status data from a selected service provider selected from the candidate set of service providers*, as disclosed by AGONI, as allegedly corresponding to identifying signals associated with candidate documents, as recited in claim 1, (an interpretation Appellants' do not agree with), then the Examiner must maintain that interpretation for all features of claim 1 that include the term "signals." Therefore, since claim 1 recites determining a measure of authoritativeness of candidate documents (that were all associated with the same geographic location) for a business at that geographic location based on signals associated with the candidate documents, the combination of GETCHIUS and AGONI would have to disclose determining a measure of authoritativeness of a *candidate set of service providers* (that were all associated with the same geographic location) for a business at that geographic location based on *receiving status data from a selected service provider selected from the candidate set of*

service providers. The Examiner has not explained how a combination of GETCHIUS and AGONI would disclose such a feature.

For example, the Examiner relies on *query terms*, as disclosed by GETCHIUS, for allegedly corresponding to candidate documents, as recited in claim 1. The Examiner has not explained how the *query terms* of GETCHIUS could be replaced with the *candidate set of service providers* disclosed by AGONI or why one or ordinary skill in the art would find it obvious to do so.

Examiner's Point (5):

In response to Appellants' arguments that GETCHIUS does not disclose determining a measure of authoritativeness of a candidate document for a business at a location, the Examiner alleges GETCHIUS discloses that a subset of query terms is determined such that a string representing a particular query is uniquely mapped to a name corresponding to a data set (Examiner's Answer, p, 28). Thus, it appears that the Examiner is alleging that *uniquely mapping a query string to a name in a data set*, as disclosed by GETCHIUS, corresponds to determining a measure of authoritativeness of a candidate document for a business at a location, as recited in claim 1.

Appellants' Response to Point (5):

Appellants respectfully disagree with the Examiner's allegation.

A measure of authoritativeness of a particular document for a business at a location determines how authoritative the particular document is as a document for the business at the location. In other words, a document with a higher measure of authoritativeness is perceived as a more reliable document. Uniquely mapping a query

string to a name in a data set does not determine how authoritative the query string is as a query string for the name.

Furthermore, even if it is assumed, for the sake of argument, that "uniquely mapping a query string to a name in a data set" can be construed as determining a measure of authoritativeness for the query string (a point Appellants do not agree with), GETCHIUS and AGONI, whether taken alone or in any reasonable combination, do not disclose or suggest uniquely mapping a query string to a name in a data set based on a *candidate set of service providers*, as would be required by claim 1 based on the Examiner relying on the *candidate set of service providers* of AGONI as allegedly corresponding to the signals associated with the candidate documents, as recited in claim 1.

For at least the reasons given above and for those reasons given in the Appeal Brief, Appellants respectfully request that the rejection of claims 1-3 and 12-13 under 35 U.S.C. § 103(a) based on GETCHIUS and AGONI be reversed.

2. Claim 4.

Examiner's Point (6):

Appellants' argued that GETCHIUS and AGONI do not disclose or suggest that identifying a set of documents further includes determining documents that are linked to by candidate documents, and identifying the determined document as candidate documents, as recited in claim 4.

In response, the Examiner additionally relies on col. 33, lines 25-53 of GETCHIUS, as well as Figs. 39 and 40 of GETCHIUS as allegedly disclosing the features of claim 4 (Examiner's Answer, p. 29).

Appellants' Response to Point (6):

Appellants submit that these additional sections of GETCHIUS also do not disclose or suggest the features recited in claim 4.

Col. 33, lines 25-53 of GETCHIUS disclose:

> Once the system is initialized, the system may operate to obtain results that are to be displayed to the user. The steps for obtaining results may be seen in a flow chart 88 displayed in FIG. 41. Referring to FIG. 41, the parse driver 858 may at a step 20 parse a user query and deliver the parsed query in suitable form for handling by the query engine 862. The query engine may include the information retrieval software 908. At a step 22, the query engine 862 may operate the information retrieval software 908 to take the parsed user request and expand the query, turning the user request into a detailed query. Next, at a step 24, the information retrieval software may operate on the expanded term lists 836 by identifying documents associated with the terms identified in the expanded query. In an embodiment, the term lists 836 are the business listings described in connection with steps 8284 and 86 above, expanded to include synonyms and terms that are determined to be related to the words in the business listing. Identification of documents may be accomplished by a variety of information retrieval techniques. Documents may also be associated with queries by sorted relevancy ranking, clustering (automated grouping of related documents), automated document, summarization (creation of content abstracts, not simply the first few sentences of the document) and query-by-example (turning an individual document into a query in order to retrieve "more documents like this"). These functions may be accomplished by software techniques, such as having a table of pointers having as an argument a tokenized version of each possible term from the expanded user query from the step 22. The table of pointers may point to the location of a term list 836, for each such term. The term list may be a linked list of documents that include the term. The linked list may include information about each document, such as the number of occurrences of the term in the document, the inverse frequency of the term in the entire set of documents, the association of the document with other documents, the association of the document with categories, and the like.

This section of GETCHIUS discloses parsing and expanding a query and identifying documents associated with terms in the query. The terms lists are business listings and the document matching the terms of the query are sorted by relevancy ranking. This section of GETCHIUS further discloses that a table of pointers may point to the location of a term list and that the term list may be a linked list of documents that include the term. The linked list may include information about each document, such as the number of occurrences of the term in the document, the inverse frequency of the term in the set of documents, and the association of the document with other documents or categories.

A linked list is a data structure in which one record links to the next record in the sequence. This section of GETCHIUS does not disclose or suggest determining which records in the linked list link to any other records. Rather, this section of GETCHIUS merely discloses that a list of terms may be a linked list of documents that include the term. Furthermore, as the Examiner relies on the *query terms* of GETCHIUS as allegedly corresponding to the candidate document, as recited in claim 1, this section of GETCHIUS does not disclose or suggest determining documents in the linked list that are linked to *query terms*, as would be required by claim 4 based on the Examiner's interpretation of GETCHIUS. Therefore, this section of GETCHIUS does not disclose or suggest that identifying a set of documents further includes determining documents that are linked to by candidate documents, and identifying the determined document as candidate documents, as recited in claim 4.

Fig. 39 of GETCHIUS depicts a query engine coupled to a term list database and an advertisement banner term lists database. Fig. 40 of GETCHIUS depicts a flow graph for a process that includes accessing mark up language files, creating term lists, and expanding the term lists. Figs. 39 and 40 of GETCHIUS do not disclose or suggest that identifying a set of documents further includes determining documents that are linked to by candidate documents, and identifying the determined document as candidate documents, as recited in claim 4.

For at least the reasons given above and for those reasons given in the Appeal Brief, Appellants respectfully request that the rejection of claim 4 under 35 U.S.C. § 103(a) based on GETCHIUS and AGONI be reversed.

3. Claim 6.

Examiner's Point (7):

Appellants argued that GETCHIUS does not disclose or suggest determining a number of outlinks from ones of the candidate documents that point to other ones of the candidate documents and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on the number of outlinks from other ones of the candidate documents that point to the candidate document, as recited in claim 6.

In response, the Examiner alleges that GETCHIUS discloses that each category is given a weight corresponding to the number of listings that are associated with the category and relies on col. 65, lines 10-25 and col. 33, lines 24-48 of GETCHIUS for allegedly disclosing the features recited in claim 6 (Examiner's Answer, p. 30).

Appellants' Response to Point (7):

Appellants submit that the Examiner's allegation does not address the features of claim 6.

A *weight given to a category*, as disclosed by GETCHIUS, cannot be reasonably held to correspond to an outlink from a document or a number of outlinks from a document, as recited in claim 6. An outlink is a hyperlink to another document. As demonstrated on pp. 17-19 of the Appeal Brief, none of the sections of GETCHIUS relied on by the Examiner in the rejection of claim 6 disclose, suggest, or even mention outlinks.

Appellants will further address the additional sections of GETCHIUS relied on by the Examiner.

Col. 65, lines 10-25 of GETCHIUS disclose:

> These statistics may be further improved by weighting other factors. For example, it is possible to weight each term that appears in one of the categories that is retrieved upon execution of a user query and to normalize the IDF and RTF statistics over the weights. Thus, if a particular category deserves a higher weight, then it might be accorded higher weight in ranking super-categories. For example, a category that is manually mapped to a super-category might be given a higher weight than a category that is automatically mapped. The user query might be given a higher or lower weight, than other information. Categories with a large number of listings may be given higher weight. In an embodiment, each category is given a weight corresponding to the number of listings that are associated with the category, normalized by dividing the total number of listings. In an embodiment, the user query terms are each given a weight of one. In the weighting process, the weight may be multiplied by the term element in performing the sum of the product of term frequency and inverse document frequency over all terms for all documents in the super-category linked list.

This section of GETCHIUS discloses weighing terms that appear in categories based on the number of listings in a category. A number of listings in a category cannot be reasonably held to correspond to a number of outlinks. As stated above, an outlink is a hyperlink to another document. This section of GETCHIUS does not disclose, suggest, or even mention a number of outlinks. Therefore, this section of GETCHIUS does not disclose or suggest determining a number of outlinks from ones of the candidate documents that point to other ones of the candidate documents and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on the number of outlinks from other ones of the candidate documents that point to the candidate document, as recited in claim 6.

Col. 33, lines 24-28 of GETCHIUS were reproduced above. This section of GETCHIUS discloses that a table of pointers may point to the location of a term list and that the term list may be a linked list of documents that include the term. The linked list may include information about each document, such as the number of occurrences of the term in the document, the inverse frequency of the term in the set of documents, and the association of the document with other document or categories.

This section of GETCHIUS does not disclose, suggest, or even mention a number of outlinks. Therefore, this section of GETCHIUS does not disclose or suggest determining a number of outlinks from ones of the candidate documents that point to other ones of the candidate documents and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on the number of outlinks from other ones of the candidate documents that point to the candidate document, as recited in claim 6.

For at least the reasons given above and for those reasons given in the Appeal Brief, Appellants respectfully request that the rejection of claim 6 under 35 U.S.C. § 103(a) based on GETCHIUS and AGONI be reversed.

4. Claim 7.

Examiner's Point (8):

(8) Appellants argued that GETCHIUS does not disclose or suggest that identifying signals associated with the candidate documents includes identifying anchor text associated with links to the candidate documents; and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on whether the candidate document is pointed to by one or more links whose anchor text matches all or part of a name of the business at the location, as recited in claim 7.

In response, the Examiner additionally relies on col. 40, lines 25-37 and on col. 62, lines 49-60 of GETCHIUS for allegedly disclosing the features recited in claim 7 (Examiner's Answer, p. 31).

Appellants' Response to Point (8):

Appellants submit that these additional sections of GETCHIUS also do not disclose or suggest the features recited in claim 7.

Col. 40, lines 25-37 of GETCHIUS disclose:

> At step 1008, the procedure "match phone number" is performed to produce a subset of one or more entries of the existing database which match the existing phone number. Control proceeds to step 1010 where the procedure "name match" is performed. Generally, "name match" will be described in paragraphs that follow to determine whether there is a business name match for a particular entry. Control proceeds to step 1012 where "derive score" is performed based on the zip code and the name match score. Generally, the result of step 1012 produces a score representing a statistic relative to determining whether two entries in a particular database and an updated version of the database match.

This section of GETCHIUS discloses a match phone number procedure, a name match procedure, and a derive score based on a zip code and the name match score. This section of GETCHIUS does not disclose, suggest, or even mention anchor text, let alone matching anchor text to a name of a business at a location. Anchor text is the visible, clickable text in a hyperlink. This section of GETCHIUS does not even mention hyperlinks. Therefore, this section of GETCHIUS does not disclose or suggest that identifying signals associated with the candidate documents includes identifying anchor text associated with links to the candidate documents; and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on whether the candidate document is pointed to by one or more links whose anchor text matches all or part of a name of the business at the location, as recited in claim 7.

Col. 62, lines 49-60 of GETCHIUS disclose:

> Once control has returned to the flow chart 52 of FIG. 68, meaning that all yellow pages categories have been mapped to a super-category, at a step 77 the banner ad retrieval software 909 may index the various super-categories in a banner ad term list 837. The banner ad term list 837 may take the form of a linked list of the super-categories, with each element in the list consisting of all of the terms that appear in the super-category, as well as all of the terms that appear in each of the categories that was matched to the super-category.

This section of GETCHIUS discloses mapping yellow pages categories to a super-category and indexing the super-categories in a banner ad term list, in the form of a linked list. This section of GETCHIUS does not disclose, suggest, or even mention anchor text, let alone matching anchor text to a name of a business at a location. As stated above, anchor text is the visible, clickable text in a hyperlink. This section of GETCHIUS does not even mention hyperlinks. Therefore, this section of GETCHIUS does not disclose or suggest that identifying signals associated with the candidate documents includes identifying anchor text associated with links to the candidate documents; and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on whether the candidate document is pointed to by one or more links whose anchor text matches all or part of a name of the business at the location, as recited in claim 7.

For at least the reasons given above and for those reasons given in the Appeal Brief, Appellants respectfully request that the rejection of claim 7 under 35 U.S.C. § 103(a) based on GETCHIUS and AGONI be reversed.

5. Claim 8.

Examiner's Point (9):

Appellants argued that GETCHIUS does not disclose or suggest that wherein identifying signals associated with the candidate documents includes identifying titles of ones of the candidate documents; and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the

candidate documents based on whether a title associated with the candidate document matches all or part of a name of the business at the location.

In response, the Examiner additionally relies on col. 9, lines 37-43; Figs. 9 and 10; col. 47, lines 11-30; and Fig. 58 of GETCHIUS for allegedly disclosing the features of claim 8 (Examiner's Answer, pp. 32-33).

Appellants' Response to Point (9):

Appellants respectfully submit that these additional sections of GETCHIUS also do not disclose or suggest the features recited in claim 8.

Col. 9, lines 37-43 of GETCHIUS, which describe Figs. 9 and 10 of GETCHIUS, disclose:

> Referring now to FIGS. 9 and 10, shown is one embodiment of a user interface for displaying a first page of the top query categories 1820. Generally, these categories are associated with the various business listings and are tags by which a user may perform queries. In this embodiment, for example, the user may select the "top categories" from the initial interface as included in the field 1802.

This section of GETCHIUS discloses a user interface for displaying a first page of top query categories that are associated with various business listings and are tags by which a user may perform queries. A user may select the top categories from the interface. This section of GETCHIUS does not disclose or suggest titles for documents, let alone determining whether a title of a document matches the name of a business. Therefore, this section of GETCHIUS does not disclose or suggest that wherein identifying signals associated with the candidate documents includes identifying titles of ones of the candidate documents; and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on whether a title associated with the candidate document matches all or part of a name of the business at the location, as recited in claim 8.

Col. 47, lines 11-30 of GETCHIUS, which describe Fig. 58 of GETCHIUS, disclose:

> Referring now to FIG. 58, shown is a flowchart of an embodiment of method steps for detecting duplicates in the category file. Generally, these steps are more detailed processing steps of step 1520 of FIG. 57. At step 1500, a first category name in the category file of the unfiltered database is tokenized. In other words, each word included in the heading or category name is associated with a token. Similarly, in step 1504, the next record of a category is examined and also tokenized. At step 1506, a comparison of the two tokenized names is performed to derive a score in accordance with the number of matching name components. This may also be normalized, as described in accordance with the foreign source update processing techniques. At step 1508, a determination is made as to whether or not the score is greater than a predetermined threshold. In this instance, the threshold is 75%. If the score is greater than the threshold, control proceeds to step 1512 where the categories are tagged as duplicates propagating any previous matching identifier tag. In other words, the transitive matching technique is used in marking matching categories. For example, if ID1,=ID2. Then, it is determined that ID2=ID5, ID5, is also marked as having ID1, as a matching identifier. Similarly, subsequent matches to ID5, f further propagate the value ID11. Subsequently, control proceeds to steps 1510 for advancement to the next record. If it is determined at step 1508 that the score is not greater than the threshold, no match is found and control proceeds to step 1510 where the next category is advanced to. At step 1514, a determination is made as to whether all the categories have been processed in the category file. If they have, control proceeds to step 1516 where processing stops. Otherwise, control proceeds to step 1504 for further comparisons and determinations of equivalent categories.

This section of GETCHIUS discloses a process that includes tokenizing a first category name and examining and tokenizing the next record of a category. The two tokenized records are compared and a score is derived and normalized. If the score is greater than a threshold, the categories are tagged as duplicates. If the score is not greater than the threshold, no match is found and control proceeds to the next category. This section of GETCHIUS does not disclose or suggest titles for documents, let alone determining whether a title of a document matches the name of a business. Therefore, this section of GETCHIUS does not disclose or suggest that wherein identifying signals associated with the candidate documents includes identifying titles of ones of the candidate documents; and wherein determining a measure of authoritativeness of the candidate documents includes generating an authoritative score for one of the candidate documents based on whether a title associated with the candidate document matches all or part of a name of the business at the location, as recited in claim 8.

For at least the reasons given above and for those reasons given in the Appeal Brief, Appellants respectfully request that the rejection of claim 8 under 35 U.S.C. § 103(a) based on GETCHIUS and AGONI be reversed.

6. Claim 10.

Examiner's Point (10):

Appellants argued that GETCHIUS does not disclose or suggest that identifying signals associated with the candidate documents includes determining locations with which ones of the candidate documents are associated; and wherein determining a measure of authoritativeness of the candidate documents further includes increasing the measure of authoritativeness of one of the candidate documents based on whether the candidate document is associated with a single location, as recited in claim 10.

In response, the Examiner additionally relies on col. 18, lines 18-26; col. 30, lines 62-67; and col. 43, lines 35-46 of GETCHIUS for allegedly disclosing the features of claim 8 (Examiner's Answer, pp. 33-34).

Appellants' Response to Point (10):

Appellants respectfully submit that these additional sections of GETCHIUS also do not disclose or suggest the features recited in claim 10.

Col. 18, lines 18-26 of GETCHIUS disclose:

> In this particular embodiment, the databases may include business information, such as for specific businesses or classifications of businesses. Additionally, data queries may be performed based on characteristics of the various businesses, such as location, name, or category. Furthermore, the architecture described herein supports a flexible presentation of these businesses, based on business agreements and service offerings.

This section of GETCHIUS discloses that the databases may include business information, such as specific businesses or classification of businesses. Data queries may be performed based on the characteristics of the various businesses, such as location,

name, or category. This section of GETCHIUS does not disclose or suggest increasing the authoritativeness of a candidate document when the candidate document is associated with a single location. Therefore, this section of GETCHIUS does not disclose or suggest that identifying signals associated with the candidate documents includes determining locations with which ones of the candidate documents are associated; and wherein determining a measure of authoritativeness of the candidate documents further includes increasing the measure of authoritativeness of one of the candidate documents based on whether the candidate document is associated with a single location, as recited in claim 10.

Col. 30, lines 59-67 of GETCHIUS disclose:

> Referring now to FIGS. 37 and 38 shown is a flowchart of an embodiment of a method for integrating total-city and multi-city cache results into "normal" cached search results. At step 260, a total-city cache name corresponding to the data query is formed. In one embodiment, the total city cache name is formed by starting with the string "SCOPE=T" to identify a total-city name. Additionally, the following information is extracted from the original query string, as formed by the parser: category, category id, business name, street address, keywords, longitude, latitude.

This section of GETCHIUS discloses forming a total-city cache name corresponding to a data query and extracting, from the original query string, a category, category identification, a business name, a street address, keywords, longitude, and latitude. This section of GETCHIUS does not disclose or suggest determining whether a document is associated with a single location, let alone increasing a measure of authoritativeness based on whether the candidate document is associated with a single location. Therefore, this section of GETCHIUS does not disclose or suggest that identifying signals associated with the candidate documents includes determining locations with which ones of the candidate documents are associated; and wherein determining a measure of authoritativeness of the candidate documents further includes increasing the measure of

authoritativeness of one of the candidate documents based on whether the candidate document is associated with a single location, as recited in claim 10.

Col. 43, lines 35-46 of GETCHIUS disclose:

> Referring now to FIG. 50, shown as a flow chart of the steps of one embodiment for performing the routine "derive score", as performed from step 1012 of FIG. 46. Generally, code. At step 1080, the score previously derived from name match for each entry is updated by one if the zip codes of an existing database entry match an updated entry. At step 1082 this score is normalized by taking the score computed thus far and dividing it by the number of tokens in produced a normalized score as in step 1082. At step 1084, control returns to the point of call. In this particular instance, control returns to step 1012 where processing resumes with step 1020 of FIG. 47.

This section of GETCHIUS discloses that a score derived from a name match is updated if one of the zip codes of an existing database entry matches an updated entry, and that the score is normalized by dividing it by a number of tokens. This section of GETCHIUS does not disclose or suggest determining whether a document is associated with a single location, let alone increasing a measure of authoritativeness based on whether the candidate document is associated with a single location. Therefore, this section of GETCHIUS does not disclose or suggest that identifying signals associated with the candidate documents includes determining locations with which ones of the candidate documents are associated; and wherein determining a measure of authoritativeness of the candidate documents further includes increasing the measure of authoritativeness of one of the candidate documents based on whether the candidate document is associated with a single location, as recited in claim 10.

For at least the reasons given above and for those reasons given in the Appeal Brief, Appellants respectfully request that the rejection of claim 10 under 35 U.S.C. § 103(a) based on GETCHIUS and AGONI be reversed.

IV. CONCLUSION

In view of the foregoing arguments and those arguments presented in the Appeal Brief, Appellants respectfully solicit the Honorable Board to reverse the Examiner's rejections of claims 1-29.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

HARRITY & HARRITY, LLP

/Viktro Simkovic, Reg No. 56,012/
Viktor Simkovic
Reg. No. 56,012

Date: June 3, 2009
11350 Random Hills Road
Suite 600
Fairfax, Virginia 22030
(571) 432-0800 main
(571) 432-0899 direct

Customer No.: 44989