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**Datasheet for the decision  
of 29 January 2026**

**Case Number:** T 1324/24 - 3.5.01

**Application Number:** 14866383.4

**Publication Number:** 3074880

**IPC:** G06Q30/02, G06F17/22, G06F17/24

**Language of the proceedings:** EN

**Title of invention:**  
SYSTEM AND METHOD FOR GENERATING AND PUBLISHING ELECTRONIC  
CONTENT FROM PREDETERMINED TEMPLATES

**Applicant:**  
1206881 Alberta ltd.

**Headword:**  
Template-based collaborative content creation/ALBERTA

**Relevant legal provisions:**  
EPC Art. 123(2)

**Keyword:**  
Amendments - added subject-matter (yes)



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**Chambres de recours**

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Case Number: T 1324/24 - 3.5.01

**D E C I S I O N**  
**of Technical Board of Appeal 3.5.01**  
**of 29 January 2026**

**Appellant:** 1206881 Alberta ltd.  
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**Decision under appeal:** **Decision of the Examining Division of the  
European Patent Office posted on 27 June 2024  
refusing European patent application No.  
14866383.4 pursuant to Article 97(2) EPC.**

**Composition of the Board:**

**Chairwoman** A. Wahrenberg  
**Members:** I. Kürten  
D. Rogers

## **Summary of Facts and Submissions**

- I. The case concerns the appeal against the decision of the examining division to refuse European patent application No. 14866383.4 for lack of inventive step (Article 56 EPC).
- II. In the statement setting out the grounds of appeal, the appellant requested that the decision to refuse the application be set aside and that a patent be granted on the basis of the main request or, alternatively, on the basis of one of the first to third auxiliary requests filed with the statement of grounds of appeal.
- III. In the communication accompanying the summons to oral proceedings, the Board expressed its preliminary opinion that claim 1 of all requests contained added subject-matter (Article 123(2) EPC) and lacked an inventive step (Article 56 EPC). In addition, claim 1 of the second and third auxiliary requests was considered to lack clarity (Article 84 EPC).
- IV. Oral proceedings were held by videoconference on 29 January 2026. The appellant's final requests were that the decision under appeal be set aside and that a patent be granted on the basis of the main request or one of the first to third auxiliary requests filed with the statement of grounds of appeal. At the end of the oral proceedings, the Chairwoman announced the Board's decision.
- V. Claim 1 of the main request reads as follows:

*A method of generating electronic content, the method comprising:*

- *providing a predetermined template (14) specifying a predetermined layout to maintain control over the structure and functionality of the template;*
- *enabling the content to be added to the template (14) by a plurality of contributors, each contributor having access to a project utilizing the template over a network, wherein access is provided by the system following registration;*
- *receiving the content;*
- *compiling a published output according to the received content and parameters of the predetermined template;*
- *following a request to revise the predetermined template (142), determining (200), by a cloud server (12) that there were requested changes to the predetermined template being used, and determining metadata associated (202) with the requested changes;*
- *generating, by the cloud server (12), a feedback report (40) comprising the requested changes and the metadata determined by the cloud server (12), and providing, by the cloud server (12), the feedback report (40) to the template generator (16);*
- *evaluating, by the template generator (16), the feedback report (40) comprising the requested changes and associated metadata;*
- *revising (142), by the template generator (16), the predetermined template (14) for subsequent use by registered users.*

VI. Claim 1 of the first auxiliary request adds to claim 1 of the main request, after "determining metadata associated (202) with the requested changes" and before the "generating" step, the following feature: "*wherein*

*the metadata comprises an explanation of, or other information regarding, the requested changes".*

VII. Claim 1 of the second auxiliary request replaces the step "receiving the content" in claim 1 of the first auxiliary request with the following:

- *receiving first content from a first contributor and receiving second content from a second contributor;*
- *determining, by a version control module (34), that a collision exists between the first content and the second content;*
- *in response to determining that a collision exists between the first content and the second content, sending at least one communication to determine which content is to be added.*

VIII. Claim 1 of the third auxiliary request replaces the step "receiving the content" in claim 1 of the first auxiliary request with the following:

- *receiving content from a plurality of contributors, including at least first, second, and third contributors;*
- *determining, by a version control module (34), that a collision exists between the content from the plurality contributors;*
- *in response to determining that a collision exists between the content from the plurality contributors, sending at least one communication to determine which content is to be added.*

## Reasons for the Decision

### *The invention*

1. The invention concerns the collaborative creation of digital content using a predefined template (see paragraphs [0002] and [0027] of the published application).

Looking at Figures 1, 2, and 6, registered users ("contributors" in claim 1) add content to a template 14 via a cloud server 12. The server compiles the individual contributions into a published output in accordance with the parameters of the template ([0050], [0051], [0054], [0055]).

If a user requests changes to the template, the server generates a feedback report 40 based on the requested modifications and associated metadata (e.g. explanatory information). The feedback report is sent to a "template generator" 16, which evaluates the feedback and revises the template ([0043], [0052], [0056]).

### *All requests - Article 123(2) EPC*

2. In all requests, claim 1 has been amended to specify that the feedback report *comprises* the requested template changes and the associated metadata.
3. In the oral proceedings, the appellant argued that this feature was implicitly disclosed in the application as filed, relying in particular on paragraphs [0043], [0052], and [0056]. According to these passages, the cloud server 12 determines requested changes to the

template and associated metadata, generates a feedback report 40, and provides the report to the template generator 16, which evaluates the feedback and revises the template. According to the appellant, since the requested changes are applied to the template in the revising step, they must necessarily be contained in the feedback report.

4. The Board is not convinced.

The application as filed does not disclose what the feedback report contains or what the template revision specifically involves. The cited passages merely indicate that the report is generated on the basis of the requested changes and associated metadata. However, this does not imply that these elements form part of the report itself.

5. In particular, paragraph [0043] states that the feedback report is generated "**according to requested changes to a template**" (emphasis added by the Board).

In the Board's view, this wording indicates that the requested changes serve as input for generating the report, but does not imply that the requested changes are included as such in the report, which is required by the wording of claim 1.

6. Paragraph [0052] explains that the cloud server determines that one or more contributors have requested or attempted to change the template and provides feedback to the template generator, allowing the latter to evaluate and, if appropriate, revise the template.

The appellant argued that this evaluation implied that all processing was carried out by the template

generator and that the server merely forwarded the requested changes and associated metadata without performing any processing itself.

The Board does not share this view. An evaluation performed by the template generator does not exclude prior processing by the server. The server may, for instance, reconcile or filter conflicting change requests from multiple contributors and include only the results in the feedback report. The template generator may then evaluate the report to determine whether the proposed modifications comply with predefined template constraints.

7. Finally, paragraph [0056] states that "*the cloud server 12 determines that there were requested changes ... and ... associated metadata*", and that "*[a] feedback report 40 may then be generated*" and "*provided to the template generator 16*". This passage therefore concerns the circumstances under which the report is generated and transmitted, but does not disclose its contents.
8. Accordingly, none of the cited passages discloses, either explicitly or implicitly, that the feedback report *comprises* the requested template changes and associated metadata. At most, the skilled person would understand that the report *is based* on this information and may contain processed or derived data instead.
9. Accordingly, claim 1 of all requests extends beyond the content of the application as filed, contrary to Article 123(2) EPC.

**Order**

**For these reasons it is decided that:**

The appeal is dismissed.

The Registrar:

The Chairwoman:



T. Buschek

A. Wahrenberg

Decision electronically authenticated