

In the *Inter Partes* Review of:

U.S. Patent No. 8,695,145

For: METHOD AND APPARATUS
FOR THE IMPLEMENTATION OF A
REAL-TIME, SHARABLE BROWSING
EXPERIENCE ON A GUEST DEVICE

Intuit Inc. / Samesurf, Inc.
Exhibit 1003
Page 1

I, Henry A. Lieberman, declare as follows:

I. INTRODUCTION

1. I have been asked by the party requesting this review, Intuit, Inc. (“Petitioner”), to provide my expert opinions in support of the above-captioned petition for *inter partes* review of U.S. Patent No. 9,185,145 (the “’145 patent” or the “challenged patent”), challenging the patentability of the claims 1 – 18 of the ’145 patent.

2. I currently hold the opinions set forth in this declaration.

3. In summary, it is my opinion that the references cited and discussed below render obvious the challenged claim of the ’145 patent. My detailed opinions on the claims are set forth below.

II. BACKGROUND AND QUALIFICATIONS

4. I graduated from Massachusetts Institute of Technology (“MIT”) with a B.S. in Mathematics in 1975 and obtained a Ph.D. equivalent from the University of Paris VI (Sorbonne) in *Informatique*, which is the French word for “computer science,” in 1990.

5. After obtaining my B.S., I worked as a research scientist at various facilities between 1975 and 1987, including MIT’s Artificial Intelligence Laboratory (1973-1987), Xerox Palo Alto Research Center (1980), and MIT Media Laboratory (1987-2015).

6. I am currently a research scientist with MIT's Computer Science and Artificial Intelligence Laboratory, a position I have held since 2015. I was a visiting professor at the University of Paris VI (Sorbonne) from 1989-1991, where I taught courses in artificial intelligence and human computer interfaces.

7. I am known in the field as an expert in Artificial Intelligence and Human-Computer Interaction. My research has focused on using artificial intelligence, natural language processing and interactive graphical user interface techniques to make intelligent interfaces to help users solve problems. I have applied these techniques in a wide variety of applications, including using machine learning for the detection and prevention of cyber-bullying, creating software agents to intelligently assist with web browsing, and developing interfaces for contextual text-based software programming.

8. I have written more than 120 articles primarily focused on machine learning, natural language processing and user interfaces, published in both peer-reviewed technical journals and other publications. In addition, I am a named inventor on three U.S. Patents generally relating to these topics.

III. COMPENSATION AND RELATIONSHIP WITH PARTIES

9. I am being compensated for my time. This compensation is not contingent upon my performance, the outcome of this matter, or any issues involved in or related to this matter.

10. I have no financial interest in Petitioner or any related parties. I have been informed that Samesurf, Inc. (“Samesurf”) owns the challenged patent. I have no financial interest in the outcome of this litigation. I similarly have no financial interest in the challenged patent.

IV. MATERIALS CONSIDERED

11. I have reviewed and considered, in the preparation of this declaration, the following documents related to the challenged patent:

- a. the '145 patent (Ex. 1001),
- b. the prosecution file history for Application No. 13/951,789 (Ex. 1002)
- c. the prosecution file history for Application No. 12/783,743 (Ex. 1027)

12. I have also reviewed and understand various references as discussed herein, including the following:

- a. International Patent Pub. No. WO00/48110 to Lebrun et al. (Ex. 1005),
- b. U.S. Patent Pub. No. 2005/0033656 to Wang et al. (Ex. 1006),
and
- c. U.S. Patent Pub. No. 2005/0021626 to Prajapat et al. (Ex. 1007).

13. I understand that the paragraph immediately above lists references that form the basis for the grounds for invalidity set forth in the Petition for *Inter Partes* Review of the challenged patent.

14. I understand that, for purposes of determining whether a reference will qualify as prior art, the claims of the challenged patent are entitled to an effective filing date of no earlier than May 20, 2010.

15. Additionally, I am aware of prior and contemporary information relevant to the subject matter of the challenged patent and generally available to, and relied upon by, a person of ordinary skill in the art (a “POSITA”) to describe the state of the art as of the effective filing date of the challenged patent, including technical dictionaries, articles, and other technical reference materials (including, for example, textbooks, manuals, technical papers, articles, and relevant technical standards), such as:

- a. “NCSA Mosaic, Project Profile,” University of Illinois, National Center for Supercomputing Applications (available at: <https://www.ncsa.illinois.edu/research/project-highlights/ncsa-mosaic/>) (Ex. 1008);
- b. “Netscape Communications Corp.,” Henry R. Norr, August 28, 2017, Encyclopedia Britannica, Inc. (available at:

- <https://www.britannica.com/topic/Netscape-Communications-Corp>) (Ex. 1009);
- c. “50 Years of Email,” cloudHQ, April 6, 2021 (available at: <https://www.prnewswire.com/news-releases/50-years-of-email-301262676.html>) (Ex. 1010);
 - d. “The History of Email: Major Milestones from 50 Years,” Kasey Steinbrinck, January 28, 2021, Email on Acid Ina Fried, (available at: <https://www.emailonacid.com/blog/article/email-marketing/history-of-email/>) (Ex. 1011);
 - e. “10 Instant Messaging Services that Used to Be Popular,” Elise Moreau, May 3, 2021, Lifewire Tech for Humans (available at: <https://www.lifewire.com/once-popular-old-instant-messaging-services-3486135>) (Ex. 1012);
 - f. “Timeline of Social Media,” Wikipedia (available at: https://en.wikipedia.org/wiki/Timeline_of_social_media) (Ex. 1013);
 - g. “Hyperlink,” Wikipedia (available at: <https://en.wikipedia.org/wiki/Hyperlink>) (Ex. 1014);
 - h. U.S. Patent No. 5,708,780 to Levergood et al. (Ex. 1015);

- i. “Session Identification URI,” W3C Working Draft WD-session-id-960221, w3 Org (available at: <https://www.w3.org/TR/WD-session-id.html>) (Ex. 1016);
- j. “Giving Web a Memory Cost Its Users Privacy,” John Schartz, September 4, 2001, New York Times (available at: <https://www.nytimes.com/2001/09/04/business/giving-web-a-memory-cost-its-users-privacy.html>) (Ex. 1017);
- k. “GroupWeb: A WWW Browser as Real Time Groupware,” Saul Greenberg and Mark Roseman, CHI ’96 ACM Conference on Human Factors in Computing Systems, April 13-18, 1996 (available at: <https://dl.acm.org/doi/pdf/10.1145/257089.257317>) (Ex. 1018);
- l. “Let’s Browse: A Collaborative Web Browsing Agent,” IUI ’99: ACM Proceedings of the 4th International Conference on Intelligent User Interfaces, December 1998 (available at: <https://dl.acm.org/doi/10.1145/291080.291092>) (Ex. 1019);
- m. “Letizia: An Agent that Assists Web Browsing,” Henry Lieberman, *International Joint Conference on Artificial Intelligence*, 1995 (available at:

- <https://web.media.mit.edu/~lieber/Lieberary/Letizia/Letizia-AAAI/Letizia.html>) (Ex. 1020);
- n. U.S. Patent No. 6,353,822 to Lieberman (Ex. 1021);
- o. “Google Docs,” Wikipedia (available at: https://en.wikipedia.org/wiki/Google_Docs) (Ex. 1022);
- p. “Google Announces Google Docs & Spreadsheets,” October 11, 2006, Google Press Release, (available at: http://googlepress.blogspot.com/2006/10/google-announces-google-docs_11.html) (Ex. 1023);
- q. “The History of JavaScript: Everything You Need to Know,” T.J. DeGroat, August 19, 2019, Springboard (available at: <https://www.springboard.com/blog/data-science/history-of-javascript/>) (Ex. 1024);
- r. “Adobe Flash,” Wikipedia (available at: https://en.wikipedia.org/wiki/Adobe_Flash) (Ex. 1025); and
- s. “What Does AJAX Even Stand For?,” Jay Hoffman, March 4, 2019, The History of The Web (available at: <https://thehistoryoftheweb.com/what-does-ajax-even-stand-for/>) (Ex. 1026).

16. I reserve the right to supplement my opinions to address any information obtained, or positions taken, based on any new information that comes to light throughout this proceeding.

V. BASIS OF OPINIONS FORMED

A. Level of Ordinary Skill in the Art

17. It is my understanding that the challenged patent is to be interpreted based on how it would be understood by a POSITA at the time of the effective filing date of the application. It is my understanding that factors such as the education level of those working in the field, the sophistication of the technology, the types of problems encountered in the art, the prior art solutions to those problems, and the speed at which innovations are made may help establish the level of skill in the art.

18. I am familiar with the technology at issue and the state of the art at the effective filing date of the challenged patent, July 26, 2013.

19. The level of ordinary skill in the art of the challenged patent at the time of the effective filing date is a person with a bachelor's degree in computer science, computer engineering, or electrical engineering, or the equivalent, and at least two years of work experience in software development and/or web-based software. With more education, such as additional graduate degrees or study, less professional experience is needed to attain the ordinary level of skill. Similarly,

with more experiential knowledge in software development and/or web-based software, less professional experience is needed to attain the ordinary level of skill.

20. I consider myself to have at least such ordinary skill in the art with respect to the subject matter of the challenged patent at the time of the effective filing date.

VI. THE '145 PATENT

21. The '145 patent is entitled “Method and Apparatus for the Implementation of a Real-Time, Sharable Browsing Experience on a Guest Device.” The '145 patent includes claims 1–18, all of which are challenged in the Petition for *Inter Partes Review*.

A. Purported Invention of the '145 Patent

22. The '145 patent describes “a method for joining a synchronized browsing session administered by a synchronization server, comprising activating a hyperlink associated with the synchronized browsing session, sending a request to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink, and joining the synchronized browsing session.” Ex. 1001, Abstract, 2:61-67. The '145 patent also describes “a method for implementing a synchronized browsing session, comprising receiving information related to a shared web browsing interaction performed by a host device from a synchronization server, and performing the shared web browsing interaction based

on the information received from the synchronization server.” *Id.*, Abstract, 3:10-16.

23. According to the ’145 patent specification, the prior art at the time “lack[ed] technology that would simultaneously connect two or more users in a medium that would allow all of them to both interact with one another and with the content itself in real time and in a synchronized or shared fashion.” *Id.*, 2:7-11.

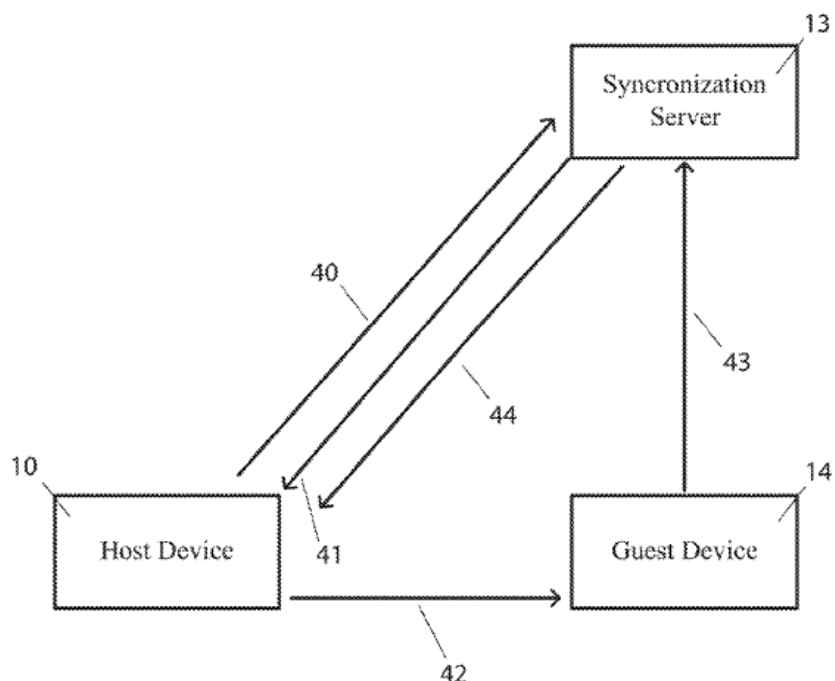
24. The specification asserts that prior art “chat software” and “desktop or screen sharing” software allowed users to send and receive messages between users and “view the same internet content” in real-time. *Id.*, 1:56-58, 2:25-30.

25. The ’145 patent specification further asserts that such prior art software did not permit multiple users to “share internet browsing in real time for online activities such as shopping together, booking travel together, watching or listening to media together, and browsing the internet together in a simultaneous fashion from different devices and/or locations.” *Id.*, 2:49-53.

26. One of the stated objectives of the ’145 patent is to “enabl[e] users to invite and interact with one another while browsing the internet together in real time.” *Id.*, 3:25-29. The specification provides examples of “shopping together, booking travel together, watching media together, and browsing the internet together in real time from different devices and/or locations . . . in a simultaneous

or nearly simultaneous fashion” for all users as examples of “synchronized online activities” purportedly encompassed by the ’145 patent. *Id.*, 3:29-34.

27. Figure 2(a) of the ’145 patent is a diagram illustrating the data communication between the components of “the present invention to initialize a synchronized browsing session.” *Id.*, 4:18-21, 10:13-16, Fig. 2(a).



28. As shown in Figure 2 above, the components of the ’145 patent include a host device 10, a synchronization server 13, and a guest device 14. *Id.*, 10:16-19, Fig. 2.

29. The ’145 patent specification describes both the host device 10 and guest device(s) 14 as “a personal computer, mobile phone, Smartphone, IPAD®, or other type of electronic device with a visual user interface and a network

connection such that a user may access and view” a website on the internet. *Id.*, 6:17-22, 26-32.

30. The ’145 patent specification distinguishes the host and guest device by their function, explaining that the host device “may initialize and conduct a synchronized browsing session with guest device 14 via synchronization server 13,” and the guest device(s) “may join a synchronized browsing session to view internet browsing conducted by host device 10 via relay communication over synchronization server 13.” *Id.*, 6:14-16, 23-26.

31. The ’145 patent specification describes the synchronization server 13 as “comprising [a] processor 28, [a] network interface 29, [a] session identification database 30, and [an] affiliate database 31.” *Id.*, 9:30-34, Fig. 1(e). The specification explains the general function of the synchronization server “to establish and facilitate a synchronized browsing session between host device 10 and guest device 14.” *Id.*, 9:34-36.

32. The ’145 patent specification describes the process for establishing the synchronized browsing session. First, the host device sends an initialization request to the synchronization server to establish a synchronized browsing session. *Id.*, 10:20-22, 11:35-36.

33. The synchronization server responds to the request with a confirmation message that may include a session identifier for the synchronized

browsing session. *Id.*, 10:22-24, 11:36-41. The '145 patent specification explains that the “session identifier may comprise an identification number, passkey, URL, MAC address, or other unique indicator” to identify and initiate the session. *Id.*, 10:14-18.

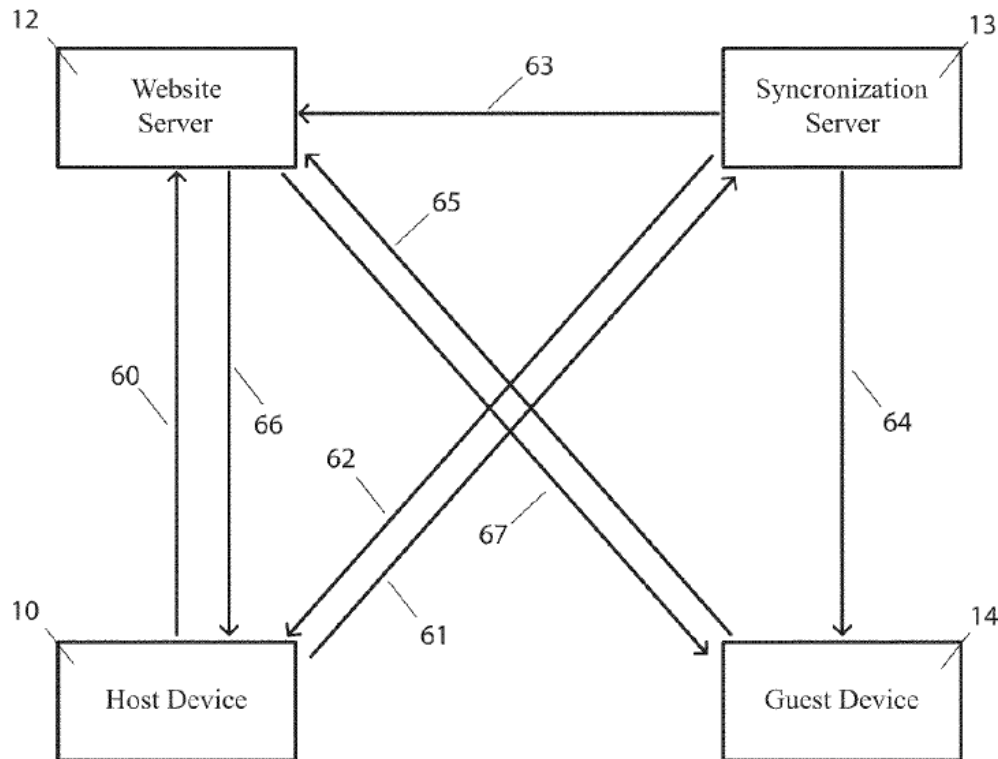
34. Once the confirmation message and session identifier have been received by the host device, the host device then sends a session invitation to prospective guest devices. *Id.*, 10:29-32, 11:42-44. The '145 patent specification explains that the session invitation “may comprise [the] session identifier 19, and [an] invitation hyperlink 52 to join the synchronized browsing session.” *Id.*, 11:45-47.

35. To join the synchronized browsing session, the invitee user of the guest device “need[s] to simply click invitation hyperlink 52 included in session invitation 42[.]” *Id.*, 11:47-49.

36. Once the invitation response has been received by the synchronization server, the synchronization server notifies the host device that a guest device has joined the synchronized browsing session. *Id.*, 12:15-25.

37. The '145 patent specification enumerates various forms that the synchronized browsing session invitation may take, including email, instant message or social network communication. *Id.*, 11:42-65, 11:66-12:14, Figs. 4(b)-4(e).

38. Figure 5(a) of the '145 patent illustrates the data communication between the system components once the synchronized browsing session has been established. *Id.*, 15:53-58, Fig. 5(a).



39. The '145 patent specification explains that during a synchronized browsing session, the host device transmits typical web requests (60) to website servers through the internet, which provide the requested website content (66). *Id.*, 15:61-16:3, Fig. 5(a).

40. Additionally, following each request to a website server, the host device sends a second communication message (61) to the synchronization server, and includes “webpage interaction information such as a URL address, form data,

java script, cookies, or other data communication.” *Id.*, 18:34-38, Fig. 5(a), 16:15-18 (“Communication message 61 may comprise the URL address of website server 12, cookie information, form data, java script, or other user inputted information, or attached files.”).

41. The ’145 patent specification explains that the synchronization server forwards the communication message (61) and webpage interaction information to the guest device. *Id.*, 16:42-51, 62-64, Fig. 5(a). The guest device uses the communication message (61) and webpage interaction data to make an identical website request (65) to the same website server as the original request (60) sent by the host device to the website server, which replies with similar or identical content (67) to the requested website content (66) sent to the host device. *Id.*, 8:11-23, 17:38-47, Fig. 5(a).

42. The ’145 patent specification explains that the host device may indicate in the communication message to the synchronization server not to relay the webpage interaction information to the guest device with the communication message (61). *Id.*, 16:18-23. In this alternative, the unshared webpage interaction information is rendered and displayed in a separate, unshared browser window at the host device only. *Id.*, 20:3-14, 20:26-29.

43. I refer now to the claims of the ’145 patent. Claim 1 recites, “A method performed by a guest device for joining a synchronized browsing session

administered by a synchronization.” *Id.*, 22:62-64. Claim 9 recites, “A guest device for performing a synchronized browsing session administered by a synchronization server.” *Id.*, 23:37-38. The claims and the reference numerals used for each claim element are reproduced below.

1[pre]	A method performed by a guest device for joining a synchronized browsing session administered by a synchronization server, comprising:
1[a]	receiving from the synchronization server a session invitation including a session identifier associated with a host device;
1[b]	activating the session invitation to send a request to join said synchronized browsing session to said synchronization server;
1[c]	receiving web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with:
1[c.i]	a website server that is independent of the synchronization server, and
1[c.ii]	the host device that has initiated the session invitation; and
1[d]	operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.
2	The method of claim 1, wherein said invitation comprises a hyperlink associated with said synchronized browsing session.
3	The method of claim 1, wherein said invitation is received via a viable means of communication.
4	The method of claim 1, wherein said web browsing interaction data further comprises cookie information associated with the website server.

5	The method of claim 4, wherein said web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window.
6	The method of claim 5, wherein non-shared web browsing interactions are depicted in a second web browser window.
7	The method of claim 1, wherein said web browsing interaction data further comprises form data associated with the website server.
8	The method of claim 1, wherein said web browsing interaction data further comprise a log-in into a restricted access webpage.
9[pre]	A guest device for performing a synchronized browsing session administered by a synchronization server, comprising:
9[a]	a network interface adapted to communicate with said synchronization server; and
9[b]	a processor configured to:
9[b.i]	receive from the synchronization server a session invitation including a session identifier associated with a host device;
9[b.ii]	activate the session invitation to send a request to join said synchronized browsing session to said synchronization server via said network interface;
9[b.iii]	receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with:
9[b.iii.1]	a website server that is independent of the synchronization server, and
9[b.iii.2]	the host device that has initiated the session invitation; and
9[b.iv]	operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation.

10	The apparatus of claim 9, further comprising a memory adapted to store one or more software modules for controlling said processor.
11	The apparatus of claim 9, wherein said invitation comprises a hyperlink associated with said synchronized browsing session and said hyperlink is received from the host device via a viable means of communication.
12	The apparatus of claim 11, further comprising a user interface adapted to initiate said processor to send said request in response to a user input.
13	The apparatus of claim 12, wherein said user input comprises activation of said hyperlink for initializing sending of said request to join said synchronized browsing session.
14	The apparatus of claim 9, further comprising a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window.
15	The apparatus of claim 14, wherein information related to said shared user input web browsing interactions comprises web browsing interaction data.
16	The apparatus of claim 14, wherein said shared user input web browsing interactions further comprise a log-in into a restricted access webpage.
17	The apparatus of claim 14, wherein said shared user input web browsing interactions are depicted in a first web browser window.
18	The apparatus of claim 17, wherein non-shared web browsing interactions are depicted in a non-shared web browser window.

44. The two independent claims of the '145 patent, claims 1 and 9, recite primarily the same basic elements:

- “a guest device for joining [performing] a synchronized browsing session administered by a synchronization server”

- “receiv[ing] from the synchronization server a session invitation including a session identifier associated with a host device”
- “activat[ing] the session invitation to send a request to join said synchronized browsing session to said synchronization server”
- “receiv[ing] web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with: a website server that is independent of the synchronization server, and the host device that has initiated the session invitation; and”
- “operat[ing] an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.”

45. The '145 patent claims the features of requesting and receiving website data using a browser, clicking a hyperlink invitation sent via email, instant message or social network, identifying browsing sessions using a session identifier, collaborative web browsing using multiple devices and a server, and operating a browser or an application based on the received data. The claims implement these well-known functions with basic steps performed in common web browsing and collaborative systems.

46. As explained, each of these functions was known before the priority date of the '145 patent. The claims thus add nothing novel and are not combined in any way that would be non-obvious to a POSITA.

B. Prosecution History

47. I reviewed the prosecution history of the '145 patent. I understand that statements made during prosecution of a patent may influence the meaning of terms in the claim of that patent, as well as terms in other claims in the same patent family.

1. Prosecution History of Application Serial No. 13/951,789

48. The '145 patent was filed on July 26, 2013 as Application Serial No. 13/951,789 (“the '789 application”). The '789 application is a continuation of Application No. 12/783,743 (“the '743 application”) filed on May 20, 2010, now U.S. Patent No. 8,527,591. I understand for the purposes of this *Inter Partes* Review proceeding that the challenged patent has an effective filing date no earlier than May 20, 2010.

49. I reviewed the prosecution history of the '145 patent. I understand that statements made during prosecution of a patent may influence the meaning of terms in the claim of that patent, as well as terms in other claims in the same patent family.

50. The '789 application was originally filed with claims 1-20, including independent claims 1 and 11. *See* Prosecution History of U.S. Patent 9,185,145 (“Exhibit 1002”) at 197-200.

51. On November 21, 2013, the '789 application was published as U.S. Patent Publication No. 2013/0311664. *Id.* at 127.

52. On April 22, 2015, the Examiner issued a non-final Office Action in the '789 application, rejecting all claims provisionally on the ground of non-statutory double patenting as being unpatentable over claims 1-15 of U.S. Patent No. 8,257,591. *Id.* at 90-91.

53. Claims 1-10 were rejected under 35 U.S.C. §101 for failing to tie the claimed steps to a particular machine or hardware, and all claims were rejected under 35 U.S.C. §112, ¶2 for failing to clearly indicate which device or person performed the claimed steps. *Id.* at 88-89.

54. All claims were further rejected under 35 U.S.C. §103(a) as obvious in light of Henrick (U.S. 2003/0041108) in view of Boehringer (U.S. 2005/0138122). *Id.* at 91-96. The Examiner noted in the Office Action that the only limitation that Henrick “does not specifically disclose [is] receiving cookie information from [the] server” additionally taught by Boehringer. *Id.* at 92.

55. On July 20, 2015, the Applicant submitted a terminal disclaimer to overcome the double patenting rejection. *Id.* at 66, 72-73, 94. The Applicant also canceled claims 2 and 4, and amended claims 1, 3, 5, 6-9, 11, 13, and 14 to recite the method is “performed by a guest device for joining a synchronized browsing session administered by a synchronization server” with limitations including

“receiving from the synchronization server a session invitation including a session identifier associated with a host device”, “activating the session invitation to send a request to join said synchronized browsing session . . .”, “receiving web browsing interaction data from said synchronization server . . . a website server that is independent of the synchronization server, and the host device that has initiated the session invitation” and “operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.” *Id.* at 61-65 (emphasis in original).

56. Based on the amended claims, the Applicant argued that the amended claims were not rendered obvious by the combination of Henrick and Boehringer. *Id.* at 67-70. The Applicant also argued in response to the Examiner’s §101 and §112, ¶2 rejections that the amended claims made clear that “the method is performed by a guest device in communication with a host device and a synchronization server.” *Id.* at 66-67.

57. A Notice of Allowance was issued on August 14, 2015, and pending claims 1, 3, and 5-20 were allowed without further substantive examination as claims 1-18. *Id.* at 8-12. The Notice of Allowance did not include the Examiner’s reasons for allowance, but merely noted that the communication was responsive to the Applicant’s July 20, 2015 amendments. *See id.* at 12.

2. Prosecution History of Application Serial No. 12/783,743

58. As discussed above, Application Ser. No. 12/783,743 is the application from which the '145 patent ultimately claims priority.

59. I reviewed the prosecution history of the '743 application. I understand that statements made during prosecution of the '743 application may also influence the meaning of terms in the '145 patent.

60. The '743 application was originally filed with claims 1-20, including independent claims 1 and 6. *See* Prosecution History of U.S. Patent 8,527,591 ("Exhibit 1027") at 205-209. On November 24, 2011, the '743 application was published as U.S. Patent Publication No. 2011/0289157. *Id.* at 136.

61. On June 5, 2012, the Examiner issued a non-final Office Action rejecting all claims provisionally on the ground of non-statutory double patenting as being unpatentable over co-pending Application No. 12/783,735 ("the '735 application") and co-pending Application No. 12/783,716 ("the '716 application"). *Id.* at 113-115.

62. Claims 6-20 were also rejected under 35 U.S.C. §102 as anticipated by Henrick (U.S. 2003/0041108). *Id.* at 116-119. Claims 1-5 were further rejected under 35 U.S.C. §103(a) as obvious in light of Henrick in view of Rosen (U.S. 2008/0028323). *Id.* at 119-122.

63. The Examiner expressly noted in the June 5, 2012 Office Action that the only limitation that Henrick “does not specifically disclose [is] activating a hyperlink associated with the synchronized browsing session.” *Id.* at 120.

64. In response, the Applicant submitted a terminal disclaimer on October 2, 2012 to overcome the double patenting rejection as to claims 6-20. *Id.* at 81, 94. The Applicant also added new claim 21, canceled claims 11 and 15, and amended claims 1, 6, 12-14 (which the Applicant amended to depend upon claim 1), and 16-19, arguing that the amended claims were patentably distinct from Henrick and not rendered obvious by the combination of Henrick and Rosen. *Id.* at 89-97.

65. On February 5, 2013, the Examiner issued a Final Rejection withdrawing the double patenting rejection based on the terminal disclaimer, but rejecting duplicate claim 17, and further rejecting claims 6-10 and 16-20 as obvious based on Henrick in combination with McCarthy (U.S. 2009/0228509), and additionally rejecting claims 1-5, 12-14 and 21 as obvious based on Henrick in combination with Rosen and McCarthy. *Id.* at 63-72.

66. On April 25, 2013, the Examiner and Applicant held an interview initiated by the Applicant. *Id.* at 40.

67. On May 6, 2013, the Applicant filed a request for continued examination and amended the claims to include limitations for “detecting an activation of a hyperlink associated with the synchronized browsing session by a

guest device”, “sending a request by the guest device to join the synchronized browsing session . . .”, “receiving from the synchronization server a notification that guest device has joined the synchronized browsing session”, “receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website and the host device[.]” *Id.* at 50-55 (emphasis in original).

68. The Applicant further argued that none of the cited prior art “disclose passing of URL and cookie information from a shared user input web browsing interaction through a synchronization server and onto a guest device” as recited in amended claims 1 and 6. *Id.* at 56-59.

69. A Notice of Allowance was issued on June 21, 2013, and pending claims 1-10, 12-14, 16, and 18-21 were allowed without further substantive examination as claims 1-18. *Id.* at 16-21. The Notice of Allowance did not include the Examiner’s reasons for allowance, but merely noted that the communication was responsive to Applicant’s May 6, 2013 amendments. *See id.* at 21.

VII. CLAIM CONSTRUCTION

A. Legal Standard for Claim Construction

70. It is my understanding that “[i]n an *inter partes* review proceeding, a claim of a patent ... shall be construed using the same claim construction standard that would be used to construe the claim in a civil action under 35 U.S.C. §282(b), including construing the claim in accordance with the ordinary and customary meaning of such claim as understood by one of ordinary skill in the art and the prosecution history pertaining to the patent.” 37 C.F.R. §42.100(b)

71. I am not a patent attorney and my opinions are limited to what I believe a POSITA would have understood the meaning of certain claim terms to be, based on the patent specifications and prosecution histories.

72. A POSITA would have no difficulty applying the plain and ordinary meanings of the terms used in the claim.

73. For purposes of this Petition, I have interpreted the terms of claims 1-18 of the '145 patent according to their plain and ordinary meaning.

VIII. OBVIOUSNESS STANDARD

74. It is my understanding that obviousness is a question of law based on underlying factual issues including (1) the scope and content of the prior art, (2) the differences between the prior art and the asserted claim, (3) the level of ordinary skill in the pertinent art, and (4) the existence of secondary considerations such as commercial success, long-felt but unresolved needs, failure of others, etc.

75. I understand that for a single reference or a combination of references to render obvious the claimed invention, a POSITA must have been able to arrive at the claim by altering or combining the applied references.

76. I understand that an obviousness evaluation can be based on a combination of multiple prior art references. I understand that the prior art references themselves may provide a suggestion, motivation, or reason to combine, but other times the nexus linking two or more prior art references is simple common sense. I further understand that obviousness analysis recognizes that market demand, rather than scientific literature, often drives innovation, and that a motivation to combine references may be supplied by the direction of the marketplace.

77. I understand that if a technique has been used to improve one device or product, and a POSITA would recognize that it would improve similar devices or products in the same way, using the technique is obvious unless its actual application is beyond his or her skill.

78. I also understand that practical and common sense considerations should guide a proper obviousness analysis, because familiar items may have obvious uses beyond their primary purposes. I further understand that a POSITA looking to overcome a problem will often be able to fit together the teaching of multiple references. I understand that obviousness analysis therefore takes into

account the inferences and creative steps that a POSITA would employ under the circumstances.

79. I understand that a particular combination may be proven obvious merely by showing that it was obvious to try the combination. For example, when there is a design need or market pressure to solve a problem and there are a finite number of identified, predictable solutions, a POSITA has good reason to pursue the known options within his or her technical grasp because the result is likely the product not of innovation but of ordinary skill and common sense.

80. I also understand that the combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results. When a work is available in one field of endeavor, design incentives and other market forces can prompt variation of it, either in the same field or a different one. If a POSITA can implement a predictable variation, the patent claims are likely obvious.

81. It is further my understanding that a proper obviousness analysis focuses on what was known or obvious to a POSITA, not just the patentee. Accordingly, I understand that any need or problem known in the field of endeavor at the time of invention and addressed by the patent can provide a reason for combining the elements in the manner claimed.

82. I understand that a claim can be obvious in light of a single reference, without the need to combine references, if the elements of the claim that are not found explicitly or inherently in the reference can be supplied by the common sense of one of skill in the art. In addition, a reference may be relied upon for all that it would have reasonably suggested to one having ordinary skill in the art, including nonpreferred embodiments. It is my understanding that the examples or any preferred embodiments disclosed in a prior art reference are not to be understood to teach away from a broader disclosure or nonpreferred embodiments.

83. It is further my understanding that a statement by an applicant in the specification or made during prosecution identifying the work of another as “prior art” is an admission which can be relied upon as evidence for both anticipation and obvious determinations involving one or more prior art patents or printed publications, regardless of whether the applicant admitted prior art (“AAPA”) would otherwise qualify as prior art.

84. I understand that secondary indicia of non-obviousness may include (1) a long felt but unmet need in the prior art that was satisfied by the invention of the patent; (2) commercial success of processes covered by the patent; (3) unexpected results achieved by the invention; (4) praise of the invention by others skilled in the art; (5) taking of licenses under the patent by others; (6) deliberate copying of the

invention; (7) failure of others to find a solution to the long felt need; and (8) skepticism by experts.

85. I also understand that there must be a relationship between any such secondary considerations and the invention. I further understand that contemporaneous and independent invention by others is a secondary consideration supporting an obviousness determination.

86. In sum, my understanding is that prior art teachings are properly combined or modified where a POSITA having the understanding and knowledge reflected in the prior art and motivated by the general problem facing the inventor, would have been led to make the combination of elements recited in the claim. Under this analysis, the prior art references themselves, or any need or problem known in the field of endeavor at the time of the invention, can provide a reason for combining the elements of multiple prior art references in the claimed manner.

IX. ANALYSIS OF THE TECHNICAL BASIS UNDERLYING THE GROUNDS OF REJECTION SET FORTH IN THE PETITION FOR *INTER PARTES* REVIEW

A. State of the Art

87. As stated in the specification, the '145 patent is in the general field of “a sharable browsing experience, and more specifically, to a method and apparatus for the implementation of a synchronized browsing session on a guest device

utilizing the transfer of URL, form data, script, and other information.” Ex. 1001, 1:8-12.

88. The ’145 patent essentially claims the features of requesting and receiving website data using a browser, clicking a hyperlink invitation sent via email, instant message or social network, identifying browsing sessions using a session identifier, collaborative web browsing using multiple devices and a synchronization server, and operating a browser or an application based on the received data. The claims implement these well-known functions with basic steps performed in common web browsing and collaborative systems. Each of these functions was known before the effective filing date of the ’145 patent, and thus, the claims add nothing new to the state of the art at the time of the purported invention.

1. Basic Web Browsing Communication

89. The concept of requesting and receiving website data using a web browser—the basic foundational mechanics of world-wide web browsing—was well-known by the time of the invention of the ’145 patent.

90. In 1993, computer scientist Marc Andreessen created Mosaic, the first internet browser at the National Center for Supercomputing Applications (NCSA) at the University of Illinois Urbana-Champaign. Mosaic was available to all students at the College of Engineering at the University of Illinois Urbana-

Champaign. Ex. 1008, <https://www.ncsa.illinois.edu/research/project-highlights/ncsa-mosaic/>. In 1994, Marc Andreessen founded Netscape and released Netscape Navigator, as the first publicly available web browser. Ex. 1009, <https://www.britannica.com/topic/Netscape-Communications-Corp>.

91. Both Mosaic and Netscape Navigator operated on the same basic principle of a user requesting web content from a web server using a Uniform Resource Locator or URL, receiving the requested content from the web server, and displaying the received content within the browser on the user's computer.

92. The key innovation of the World Wide Web was to allow a document ("Web page") to contain a URL, referencing another page on the same, or a different server. The URL was displayed in the document using some text (the link) informing the user of the content of the referenced document. When the user clicked on the link, the displayed page was replaced by the page referred to by the link. In that way, a network of documents connected by links was created across a set of server computers that could be anywhere in the world. The process of exploring links on this network was termed "browsing." Browsing was originally conceived as an individual activity, by a single person on a single computer. But eventually, groups of people collaborating in different locations wished to share their browsing sessions in real time. That concept became known as collaborative browsing, co-browsing, or shared browsing. It was an extension of the already

popular concept of “groupware,” software intended to be used by multiple users, in distributed locations, collaborating on a project.

93. The client-server architecture of the Web was also designed to allow the maximum in flexibility of configuration of sources of information and their consumption by users. The responsibility of a server to deliver pages helps a server manage requests emanating from multiple, independent users; the responsibility of a client to display pages from the user facilitates multiple points of view on the same information. Thus, browsing by a set of coordinated, rather than independent users, can be best managed by a server whose responsibility it is to coordinate the session. That server coordinates the process of invitation to the group, acceptance/decline, and synchronization of actions across multiple users.

94. This foundational concept of web browsing—requesting and receiving website data using a web browser—as well as groupware, and specifically, collaborative browsing, were many years old by the time of the effective filing date of the ’145 patent.

2. Hyperlink Invitations

95. Sending a hyperlink invitation via email, instant message or social network, and clicking the hyperlink to initiate a web request was also widely in use prior to the effective filing date of the ’145 patent.

96. Email and email delivery systems using local area and wide area networks was introduced as early as the 1970s, with the ability to send messages between computers connected within the ARPANET system. Ex. 1010, <https://www.prnewswire.com/news-releases/50-years-of-email-301262676.html>.

97. Email protocols Simple Mail Transfer Protocol (SMTP), Post Office Protocol (POP3) and Internet Message Access Protocol (IMAP) were designed and in wide use by the mid-1980s. Ex. 1011, <https://www.emailonacid.com/blog/article/email-marketing/history-of-email/>.

98. Internet messaging, providing the ability to send messages and links between users, was ubiquitous by the late 1990s, with the launch of ICQ in 1996, AOL Instant Messenger (AIM) in 1997, Yahoo! Messenger in 1998, and MSN Messenger in 1999. Ex. 1012, <https://www.lifewire.com/once-popular-old-instant-messaging-services-3486135>.

99. With the introduction of social networking platforms MySpace (2003), Facebook (2004), and Twitter (2006), communication via social network also became universally available as a core element connecting users together in MySpace's, Facebook's and Twitter's expanding subscriber base. Ex. 1013, https://en.wikipedia.org/wiki/Timeline_of_social_media.

100. Hyperlinks, which could be clicked to deliver the user to an internet destination via a Universal Resource Locator or URL, were a core feature of

Mosaic, Netscape Navigator, and all subsequent web browsers from their earliest introduction in 1993. Ex. 1014, <https://en.wikipedia.org/wiki/Hyperlink>.

101. After the advent of the Web, each internet communication method discussed above—email, messaging, and social network communication—included clickable hyperlinks, often in the form of an invitation to browse to a webpage or initiate a browser application.

102. Because HTTP/HTTPS requests containing a URL can also invoke functions on the server (typically, by naming the function after a “?” character in the URL), a URL can be used, not only for simply reading and displaying a page, but also for additional functions involving that URL. In particular, the functions of joining a group browsing session, or transmitting information to be used by other users, can be requested from the group browsing server by an HTTPS request containing a URL. Invoking server functions via HTTPS request and is a standard technique well known to POSITAs at the time.

103. Moreover, because URLs provided a way to reference a Web page that was valid no matter where on the Web the referencing page was located, they became a standard means of providing invitations. Since the issuer of the invitation could not necessarily tell where the invitee was located, invitations via URLs provided a foolproof method.

104. The combination of sending a hyperlink invitation via email, messenger or social network, which can be clicked to initiate a web request, was well-known and in wide use years before the '145 patent's effective filing date.

3. Web Session Identifiers

105. Web session identifiers were also well-known and widely used before the effective filing date of the '145 patent.

106. U.S. Patent No. 5,708,780, filed on June 7, 1995, discloses the concept of creating and appending session identifiers to web requests and responses to enable a webserver to recognize a requesting device during a series of requests and responses. Ex. 1015 (U.S. Patent No. 5,708,780 to Levergood et al.), 3:11-16 ("One aspect of the invention involves forwarding a service request from the client to the server and appending a session identification (SID) to the request and to subsequent service requests from the client to the server within a session of requests.")

107. A session identifier, session ID, or session token was a widely used method for providing a state function within the stateless HTTP protocol used by internet web servers by the early 2000s. Commercial websites could track an individual user's browsing habits, product interests, and intentions to purchase products in the user's online shopping cart using a session identifier.

108. By 2000, it was common for commercial websites to employ some form of a session identifier, including an identification number, an electronic passkey, a URL, a device MAC address, device serial number, hashcode, or other unique indicator, to track a user's online behavior and interests. Ex. 1016, <https://www.w3.org/TR/WD-session-id.html>; Ex. 1017, <https://www.nytimes.com/2001/09/04/business/giving-web-a-memory-cost-its-users-privacy.html>. Internet browsers Netscape Navigator and Microsoft Explorer allowed a user to view and place products into their shopping cart (e.g., DVDs and books) in an ongoing communication session with well-known commercial web sites (e.g., BestBuy.com, Amazon.com, and BarnesAndNoble.com) by exchanging a time-limited session identifier with each webpage request and response.

109. One important characteristic of the HTTP/HTTPS (HyperText Transfer Protocol) software that is used by Web servers to respond to URLs that request Web pages, is that it is "stateless" – normally, two users request the same page with identical URLs that do not carry the user's identity or identify the interactive session in which the user made the request. Because of that, if an e-commerce site wishes to have a "cart" to hold potential user purchases, it must have an additional mechanism to identify that user and that session. One such mechanism is the so-called "cookie." The server asks the user for permission to store an identifying cookie on the user's computer, and if granted, future requests

from that user to that server carry an identifier that can be used by the server to access the cart unique to that user (and that session).

110. Thus, the concept of a session identifier to identify a unique browsing session was not novel at the purported time of invention.

4. Collaborative Web Browsing and Collaborative Systems

111. The concept of collaborative web browsing using multiple devices and a synchronization server was also well-known and widely used before the effective filing date of the '145 patent.

112. For example, collaborative web browsers, such as GroupWeb, developed in 1996, allowed multiple users to browse together real-time in a shared visual browsing session with each user viewing a separate browser that provided independent web access that was synchronized across all users in the session. Ex. 1018 (GroupWeb: A WWW Browser as Real Time Groupware) at 1-2 (“GroupWeb is a browser that allows group members to visually share and navigate World Wide Web pages in real time.”), Fig. 1.

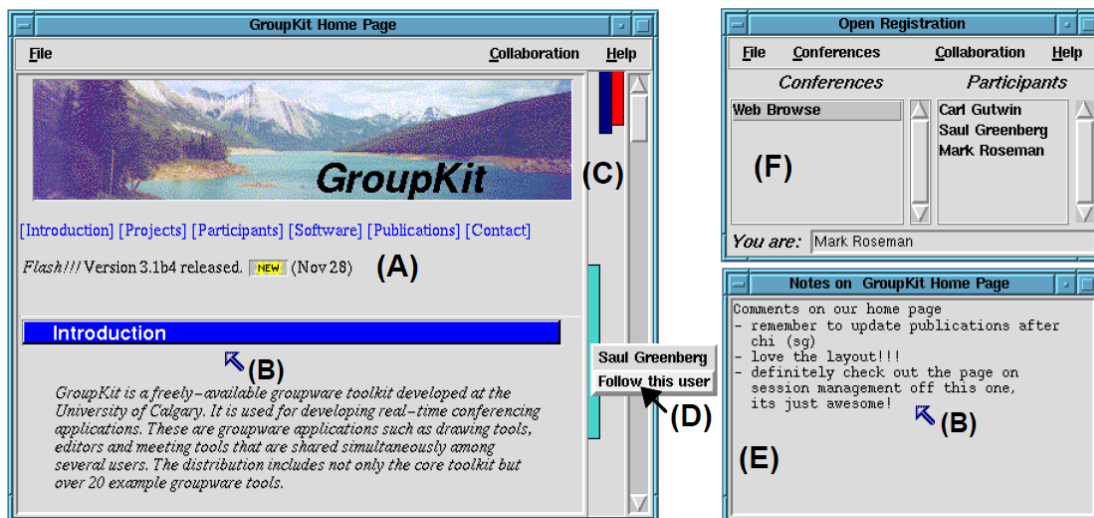


Figure 1. GroupWeb, showing (a) a shared web page, (b) telepointers, (c) multi-user scrollbars, (d) view-slaving controls, (e) a group annotation tool, and (f) a session manager for joining the GroupWeb conference.

113. Collaborative web browsing was known to me personally in 1999; I am co-author of a paper titled “Let’s Browse: A Collaborative Web Browsing Agent,” dated December 1998, available at <https://dl.acm.org/doi/10.1145/291080.291092>. Ex. 1019.

114. In particular, Let’s Browse was “an experiment in building an agent to assist a group of people in browsing, by suggesting new material likely to be of common interest.” *Id.*, Abstract. Let’s Browse was a further extension of the authors’ Web agent Letizia (Lieberman, Henry. “Letizia: An Agent That Assists Web Browsing.” *International Joint Conference on Artificial Intelligence* (1995) <https://web.media.mit.edu/~lieber/Lieberary/Letizia/Letizia-AAAI/Letizia.html> (Ex. 1020); U.S. Patent No. 6,353,822 to Lieberman (“Method and Apparatus for Document Browsing Based on Real-time Analysis of User Preferences”) (Ex. 1021), whose job it was to “look ahead” to the content of the links on a users’

screen, filtering the content to suggest the next page most relevant to a user's interest. Let's Browse extended this idea to use a filtering profile that came from more than one user. Let's Browse had several different ways of configuring multi-user browsing sessions. One, intended for use in a stand-up "kiosk" setting, automatically detected the presence of users walking up to it to automatically join the browsing session. Another allowed multiple users with independent browsing sessions, synchronously or asynchronously, to browse "with someone else's eyes". That is, to browse using the interest profile of one or more other users to anticipate which of the currently displayed links might be of most interest. The Let's Browse client also acted as a server for coordinating the group browsing session.

115. Collaborative user interfaces and collaborative work systems, or groupware, were also well-known and widely in use before the effective filing date of the '145 patent. For example, in August 2005, the software company Upstartle released Writely, one of the first collaborative cloud-based word processors. Ex.

1022, https://en.wikipedia.org/wiki/Google_Docs.

116. Google acquired Writely in 2006, which was incorporated into Google's widely available collaborative cloud-based word processor, Google Docs and Spreadsheets. Ex. 1023 (Press Release, Google Announces Google Docs & Spreadsheets, 10/11/2006, <http://googlepress.blogspot.com/2006/10/google->

announces-google-docs_11.html). Google released Google Docs and Spreadsheets on October 11, 2006.

117. It was well-known to a POSITA at the time that collaborative web browsing, collaborative user interfaces, and collaborative work systems typically involved multiple user computers (guest and host devices) and a separate server or set of servers (e.g., Google Doc & Spreadsheet servers) to synchronize the users' devices and user interfaces with one another.

118. Further, at the time, there were also troubleshooting systems that allowed a customer service support person to "take over" a customer's computer (see what the user saw on their screen, and optionally, provide input directly to the customer's computer) in order to resolve a problem. Such systems could be used for a synchronized browsing session between the helper and the customer by running a browser on the customer's computer. Co-browsing between a helper and a customer was typically used for the customer to demonstrate to the helper what was wrong; and for the helper to show the customer how to browse for information useful in solving the customer's problem, such as documentation; or for the helper to show the user how to perform a procedure by interacting with a Web site. They included all of the same steps of invitation, accept/decline, establishing a shared connection, and synchronizing input and output data.

119. Moreover, all collaborative groupware systems, whether text editors, spreadsheets or Web browser, use the same basic elements to establish a shared user interface that shows a common display (perhaps with minor variations) to multiple users at the same time, and can potentially accept input from any of the users in the group. First of all, users must receive an invitation that contains information that allows each user to access the shared interface. The user must declare their acceptance of the invitation to join the group in response to the invitation. The software on each user's computer must be able to communicate both input from its own user to other users, typically through a common server, and also display output that is the result of other user's actions. In that sense, the operation of a groupware system is similar to many other kinds of multiple-user interfaces, such as a shared database that can be read or written by multiple users. The principles of synchronization of actions of multiple users were not novel, and well-known to POSITAs at the time of the effective filing date.

120. Thus, the concept of collaborative web browsing using multiple devices and a synchronization server was not novel as of the effective filing date.

5. Operating a Browser or Application Based on Received Web Data

121. The final concept of operating a browser or an application based on web data received by a guest device was similarly well-known and in wide use prior to the effective filing date of the '145 patent.

122. Operating a client-side browser or application based on received web data was decades old by the purported time of invention. For instance, Netscape introduced JavaScript in 1995 as a client-side scripting language to provide dynamic application elements capable of executing within the user's browser. Shortly after its introduction, JavaScript quickly became a standard programming language for internet websites. Ex. 1024, <https://www.springboard.com/blog/data-science/history-of-javascript/>.

123. In 1996, Macromedia released Flash as a multimedia software application run within a user's browser to add animation, audio, and video elements to web pages requested by a user device and served by a webserver. Ex. 1025, https://en.wikipedia.org/wiki/Adobe_Flash.

124. Flash was an early example of how the client-server architecture of the Web could be used to implement additional user interaction functionality, beyond simple display of static Web pages. In later developments, this enabled such additional functionality as group browsing, while still adhering to the standard Web HTTP protocols and functionality.

125. Flash, and other extensions to Web protocols, effectively allowed a much richer graphical vocabulary for constructing user interfaces than was previously available. They allowed more dynamic interfaces in response to user interaction. Developers realized that they now had all the elements necessary to

implement, with Web technology, user interfaces that had previously required native applications designed for a single computer and user. This paved the way for Web- and cloud- based groupware.

126. In 2005, Asynchronous JavaScript And XML (Ajax) was introduced to enable website developers to create asynchronous web applications, including today's well-known Google's Gmail and Google Maps web applications, all of which operate based on web data received by a user's computer or handheld device from a webserver or web application server. Ex. 1026, <https://thehistoryoftheweb.com/what-does-ajax-even-stand-for/>.

127. Javascript and Ajax took us further down the road of enabling the Web to reproduce responsive user interaction techniques in a manner similar to that of applications natively programmed on a single-user machine. This helped open the door to multiple-user groupware applications for the Web, similar to what had previously been accomplished on single-user and time-shared systems.

128. Flash, and systems like it, were introduced in order to reduce the amount of display refresh required for interactive interfaces. The original Web architecture was designed to display one complete Web page at a time. If only part of the page changed, it still required redisplay of the entire page, which was slow and sometimes resulted in visual artifacts. Flash and Ajax allowed for incremental redisplay of individual graphic elements within a page.

129. It was well-known to a POSITA as of the effective filing date of the '145 patent that then-contemporary browser and web applications operated based on web data received by a guest (user) device.

130. The claimed invention of the '145 is the combination of the above known concepts to perform known methods used in collaborative systems and collaborative web browsing. The background provided above shows that each of the individual concepts were well-known and in use by the time of the invention.

B. Specific References that Render Claim 1 Obvious

1. International Application Publication WO 00/48110 to Lebrun et al.

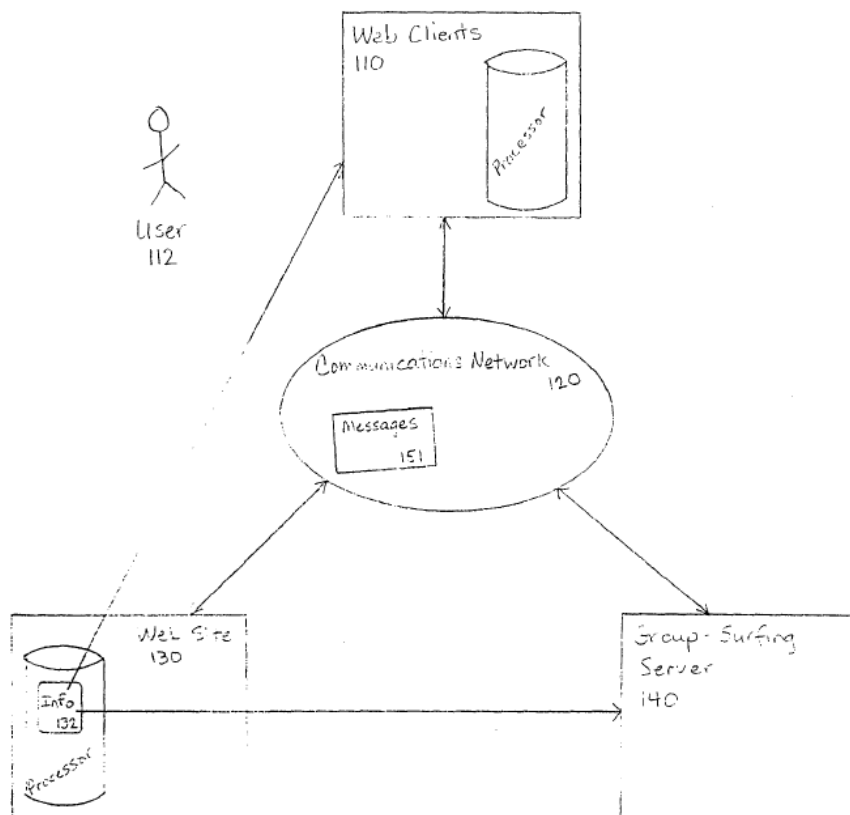
131. International Application Publication WO 00/48110, titled “Personalized Access to Web Sites” to Lebrun et al. (“Lebrun”) has an international filing date of February 11, 2000, and a publication date of August 17, 2000. Ex. 1005, Title. Lebrun is therefore prior art to the '145 patent under pre-AIA §102(a) and 102(b). Lebrun was not cited by the applicant or examiner during prosecution of the '145 patent. Ex. 1001, References Cited.

132. Lebrun identified problems in the art, much like the '145 patent, that “there is no convenient and simple technique in the known art for those users to coordinate following links to other and further web sites. Similarly, there is no convenient and simple technique in the known art for providing, for a group of related users, simultaneous access to a sequence of web sites.” Ex. 1005, 4:1-4.

133. Lebrun further noted a need in the art for “an improved technique for group access to web sites” and disclosed an embodiment “in which multiple related users can simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same time.” Lebrun further disclosed that one of the users or a selected plurality of the users may control the group web surfing process. *Id.*, 4:6-11; *see also id.*, 4:14-20 (describing general web browsing, web site requests, web links).

134. Figure 3 of Lebrun depicts “a system for group access to web sites” that includes “a set of web client 110, a communication network 120, at least one web site 130, and a group surfing server 140.” *Id.*, 29:25-28, Fig. 3.

System 100



135. Lebrun described the web clients 110 including a web browser or related software running on “a general-purpose computer, such as a laptop or workstation” or a variety of handheld user devices including “a Palm Pilot” and “cellular telephone or other telephonic device” independent of location. *Id.*, 30:14-28. The communication network 120 includes any packet-switched network, including the internet to enable communication between the components of the Lebrun system. *Id.*, 30:30-31:2.

136. Lebrun disclosed a sequence to create and participate within a group surfing session, in which a first web client 110 sends a group session creation request to the group surfing server 140 via the communication network 120. A group session identifier may be included with the web client's request message or the group surfing server 140 can also assign the group session identifier in its reply. *Id.*, 32:1-14. The group surfing server responds to the group session request "by (1) creating a group-surfing session, and (2) informing the participants [web clients] in the group-surfing session" and delivering the web clients to an online destination provided by web site 130. *Id.*, 32:26-31. *See also id.*, 44:5-13, Fig. 4.

137. Additional web clients may join the group surfing session by sending "a session-join message" that includes the group session identifier. *Id.*, 33:1-4. The group session server receives the join session message, responds by adding the web client to the group surfing session, and notifies the web clients in the session of the web client new to the session. *Id.*, 33:6-10. *See also id.*, 44:16-45:7, Fig. 4.

138. Lebrun, thus, described a system of collaborative web browsing and components in virtually the same manner as that offered by the system of the '145 patent, described below.

2. U.S. Patent Application Publication No. 2005/0033656 to Wang et al.

139. U.S. Patent Application Publication No. 2005/0033656, titled "Collaboration System Suitable for On-Line Shopping" to Wang et al. ("Wang")

has a filing date of April 21, 2004, and a publication date of February 10, 2005. Ex. 1006, Title. Wang is therefore prior art to the '145 patent under pre-AIA 35 U.S.C. §102(b) and 102(e). Wang was not cited by the applicant or examiner during prosecution of the '145 patent. Ex. 1001, References Cited.

140. Wang, like the '145 patent and Lebrun, is directed to a collaboration system that includes multiple client devices, a communication network, and a server providing “a group session” to the connected client devices and “means for synchronizing the client devices in the collaboration environment.” Ex. 1006, Abstract.

141. Wang, also like the '145 patent and Lebrun, identified problems in the art related to collaborative browsing, and in particular, to group virtual shopping sessions which suffer synchronization issues when individual web clients attempt to browse web pages or process online purchase requests. *Id.*, ¶¶[0009-10] (describing synchronization problems using conventional methods for an “on-line shopping system” and explaining that such “problems may be solved if web pages are shared using the collaborative technology” described therein).

142. To resolve such problems, Wang provided a “collaboration system” enabling a plurality of users to initiate a group browsing session via a synchronization server, to communicate with other users and invite them to follow an URL link to the group browsing session, and virtually shop together in a

synchronized manner through the server apparatus. *Id.*, ¶¶[0013-0017], [0046] (defining “the term ‘group session’ [a]s a session which enables client devices included in a group designated by a fixed identification value to access a common application service. In a virtual shopping system, this group session may be referred to as a shopping session.”).

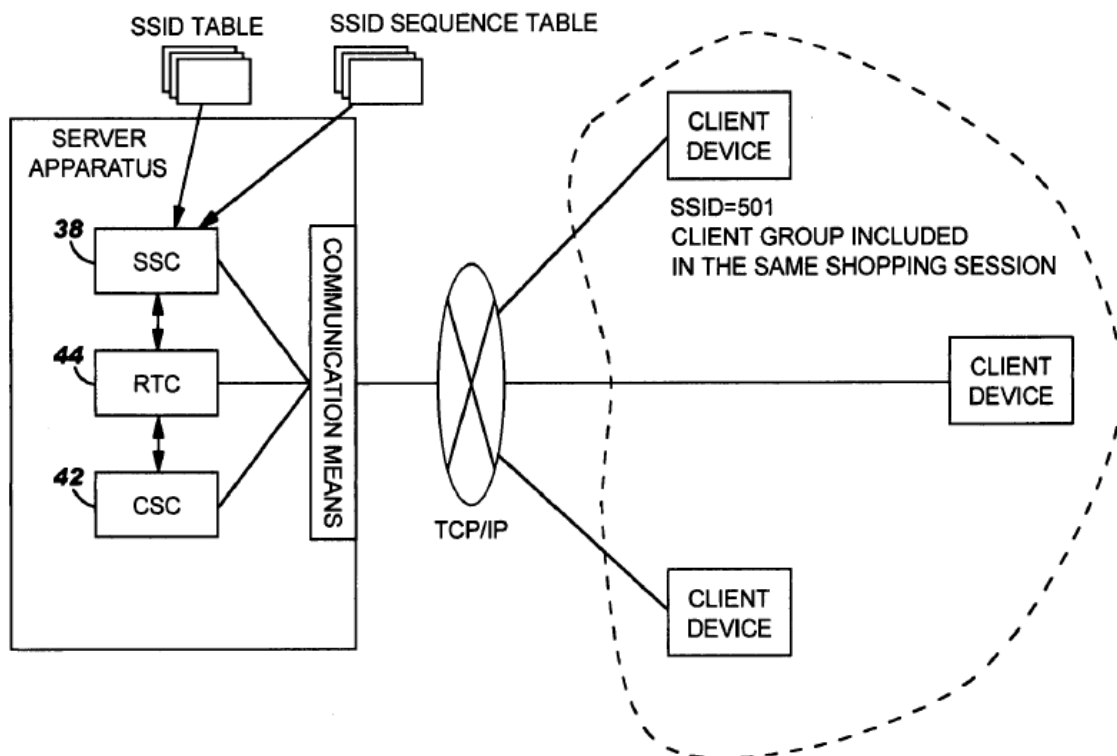
143. Wang described the group browsing process in which a first user initiates a collaborative browsing session by sending a request to the synchronization server, which responded by creating the group browsing session and sending invitations to one or more users to join the session. *Id.*, ¶¶[0046-48]. Wang explained that the group session invitation includes “a dedicated URL address” enabling the invitee user to join the group session. *Id.*, ¶¶[0015], [0047-48].

144. Wang’s synchronization server apparatus enabled the client devices to collaborate by creating a group session, transmitting a group session invitation and a URL address for the group session, storing group session identifiers and dedicated URL addresses in a database, and synchronizing web pages browsed by client devices within the group session using the session identifiers and received web server page data. *Id.*, ¶¶[0018-19], [0045-49], [0054-55].

145. Figure 11 is a diagram showing multiple client devices engaged in a group shopping session using the collaboration system of Wang, including multiple

client devices engaged in a group shopping session with a session identifier 501, a TCP/IP communication network, and a server apparatus responsible for storing the group session information, for managing the group session, and synchronizing the requested web page data across the client devices within the group session. *Id.*, ¶[0063], Fig. 11.

FIG. 11



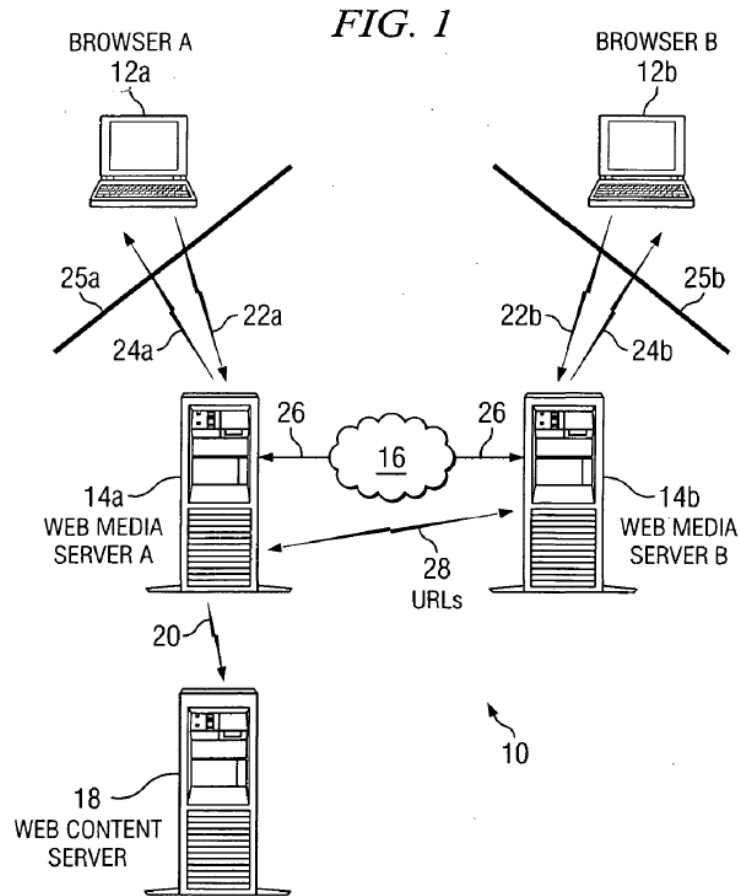
146. Wang thus disclosed a collaborative browsing system and components, group session initiation sequence, and group session operation in much the same manner and operation as the '145 patent.

3. U.S. Patent Application Publication No. 2005/0021626 to Prajapat et al.

147. U.S. Patent Application Publication No. 2005/0021626, titled “Peer-to-Peer Dynamic Web Page Sharing” to Prajapat et al. (“Prajapat”) has a filing date of May 22, 2003, and a publication date of January 27, 2005. Ex. 1007, Title. Prajapat is therefore prior art to the ’145 patent under pre-AIA 35 U.S.C. §102(b) and 102(e). Prajapat was not cited by the applicant or examiner during prosecution of the ’145 patent. Ex. 1001, References Cited.

148. Prajapat, like the ’145 patent, Lebrun and Wang, disclosed a collaborative browsing system that is directed to solving problems in the art regarding “efficiency in a communication system when sharing web pages.” Ex. 1007, ¶¶[0009-10], [0013].

149. Figure 1 of Prajapat depicts the communication system, including multiple client browsers, web media servers and web content servers, connected by a communication network. *Id.*, ¶[0012], Fig. 1.



150. In Prajapat’s system, web media servers act as the synchronizing service, allowing multiple client browsers to “co-browse on or more webpages” together, in which to “co-browse” includes “browser 12a and browser 12b display the same web pages at substantially the same time; browser 12a may alter web pages and browser 12b may view those alterations; browser 12b may alter web pages and browser 12a may view those alterations; or any other suitable situations.” *Id.*, ¶[0012].

151. Prajapat described the process of initiating a co-browsing session similar to that of the ’145 patent, Lebrun and Wang, in which a client browser

sends a request to a web media server to co-browse with one or more client browsers identified by email address. *Id.*, ¶¶[0016-17], [0034-35]. In response, the web media server establishes the co-browsing session with the requesting client browser, web media content servers, and invitee client browsers via their associated web media servers. *Id.*, ¶¶[0019-21], [0035].

152. Upon establishing a co-browsing session, any of the participating client browsers may submit web page requests to their respective web media servers, which synchronize the retrieval of the requested web content from web media content servers, for display on each co-browsing client browser via its associated web media server. *Id.*, ¶¶[0022-26], [0036-39].

153. Thus, Prajapat also disclosed a collaborative browsing system that is formed and operates in the same or similar manner as the '145 patent.

4. Motivation to Combine Lebrun and Wang

154. A POSITA would have been motivated to combine Lebrun with Wang. Both are directed to solving problems in the art regarding collaborative browsing of web pages by multiple users in a synchronized manner. *See* Ex. 1005, 4:1-4 (stating that “there is no convenient and simple technique in the known art for providing, for a group of related users, simultaneous access to a sequence of web sites.”); Ex. 1006, ¶¶[0009-10] (describing synchronization problems using conventional methods and explaining that such “problems may be solved if web

pages are shared using the collaborative technology” described therein); *see also*, Ex. 1005, 4:6-10 (describing an “embodiment of the invention in which multiple related users can simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same times”); Ex. 1006, ¶[0013] (“The present invention provides a collaboration environment that enables a plurality of users to access the same web page through their browsers while communicating with each other.”).

155. Furthermore, both Lebrun and Wang describe a process in which a first user initiates a collaborative browsing session by sending a request to a server to create a group browsing session and to send invitations to other users to join the session. Ex. 1005, 32:3-28; Ex. 1006, ¶¶[0047-48]. A POSITA would have recognized that the “identifier” in the group surfing invitation of Lebrun (Ex. 1005, 32:21-24) could incorporate the hyperlink “URL address” disclosed in Wang (Ex. 1006, ¶[0048]) using conventional web programming techniques. The result would be a combination of prior art elements according to known methods to yield predictable results.

156. A POSITA attempting to solve problems in collaborative web browsing and collaborative systems at the time of the effective filing date of the ’145 patent would have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative, synchronized

manner, and considered combining the “group surfing” concepts disclosed in Lebrun with the hyperlink invitation concept disclosed in Wang.

157. A POSITA attempting to implement Lebrun’s “identifier in the group surfing invitation” would have realized that the most natural way to represent the invitation would be as a URL constructed by the group surfing server, as was well-known in the art and disclosed in Wang. Web servers are already equipped, through the HTTPS protocol, with software to understand URLs, and have provision to accommodate additional functions in the HTTPS request which could be used for identification of the particular user and other information relevant to the group browsing session.

5. Motivation to Combine Prajapat and Wang

158. A POSITA would also have been motivated to combine Prajapat with Wang. Prajapat, like Wang, is directed to solving problems related to collaborative browsing via multiple web media servers and user devices to “improve efficiency in a communication system when sharing web pages.” Ex. 1007, ¶[0005], Fig. 2; Ex. 1006, ¶¶[0009-10], [0013].

159. Moreover, both Prajapat and Wang disclose synchronizing the retrieval and display of web pages to all client devices participating in a co-browsing session using a synchronization service comprised of a single server

(Wang) or multiple web media servers (Prajapat). Ex. 1006, ¶¶[0018-19], [0045-49], [0054-55]; Ex. 1007, ¶¶[0022-26], [0036-39].

160. A POSITA attempting to solve problems in collaborative web browsing and collaborative systems at the time of the effective filing date of the '145 patent would have sought out various available solutions for enabling multiple users to browse web pages together in an efficient, collaborative manner such as Prajapat web page sharing with the hyperlink invitation concept disclosed in Wang.

161. Furthermore, a POSITA would have recognized that even if Prajapat did not explicitly disclose that an invitee user requests a web page independent of a “web media server,” it would have been obvious to incorporate the software functionality of Wang to permit the invited user’s web browser to request a web page independent of a “web media server.” *See* Ex. 1006, ¶¶[0021], [0041] (discussing “page navigation control” functionality). The resulting combination would be a combination of prior art elements according to known methods to yield predictable results (e.g., a web browser software plug-in allowing an invited user to request a web page independently).

162. It would have been obvious to a POSITA that a group browsing session requires access to different kinds of Web pages, including those that are initiated uniquely by a single user and those that are intended to be shared by

multiple users in the session. Retrieval of pages by external Web servers is independent of the group surfing server. Web pages to be shared must be communicated to the group surfing server.

6. Secondary Considerations

163. I am unaware of any secondary considerations that would render the claims of the challenged patent non-obvious. In addition, the challenged patent did not satisfy any long felt but unmet need because a review of the prior art, including the references cited herein, already met the same needs as the features of each claim. Similarly, the alleged invention(s) of the challenged patent does not achieve any unexpected results because the prior art, including those cited herein, disclose the same processes achieving the same results.

C. Ground 1: Claims 1-18 are Rendered Obvious by Lebrun in View of Wang

a. Independent Claim 1

(1) Lebrun Discloses 1[pre] of Claim 1

164. To the extent the preamble of claim 1 is limiting, Lebrun discloses “**a method performed by a guest device for joining a synchronized browsing session administered by a synchronization server.**” Lebrun discloses “[a] first web client 110 sends a session-creation message 151 to a group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session.” Ex. 1005, 32:9-11. The message may include an identifier for the group-surfing

session, “so that other web clients 110 can add themselves to that session.” *Id.*, 32:11-12. The group-surfing server receives the session-creation message 151, and responds by creating a “group-surfing session” and informing web client participants. *Id.*, 32:26-31; *see also id.*, Fig. 4 (step 212); *id.*, 44:12-14. The “other web client[] 110” or “second (or further) web client 110” then “add[s] itself to the session” by “send[ing] a session-join message 151 to the group-surfing server 140.” *Id.*, 33:2-4.

165. A POSITA would have understood that the “other” or “second” web client, which may be a “a general-purpose computer, such as a laptop or workstation,” *id.*, 30:19-24, is a guest device and that adding itself to the group-surfing session comprises a method performed by a guest device for joining a synchronized browsing session. A POSITA would have further understood that the “group-surfing session” created by the “group-surfing server,” comprises a synchronized browsing session because the group-surfing session is a session where multiple web clients are shown the same progression of web pages as determined by one or more controlling web clients. *Id.*, 34:15-232. Further, a POSITA would understand the group-surfing server administers the session because the server is configured to “create or set up [the] group surfing session.” *Id.*, 7:3; 32:9-11.

166. Accordingly, Lebrun discloses a method performed by a guest device for joining a synchronized browsing session administered by a synchronization server.

(2) **Lebrun discloses 1[a], “receiving from the synchronization server a session invitation including a session identifier associated with a host device;”**

167. Lebrun discloses **“receiving from the synchronization server a session invitation.”**

168. First, Lebrun discloses “a web client 110” utilizing software that is “disposed for sending a message 151 to the group-surfing server 140, to request the group-surfing server 140 to respond.” Ex. 1005, 32:3-4. The message “is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page.” *Id.*, 32:5-7.

169. The group-surfing server responds to this “session-creation message 151” by “(1) creating a group-surfing session, and (2) informing the participants in the group-surfing session.” *Id.*, 32:26-28. A POSITA would have recognized and found obvious that the “other web clients 110” being informed by the “group-surfing server” of the “group-surfing session” comprises receiving from the synchronization server a session invitation.

170. Lebrun further teaches that the invitation received by the guest device “includ[es] a session identifier associated with a host device.” Lebrun discloses

that the host device that initiated the group-surfing session (the first “web client 110”) “sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session.” *Id.*, 32:9-11. “[T]he message 151 includes an identifier for the group-surfing session, so that other web clients 110 can add themselves to that session.” *Id.* 32:11-12. Also, “the message 151 is responsive to an action by the user of the web client software 111,” such as by “selecting a web page or a link to a web page.” *Id.* 32:5-7. Furthermore, the group-surfing server “assign[s] this identifier in a reply to the session-creation message 151.” *Id.*, 32:13-14. Lebrun discloses that the “reply message” sent by the group-surfing server is transmitted to the “other web browsers 110” when it “inform[s] the participants in the group surfing session” of the group-surfing session. *Id.*, 32:26-28.

171. Because the host device includes the same identifier in the initiating session-creation message 150, a POSITA would have understood that the group-surfing server “assign[ing] this identifier in a reply to the session-creation message” corresponds to the claimed “including an identifier associated with the host device that initiated the session invitation.”

**(3) Lebrun in view of Wang discloses 1[b],
“activating the session invitation to send a**

request to join said synchronized browsing session to said synchronization server;”

172. Lebrun discloses that in response to being informed of the group-surfing session by the group-surfing server (*see supra* limitation 1[a]. citing Ex. 1005, 32:23-28) the guest device (“second” or “other web client[] 110”) “add[s] itself to the session” by “send[ing] a session-join message 151 to the group-surfing server 140.” Ex. 1005, 33:2-3. In response, the group-surfing server “adds the new web client 110 to the group-surfing session.” *Id.*, 44:21-27.

173. As discussed above, the group-surfing server “assign[s] this identifier in a reply to the session-creation message 151.” *Id.*, 32:13-14. A POSITA would have understood that the “second (or further) web client 110” sending a session-join message to the group-surfing server in response to being informed of the group-surfing session by the group-surfing server corresponds to activating a session invitation in order to send a request to join the synchronized browsing session to the synchronization server. It would have been obvious and understood to a POSITA that the “identifier” included in the reply sent to the guest device would include a hyperlink or a URL, for the recipient to select and access to join the group-surfing session because this was a commonly employed technique and known in the field.

174. My opinion is supported by Lebrun’s own disclosure that the identifier disclosed in Lebrun is created “responsive to an action by the user of the

web client software 111, such as by selecting a web page or a link to a web page,” *id.*, 32:3-7, and can include “a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130.” *Id.*, 32:21-24. A POSITA would understand this disclosure to mean that the session-creation message (and relayed invitation) includes a common means of connecting to the join session at a home page, such as clicking a hyperlink to be directed to a specific URL.

175. But even if Lebrun did not expressly disclose this limitation, Wang discloses it.

176. First, Wang discloses a guest device receiving an invitation from a server to join a group browsing session initiated by a host device. Wang discloses process by which a first client device establishes a collaborative “group session.” Ex. 1006, Abstract, Fig. 3.

177. “As shown in FIG. 3, at T1, a customer connects to the server apparatus from a first client device. The server apparatus sets up an individual session with the first client device with an identification value SESSION A at T2. The server apparatus transmits an HTTP response to the first client at T3, establishes a session therewith (T4), and stores values of the SESSION A as an SSID table (described below) in an appropriate storage device. **At T4, the first client device transmits a message inviting the other client devices to the**

shopping session, for example the message ‘Add Others’ and a message such as ‘Invitee’ including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of ‘Add Others’ and ‘Invitee.’” Ex. 1006, ¶[0047] (emphasis added).

178. Then, “[a]t T7, the server apparatus **transmits an invitation notice and a URL address to be used, such as ‘Invitation Acknowledgment, myURL address,’ to a second client device**” that is sent “as electronic mail.” *Id.*, ¶[0048] (emphasis added).

179. Once the invitation is received by the second client device, “including the ‘Invitation acknowledgment, myURL address’ at T8, **the second client device accesses the designated URL address at T9.**” Ex. 1006, ¶[0049] (emphasis added); Fig. 3.

180. A POSITA would have recognized that the second client device receiving an invitation comprising the “Invitation acknowledgment, myURL address” and accessing the URL address to join the “group session” disclosed in Wang corresponds to “activating the session invitation.”

181. A POSITA would further have understood that the client device sending “message 151” disclosed in Lebrun to join the group-surfing session could be modified to include acting on the “Invitation acknowledgment, myURL address” disclosed by Wang. Lebrun already discloses an invitation sent to the

“second” web client, which acts upon that invitation to join the “group-surfing session.” Incorporating a URL into the message received and acted upon by the web client (which a POSITA would already understand is the most natural way to accomplish Lebrun’s group-surfing invitation method) would have been the obvious technique to accomplish this disclosure, as URLs were a ubiquitous and well-known technique for sending and prompting responses in messages to client devices.

182. A POSITA would have been motivated to combine activating a session invitation via the “Invitation acknowledgment, myURL address” of Wang into Lebrun’s invitation to join a group-surfing session. URLs were a fundamental and standard user interface tool in web technology, which a POSITA would have known and would have looked to in order to determine how to allow the recipient web client to perform the session invitation response disclosed in Lebrun.

183. Likewise, activating an invitation via a designated URL address would further enable the group-surfing server disclosed in Lebrun to coordinate and manage the group-surfing session. A POSITA, understanding that Lebrun provides an “improved technique for group access to web sites,” would understand that Lebrun assumes use of or could easily be modified to incorporate standard technology such as selecting a URL to direct the web clients to the join web browsing “group-surfing” session. *See, e.g., Ex. 1005, 7:1.*

184. Combining Lebrun’s disclosure of receiving an invitation to a group-surfing session, with the response via selecting the URL in Wang is a combination of prior art elements according to known methods, which would yield predictable results. Incorporating the technique of being directed to a session hosted by a server via selecting a URL in Lebrun constitutes the use of a known technique, which would improve a similar method as disclosed in Lebrun, in the same way that Wang uses the technology. In other words, activating a designated URL address was a known technique, and it is used in a similar way in Wang as Lebrun teaches it could be implemented within its group-surfing session invitation and acceptance method.

(4) **Lebrun discloses 1[c], “receiving web browsing interaction data from said synchronization server, [wherein said web browsing interaction data is associated with:]”**

185. Lebrun discloses web client 110 **“receiving web browsing interaction data from said synchronization server.”**

186. Lebrun discloses that the group-surfing server “begin[s] operation of the group-surfing session,” by “causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session,” as indicated by the identifier in the session-creation message sent by the host device. Ex. 1005, 32:28-31. The group surfing server then determines a “progression of pages 153 in the session” based on user input, and for each selected page, the server “contacts the

web site 130 having that next page . . . so it can be presented to those web clients 110 participating in the session.” *Id.*, 35:5-8.

187. Lebrun further discloses that each web client receives web browsing interaction data from a “program fragment loaded at each web client 110” that “interfac[es] with the web client 110 and affect[s] its operation with the web site 130 and the group-surfing server 140.” *Id.*, 36:21-25.

188. Lebrun explains that the “program fragment” receives browsing interaction data in at least two ways. First, the “program fragment” can intercept selection of a link 152 at the web client 110 and direct that selection to the group surfing server 140 for processing.” *Id.*, 37:5-10. Second, the controlling web client may enter information to complete HTML forms, which the group-surfing server will intercept via the program fragment, and “present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in.” *Id.*, 39:4-8.

189. z POSITA would understand that each of following examples of data provided to the web clients during the interactive group-surfing session meets the claimed “web browsing interaction data”: (1) the group-surfing delivery of the selected web pages to the web clients for display, (2) the web clients using a program fragment loaded at each web client to present selected web pages, and (3)

the web clients using the program fragment to display HTML form information entered by the controlling web client.

(5) Lebrun discloses 1[c.i], web browsing interaction data that is associated with “a website server that is independent of the synchronization server, [and]”

190. Lebrun discloses that the web browsing interaction data described above in limitation 1[c] is associated with **“a website server that is independent of the synchronization server.”**

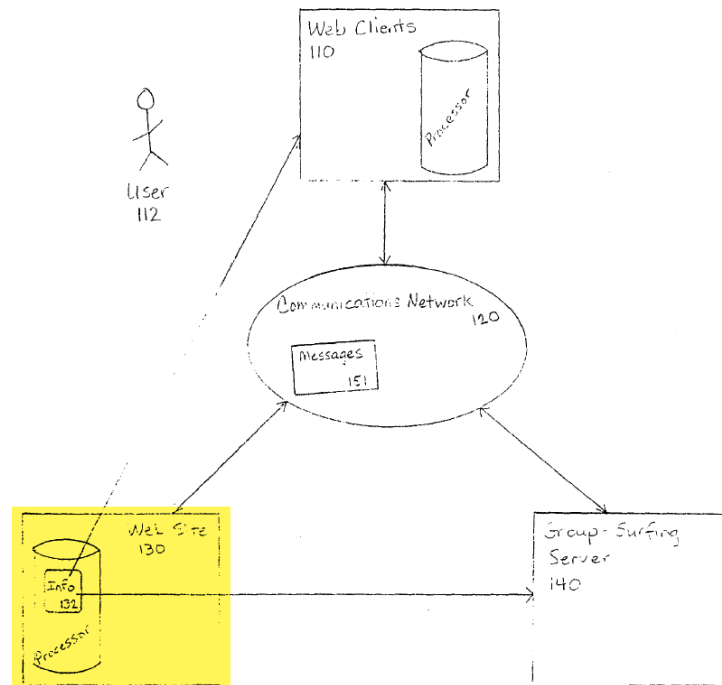
191. Lebrun explains that the web browsing interaction data identified above is delivered to the web clients or the group-surfing server by a “web site” that comprises a server and is independent of the synchronization server (“group-serving server.” Ex. 1005, 12:18.

192. First, the “‘web site’ includes any combination of devices or software **taking on the role of a server in a client-server environment in the internet**, the world 20 wide web, or an equivalent or extension thereof.” *Id.*, 12:18-20 (emphasis added) (referencing Fig. 1). A POSITA would thus know the disclosed web site constitutes a “website server” as claimed.

193. Next, Lebrun teaches that the **“website server [“web server software 131”] is independent of the synchronization server” (“group-surfing server”).**

194. Lebrun further discloses that the “website server” is independent of the “group-serving server,” in that the website server can serve pages without

explicit interaction with the group-serving server. With reference to Figure 3, Lebrun discloses that “web site 130 includes a processor operating under control of web server software 131, and disposed for delivering information 132 to the web clients 110 or the group-surfing server 140 in response to requests made using the communication protocol.” *Id.*, 31:27-30.



Id., Fig. 3 (highlighting added).

195. A POSITA would recognize that the web interaction data that is received from the synchronization server (i.e., the page and HTML data displayed on the web client) is associated with “web site 130” that comprises and is under the control of a website server (“web server software 131”) independent of the synchronization server (“group-surfing server”).

(6) **Lebrun discloses 1[c.ii], web browsing interaction data that is associated with “the host device that has initiated the session invitation;”**

196. Lebrun teaches that the web browsing interaction data disclosed in limitation 1[c] associated with **“the host device that has initiated the session invitation.”**

197. First, the progression of web pages displayed on each client device may be determined by the initiating host device. *Id.*, 35:26-28 (“[T]he controlling web client 110 selects a progression of pages 153 for the session, that progression of pages 153 is presented at each of the web clients 110 participating in the session.”).

198. Second, the host device that initiated the session “sends an import-export message 151 to the group-surfing server 140, directing import or export of information relating to web sites (such as bookmarks, ‘cookies,’ or user registrations at participating web sites 130).” *Id.*, 49:1-3. The group-surfing server, after receiving the import-export message, “imports or exports the designated information to selected databases at web clients 110 participating in the session that indicate their willingness to participate in the import or export operation.” *Id.*, 49:1-11.

199. A POSITA would have recognized that because the host device may select the web pages to be displayed and directs the import or export of information related to user registration for the entry of HTML information, the web

interaction data identified in limitation 1[c] is associated with the host device that initiated the session invitation (the first “web client 110”).

- (7) **Lebrun discloses 1[d], “operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.”**

200. Lebrun discloses a guest web client device **“operating an application based on said web browsing interaction data received from the synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.”**

201. Lebrun teaches that after the guest device (“other web client 110”) joins the group-surfing session, that web client is able to operate a web browser and access a website based on the data received from the group-surfing server.

202. The “other web client” during this session, is “operating an application” such as a common internet browser application. Lebrun discloses that the “web client is operated by a user 111, and includes an input device 112 and a presentation device 113” and can include web client software applications such as “Netscape Navigator” or “Internet Explorer.” Ex. 1005, 66:9-12.

203. Those browser applications are operating **based on web browsing interaction data received from said synchronization server to access a website server subsequent to the activation of the session invitation.** Lebrun explains that after the “other web client” joins the session, “the group-surfing server 140

sends to the new web client 110 a program fragment (preferably a Java applet and JavaScript code) that processes those pages 153 received as part of the session.”

Id., 44:29-31.

204. The web clients can interact directly with the web page and web server – i.e., **independent of the synchronization server** (“group-surfing server”). When providing the group-surfing session, the group-serving server sends to the web clients only the requested webpage itself “without any multimedia elements (such as embedded sound, images, or program fragments).” *Id.*, 45:31-46:2. To populate those parts of the web page, “[e]ach participating web client 110 requests those multimedia elements **directly from the web site 130.**” *Id.*, 46:1-2 (emphasis added).

205. A POSITA would have understood that each Lebrun’s disclosure of each participating web client requesting multimedia elements directly from the website corresponds with operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.

- b. **Lebrun in view of Wang discloses claim 2, “[t]he method of claim 1, wherein said invitation comprises**

**a hyperlink associated with said synchronized
browsing session”**

206. Lebrun teaches that the “invitation” received by the guest device (as described above in Section IX.C.a (citing Ex. 1005, 32:9-16, 32:26-28, 33:2-4, 44:12-14)) “comprises a hyperlink associated with the synchronized browsing session” (the “group-surfing session”).

207. Lebrun discloses that the group-surfing server assigns the “identifier,” that was provided by the initiating web client in its session creation message 151, “in a reply to the session-creation message 151.” Ex. 1005, 32:9-16. The session creation message 151 “is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page.” *Id.*, 32:5-7. The identifier included in the session creation message 151 may be “an identifier 152 for an initial page 153 for the group-surfing session” such as a “a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130.” *Id.*, 32:21-24.

208. A POSITA would have understood that the “identifier” identifying a “home page” in the session invitation that is “responsive to an action by the user” would include or comprise a hyperlink. A POSITA would look to Lebrun’s own disclosure that “the message 151 is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page,” and

understand that messages that are responsive to actions of a user and direct them to a web page or “home page” of a session would comprise a hyperlink.

209. Even if Lebrun did not expressly disclose claim 2, Wang discloses it.

210. Wang discloses a second client device activating a session invitation to send a request to join a synchronized browsing session to a synchronization server. *See* Section IX.C.a(4) (citing Ex. 1006, ¶¶[0047-49], Fig. 3). That invitation comprises a hyperlink associated with the synchronized browsing session.

211. The invitation is received via electronic mail and includes an “Invitation acknowledgment, myURL address.” Ex. 1006, ¶¶[0048-49], Fig. 3 (steps T7 and T8). Upon receipt, the second client device “accesses the designated URL” and the “the server apparatus receives an access notice.” *Id.*, ¶[0049]; Fig. 3. A POSITA would have understood that the second client device accessing the designated URL address in the invitation notice by acting on “Invitation acknowledgement, myURL address” corresponds with activating a hyperlink.

212. A POSITA would have understood that the “identifier” associated with the “home page” of the group-surfing session in the invitation message that is “responsive to an action by the user” could have been modified to include the “myURL address” hyperlink of Wang because it was a well-known technology at the time.

213. A POSITA would have been motivated to combine Wang's teachings of including a hyperlink in a session invitation to Lebrun's invitation to join a group-surfing session. Incorporating standard user interface and web technology, such as a standard URL hyperlink as disclosed in Wang, into Lebrun's invitation would allow Lebrun to perform the functions (i.e., joining a group browsing session by responding to a notice) described by Lebrun, in the same manner disclosed by Lebrun.

214. Such a combination is a combination of prior art elements according to known methods to yield predictable results. That is, the reply message sent to the second client device in Lebrun already includes technology allowing it to be "responsive to an action by the user," thus even if a hyperlink were not already disclosed as being included in that message (which in my opinion it is), modifying that message to include a hyperlink would be well within the technical skills of a POSITA, and its addition to the invitation message would comprise a common technique to improve that message in the same way that it is used in Wang. In other words, creating and sending hyperlinks was a known technique, and it is used in a similar way in Wang as Lebrun teaches it could be implemented within its group-surfing session invitation and acceptance method.

c. Lebrun discloses claim 3, “[t]he method of claim 1, wherein said invitation is received via a viable means of communication”

215. Lebrun teaches a guest device receiving a session invitation from the synchronization server. *See supra* Section IX.C.a(2) (citing Ex. 1005, 32:9-16, 32:26-28, 33:2-4, 44:12-14). Lebrun further discloses that the “invitation [that is sent to the guest device is received by the guest device] is received via a viable means of communication.”

216. The disclosed method takes place within a communication network that “is disposed for transporting messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140.” Ex. 1005, 31:4-5. Further, “[t]he messages 151 are formatted in the communication protocol recognized by the web clients 110, the web site 130, and the group-surfing server 140,” such as “TCP/IP,” “HTTP,” or “HTTPS.” *Id.*, 31:5-6; *see also id.* at Fig. 3. Lebrun thus discloses that the reply message sent to and received by the “other web client 110” (by way of the group-surfing server) was over communication network 120 using standard communication protocols. A POSITA would understand that such communication methods (over a network using standard protocols) comprise viable means of communication.

d. Lebrun discloses claim 4, “[t]he method of claim 1, wherein said web browsing interaction data further

comprises cookie information associated with the website server”

217. Lebrun discloses **“receiving web browsing interaction data”** per limitation 1[c]. *See* Section IX.C.a(4) (citing Ex. 1005, 12:18-22, 31:27-30, 32:28-31, 35:5-8, 35:26-28, 36:21-25, 37:5-10, 39:4-10, Fig. 1, Fig. 3.)

218. Lebrun also discloses that **“said web browsing interaction data further comprises cookie information associated with the website server.”** The web browsing interaction data identified above in limitation 1[c], includes **“information relating to web sites (such as bookmarks, ‘cookies,’ or user registrations at participating web sites 130),”** which are provided to the web clients, including the guest device, participating in the session. Ex. 1005, 49:1-11 (emphasis added).

e. Lebrun discloses claim 5, “[t]he method of claim 4, wherein said web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window”

219. As discussed above, Lebrun discloses **“receiving web browsing interaction data”** per limitation 1[c]. *See* Section IX.C.a(4) (citing Ex. 1005, 12:18-22, 31:27-30, 32:28-31, 35:5-8, 35:26-28, 36:21-25, 37:5-10, 39:4-10, Fig. 1, Fig. 3) Lebrun discloses that the **“web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window.”**

220. First, Lebrun explains that during the group-surfing session, the “group-surfing server 140 determines a next [web page] in the progression of pages 153 in the session” according to the selections made by the controlling web clients. Ex. 1005, 34:19-35:6 (describing various techniques used by the server to determine which selected web page is delivered to the web clients). Based on this input and determination, the group-surfing server then “contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session.” *Id.*, 35:5-8.

221. Second, Lebrun discloses that during the group-surfing session, the server shares HTML form data entered by a controlling web client with the other participating web clients. The controlling web client may enter information in an HTML form on the shared web site, which is sent to the group-surfing server. *Id.*, 38:31-32. “[W]hen the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in.” *Id.*, 39:4-10.

222. A POSITA would understand that these disclosures comprise web browsing interaction data that further comprises information related to shared user

input web browsing interactions because they are delivered to the client via the server based on interactions with the internet by the other web clients.

223. Lebrun discloses that these user input web browsing interactions are **depicted in a first web browser window**. The “web client is operated by a user 111, and includes an input device 112 and a presentation device 113” and can include web client software applications such as “Netscape Navigator” or “Internet Explorer,” which may display the shared user input web browsing interactions. *Id.*, 66:9-12. A POSITA would understand that the information displayed based on the web browser interaction data (HTML forms and selected web pages) are displayed in web browser windows.

f. Lebrun discloses claim 6, “[t]he method of claim 5, wherein non-shared web browsing interactions are depicted in a second web browser window”

224. Lebrun discloses the method of claim 5, **“wherein non-shared web browsing interactions are depicted in a second web browser window.”**

225. First, Lebrun discloses a “web page look ahead” feature, in which the “controlling web client 110 can select web pages 153 for ‘look ahead’ before designating those web pages 153 as next pages 153 in the progression of pages 153 in the session.” Ex. 1005, 37:29-31; *see also id.*, 38:1-12 (describing use cases for the “look ahead” feature). For example, a first user can “look ahead” to certain pages to see if they are “appropriate for the web clients 110 participating in the

session,” and exclude content that is “immaterial” for a class or seminar, or “inappropriate” for a session involving minors if the content is “adult-oriented.” *Id.*, 38:8-10. In another example, the first user can look ahead and see if a web page requires special access that would require the input of information such as a password or credit card information. *Id.*, 38:12-14. The user can choose to “accept such special access (such as entering a password or credit card number) without presenting that acceptance to other web clients.” *Id.*, 38:15-17.

226. A POSITA would understand the “look ahead” web page to be a non-shared web browsing interaction and that, because Lebrun discloses that the decision about sharing the page as described is done by an interaction with a user, it necessarily is disclosed as being viewed in a second browser window. *Id.*, 38:1-17. It would be clear to a POSITA from Lebrun’s disclosures that the first web client that “looks ahead” to view and interact with the web page could view that web page in a non-shared second web browser window, in order to separately view and interact with the web site and not share that with the other clients.

227. Second, Lebrun discloses a “web page special access feature,” in which a web client “can enter information required for special access privately, without presenting that information to other web clients 110 participating in the session.” *Id.*, 38:21-25. Likewise, a POSITA would understand that the privately entered information in the special access feature to be a non-shared web browsing

interaction in a second browser window because it requires a user interaction that is not shared with the group-surfing session.

- g. Lebrun discloses claim 7, “[t]he method of claim 1, wherein said web browsing interaction data further comprises form data associated with the website server”**

228. Lebrun discloses the method of claim 1, “wherein said web browsing interaction data further comprises form data associated with the website server.”

229. As noted above, Lebrun discloses that the group-surfing server shares HTML form data entered by a controlling web client into the HTML form. *See supra* Section IX.C.e (citing Ex. 1005, 38:31-39:10). A POSITA would understand that such HTML form data that is entered into a website associated with the website server comprises “form data associated with the website server” as claimed.

- h. Lebrun discloses claim 8, “[t]he method of claim 1, wherein said web browsing interaction data further comprise a log-in into a restricted access webpage”**

230. Lebrun discloses the method of claim 5, “wherein said web browsing interaction data further comprises form data associated with the website server.”

231. As noted above, Lebrun discloses a “web page look ahead” feature. *See supra* Section IX.C.f (citing Ex. 1005, 37:29-31); *see also* Ex. 1005, 38:1-12 (describing use cases for the “look ahead” feature). The “web page look ahead” feature allows the controlling web client to “determine if the selected ‘look ahead’

pages 153 require special access (**such as password restriction** or cost-burdened services),” and the web client can “choose to accept such special access (such as entering a password or credit card number) without presenting that acceptance to other web clients 110 participating in the session.” Ex. 1005, 38:12-17 (emphasis added); *see also*, Ex. 1005, 47:19-48:6 (describing process for inputting special access information to the website without displaying it to the other users, but allowing those users to be presented with the information in the pages once access is granted).

232. A POSITA would have understood Lebrun’s disclosure of providing access to password restricted web pages by entering (but not sharing) a password comprises web browsing interaction data that comprises a log-in into a restricted access webpage.

i. Independent Claim 9

(1) Lebrun discloses claim 9[pre], “[a] guest device for performing a synchronized browsing session administered by a synchronization server, comprising:”

233. Should the preamble of claim 9 be deemed limiting, Lebrun discloses it.

234. Lebrun discloses a “guest device that joins and participates in a synchronized browsing session.” As shown for 1[pre], Lebrun discloses a nearly identical limitation of a method “performed by a guest device for joining a

synchronized browsing session administered by a synchronization server.” *See* Section IX.C.a(1).

235. A POSITA would have understood that “a method performed by a guest device for joining a synchronized browsing session, comprising,” a guest device that “activat[es] a session invitation” and performs in a synchronized browsing session by “receiving web browsing interaction data” and “operating an application based on said web browsing interaction data,” as recited in claim 1, is substantively identical to a “[a] guest device for performing a synchronized browsing session . . . comprising,” a processor configured to perform the same “activate [a] session invitation,” “receiving web browsing interaction data,” and “operate an application based on said web browsing interaction data,” functions, as recited in claim 9.

236. Accordingly, as I discussed with respect to limitation 1[pre], a POSITA would have understood that the “other” or “second” web client that joins the group-surfing session is a guest device for performing a synchronized browsing session. *See* Section IX.C.a(1); *see also* Ex. 1005, 32:9-12, 26-31, 30:19-24, 33:2-4, 44:21-27, Fig. 4 (step 212).

(2) Lebrun discloses 9[a], “a network interface adapted to communicate with said synchronization server[; and]”

237. Lebrun discloses that the guest device (“other” or “second” web client 110) comprises **“a network interface adapted to communicate with the synchronization server”** (“group-surfing server 140”).

238. As I discussed for limitation 1[pre], Lebrun describes the web client as a “general-purpose computer.” Ex. 1005, 30:19-24, 32:9-16, 32:26-31, 33:2-4, 43:27-30. Further, the web client “includes any combination of devices or software taking on the role of a client in a client-server environment in the internet,” and “is configured to communicate over “a communication network 120 [that is] disposed for transporting messages 151 between any two of the web clients . . . and the group surfing server 140.” *Id.*, 30:1-3, 30:30-31:15.

239. A POSITA would understand Lebrun’s disclosure of a general-purpose computer configured to communicate over a network with a server that administers a group-surfing session to correspond with the claimed guest device with a network interface adapted to communicate with said synchronization server.

(3) Lebrun discloses 9[b], “a processor configured to:”

240. Lebrun discloses that the guest device (“other” or “second” web client 110) comprises **“a processor.”** Lebrun discloses that the web clients 110 “each include **a processor** operating under control of web client software 111, such as a web browser, and disposed for use by an operator or user 112.” *Id.*, 30:14-15

(emphasis added). A POSITA would understand that Lebrun expressly discloses that the web client comprises a processor.

- (4) **Lebrun discloses 9[b.i], a processor configured to “receive from the synchronization server a session invitation including a session identifier associated with a host device”**

241. Lebrun discloses a processor configured to “receive from the synchronization server a session invitation including a session identifier associated with a host device. I incorporate by reference my analysis with respect to claim limitation 1[a], wherein I provide analysis of a substantively identical claim limitation. *See* Section IX.C.a(2) (citing Ex. 1005, 32:3-7, 32:9-11, 32:13-14, 32:26-28).

- (5) **Lebrun in view of Wang discloses 9[b.ii], a processor configured to “activate the session invitation to send a request to join said synchronized browsing session to said synchronization server via said network interface”**

242. Lebrun in combination with Wang discloses a guest device comprising a processor “configured to **activate the session invitation to send a request to join said synchronized browsing session to said synchronization server.**” I incorporate my analysis of Lebrun in view of Wang with respect to claim limitation 1[b], where I provide my analysis of a substantively identical claim limitation, with the exception of the “via said network interface” element, which I discuss below. *See* Section IX.C.a(3) (citing Ex. 1005, 32:13-14, 32:23-28, 33:2-3, 44:21-27; Ex. 1006, ¶¶[0047-49], Fig. 3).

243. Lebrun discloses that the guest device activates the session invitation “**via said network interface.**” I incorporate my analysis with respect to claim limitation 9[a], where I discuss the network interface disclosed by Lebrun. *See* Section IX.C.i(2) (citing Ex. 1005, 30:19-24, 30:30-31:15, 32:9-16, 32:26-31, 33:2-4, 43:27-30). Lebrun discloses that the communication between the web clients 110 and the group-surfing server 140 takes place over the communications network 120. Ex. 1005, 30:30-31:15. A POSITA would understand that this is an explicit disclosure of the guest device activating the session invitation via a communication that takes place “via said network interface.”

- (6) **Lebrun discloses 9[b.iii], a processor configured to “receive web browsing interaction data from said synchronization server, [wherein said web browsing interaction data is associated with:]”**

244. Lebrun discloses that the processor of the guest device is configured to “receive web browsing interaction data from said synchronization server.” I incorporate by reference my analysis with respect to claim limitation 1[c], which recites a substantively identical claim limitation. *See* Section IX.C.a(4) (citing Ex. 1005, 32:28-31, 36:21-25, 37:5-10, 39:4-10).

- (7) **Lebrun discloses 9[b.iii.1], web browsing interaction data associated with “a website server that is independent of the synchronization server, and”**

245. Lebrun discloses web browsing interaction data associated with “a website server that is independent of the synchronization server.” I incorporate by

reference my analysis with respect to claim limitation 1[c.i], which recites a substantively identical claim limitation. *See* Section IX.C.a(5) (citing Ex. 1005, 12:18-20 (referencing Fig. 1), 31:27-30, Fig. 3).

- (8) **Lebrun discloses 9[b.iii.2], web browsing interaction data associated with “the host device that has initiated the session invitation[; and]”**

246. Lebrun discloses web browsing interaction data associated with **“the host device that has initiated the session invitation.”** I incorporate by reference my analysis with respect to claim limitation 1[c.ii], which recites a substantively identical claim limitation. *See* Section IX.C.a(6) (citing Ex. 1005, 35:26-28, 49:1-11).

- (9) **Lebrun discloses 9[b.iv], a processor configured to “operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation”**

247. Lebrun discloses a processor configured to **“operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation.”** I incorporate by reference my analysis with respect to claim limitation 1[d], which recites a substantively identical claim limitation. *See* Section IX.C.a(7) (citing Ex. 1005, 44:21-27, 45:7-19, 66:9-12).

- j. **Lebrun discloses claim 10 “[t]he apparatus of claim 9, further comprising a memory adapted to store one or more software modules for controlling said processor”**

248. Lebrun discloses that the guest device (“other” or “second” web client 110) comprises “a memory adapted to store one or more software modules for controlling said processor.”

249. As I discussed above with respect to the preamble of Claim 9, Lebrun discloses a guest device. *See* Section IX.C.i(1) (citing Ex. 1005, 30:19-24). That device includes “a processor operating **under control of web client software 111**, such as a web browser, and disposed for use by an operator or user 112.” Ex. 1005, 30:14-15 (emphasis added). A POSITA would know that the software executing to control the processor must be stored in memory, and that the web client software 111 comprises software modules as claimed. Accordingly, a POSITA would understand that the web client software 111 is stored on a memory of the user device and is one or more software modules for controlling the processor.

- k. **Lebrun in view of Wang discloses claim 11, “[t]he apparatus of claim 9, wherein said invitation comprises a hyperlink associated with said synchronized browsing session and said hyperlink is received from the host device via a viable means of communication”**

250. Lebrun alone or in view of Wang discloses an **“invitation that comprises a hyperlink.”** I incorporate by reference my analysis of claim 2, which

recites a substantively identical claim limitation, with the exception of the “via viable means of communication” portion of the limitation. *See* Section IX.C.b (citing Ex. 1005, 32:9-16, 32:21-24, 32:26-31; Ex. 1006, ¶¶[0047-49], Fig. 3).

251. Lebrun discloses that the hyperlink is received from the host device **“via a viable means of communication.”** I incorporate by reference my analysis of claim 3, which recites a substantively identical claim limitation. *See* Section IX.C.c (citing Ex. 1005, 30:30-31:15).

I. Lebrun in view of Wang discloses claim 12 “[t]he apparatus of claim 11, further comprising a user interface adapted to initiate said processor to send said request in response to a user input”

252. Lebrun discloses that the web client 110 comprises **“a user interface adapted to initiate its processor to send the request in response to a user input”** as recited in claim 12.

253. Lebrun discloses that the “web client” includes devices such as general purpose computers, laptops, Palm Pilots, and cellular telephones, operating under control of “web client software” such as a “web browser.” Ex. 1005, 12:11-13, 12:30-13:2; *see also id.* at 66:7-19 (describing functionalities and interface capabilities of the web client). The messages received by the web client are “responsive to an action by the user of the web client software,” and the web client “send[s] a message 151 to the group-surfing server 140, to request the group-surfing server 140” to perform the group-surfing session. *Id.*, 32:5-7; *see also id.*

at 41:20-21, 44:21-27 and Fig. 4 (describing ability of web client to respond to the message using a window). A POSITA would understand that this disclosure means the device has a user interface operable by a user to respond to the invitation message.

254. Similarly, the guest web client “sends a session-join message 151 to the group-surfing server.” *Id.*, 33:1-4. A POSITA would likewise understand that this discloses that, responsive to user input, the guest web client sends a message to join the group-surfing session takes place via a user interface adapted to send the message response.

255. Even if Lebrun did not disclose this limitation, Wang discloses it.

256. Wang discloses a “client device” comprising a “browser means for allowing the client to display data received through the network” and “synchronization control means for enabling the plurality of client devices to share the web page.” Ex. 1006, ¶[0020]. Wang further discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” *Id.*, ¶[0047].

257. A POSITA would have recognized that Lebrun’s “first web client” could have been modified to incorporate the user interface “browser means” and response via “Invitation acknowledgment, myURL address” disclosed in Wang. *See* Section IX.C.b. As discussed above, the user interface and hyperlink

technology described in Wang was commonplace at the time of the two references. Incorporating such standard user interface technology into the disclosures of Lebrun (which already teach that such technology is present in its disclosures) would have been well within the capabilities of a POSITA. Incorporating standard user interface technology, such as selecting a URL hyperlink on a standard web browser interface, into Lebrun's disclosed "web client" would allow the web client disclosed in Lebrun to respond and choose to enter a group-surfing session.

258. A POSITA would have been motivated to combine these references. A POSITA would look to common user interface technology and techniques that would allow Lebrun's web client to accomplished the disclosed goals and functionalities, and Wang describes such common, well-known user interface technology (i.e. an invitation comprising a URL hyperlink acted upon by the recipient) that could be easily incorporated into Lebrun.

m. Lebrun in view of Wang discloses claim 13 "[t]he apparatus of claim 12, wherein said user input comprises activation of said hyperlink for initializing sending of said request to join said synchronized browsing session"

259. Lebrun in view of Wang teaches user input comprising "activation of said hyperlink for initializing sending of said request to join said synchronized browsing session." I incorporate by reference my analysis with respect claim limitations 1[b] and 2, which collectively recite a substantively identical limitation.

See Section IX.C.a(3) (disclosing **activation of a session invitation**) (citing Ex. 1005, 32:23-28, 33:2-3, 44:21-27, 7:1; Ex. 1006, ¶¶[0047-49] (referencing Fig. 3)); Section IX.C.b (disclosing said **activation via a hyperlink** for sending request to join the synchronized browsing session (citing Ex. 1005, 32:5-7, 32:9-16, 32:21-24, 32:26-31; Ex. 1006, ¶¶[0047-49] (referencing Fig. 3))).

n. Lebrun in view of Wang discloses claim 14 “[t]he apparatus of claim 9, further comprising a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window”

260. Lebrun discloses “a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window.”

261. Lebrun discloses that during the group-surfing session, the “group-surfing server 140 determines a next [web page] in the progression of pages 153 in the session” according to the selections made by the controlling web clients. Ex. 1005, 34:19-35:6 (describing various techniques used by the server to determine which selected web page is delivered to the web clients). The group-surfing server then “contacts the web site” and “directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110.” *Id.*, 35:5-8.

262. In addition, Lebrun discloses that the server shares HTML form data entered by a controlling web client with the other participating web clients. “[T]he controlling web client 110 enters information to complete the HTML form, and

sends that information to the group-surfing server.” *Id.*, 38:31-32. The group-surfing server, in turn, “enters information to complete the HTML form, and sends that information to the web site 130.” *Id.*, 38:32-39:1. The web site replies with a new page, and “the group-surfing server 140 sends that new page to all participating web clients 130.” *Id.*, 39:1-2. Alternatively, “when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in.” *Id.*, 39:4-10.

263. A POSITA would understand that the web clients adapted to display (1) common web pages selected by the controlling web client and (2) dynamically entered HTML form data during or after it is entered by the controlling user each corresponds to a user interface adapted to depict shared user input web browsing interacts.

264. Lebrun further discloses that the shared user input web browsing interactions are depicted **in a shared web browser window**. The “web client is operated by a user 111, and includes an input device 112 and a presentation device 113” and can include web client software applications such as “Netscape

Navigator” or “Internet Explorer,” which may display the shared user input web browsing interactions. *Id.*, 66:9-12.

265. A POSITA would further understand that the shared user input web browsing interactions are depicted in a shared web browser window, such as the disclosed “Netscape Navigator” window.

- o. Lebrun discloses claim 15 “[t]he apparatus of claim 14, wherein information related to said shared user input web browsing interactions comprises web browsing interaction data”**

266. Lebrun discloses information related to said shared user input web browsing interactions that “comprises web browsing interaction data.”

267. I incorporate my analysis with respect to claim 14, where I explain that Lebrun’s disclosure of shared web pages and dynamic HTML form information comprises shared input web browsing interactions input by a controlling web client. *See supra* Section IX.C.n (citing Ex. 1005, 34:19-35:6, 35:5-8, 38:31-39:2, 39:4-10, 66:9-12). Because this information is comprised of the web clients’ interaction with the web pages and HTML forms during the group-surfing session, a POSITA would understand that the information related to these shared user input web browsing interactions comprise web browsing interaction data.

- p. Lebrun discloses claim 16 “[t]he apparatus of claim 14, wherein said shared user input web browsing**

interactions further comprise a log-in into a restricted access webpage”

268. I incorporate by reference my analysis with respect to claim 8, which recites a substantively identical limitation. *See supra* Section IX.C.h (citing Ex. 1005, 37:29-31, 38:1-12, 38:12-17).

q. Lebrun discloses claim 17 “[t]he apparatus of claim 14, wherein said shared user input web browsing interactions are depicted in a first web browser window”

269. I incorporate my analysis with respect to claim 5, which recites a substantively identical limitation. *See supra* Section IX.C.e (citing Ex. 1005, 34:19-35:6, 35:5-8, 38:31-32, 38:32-39:1, 39:1-2, 39:4-10, 66:9-12).

r. Lebrun discloses claim 18 “[t]he apparatus of claim 17, wherein non-shared web browsing interactions are depicted in a non-shared web browser window”

270. I incorporate my analysis with respect to claim 6, which recites a substantively identical limitation. *See supra* Section IX.C.f (citing Ex. 1005, 37:29-31; 38:1-12, 38:21-25, 39:4-10).

D. Ground 1: Claims 1-18 are Rendered Obvious by Prajapat in View of Wang

a. Independent Claim 1

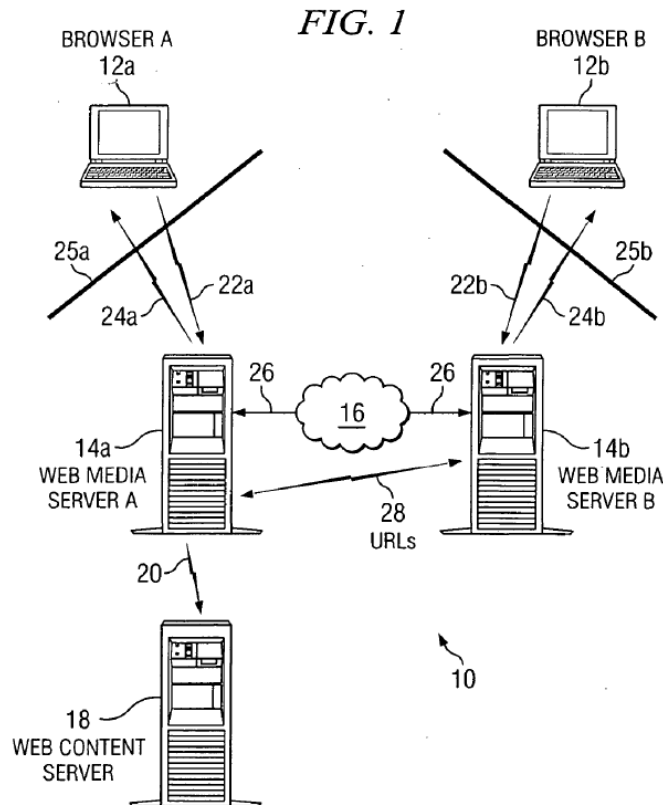
(1) Prajapat in View of Wang Discloses [1.pre] of Claim 1

271. To the extent the preamble of claim 1 is limiting, Prajapat discloses a method performed by “a guest device for joining a synchronized browsing

session.” Prajapat discloses a method for allowing users associated with browsers to “co-browse or share . . . web pages or other web content with another user,” also referred to as “peer-to-peer dynamic web page sharing.” Ex. 1007, ¶[0016]; *see also id.*, ¶¶[0012], [0034], Fig. 2. The method includes a “web media server” that allows a user (e.g., “browser 12a”) to “co-browse one or more web pages with browser 12b.” *Id.*, ¶[0012]. The term “co-browse” may include browsers that “display the same web pages at substantially the same time,” or “alter web pages” and “view those alterations.” *Id.*

272. A POSITA would have recognized that browser 12b joining the co-browsing session initiated by browser 12a constitutes a guest device for joining a synchronized browsing session.

273. Second, Prajapat discloses **a synchronization server that administers the synchronized browsing session**. As shown in Fig. 1, the communication system providing the “peer-to-peer dynamic web page sharing” includes “browsers 12, web media servers 14a and 14b coupled via network 16, and web content server 18 coupled to web media server 14a via link 20,” wherein the “web media servers 14 allow browser 12a to co-browse one or more web pages with browser 12b.” *Id.*, ¶[0012].



274. A POSITA would have understood that the web media servers 14a and 14b, which allow the co-browsing between browsers, constitute “a synchronization server” that administers the synchronized browsing session.

(2) **Prajapat discloses 1[a], “receiving from the synchronization server a session invitation including a session identifier associated with a host device;”**

275. Prajapat discloses **“receiving from the synchronization server a session invitation including a session identifier associated with a host device.”**

276. The guest device disclosed in Prajapat (“browser 12b”) **receives from the synchronization server (“web media servers 14a and 14b”) a session invitation.**

277. To initiate the session, “browser 12a may click on a desktop icon associated with browser 12a to establish a communication session with web media server 14a.” Ex. 1007, ¶¶[0015-16]; *see also id.*, ¶[0034] (referencing method described in Fig. 2). When initiating the session, browser 12a “may specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse,” by submitting “requests” to co-browse. *Id.*, ¶[0017]. For example, browser 12 may request to co-browse with “chachi@happydaycompany.com” by submitting a request. *Id.*

278. In response to a request to co-browse with browser 12b, “[w]eb media server 14a may locate the web media server 14b associated with browser 12b” and then “establish a signaling session 26 with web media server 14b” over a network. *Id.*, ¶[0019]; *see also id.*, ¶¶[0035], [0041].

279. Prajapat further discloses that the invitation includes **an identifier associated with a host device**. When the host device (“browser 12a”) submits a request to web content server 18 for a web page, a “URL or other suitable information regarding the requested web page” is communicated in the invitation to the “web media server 12b” which allows “browser 12b” to “use the URL and other suitable information to request from web content server 18 the web page that browser 12a requested.” *Id.*, ¶[0043].

280. A POSITA would have understood (1) “browser 12b” being contacted by “web media server 14b” to establish the communication session comprises receiving from the synchronization server a session invitation, and (2) communicating a URL associated with the web page selected by the host device (“browser 12a”) in the communication to browser 12b and its associated web media server constitutes an invitation including an identifier associated with a host device in the session invitation.

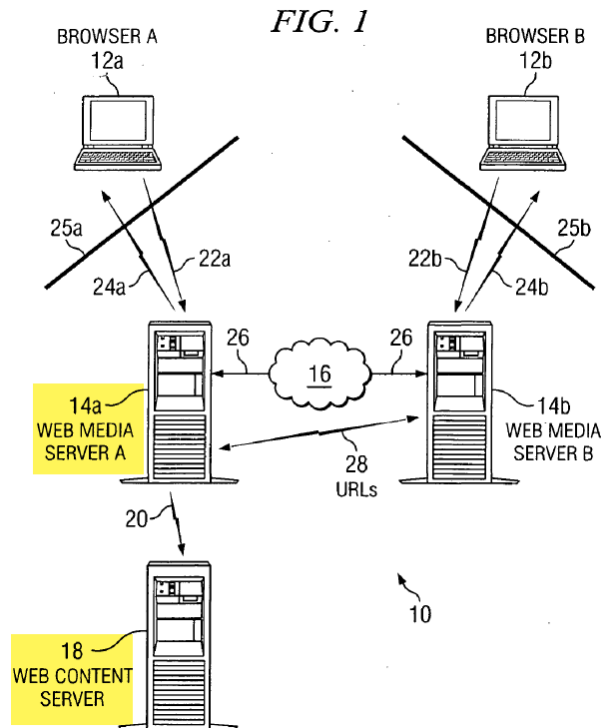
(3) Prajapat discloses 1[b], “activating the session invitation to send a request to join said synchronized browsing session to said synchronization server;”

281. Prajapat discloses “activating the session invitation to send a request to join said synchronized browsing session to said synchronization server.”

282. As discussed above, the session invitation includes a URL from the host device to the guest device communicated through the server. *See* Section IX.D.a(2) (citing Ex. 1007, ¶[0043]). Once the URL is communicated to web media server 14b, associated browser 12b “**may use the URL** and any other suitable information to request from web content server 18 the web page that browser 12a requested.” *Id.* (emphasis added). A POSITA would understand “us[ing] the URL” in the invitation constitutes “activating a session invitation.”

283. Further, as shown in Fig. 1, this activation is done via a communication with the server. “[W]eb media server [14a] is operable to retrieve

web pages from web content server 18,” which are then provided to browser 12b through web media server 14b:



Id., ¶[0047], Fig. 1 (highlighting added).

284. A POSITA would understand that browser 12b using the URL to join the dynamic web page sharing session corresponds to “activating the session invitation to send a request to join said synchronized browsing session to said synchronization server.”

- (4) **Prajapat in view of Wang discloses 1[c], “receiving web browsing interaction data from said synchronization server, [wherein said web browsing interaction data is associated with:]”**

285. Prajapat discloses “receiving web browsing interaction data from said synchronization server.”

286. The disclosed “peer-to-peer dynamic web page sharing” or “co-browsing” disclosed in Prajapat, *see* Section IX.D.a(2) (citing Ex. 1007, ¶[0012]), includes “the following situations: browser 12a and browser 12b display **the same web pages at substantially the same time; browser 12a may alter web pages and browser 12b may view those alterations;** browser 12b may alter web pages and browser 12a may view those alterations; or any other suitable situations.” Ex. 1007, ¶[0012].

287. As shown in Fig. 1 above, the data received by the browsers permitting viewing the “same web pages” selected by browser 12a or viewing “alterations” is received by browser 12b **from the synchronization server** (i.e. the web media servers). *Id.*, Fig. 1, ¶[0028]. During the co-browsing session the web media servers retrieve the browsing information from the web content server. “[B]rowser 12a may submit a web site address to web media server 14a, and web media server 14a may locate web content server 18 using the web site address.” *Id.*, ¶[0023]. The browsers may also contact the web content server through the web media servers to request “web pages” or “alter currently displayed web pages,” or “perform any other suitable actions,” *id.*, ¶[0028], which the web media servers may provide by, for example, “contact[ing] web content server 18 to retrieve another web page” (*id.*, ¶[0029]), “maintain[ing] a content tree” to display multiple web pages (*id.*, ¶[0030]), or relaying information “to update web page

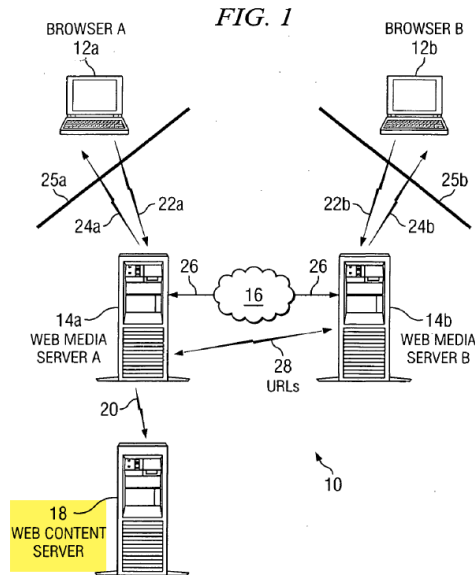
form content” of another browser. *Id.*, ¶¶[0031-32] (describing updating form content in co-browsing session by notifying the media servers).

288. Accordingly, a POSITA would understand that the user receiving the same web pages at the same time in the peer-to-peer dynamic session, as well as receiving and “alterations” of those web pages during the session as they occur corresponds to the claimed receiving web browsing interaction data from said synchronization server.

- (5) **Prajapat in view of Wang discloses 1[c.i], web browsing interaction data that is associated with “a website server that is independent of the synchronization server, [and]”**

289. Prajapat discloses that the web browsing interaction data described above in limitation 1[c] is associated **“a website server that is independent of the synchronization server.”**

290. Prajapat discloses that the web browsing interaction data sent from the web media servers is associated with web content server 18.



Ex. 1007, Fig. 1 (highlighting added).

291. Prajapat explains that “[w]eb content server 18 may include any suitable server or other computer for storing and communicating web pages.” *Id.*, ¶[0024]. And upon request from web media server 14a, web content server 18 “return[s] a requested web page to web media server 14a,” which may then be transformed by the web media server as needed. *Id.*

292. A POSITA would understand that web content server 18, which retrieves web pages at the request of the web media servers, is a web site server independent of the web media servers administering the co-browsing session.

(6) Prajapat discloses 1[c.ii], web browsing interaction data that is associated with “the host device that has initiated the session invitation;”

293. Prajapat discloses that the web browsing interaction data disclosed in limitation 1[c] is associated with “the host device that has initiated the session invitation.”

294. The web browsing interaction data that I discussed above in limitation 1[c] includes web pages chosen by web browser 12a. For example, during the group browsing session, browser 12a “may submit new action requests such as request for web pages, requests to alter currently displayed web pages” by taking action “such as posting a form or clicking on a link within the current displayed web page.” Ex. 1007, ¶[0028].

295. A POSITA would recognize that web pages chosen by the initiating web browser, including new action requests and alterations to displayed web pages correspond to the claimed web browsing interaction data that is associated with the host device.

(7) Prajapat discloses 1[d], “operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.”

296. Prajapat discloses a guest web client device “operating an application based on said web browsing interaction data received from the synchronization

server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.”

297. As discussed above, Prajapat discloses operating a web browser application based on the web browsing interaction data identified in limitation 1[c]. *See* Section IX.D.a(4) (citing Ex. 1007, ¶[0028]). The host and guest browsers 12a and 12b “may include any suitable interface for submitting requests and displaying media such as web pages.” *Id.*, ¶[0015]. Web browsers 12a and 12b include “a user of browser 12,” “a device including browser 12,” and “a user interface of browser 12.” *Id.* “A user of browser 12 may include **a computer program . . .** for automatically communicating with one or more other users of other browsers.” *Id.* (emphasis added).

298. The guest device operates the web browser application based on the web browsing interaction data received from said synchronization server (“media server 14 and 14b”) to access a website server (“web content server 18”) independent of the synchronization server and subsequent to the activation of the session invitation. After the session is initiated, either browser “may submit new action requests such as request for web pages and “requests to alter currently displayed web pages” by taking action “such as posting a form or clicking on a link within the current displayed web page.” *Id.*, ¶[0028].

299. A POSITA would understand that taking action on the peer-to-peer dynamically shared web pages during the co-browsing session by altering the web pages or navigating away from the presently displayed web page disclose operating an application based on said web browsing interaction data received from said synchronization server to access a website server. Further, a POSITA would have understood that requesting “a web page” from a “web content server,” as opposed to a “web media server,” comprises sending a request for webpage content to a website server independent of the synchronization server.

300. In addition, even if Prajapat did not disclose this limitation, Wang discloses a “computer-executable program” that may comprise a “a step of forming a page navigation control unit for providing a web page common to each of the individual sessions.” Ex. 1006, ¶[0021]. The page navigation means “allows the client device 12a to access the server apparatus 14 directly and to acquire a web page when the client device 12a has ownership of the initiative of web page operation.” *Id.*, ¶[0041]. A POSITA would have been motivated to combine Wang’s teachings of “page navigation control” software functionality to Prajapat’s “browser 12a.” Incorporating standard web software functionality, as disclosed in Wang, such as retrieving a web page by a web browser, into Prajapat’s disclosed “browser” would allow Prajapat to perform the functions described in Prajapat’s disclosure.

b. Prajapat in view of Wang discloses claim 2, “[t]he method of claim 1, wherein said invitation comprises a hyperlink associated with said synchronized browsing session”

301. Prajapat discloses the method of claim 1, wherein the invitation comprises a hyperlink associated with the browsing session as recited in claim 2.

302. As previously discussed, Prajapat discloses an invitation as analyzed with respect to claim limitation 1[a]. *See* Section IX.C.a(2) (citing Ex. 1007, ¶¶[0015-17], [0019], [0034-35], [0043]).

303. Prajapat explains that the notification of the co-browsing session sent from the host device (“browser 12a”) to the guest device (“browser 12b”) may include “the URL” of the requested web page in the peer-to-peer co-browsing session, and “browser 12b may **use the URL** and any other suitable information to request from web content server 18 the web page that browser 12a requested.” *Id.*, ¶[0043] (emphasis added).

304. A POSITA would recognize or find obvious that the sending of a URL and other suitable information that is then used by web 12b to request from the web content server comprises a hyperlink associated with the synchronized browsing (“co-browsing”) session because that would be a common technique used in the field to accomplish this disclosed function.

305. Even if Prajapat did not expressly disclose a hyperlink associated with said synchronized browsing session, Wang does, and Prajapat could be modified to incorporate the disclosures of Wang, as I discussed above with respect to claim 2 in Ground 1. *See* Section IX.C.b (citing Ex. 1006, ¶¶[0015-16], [0049], Fig. 3).

306. A POSITA would have understood that Prajapat's disclosure of "browser 12b" being contacted through "web media server 14b" to establish the communication session could be modified to include a hyperlink as disclosed by Wang ("Invitation Acknowledgment, myURL address"). A POSITA would know that the hyperlink and URL technique described by Wang was a commonly used, well known technology.

307. Moreover, a POSITA would have been motivated to combine Wang's teachings of including a URL and hyperlink associated with the host device into Prajapat's communication session invitation to join a co-browsing session, which includes a URL. Incorporating standard user interface and web technology, such as a hyperlink associated with a designated URL address as disclosed in Wang, into Prajapat's session notification would allow the guest device in Prajapat to join the collaborative browsing session as intended by the other disclosures of Prajapat.

308. Such a combination would be a of known prior art elements according to known methods that yield predictable results, and such use of a known technique would improve the similar method disclosed in Prajapat in the same way

as disclosed in Wang. In other words, incorporating a URL address associated with a web page was a known technique, and it is used in a similar way in Wang as Prajapat teaches it could be implemented within its described method of inviting a user and joining a co-browsing session. That is, Wang's disclosure of a hyperlink, if incorporated into Prajapat, would permit browser 12b to join the co-browsing session in the same way that Prajapat teaches its disclosed functions are performed.

c. Prajapat discloses claim 3, “[t]he method of claim 1, wherein said invitation is received via a viable means of communication”

309. Prajapat discloses claim 3. As discussed above, which I incorporate here by reference, Prajapat discloses a session invitation (“a user of browser 12a may submit a request to co-browse”) received by a guest device (“browser 12b”) for a peer-to-peer dynamic web page co-browsing session. *See supra* Section IX.D.a(3) (citing Ex. 1007, ¶¶[0015-17], [0019], [0021], [0034], [0035], [0043]).

310. Prajapat discloses that the invitation is communicated from browser 12a to web media server 14a and then to browser 12b after “media session 28” is established. Ex. 1007, ¶¶[0019-20]. The web media servers, which communicate the session invitation from browser 12a to browser 12b communicate “using network 16,” and are “equipped to negotiate communication sessions with other web media servers 14 using session initiated protocol (SIP) or any other suitable standard signaling protocol.” *Id.*, ¶¶[0018-19]. The communication between

server 14b and browser 12b “may be established in any suitable manner,” including via establishing a “a hypertext transfer protocol (HTTP) channel,” or “a LongPoll event channel.” *Id.*, ¶[0021].

311. A POSITA would understand that the suitable communication channels between the web browsers 12 and media servers 14a and 14b and the network communications between the media servers 14a and 14b comprise viable means of communicating the session invitation. Thus, the invitation notification is received via that viable means of communication.

d. Prajapat discloses claim 4, “[t]he method of claim 1, wherein said web browsing interaction data further comprises cookie information associated with the website server”

312. Prajapat discloses “[t]he method of claim 1, wherein said web browsing interaction data further comprises cookie information associated with the website server.” I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[c]. *See* Section IX.D.a(4) (citing Ex. 1007, ¶¶[0012], [0023], [0028-32]).

313. The web browsing interaction data I identified above in limitation 1[c] includes a “request for a web page” that includes information “information that may be required to properly render the web page such as session information, **cookies**, parameters to send to the web content server associated with the web

page, or any other suitable information.” Ex. 1007, ¶[0017] (emphasis added); *see also id.*, ¶[0022].

314. Accordingly, cookie information is part of the web browsing interaction data that Prajapat discloses, and a POSITA would understand that Prajapat discloses this claim limitation.

- e. **Prajapat discloses claim 5, “[t]he method of claim 4, wherein said web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window”**

315. Prajapat discloses web browsing interaction data that “further comprises information related to shared user input web browsing interactions depicted in a first web browser window.” I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim 4. *See* Section IX.D.d (citing Ex. 1007, ¶¶[0012], [0017], [0022-23], [0028-32]).

316. Prajapat discloses “**shared user input web browsing interactions.**” The participating browsers may “share the one or more web pages or other web content with another user associated browser” in the co-browsing session. Ex. 1007, ¶[0016]. The co-browsing session may also include the dynamic input of web page form content and cursor movements. “[W]eb page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers involved in a web page sharing session by using JavaScript or other suitable

events.” *Id.*, ¶[0031]. In addition, “JavaScript events, such as onMouseOver events for example, may be kept in sync on the browsers 12 in a substantially similar manner.” *Id.*, ¶[0032].

317. A POSITA would understand that the display of these dynamic inputs on a web page in the co-browsing session comprise information related to “shared user input web browsing interactions.”

318. Prajapat further discloses that the shared browsing session takes place on a first web browser window. Prajapat explains that the participating browsers 12a and 12b, “may include any suitable interface for submitting requests for and displaying media such as web pages,” including “any device, application, hardware, and/or software for displaying one or more types of media.” *Id.*, ¶[0015]. “[T]he browsers 12 may be rendering multiple pages at the same time, using frames, iframes, or any other suitable techniques.” *Id.*, ¶[0030].

319. A POSITA would understand that the suitable interface for submitting requests for and displaying media such as web pages would include standard display means such as internet browser windows on standard operating systems at the time of the disclosure.

320. Further, a POSITA would understand that Prajapat’s disclosure of “multiple pages” being rendered at the same time using different “frames”

constitutes the depiction of the shared user input web browsing interactions depicted in a first web browser window. *Id.*, ¶[0030].

321. Accordingly, Prajapat discloses or alone renders obvious this limitation.

f. Prajapat discloses claim 6, “[t]he method of claim 5, wherein non-shared web browsing interactions are depicted in a second web browser window”

322. Prajapat discloses the method of claim 5, “wherein non-shared web browsing interactions are depicted in a second web browser window.”

323. Prajapat explains that “browser 12a” can register with a “web media server 14a,” for the co-browsing session, “without actually sharing web pages with another browser 12.” Ex. 1007, ¶[0034]. A POSITA would have understood that before browser 12a requests to share “one or more web pages” with other browsers, a user associated with browser 12a may view but opt not to share certain web pages. Because these web pages are not shared, a POSITA would understand that they are depicted in a second web browser window.

g. Prajapat discloses claim 7, “[t]he method of claim 1, wherein said web browsing interaction data further comprises form data associated with the website server”

324. Prajapat discloses web browsing interaction data that “**further comprises form data associated with the website server.**” The “web browsing

interaction data” disclosed by Prajapat (*see* Section IX.D.a(4) (citing Ex. 1007, ¶¶[0012], [0023], [0028-32], Fig. 1) further includes information related to the shared user input including: form data; java script data; or other web browsing interaction data.

325. During the co-browsing session, “web page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events.” Ex. 1007, ¶[0031]. Prajapat discloses that the web page form data is associated with the web media because the “web media server 14a may contact web content server 18” to retrieve the web pages including the form data that the browsers act upon. *Id.*, ¶¶[0028-29].

326. A POSITA would understand that because the web browsing interaction data comprises information received from the web site server related to the viewed web pages, such as web page forms, Prajapat discloses web browsing interaction data comprising form data associated with the website server.

h. Prajapat discloses claim 8, “[t]he method of claim 1, wherein said web browsing interaction data further comprise a log-in into a restricted access webpage”

327. Prajapat discloses the method of claim 1, “wherein said web browsing interaction data further comprises form data associated with the website server.”

328. Prajapat discloses that during the co-browsing session, “web page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events.” Ex. 1007, ¶[0031]. Furthermore, the request for a web page” may require information “to properly render the web page on browser 12a, **such as session information, cookies, parameters to send to web content server 18, and any other suitable information.**” Ex. 1007, ¶[0017] (emphasis added).

329. A POSITA would understand that the disclosed “session information, cookies, parameters” or “any other suitable information” includes credentials or access information, which a POSITA would know is needed to access restricted web pages.

i. Independent Claim 9

(1) Prajapat discloses claim 9[pre], “[a] guest device for performing a synchronized browsing session administered by a synchronization server, comprising:”

330. Should the preamble be deemed limiting, Prajapat discloses it.

331. As discussed above with respect to claim limitation 9[pre] for the Lebrun reference (Ground 1), which I incorporate by reference, claim limitation 1[pre] and 9[pre] of the ’145 patent are substantively identical. *See* Section IX.C.i(1). Accordingly, I incorporate by reference my analysis with respect to

claim limitation 1[pre]that a POSITA would have understood that “browser 12b” that joins the co-browsing session is a guest device for performing a synchronized browsing session. *See* Section IX.D.a(1) (citing Ex. 1007, ¶¶[0012], [0034], Fig. 2).

(2) **Prajapat discloses 9[a], “a network interface adapted to communicate with said synchronization server[; and]”**

332. Prajapat discloses “a network interface adapted to communicate with said synchronization server.”

333. Prajapat discloses that browser 12b (the “guest device”) may comprise “an appropriate combination of hardware and software associated with one or more computers at one or more locations,” and may be “coupled” via “LANs,” “MANs,” “WANs,” or “the Internet” to the other components of the system. Ex. 1007, ¶[0014]. Browser 12b “may include **any suitable interface** for submitting requests for and displaying media such as web pages.” *Id.*, ¶[0015] (emphasis added). Prajapat further discloses that “[a] communication session between web media server 14b and browser 12b may be established in any suitable manner.” *Id.*, ¶[0021].

334. A POSITA would understand that the disclosed interface of browser 12b that permits its communication over a network with the web media servers corresponds to a network interface adapted to communicate with the synchronization server as claimed.

(3) Prajapat discloses 9[b], “a processor configured to:”

335. Prajapat discloses that the guest device (“other” or “second” web client 110) comprises “a processor.”

336. Prajapat discloses that the browser may “comprise an appropriate combination of hardware and software associated with one or more computers at one or more locations,” and “may include one or more suitable input devices, output devices, mass storage media, **processors**, memory, or other components for receiving, processing, storing, and communicating information according to the operation of system 10.” Ex. 1007, ¶[0014] (emphasis added). A POSITA would understand that the web browser comprises a processor.

(4) Prajapat discloses 9[b.i], a processor configured to “receive from the synchronization server a session invitation including a session identifier associated with a host device”

337. Prajapat discloses a processor configured to “receive from the synchronization server a session invitation including a session identifier associated with a host device. I incorporate by reference my analysis with respect to claim limitation 1[a], wherein I provide analysis of a substantively identical claim limitation. *See* Section IX.D.a (2) (citing Ex. 1007, ¶¶[0015-17], [0019], [0034] (referencing Fig. 2), [0035], [0043]).

(5) Prajapat discloses 9[b.ii], a processor configured to “activate the session invitation to send a request to join said synchronized

**browsing session to said synchronization server
via said network interface”**

338. Prajapat discloses a guest device comprising a processor “configured to **activate the session invitation to send a request to join said synchronized browsing session to said synchronization server.**”

339. I incorporate my analysis of Prajapat with respect to claim limitation 1[b], where I provide my analysis with respect to a substantively identical claim limitation, with the exception of the “via said network interface” element, which I discuss below. *See* Section IX.D.a(3) (citing Ex. 1007, ¶¶[0043], [0047] (referencing Fig. 1)).

340. Prajapat discloses that the guest device activates the session invitation “**via said network interface.**” As shown in Fig. 1, browser 12b receives the invitation, uses the URL, and connects to the synchronized co-browsing session via the network interface and connection to web media server b. Ex. 1007, ¶¶[0043], [0047] (referencing Fig. 1). A POSITA would understand that sending the message accepting the co-browsing invitation constitutes activating the session invitation via the network interface.

(6) **Prajapat discloses 9[b.iii], a processor configured to “receive web browsing interaction data from said synchronization server, [wherein said web browsing interaction data is associated with:]”**

341. Prajapat discloses that the processor of the guest device is configured to “receive web browsing interaction data from said synchronization server.” I

incorporate by reference my analysis with respect to claim limitation 1[c], which recites a substantively identical claim limitation. *See* Section IX.D.a(4) (citing Ex. 1007, ¶¶[0012], [0028], Fig. 1).

(7) Prajapat discloses 9[b.iii.1], web browsing interaction data associated with “a website server that is independent of the synchronization server, and”

342. Prajapat discloses web browsing interaction data associated with “a website server that is independent of the synchronization server.” I incorporate by reference my analysis with respect to claim limitation 1[c.i], which recites a substantively identical claim limitation. *See* Claim IX.D.a(5) (citing Ex. 1007, Fig. 1, ¶[0024]; Ex. 1006, ¶¶[0021], [0041]).

(8) Prajapat discloses 9[b.iii.2], web browsing interaction data associated with “the host device that has initiated the session invitation[; and]”

343. Prajapat discloses web browsing interaction data associated with “the host device that has initiated the session invitation.” I incorporate by reference my analysis with respect to claim limitation 1[c.ii], which recites a substantively identical claim limitation. *See* Section IX.D.a(6) (citing Ex. 1007, ¶[0028]).

(9) Prajapat discloses 9[b.iv], a processor configured to “operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation”

344. Prajapat discloses web browsing interaction data associated with “a website server that is independent of the synchronization server, and.” I

incorporate by reference my analysis with respect to claim limitation 1[d], which recites a substantively identical claim limitation. *See* Claim IX.D.a(7) (citing Ex. 1007, ¶¶[0012], [0028]; Ex. 1006, ¶¶[0021], [0041]).

j. Prajapat discloses claim 10 “[t]he apparatus of claim 9, further comprising a memory adapted to store one or more software modules for controlling said processor”

345. Prajapat discloses “a memory adapted to store one or more software modules for controlling said processor.”

346. Prajapat discloses that the guest device (“browser 12b”) comprises “an appropriate combination of hardware and software associated with one or more computers at one or more locations,” including “one or more suitable input devices, output devices, mass storage media, processors, memory, or other components for receiving, processing, storing, and communicating information according to the operation of system 10.” Ex. 1007, ¶[0014].

347. A POSITA would therefore have understood that the general purpose processors configured to perform the described functions would have comprised a memory adapted to store one or more software modules for controlling that processor.

k. Prajapat in view of Wang discloses claim 11 “[t]he apparatus of claim 9, wherein said invitation comprises a hyperlink associated with said synchronized browsing session and said hyperlink is

received from the host device via a viable means of communication”

348. Prajapat alone or in view of Wang teaches an **“invitation that comprises a hyperlink.”** I incorporate by reference my analysis of claim 2, which recites a substantively identical claim limitation, with the exception of the “via viable means of communication” portion of the limitation. *See* Section IX.D.b (citing Ex. 1007, ¶[0043]; Ex. 1006, ¶¶[0015-16], [0049], Fig. 3).

349. Prajapat discloses that the hyperlink is received from the host device **via a viable means of communication.** I incorporate by reference my analysis of claim 3, which recites a substantively identical claim limitation *See* Section IX.D.c (citing Ex. 1007, ¶¶[0019], [0021]).

I. Prajapat in view of Wang discloses claim 12 “[t]he apparatus of claim 11, further comprising a user interface adapted to initiate said processor to send said request in response to a user input”

350. Prajapat discloses that apparatus disclosed with respect to claim 11 further comprises “a user interface adapted to initiate its processor to send the request in response to a user input” as recited in claim 12.

351. Prajapat discloses that the “browser 12b” includes a user interface. It may include “any suitable interface for submitting requests for and displaying media such as web pages.” Ex. 1007, ¶[0015]. Prajapat explains that browsers comprise a computer that “may include one or more suitable input devices, output

devices, mass storage media, processors, memory, or other components for receiving, processing, storing, and communicating information.” *Id.*, ¶[0014]. A POSITA would understand that the browser comprising a computer with a suitable input device corresponds to the claimed user interface.

352. Prajapat further discloses that the user interface is **adapted to initiate said processor to send said request in response to a user input**. Prajapat explains that “browser 12b may use the URL and any other suitable information to request from web content server 18 the web page that browser 12a requested.” *Id.*, ¶[0043].

353. A POSITA would have understood that the guest browser 12b *using the URL* to request the web page for the co-browsing session constitutes a user interface adapted to initiate said processor to send said request in response to a user input.

354. But even if Prajapat did not disclose a user interface adapted to initiate said processor to send said request in response to a user input, Wang does. I incorporate by reference my analysis of Wang with respect to Claim 12 as discussed in Ground 1 in combination with Wang. *See* Section IX.C.1 (citing Ex. 1006, ¶¶[0020], [0049].)

355. A POSITA would have understood that Prajapat’s disclosure of “browser 12b” using a “URL and other suitable information to request” access to

the co-browsing session, could have been modified to Wang's disclosure of an input means that a user uses to access the designated URL.

356. A POSITA would have been motivated to combine Wang's teachings of the guest device acting upon the invitation via an input means with Prajapat's user interface disclosures and disclosures for "using the URL" to access the co-browsing session and web page. Incorporating standard user interface and web technology as disclosed in Wang, such activating a hyperlink associated with a designated URL address, into Prajapat's use of the URL would allow the guest device in Prajapat to perform the collaborative browsing described in its disclosures as expected. Combining these disclosures is a combination of prior art elements according to known methods that yield predictable results, and a use of a known technique to improve a similar method in the same way (i.e. using the standard user interface technology such as an input means to act upon a URL hyperlink to achieve joining a group browsing session).

- m. Prajapat in view of Wang discloses claim 13 "[t]he apparatus of claim 12, wherein said user input comprises activation of said hyperlink for initializing sending of said request to join said synchronized browsing session"**

357. Prajapat in view of Wang teaches user input comprising "activation of said hyperlink for initializing sending of said request to join said synchronized browsing session." I incorporate by reference my analysis with respect claim

limitations 1[b] and 2, which collectively recite a substantively identical limitation. *See* Section IX.D.a(3) (disclosing activation of a session invitation (citing Ex. 1007, ¶¶[0037], [0043], [0047], Fig. 1.)); Section IX.D.b (disclosing said activation via a hyperlink associated with the synchronized browsing session (citing Ex. 1007, ¶[0043]; Ex. 1006, ¶¶[0015-16], [0049], Fig. 3)).

n. Prajapat in view of Wang discloses claim 14 “[t]he apparatus of claim 9, further comprising a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window”

358. Prajapat discloses “a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window.”

359. First, Prajapat discloses **a user interface**. I incorporate by reference my analysis for claim 12 where I analyze this disclosure. *See* Section IX.D.1 (citing Ex. 1007, ¶¶[0014-15]; Ex. 1006, ¶¶[0020], [0049]).

360. Second, the co-browsing session may **depict shared input browsing interactions**. Prajapat discloses that “web page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events.” Ex. 1007, ¶[0031]. In addition, “JavaScript events, such as onMouseOver events for example, may be kept in sync on the browsers 12 in a substantially similar manner.” *Id.*, ¶[0032].

361. A POSITA would understand that these synchronized web pages and JavaScript events constitute shared input browsing interactions.

362. Third, the shared browsing session takes place in a **web browsing window**. Prajapat explains that the participating browsers 12a and 12b, “may include any suitable interface for submitting requests for and displaying media such as web pages,” which may “display[] one or more types of media.” *Id.*, ¶[0015]. “[T]he browsers 12 may be rendering multiple pages at the same time, using frames, iframes, or any other suitable techniques.” *Id.*, ¶[0030].

363. A POSITA would understand that the suitable interface for submitting requests for and displaying media such as web pages would include standard internet browser windows on standard operating systems at the time of the disclosure. Further, a POSITA would understand that Prajapat’s disclosure of the use of “frames” to display the dynamic interactions of the users with the web pages would constitute depictions in a web browser window. *Id.*

- o. Prajapat discloses claim 15 “[t]he apparatus of claim 14, wherein information related to said shared user input web browsing interactions comprises web browsing interaction data”**

364. Prajapat discloses information related to said shared user input web browsing interactions that “comprises web browsing interaction data.”

365. I incorporate my analysis with respect to claim 14, where I explain that Prajapat discloses the display of shared user input web browsing interactions

through the display of web pages in a peer-to-peer dynamic co-browsing session.

See supra Section IX.D.n (citing Ex. 1007, ¶¶[0031-32]). Because this information is comprised of the web clients' interaction with the web pages during the co-browsing session, a POSITA would understand that the information related to these shared user input web browsing interactions comprise web browsing interaction data.

- p. Prajapat in view of Wang discloses claim 16 “[t]he apparatus of claim 14, wherein said shared user input web browsing interactions further comprise a log-in into a restricted access webpage”**

366. I incorporate my analysis with respect to claim 8, which recites a substantively identical limitation. *See supra* Section IX.D.h (citing Ex. 1007, ¶¶[0012], [0017], [0031]; Ex. 1006, ¶¶[0064], [0067], [0068]),

- q. Prajapat discloses claim 17 “[t]he apparatus of claim 14, wherein said shared user input web browsing interactions are depicted in a first web browser window”**

367. I incorporate my analysis with respect to claim 5, which recites a substantively identical limitation. *See supra* Section IX.D.e (citing Ex. 1007, ¶¶[0015-16], [0031-32]).

- r. **Prajapat discloses claim 18 “[t]he apparatus of claim 17, wherein non-shared web browsing interactions are depicted in a non-shared web browser window”**

368. I incorporate my analysis with respect to claim 6, which recites a substantively identical limitation. *See supra* Section IX.D.f (citing Ex. 1007, ¶¶[0030], [0034]).

2. Claim Charts and Summary of Invalidity

369. For the reasons provided above and further analyzed in the claim chart below, it is my opinion that the applied references render obvious claims 1-18 of the '145 patent.

370. The charts list claim language from the challenged patent on the left side and provides my analysis for why the claims are obvious in view of the cited references on the right side.

371. To aid in referencing to individual portions of the chart, I enclose the chart for each ground under a separate paragraph number of this declaration.

a. '145 Patent Claims 1-18 in view of Lebrun and Wang

372. Claims 1-18 are obvious in view of Lebrun and Wang for at least the following reasons:

Claim No.	Claim	Prior Art Analysis
1[pre]	A method performed by a guest device for joining a	<i>Claim 1 is obvious in view of Int. Pub. No. WO 00/58110 to Lebrun (“Lebrun”).</i>

Claim No.	Claim	Prior Art Analysis
	synchronized browsing session administered by a synchronization server, comprising:	<i>Lebrun discloses a method performed by a guest device for joining a synchronized browsing session administered by a synchronization server.</i> In a preferred embodiment, the web clients 110 each include a general-purpose computer, such as a laptop or workstation. However, the web clients 110 can also include (either alone or in conjunction with a laptop or workstation), a hand-held calendar (such as a “Palm Pilot” or other hand-held device), a portable computer, a special purpose computer, a cellular telephone or other telephonic device, a web server acting as the agent for a user, or another device. In alternative embodiments, the web clients 110 may also include any other device disposed for performing the all or some functions described herein. Ex. 1005, 30:19-25. A first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session. In a preferred embodiment, the message 151 includes an identifier for the group-surfing session, so that other web clients 110 can add themselves to that session. (The group-surfing server 140 can also assign this identifier in a reply to the session-creation message 151.) In a preferred embodiment, the message 151 includes identifiers for a set of web clients 110 participating in, permitted to participate in, or forbidden from

Claim No.	Claim	Prior Art Analysis
		participating in, that session. Ex. 1005, 32:9-16. The group-surfing server 140 receives the session-creation message 151, and responds by (1) creating a group-surfing session, and (2) informing the participants in the group-surfing session. When the session-creation message 151 includes an identifier 152 for an initial page 153, the group-surfing server 140 proceeds to begin operation of the group-surfing session, as described below, causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session. Ex. 1005, 32:26-31. After creating the group-surfing session, the group-surfing server 140 prepares to add additional web clients 110 to the session. To add itself to the session, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140. In a preferred embodiment, the message 151 includes the identifier for the group-surfing session. Ex. 1005, 33:1-4. Ex. 1005, Fig. 4. Figure 4 shows a process flow diagram for a method of using a system for group access to web sites.

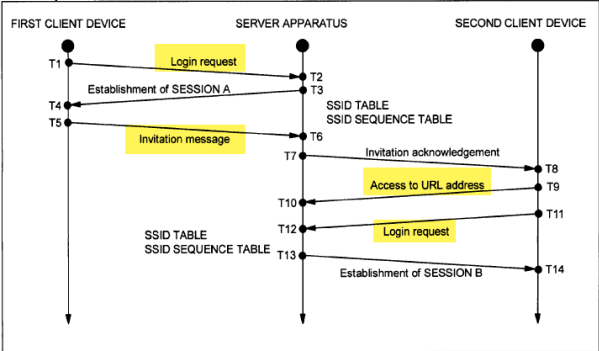
Claim No.	Claim	Prior Art Analysis
		A method 200 is performed by the system 100, including the web client 110, 30 the communication network 120, the web server 130, and the group-surfing server 140. Ex. 1005, 43:27-30. At a step 212, the group-surfing server 140 receives the session-creation message 151. The group-surfing server 140 (1) creates the group-surfing session, and (2) informs the participants in the group-surfing session. Ex. 1005, Fig. 4, 44:12-14. <i>A POSITA would have understood that the “other web clients 110” joining a “group-surfing session” administered by a “group-surfing server” comprises a method performed by a guest device for joining a synchronized browsing session administered by a synchronization server.</i>
1[a]	receiving from the synchronization server a session invitation including a session identifier associated with a host device;	<i>Lebrun discloses receiving from the synchronization server a session invitation including a session identifier associated with a host device.</i> The web client software 111 is disposed for sending a message 151 to the group-surfing server 140, to request the group-surfing server 140 to respond and perform functions described herein. In a preferred embodiment, the message 151 is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page.

Claim No.	Claim	Prior Art Analysis
		A first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session. In a preferred embodiment, the message 151 includes an identifier for the group-surfing session, so that other web clients 110 can add themselves to that session. (The group-surfing server 140 can also assign this identifier in a reply to the session-creation message 151.) In a preferred embodiment, the message 151 includes identifiers for a set of web clients 110 participating in, permitted to participate in, or forbidden from participating in, that session. Ex. 1005, 32:1-16. The group-surfing server 140 receives the session-creation message 151, and responds by (1) creating a group-surfing session, and (2) informing the participants in the group-surfing session. Ex. 1005, 32:26-28. To add itself to the session, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140. In a preferred embodiment, the message 151 includes the identifier for the group-surfing session. Ex. 1005, 33:2-4. <i>A POSITA would have understood that the “other web clients 110” being informed of the “group-surfing session” by the “group-surfing server” comprises receiving from the synchronization server a session invitation.</i>

Claim No.	Claim	Prior Art Analysis
		<i>A POSITA would have further understood that the group-surfing server assigning an “identifier” in a reply to the session-creation message, which is sent to the “other web clients 110,” comprises including an identifier associated with the host device (the first “web client 110”) because the host device includes that same identifier in the initiating session-creation message 150.</i>
1[b]	activating the session invitation to send a request to join said synchronized browsing session to said synchronization server;	<i>Lebrun discloses activating the session invitation to send a request to join said synchronized browsing session to said synchronization server.</i> I incorporate by reference the disclosures identified with respect to limitation 1[a]: Ex. 1005, 32:23-28, 33:2-3, 44:21-27. The web client software 111 is disposed for sending a message 151 to the group-surfing server 140, to request the group-surfing server 140 to respond and perform functions described herein. In a preferred embodiment, the message 151 is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page. Ex. 1005, 32:3-7. In a preferred embodiment, the message 151 can also include an identifier 152 for an initial page 153 for the group-surfing session. For example, the initial page 153 can include a home page for a selected web site 130 or a welcome page for a selected

Claim No.	Claim	Prior Art Analysis
		service available at the selected web site 130. Ex. 1005, 32:21-24. <i>A POSITA would have understood that the “second (or further) web client 110” sending a session -join message to the group-surfing server in response to being informed of the group-surfing session by the group-surfing server comprises activating the session invitation to send a request to join said synchronized browsing session to said synchronization server.</i> In addition, even if Lebrun did not disclose “activating the session invitation to send a request to join said synchronized browsing session to said synchronization server,” Wang discloses this limitation. A collaboration system includes a plurality of client devices individually connected to a network, and a server apparatus for receiving requests from the client devices, responding to the client devices, and providing a common collaboration environment among the client devices. The server includes means for providing a group session formed by integrating communication sessions of the plurality of client devices and means for synchronizing the client devices in the collaboration environment. Ex. 1006, Abstract. As shown in FIG. 3, at T1, a customer connects to the server apparatus from a first client device. The server apparatus sets up

Claim No.	Claim	Prior Art Analysis
		an individual session with the first client device with an identification value SESSION A at T2. The server apparatus transmits an HTTP response to the first client at T3, establishes a session therewith (T4), and stores values of the SESSION A as an SSID table (described below) in an appropriate storage device. At T4, the first client device transmits a message inviting the other client devices to the shopping session, for example the message ‘Add Others’ and a message such as ‘Invitee’ including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of “Add Others” and “Invitee.” Ex. 1006, ¶[0047]. At T7, the server apparatus transmits an invitation notice and a URL address to be used, such as “Invitation Acknowledgment, myURL address,” to a second client device by way of, for example. The description that follows assumes that the customer using the second client device has previously received notice from the customer using the first client device and is on standby for receiving an HTML message including “Invitation acknowledgment, myURL address” or the like as electronic mail. Ex. 1006, ¶[0048]. Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a

Claim No.	Claim	Prior Art Analysis
		login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]. FIG. 3  Ex. 1006, Fig. 3. <i>A POSITA would have recognized that the second client device receiving an invitation comprising a “Invitation acknowledgement, myURL address” and accessing the URL address to join the “group session” corresponds to “activating the session invitation.”</i>
1[c]	receiving web browsing interaction data from said synchronization server, [wherein said web browsing	<i>Lebrun discloses receiving web browsing interaction data from said synchronization server,[wherein said web browsing interaction data is associated with:].</i> When the session-creation message 151 includes an identifier 152 for an initial page

Claim No.	Claim	Prior Art Analysis
	interaction data is associated with]:	153, the group-surfing server 140 proceeds to begin operation of the group-surfing session, as described below, causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session. Ex. 1005, 32:28-31. In any event, the group-surfing server 140 determines a next one in the progression of pages 153 in the session. The group-surfing server 140 contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session. Ex. 1005, 35:5-8. In a preferred embodiment, load is reduced on the group-surfing server 140 using a program fragment loaded at each web client 110. The program fragment can include one or more of, or any combination of, a Java applet, a section of JavaScript code, a web browser plug-in, an active-X element, or another technique for interfacing with the web client 110 and affecting its operation with the web site 130 and the group-surfing server 140. Ex. 1005, 36:21-25. The program fragment can intercept selection of a link 152 at the web client 110 and direct that selection to the group-surfing server 140 for processing.

Claim No.	Claim	Prior Art Analysis
		The program fragment can intercept “submit” selections by the web client 110 during posting of HTML forms, and direct the information in those “submit” selections to the group-surfing server 140 for processing. Ex. 1005, 37:5-10. In alternative embodiments, [] when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 39:4-10. <i>A POSITA would have understood that the group-surfing server beginning operation of the group-surfing session by causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session, including using a program fragment loaded at each web client and presenting information entered by the controlling web client on the HTML form at each participating web client each comprises receiving web browsing interaction data from said synchronization server.</i>
1[c.i]	a website server that is independent of the	<i>Lebrun discloses that the web browsing interaction data is associated with a website</i>

Claim No.	Claim	Prior Art Analysis
	synchronization server,	<i>server that is independent of the synchronization server.</i> I incorporate by reference the disclosures identified above with respect to limitation 1[c]: Ex. 1005, 32:28-31, 35:5-8, 36:21-25, 37:5-10, 39:4-10. <i>See Ex. 1005, Fig. 3.</i> As used herein, the phrase “web site” includes any combination of devices or software taking on the role of a server in a client-server environment in the internet, the world wide web, or an equivalent or extension thereof. There is no particular requirement that the web sites 130 must be individual devices; they can each be a single device, a set of cooperating devices, a portion of a device, or some combination thereof. Ex. 1005, 12:18-22. [T]he web site 130 includes a processor that is under control of web server software 131, and disposed for delivering information 132 to the web clients 110 or the group-surfing server 140 in response to requests made using the 30 communication protocol. <i>Id.</i>, 31:27-30. <i>A POSITA would understand from the above disclosures in light of Figure 3 that the web interaction data identified above is associated with a web site that comprises “a website server”</i>

Claim No.	Claim	Prior Art Analysis
		<i>that is independent of the synchronization server (“group-surfing server”).</i>
1[c.ii]	and the host device that has initiated the session invitation; and	<i>Lebrun discloses that the web browsing interaction data is associated with the host device that has initiated the session invitation.</i> I incorporate by reference the disclosures identified above with respect to limitation 1[c]: Ex. 1005, 32:28-31, 35:5-8, 36:21-25, 37:5-10, 39:4-10. As the controlling web client 110 selects a progression of pages 153 for the session, that progression of pages 153 is presented at each of the web clients 110 participating in the session. Ex. 1005, 35:26-28. At a step 291, the controlling web client 110 sends an import-export message 151 to the group-surfing server 140, directing import or export of information relating to web sites (such as bookmarks, “cookies,” or user registrations at participating web sites 130). At a step 292, the group-surfing server 140 receives the import-export message 151. The group-surfing server 140 imports or exports the designated information to selected databases at web clients 110 participating in the session that indicate their willingness to participate in the import or export operation. Ex. 1005, 49:1-11.

Claim No.	Claim	Prior Art Analysis
		<i>A POSITA would understand that the web interaction data identified above in limitation 1[c] is associated with the host device (the first “web client 110”) that initiated the session invitation because Lebrun discloses that the host device may select the web pages that are displayed and directs the import or export of information related to user registration.</i>
1[d]	operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.	<i>Lebrun discloses operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.</i> One aspect of the Internet that has become popular is access to the world wide web, in particular access by web client devices or software (also known as “web browsers”) to information provided by web servers (also known as “web sites”). Some of these web sites provide structured forms for data input, such as HTML or XML forms, table entry of data, and other techniques. Ex. 1005, 5:12-16. At a step 223, the group-surfing server 140 sends to the new web client 110 a program fragment (preferably a Java applet and JavaScript code) that processes those pages 153 received as part of the session. Ex. 1005, 44:29-31. In a preferred embodiment, in order to reduce load on the group-serving server 140,

Claim No.	Claim	Prior Art Analysis
		the group-serving server 140 sends only the page 153 itself without any multimedia elements (such as embedded sound, images, or program fragments). Each participating web client 110 requests those multimedia elements directly from the web site 130. At a step 235, the page 153 is presented at each of the web clients 110 participating in the session. Ex. 1005, 45:31-46:5. The web client 110 includes a processor, program and data memory, and mass storage, operating under control of web client software (not shown) to perform the functions of a web client or web browser. The web client is operated by a user 111, and includes an input device 112 and a presentation device 113. In a preferred embodiment, the web client software can include the “Netscape Navigator” product from America OnLine or the “Internet Explorer” product from Microsoft Corporation. Ex. 1005, 66:9-12. <i>A POSITA would have understood that each web client 110 (which may be a web browser) interfacing with the web site during the group-surfing session hosted by the group-surfing server along with “each participating web client” requesting multimedia elements directly from the website comprises operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization</i>

Claim No.	Claim	Prior Art Analysis
		<i>server subsequent to the activation of the session invitation.</i>
2	The method of claim 1, wherein said invitation comprises a hyperlink associated with said synchronized browsing session.	<i>Claim 2 is rendered obvious by Lebrun in view of Wang.</i> <i>Lebrun discloses the method of claim 1, wherein said invitation comprises a hyperlink associated with said synchronized browsing session.</i> I incorporate by reference the disclosures identified with respect to limitation 1[a]: Ex. 1005, 32:9-16, 32:26-28, 33:2-4, 44:12-14. The web client software 111 is disposed for sending a message 151 to the group-surfing server 140, to request the group-surfing server 140 to respond and perform functions described herein. In a preferred embodiment, the message 151 is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page. Ex. 1005, 32:3-7. A first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session. In a preferred embodiment, the message 151 includes an identifier for the group-surfing session, so that other web clients 110 can add themselves to that session. (The group-surfing server 140 can also assign this identifier in a reply to the session-creation message 151.) In a

Claim No.	Claim	Prior Art Analysis
		preferred embodiment, the message 151 includes identifiers for a set of web clients 110 participating in, permitted to participate in, or forbidden from participating in, that session. Ex. 1005, 32:9-16. In a preferred embodiment, the message 151 can also include an identifier 152 for an initial page 153 for the group-surfing session. For example, the initial page 153 can include a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130. Ex. 1005, 32:21-24. <i>A POSITA would have understood or would have found it obvious that the “identifier for an initial page 153, which can include a home page for a selected web site” associated with the group-surfing session could include or could comprise a hyperlink associated with said synchronized browsing session.</i> <i>In addition, even if Lebrun did not explicitly disclose an invitation that “comprises a hyperlink associated with said synchronized browsing session,” Wang does.</i> I incorporate by reference the disclosures identified above with respect to limitation 1[c]: Ex. 1006, ¶¶[0047-49], Fig. 3. An embodiment of the virtual shopping system realized by the collaboration control of the present invention by use of the web

Claim No.	Claim	Prior Art Analysis
		page displayed on the client devices will now be described. Suppose, for example, that a first customer resides in New York and that a second customer resides in Toronto. Here, it is assumed that the first customer desires to do the virtual shopping with the remote friend and accesses the server apparatus by use of the session identification value SESSION A as his own value. The server apparatus which has received the HTTP request from the first customer inviting the second customer notifies the second customer of the invitation, and allows the second customer to display a login screen. Ex. 1006, ¶[0075]. <i>A POSITA would have understood that the second client device accessing the designated URL address in the invitation notice by acting on “Invitation acknowledgement, myURL address” corresponds with activating a hyperlink.</i> <i>A POSITA would have understood that Lebrun’s disclosure of a “user of the web client software 111” that sends a “message 151” to the “group-surfing server 140” where the message is sent by “selecting a web page or a link to a web page,” could be modified to include the “myURL address” of Wang, which comprises activating a hyperlink on a website to initialize the sending of the request to establish the synchronized browsing session.</i>
3	The method of claim 1, wherein said invitation is	<i>Lebrun discloses the method of claim 1, wherein said invitation is received via a viable means of communication.</i>

Claim No.	Claim	Prior Art Analysis
	received via a viable means of communication.	I incorporate by reference the disclosures identified above with respect to limitation 1[a]: Ex. 1005, 32:9-16, 32:26-28, 33:2-4, 44:12-14. The communication network 120 is disposed for transporting messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140. The messages 151 are formatted in the communication protocol recognized by the web clients 110, the web site 130, and the group-surfing server 140. In a preferred embodiment, the communication protocol includes TCP/IP (transfer control protocol/ Internet protocol), or HTTP (hypertext transfer protocol) a variant thereof, such as HTTPS (secure HTTP). In a preferred embodiment, the communication protocol can include an additional protocol operating over TCP/IP. The communication protocol can also include other protocols for requesting and sending information, including FTP (file transfer protocol), Gopher, and variants thereof. Although the description refers herein primarily to HTTP and TCP/IP, those of ordinary skill in the art will recognize, after perusing this application, that use of the invention with other protocols would not require new invention or undue experimentation. Ex. 1005, 31:4-15. <i>See Ex. 1005 Figure 3.</i>

Claim No.	Claim	Prior Art Analysis
		<i>A POSITA would have understood that the communication network 120 that is “disposed for transporting messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140” and transports the invitation message to the guest device for the group-surfing session is a viable means of communication.</i>
4	The method of claim 1, wherein said web browsing interaction data further comprises cookie information associated with the website server.	<i>Lebrun discloses the method of claim 1, wherein said web browsing interaction data further comprises cookie information associated with the website server.</i> I incorporate by reference the disclosures identified above with respect to limitation 1[c]: Ex. 1005, 12:18-22, 31:27-30, 32:28-31, 35:5-8, 35:26-28, 36:21-25, 37:5-10, 39:4-10, Fig. 1, Fig. 3. At a step 291, the controlling web client 110 sends an import-export message 151 to the group-surfing server 140, directing import or export of information relating to web sites (such as bookmarks, “cookies,” or user registrations at participating web sites 130). At a step 292, the group-surfing server 140 receives the import-export message 151. The group-surfing server 140 imports or exports the designated information to selected databases at web clients 110 participating in the session that indicate their willingness to participate in the import or export operation.

Claim No.	Claim	Prior Art Analysis
		In a preferred embodiment, the selected databases are specific to a cookie/identity database for the group-surfing session. Ex. 1005, 49:1-11. <i>A POSITA would have understood that group-surfing server importing or exporting designated information including “bookmarks, ‘cookies,’ or user registrations at participating web sites 130” comprises web browsing interaction data comprising cooking information associated with the website server.</i>
5	The method of claim 4, wherein said web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window.	<i>Lebrun discloses the method of claim 4, wherein said web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window.</i> I incorporate by reference the disclosures identified above with respect to limitation 1[c]: Ex. 1005, 12:18-22, 31:27-30, 32:28-31, 35:5-8, 35:26-28, 36:21-25, 37:5-10, 39:4-10, Fig. 1, Fig. 3. If there is more than one controlling web client 110, those controlling web clients 110 act in concert to determine the progression of pages 153 viewed during the group-surfing session. The group-surfing server 140 can determine the progression of pages 153 in any one of, or some combination of, a variety of techniques: Ex. 1005, 34:9-22. In any event, the group-surfing server 140 determines a next one in the progression of

Claim No.	Claim	Prior Art Analysis
		pages 153 in the session. The group-surfing server 140 contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session. Ex. 1005, 35:5-8. In a preferred embodiment, the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140. The group-surfing server 140 enters information to complete the HTML form, and sends that information to the web site 130. When the web site 130 replies with a new page, the group-surfing server 140 sends that new page to all participating web clients 130. In alternative embodiments, the when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 38:31-39:10.

Claim No.	Claim	Prior Art Analysis
		The web client 110 includes a processor, program and data memory, and mass storage, operating under control of web client software (not shown) to perform the functions of a web client or web browser. The web client is operated by a user 111, and includes an input device 112 and a presentation device 113. In a preferred embodiment, the web client software can include the “Netscape Navigator” product from America OnLine or the “Internet Explorer” product from Microsoft Corporation. Ex. 1005, 66:7-12. <i>A POSITA would have understood that the one or more controlling web clients determining the progression of pages viewed during the group-surfing session and the controlling web client entering information to complete an HTML form that is then sent to the group-surfing server and sent to all participating web clients (which as described above may include web browsers) comprises the web browsing interaction data further comprising information related to shared user input web browsing interactions depicted in a first web browser window.</i>
6	The method of claim 5, wherein non-shared web browsing interactions are depicted in a second web browser window.	<i>Lebrun discloses the method of claim 5, wherein non-shared web browsing interactions are depicted in a second web browser window.</i> I incorporate by reference the disclosures identified above with respect to claim 1[c] (Ex. 1005, 12:18-22, 31:27-30, 32:28-31, 35:5-8, 35:26-28, 36:21-25, 37:5-10, 39:4-10, Fig. 1, Fig.

Claim No.	Claim	Prior Art Analysis
		3) and claim 5: 34:9-22, 35:5-8, 38:31-39:10, 66:7-12. <u>Web Page Look Ahead</u> The controlling web client 110 can select web pages 153 for “look ahead” before designating those web pages 153 as next pages 153 in the progression of pages 153 in the session. Ex. 1005, 37:27-32. <i>See also, id.</i>, 38:1-17 (describing use cases such as the user avoiding inappropriate or immaterial content). <u>Web Page Special Access</u> The controlling web client 110 can select web pages 153 for special access when designating those web pages 153 as next pages 153 in the progression of pages 153 in the session. For a first example, the controlling web client 110 can enter information required for special access privately, without presenting that information to other web clients 110 participating in the session. For a second example, the controlling web client 110 can enter such information (such as for completing an HTML “form”) using information available from, and supplied by, other web clients 110 participating in the session. Ex. 1005 38:21-27. In a preferred embodiment, the controlling web client 110 enters information to

Claim No.	Claim	Prior Art Analysis
		complete the HTML form, and sends that information to the group-surfing server 140. The group-surfing server 140 enters information to complete the HTML form, and sends that information to the web site 130. When the web site 130 replies with a new page, the group-surfing server 140 sends that new page to all participating web clients 130. In alternative embodiments, the when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 38:31-39:10. <i>A POSITA would understand the “look ahead” web page to be a non-shared web browsing interaction and that, because the decision about sharing the page as described by Lebrun requires interaction with a user, it necessarily would be viewed in a second browser window. Likewise, a POSITA would understand the privately entered information in the “web page special access feature” to be a non-shared web browsing interaction in a second browser window because</i>

Claim No.	Claim	Prior Art Analysis
		<i>it is viewed by the controlling user but not shared with the group-surfing session.</i>
7	The method of claim 1, wherein said web browsing interaction data further comprises form data associated with the website server.	<i>Lebrun discloses the method of claim 1, wherein said web browsing interaction data further comprises form data associated with the website server.</i> I incorporate by reference the disclosures identified above with respect to claim 1[c] (Ex. 1005, 12:18-22, 31:27-30, 32:28-31, 35:5-8, 35:26-28, 36:21-25, 37:5-10, 39:4-10, Fig. 1, Fig. 3) and claim 5: 34:9-22, 35:5-8, 38:31-39:10, 66:7-12. In alternative embodiments, [] when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 39:4-10. <i>A POSITA would have understood that the information presented and shared by the group-surfing server during the posting of HTML form data comprises web browsing interaction data that is form data associated with the website server.</i>

Claim No.	Claim	Prior Art Analysis
8	The method of claim 1, wherein said web browsing interaction data further comprise a log-in into a restricted access webpage.	<i>Lebrun discloses the method of claim 1, wherein said web browsing interaction data further comprise a log-in into a restricted access webpage.</i> I incorporate by reference the disclosures identified above with respect to claim 1[c] (Ex. 1005, 12:18-22, 31:27-30, 32:28-31, 35:5-8, 35:26-28, 36:21-25, 37:5-10, 39:4-10, Fig. 1, Fig. 3), and claim 6: Ex. 1005, 39:4-10. At a flow point 260, the controlling web client 110 is ready to select web pages 153 for “special access.” At a step 261, the controlling web client 110 sends a special-access-start message 151 to the group-surfing server 140. At a step 262, the group-surfing server 140 receives the special-access-start message 151. The group-surfing server 140 refrains from presenting access or authentication information (such as HTML forms) to participants in the session. At a step 263, the controlling web client 110 sends messages 151 to one or more web sites 130 to obtain access to those web sites 130, without having that information presented to participants in the session.

Claim No.	Claim	Prior Art Analysis
		At a step 264, the controlling web client 110 sends a special-access-stop message 151 to the group-surfing server 140. At a step 265, the group-surfing server 140 receives the special-access-stop message 151. The group-surfing server 140 returns to regular presentation of information in pages 153 to participants in the session. Ex. 1005 47:19-48:6. <i>A POSITA would have understood that providing access to password restricted web pages by entering (but not sharing) as a password comprises web browsing interaction data further comprise a log-in into a restricted access webpage.</i>
9[a]	A guest device for performing a synchronized browsing session administered by a synchronization server, comprising:	<i>Claim 9 is obvious in view of Int. Pub. No. WO 00/58110 to Lebrun ("Lebrun").</i> <i>Lebrun discloses a guest device for performing a synchronized browsing session administered by a synchronization server.</i> I incorporate by reference the disclosures identified above with respect to claim 1[pre]: Ex. 1005, 32:9-12, 26-31, 30:19-24, 33:2-4, 44:21-27, Fig. 4 (step 212). As used herein, the phrase "web client" includes any combination of devices or software taking on the role of a client in a client-server environment in the internet, the

Claim No.	Claim	Prior Art Analysis
		world wide web, or an equivalent or extension thereof. Ex. 1005, 30:1-3. In a preferred embodiment, the communication network 120 includes a packet switched network such as the Internet, as well as (in conjunction with or instead of) an intranet, an enterprise network, an extranet, a virtual private network, a virtual switched network. In alternative embodiments, the communication network 120 may include any other set of communication links that couple the web clients 110, web site 130, and group-surfing server 140 so they can perform the functions described herein. The communication network 120 is disposed for transporting messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140. The messages 151 are formatted in the communication protocol recognized by the web clients 110, the web site 130, and the group-surfing server 140. In a preferred embodiment, the communication protocol includes TCP/IP (transfer control protocol/Internet protocol), or HTTP (hypertext transfer protocol) a variant thereof, such as HTTPS (secure HTTP). In a preferred embodiment, the communication protocol can include an additional protocol operating over TCP/IP. The communication protocol can also include other protocols for requesting and sending information, including FTP (file transfer protocol),

Claim No.	Claim	Prior Art Analysis
		Gopher, and variants thereof. Although the description refers herein primarily to HTTP and TCP/IP, those of ordinary skill in the art will recognize, after perusing this application, that use of the invention with other protocols would not require new invention or undue experimentation. Ex. 1005, 30:30-31:15. <i>A POSITA would have understood that the “other web clients 110” joining a “group-surfing session” administered by a “group-surfing server” are devices for performing a synchronized browsing session administered by a synchronization server.</i>
9[a]	a network interface adapted to communicate with said synchronization server; and	<i>Lebrun discloses a network interface adapted to communicate with said synchronization server.</i> I incorporate by reference the disclosures identified above with respect to claim limitation 1[pre] (Ex. 1005, 30:19-24, 32:9-16, 32:26-31, 33:2-4, 43:27-30) and claim limitation 9[pre]: 30:1-3, 30:30-31:15. <i>A POSITA would have understood that the web clients 110 comprise a network interface adapted to communicate with said synchronization server through the disclosure of the network communication over which the web clients communicate with the web server and group-surfing server.</i>
9[b]	a processor configured to:	<i>Lebrun discloses a processor.</i>

Claim No.	Claim	Prior Art Analysis
		The web clients 110 each include a processor operating under control of web 15 client software 111, such as a web browser, and disposed for use by an operator or user 112. Ex. 1005, 30:14-15. <i>A POSITA would have understood that Lebrun expressly discloses that the web client 110 includes a processor.</i>
9[b.i]	receive from the synchronization server a session invitation including a session identifier associated with a host device;	<i>Lebrun discloses that the processor is configured to receive from the synchronization server a session invitation including a session identifier associated with a host device.</i> I incorporate by reference the disclosures identified above with respect to claim limitation 1[a] (Ex. 1005, 32:3-7, 32:9-11, 32:13-14, 32:26-28) and my analysis therein.
9[b.ii]	activate the session invitation to send a request to join said synchronized browsing session to said synchronization server via said network interface;	<i>Lebrun in view of Wang discloses that the processor is configured to activate the session invitation to send a request to join said synchronized browsing session to said synchronization server via said network interface.</i> I incorporate by reference the disclosures identified above with respect to claim limitation 1[b] (Ex. 1005, 32:13-14, 32:23-28, 33:2-3, 44:21-27; Ex. 1006, ¶¶[0047-49], Fig. 3) and claim limitation 9[a] (Ex. 1005, 30:19-24, 30:30-31:15, 32:9-16, 32:26-31, 33:2-4, 43:27-30). <i>A POSITA would have understood that the “second (or further) web client 110” sending a session -join message to the group-surfing server</i>

Claim No.	Claim	Prior Art Analysis
		<i>in response to being informed of the group-surfing session by the group-surfing server comprises activating the session invitation to send a request to join said synchronized browsing session to said synchronization server over the communication network via the network interface.</i>
9[b.iii]	receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with:	<i>Lebrun discloses a processor configured to receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with: a website server that is independent of the synchronization server, and the host device that has initiated the session invitation.</i> I incorporate by reference my analysis and the disclosures identified above with respect to claim limitation 1[c]: Ex. 1005, 32:28-31, 36:21-25, 37:5-10, 39:4-10.
9[b.iii.1]	a website server that is independent of the synchronization server, and	<i>Lebrun discloses a processor configured to receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with a website server that is independent of the synchronization server.</i> I incorporate by reference my analysis and the disclosures identified above with respect to claim limitation 1[c.i]: Ex. 1005, 12:18-20 (referencing Fig. 1), 31:27-30, Fig. 3.
9[b.iii.2]	the host device that has initiated the session invitation; and	<i>Lebrun discloses a processor configured to receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with the</i>

Claim No.	Claim	Prior Art Analysis
		<i>host device that has initiated the session invitation.</i> I incorporate by reference my analysis and the disclosures identified above with respect to claim limitation 1[c.ii]: Ex. 1005, 35:26-28, 49:1-11.
9[b.iv]	operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation.	<i>Lebrun discloses a processor configured to operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation.</i> I incorporate by reference my analysis and the disclosures identified above with respect to claim limitation 1[c.ii]: Ex. 1005, 44:21-27, 45:7-19, 66:9-12.
[10]	The apparatus of claim 9, further comprising a memory adapted to store one or more software modules for controlling said processor.	<i>Lebrun discloses the apparatus of claim 9 further comprising a memory adapted to store one or more software modules for controlling said processor.</i> I incorporate by reference my analysis and the disclosures identified above with respect to claim limitation 9[pre]: Ex. 1005, 30:19-24. The web clients 110 each include a processor operating under control of web

Claim No.	Claim	Prior Art Analysis
		15 client software 111, such as a web browser, and disposed for use by an operator or user 112. Ex.1005, 30:14-15. <i>A POSITA would know that the software executing to control the processor must be stored in memory, and that the web client software 111 comprises software modules as claimed. Accordingly, a POSITA would understand that the web client software 111 is stored on a memory of the user device and is one or more software modules for controlling the processor.</i>
[11]	The apparatus of claim 9, wherein said invitation comprises a hyperlink associated with said synchronized browsing session and said hyperlink is received from the host device via a viable means of communication.	<i>Lebrun discloses the apparatus of claim 9, wherein said invitation comprises a hyperlink associated with said synchronized browsing session and said hyperlink is received from the host device via a viable means of communication.</i> I incorporate by reference my analysis and the disclosures identified above with respect to claim 2: Ex. 1005, 32:9-16, 32:21-24, 32:26-31; Ex. 1006, ¶¶[0047-49], Fig. 3. I further incorporate by reference my analysis and the disclosures identified above with respect to claim 3 as to the “viable means of communication” limitation: Ex. 1005, 30:30-31:15.
[12]	The apparatus of claim 11, further comprising a user interface adapted to initiate said processor to send said request in	<i>Lebrun discloses the apparatus of claim 11 further comprising a user interface adapted to initiate said processor to send said request in response to a user input.</i>

Claim No.	Claim	Prior Art Analysis
	response to a user input.	As used herein, the phrase “web client” includes any combination of devices or software taking on the role of a client in a client-server environment in the internet, the world wide web, or an equivalent or extension thereof. There is no particular requirement that the web clients 110 must be individual devices; they can each be a single device, a set of cooperating devices, a portion of a device, or some combination thereof (such as for example a device providing web server services that acts as an agent of the user). ... The web client 110 includes a processor operating under control of web client software 111, such as a web browser, and disposed for use by an operator or user 112. In a preferred embodiment, the web client software 111 includes software 113 disposed for communicating with the web sites 130 using a communication protocol, possibly including data 114 stored locally at the web client 110 regarding those web sites 130. Ex. 1005, 12:11-16, 12:24-28. In a preferred embodiment, the message 151 is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page. Ex. 1005, 30:5-7. To add itself to the session, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140. In a preferred embodiment, the

Claim No.	Claim	Prior Art Analysis
		message 151 includes the identifier for the group-surfing session. Ex. 1005, 33:2-4. In a preferred embodiment, the communication technique can be presented to each web client 110 at the initiation of the group-surfing server 140, using either a same or a separate window at the web client 110. Ex. 1005, 41:20-22. At a step 221, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140 At a step 222, the group-surfing server 140 receives the session-join message 151. The group-surfing server 140 (1) adds the new web client 110 to the group-surfing session, and (2) inform the other participants in the group-surfing session of the newly added web client 110. Ex. 1005, 44:21-27 and Fig. 4. The web client 110 includes a processor, program and data memory, and mass storage, operating under control of web client software (not shown) to perform the functions of a web client or web browser. The web client is operated by a user 111, and includes an input device 112 and a presentation device 113. In a preferred embodiment, the web client software can include the “Netscape Navigator” product from America OnLine or the “Internet Explorer” product from Microsoft Corporation.

Claim No.	Claim	Prior Art Analysis
		Similar to the web client 110, the web site 120 includes a processor, program and data memory, and mass storage, operating under control of web server software (not shown) to perform the functions of a web server or web site. The web site 120 includes a set of web pages 121 for sending to the web client 110 (upon request of the web client 110), including at least one web page 121 having a structured data form 122 for requesting information from the web client 110. Ex. 1005, 66: 7-19. <i>A POSITA would have understood that the web client 110 includes a processor, program and data memory, and mass storage, and operates under control of web client software to perform the functions of a web client or web browser. The web client is operated by a user 111, and the communication method may be performed in response to user input via a web browser window.</i>
[13]	The apparatus of claim 12, wherein said user input comprises activation of said hyperlink for initializing sending of said request to join said synchronized browsing session.	<i>Lebrun in view of Wang discloses the apparatus of claim 12, wherein said user input comprises activation of said hyperlink for initializing sending of said request to join said synchronized browsing session.</i> I incorporate by reference my analysis with respect claim limitations 1[b] and [2]: Ex. 1005, 32:23-28, 33:2-3, 44:21-27, 7:1; Ex. 1006, ¶¶[0047-49] (referencing Fig. 3)); Ex. 1005, 32:5-7, 32:9-16, 32:21-24, 32:26-31; Ex. 1006, ¶¶[0047-49] (referencing Fig. 3)).

Claim No.	Claim	Prior Art Analysis
[14]	The apparatus of claim 9, further comprising a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window.	<i>Lebrun in view of Wang discloses the apparatus of claim 9, further comprising a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window.</i> If there is more than one controlling web client 110, those controlling web clients 110 act in concert to determine the progression of pages 153 viewed during the group-surfing session. The group-surfing server 140 can determine the progression of pages 153 in any one of, or some combination of, a variety of techniques: • The first page 153 selected by any controlling web client 110 is selected as the next one in the progression of pages 153 in the session. • The next one in the progression of pages 153 in the session is designated using a random or pseudo-random technique by the group-surfing server 140 from those pages 153 selected by any of the controlling web clients 110. • The next one in the progression of pages 153 in the session is designated using a round-robin technique by the group-surfing server 140 from those pages 153 selected by any of the controlling web clients 110. • The page 153 selected by a majority or a plurality of controlling web clients 110 is selected as the next one

Claim No.	Claim	Prior Art Analysis
		in the progression of pages 153 in the session. In any event, the group-surfing server 140 determines a next one in the progression of pages 153 in the session. The group-surfing server 140 contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session. Ex. 1005, 34:15-35:8. In a preferred embodiment, the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140. The group-surfing server 140 enters information to complete the HTML form, and sends that information to the web site 130. When the web site 130 replies with a new page, the group-surfing server 140 sends that new page to all participating web clients 130. In alternative embodiments, the when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each

Claim No.	Claim	Prior Art Analysis
		field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 38:31-39:10. As used herein, the phrase “web site” includes any combination of devices or software taking on the role of a server in a client-server environment in the internet, the world wide web, or an equivalent or extension thereof. There is no particular requirement that the web sites 130 must be individual devices. Ex. 1005, 30:8-12. The web client 110 includes a processor, program and data memory, and mass storage, operating under control of web client software (not shown) to perform the functions of a web client or web browser. The web client is operated by a user 111, and includes an input device 112 and a presentation device 113. In a preferred embodiment, the web client software can include the “Netscape Navigator” product from America OnLine or the “Internet Explorer” product from Microsoft Corporation. Ex. 1005, 66:9-12. <i>A POSITA would have understood that the one or more controlling web clients determining the progression of pages viewed during the group-surfing session and the controlling web client entering information to complete an HTML form that is then sent to the group-surfing server and sent to all participating web clients (which as described above may include web browsers) comprises web browsing interaction data</i>

Claim No.	Claim	Prior Art Analysis
		<i>comprising information related to shared user input web browsing interactions depicted in a shared web browsing window.</i>
[15]	The apparatus of claim 14, wherein information related to said shared user input web browsing interactions comprises web browsing interaction data.	<i>Lebrun discloses the apparatus of claim 14, wherein information related to said shared user input web browsing interactions comprises web browsing interaction data.</i> I incorporate my analysis with respect to claim 14 and the disclosures of Lebrun cited therein: Ex. 1005, 34:19-35:6, 35:5-8, 38:31-39:2, 39:4-10, 66:9-12.
[16]	The apparatus of claim 14, wherein said shared user input web browsing interactions further comprise a log-in into a restricted access webpage.	<i>Lebrun discloses the apparatus of claim 14, wherein said shared user input web browsing interactions further comprise a log-in into a restricted access webpage.</i> I incorporate by reference my analysis with respect to claim 8 and the disclosures of Lebrun cited therein: Ex. 1005, 37:29-31, 38:1-12, 38:12-17).
[17]	The apparatus of claim 14, wherein said shared user input web browsing interactions are depicted in a first web browser window.	<i>Lebrun discloses the apparatus of claim 14, wherein said shared user input web browsing interactions are depicted in a first web browser window.</i> I incorporate my analysis with respect to claim 5, which recites a substantively identical limitation. <i>See supra</i> claim 5 (citing Ex. 1005, 34:19-35:6, 35:5-8, 38:31-32, 38:32-39:1, 39:1-2, 39:4-10, 66:9-12).
[18]	The apparatus of claim 17, wherein non-shared web	<i>Lebrun discloses the apparatus of claim 17, wherein non-shared web browsing interactions</i>

Claim No.	Claim	Prior Art Analysis
	browsing interactions are depicted in a non-shared web browser window.	<i>are depicted in a non-shared web browser window.</i> I incorporate by reference my analysis with respect to claim 6 and the disclosures of Lebrun cited therein: Ex. 1005, 37:29-31; 38:1-12, 38:21-25, 39:4-10.

b. '145 Patent Claim 1-18 in view of Prajapat and Wang

373. Claims 1-18 are obvious in view of Prajapat and Wang for at least the following reasons:

Claim No.	Claim	Prior Art Analysis
1[pre]	A method performed by a guest device for joining a synchronized browsing session administered by a synchronization server, comprising:	<i>Claim 1 is rendered obvious by U.S. Patent Application Publication No. 2005/0021626 A1 to Prajapat ("Prajapat" or "Ex. 10007") in view of U.S. Patent Application Publication. No. 2005/0033656 ("Wang").</i> <i>Prajapat discloses a method performed by a guest device for joining a synchronized browsing session administered by a synchronization server.</i> FIG. 1 illustrates an example communication system 10 operable to provide peer-to-peer dynamic web page sharing. Communication system 10 includes browsers 12, web media servers 14a and 14b coupled via network 16, and web content server 18 coupled to web media server 14a via link 20. In general, web media servers 14 allow browser 12a to co-

Claim No.	Claim	Prior Art Analysis
		browse one or more web pages with browser 12b. Ex. 1007, ¶[0012]. A user associated with browser 12a may desire to view one or more web pages. The user associated with browser 12a may also desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b. Although only one browser 12b is illustrated and described, the present invention contemplates browser 12a sharing web pages with any number of other browsers 12 (i.e. browser 12b, browser 12c, browser 12d, and so on). To begin a co-browsing session, the user of browser 12a may need to establish a communication session with an associated web media server 14a. For example, the user of browser 12a may click on a desktop icon associated with browser 12a to establish a communication session with web media server 14a. In another embodiment, browser 12a may already have an established communication session with web media server 14a. Ex. 1007, ¶[0016]. FIG. 2 illustrates an example method for peer-to-peer dynamic web page sharing. At step 100, browser 12a establishes a communication session with its associated web media server 14a. This may include clicking on an icon on a desktop of browser 12a to initiate page sharing. However, in certain embodiments, browser 12a may be registered with web media server 14a without actually sharing web pages with

Claim No.	Claim	Prior Art Analysis
		another browser 12. In certain embodiments, the communication session between browser 12a and web media server 14a includes outgoing channel 30a and incoming channel 32a. Browser 14a may submit requests for web pages and other web content using outgoing channel 30a and web media server 14a may communicate notifications and other information to browser 14a using incoming channel 32a. At step 102, browser 12a submits to web media server 14a one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, browser 12a may submit a request to co-browse with chachi@happydaycompany.com. For purposes of this description, it will be assumed that the browser 12 with which browser 12a desires to share is browser 12b; however, as discussed above, browser 12a may share with any suitable number of other browsers 12 according to particular needs. Ex. 1007, ¶[0034]. <i>See Ex. 1007, Fig. 1.</i> <i>A POSITA would have understood that the “browser 12b” joining the co-browsing session initiated by web browser 12a and administered by the web media servers 14a comprises a method performed by a guest device for joining a synchronized browsing session administered by a synchronization server.</i>
1[a]	receiving from the synchronization server a session	<i>Prajapat discloses receiving from the synchronization server a session invitation</i>

Claim No.	Claim	Prior Art Analysis
	invitation including a session identifier associated with a host device;	<i>including a session identifier associated with a host device.</i> Browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages. For example, browsers 12 may be associated with any device, application, hardware, and/or software for displaying one or more types of media. Browsers 12 may include analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application. Furthermore, browsers 12 may be compatible with any suitable operating system according to particular needs. Reference to a browser 12 is meant to include reference to a user of browser 12, reference to a device including browser 12, reference to a user interface of browser 12, or any other suitable references as appropriate. A user of browser 12 may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12. A user associated with browser 12a may desire to view one or more web pages. The user associated with browser 12a may also desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b.

Claim No.	Claim	Prior Art Analysis
		Although only one browser 12b is illustrated and described, the present invention contemplates browser 12a sharing web pages with any number of other browsers 12 (i.e. browser 12b, browser 12c, browser 12d, and so on). To begin a co-browsing session, the user of browser 12a may need to establish a communication session with an associated web media server 14a. For example, the user of browser 12a may click on a desktop icon associated with browser 12a to establish a communication session with web media server 14a. In another embodiment, browser 12a may already have an established communication session with web media server 14a. In certain embodiments, the communication session between browser 12a and web media server 14a includes an outgoing channel 30a and an incoming channel 32a. Outgoing channel 30a may include a hypertext transfer protocol (HTTP) channel or any other suitable type of channel. Incoming channel 32a may include a LongPoll event channel such as that described in U.S. patent application Ser. No. 08/352,764 entitled “_____” and filed “_____” with the U.S. Patent and Trademark Office, or any other suitable type of channel. For example, browser 14a may submit requests for web pages and other web content using outgoing channel 30a and web media server 14a may communicate notifications and other information to browser 14a using incoming channel 32a. In one embodiment, the communication session between browser 12a and web media server 14a may be

Claim No.	Claim	Prior Art Analysis
		established over a firewall or other security measure 25 a. Outgoing channels 30 and incoming channels 32 may not necessarily include always on links. For example, in certain embodiments, outgoing channels 30 and incoming channels 32 are established for intermittent communications such as packets. In a request to co-browse or otherwise, browser 12a may specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, a user of browser 12a may submit a request to co-browse with hachi@happydaycompany.com who is associated with browser 12b. Browser 12a may also submit requests for one or more web pages, for example by requesting a particular web site, to web media server 14a. The request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18, and any other suitable information. Ex. 1007, ¶¶[0015-17]. In response to a request to co-browse from browser 12a, web media server 14a may participate in the establishment of the communication session between web media server 14a and browser 12a. For example, web media server 14a may participate in the

Claim No.	Claim	Prior Art Analysis
		establishment of outgoing channel 30a and incoming channel 32a with browser 12a. Web media server 14a may be operable to receive one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, browser 12a may request to co-browse one or more web pages with browser 12b. Web media server 14a may locate the web media server 14b associated with browser 12b. This may be done in any suitable manner. In one embodiment in which web media servers 14 are SIP endpoints, web media server 14a may locate web media server 14b using presence functionality of SIP network 16 such as SIP softswitch, for example. In one embodiment, web media servers 14 are already registered with SIP network 16. Web media server 14a may establish a signaling session 26 with web media server 14b using network 16. In an embodiment in which network 16 is a SIP network, signaling session 26 may be a SIP signaling session. In one embodiment, once web media servers 14 have found each other using network 16, the established signaling session 26 is a direct connection between web media servers 14. Ex. 1007, ¶[0019]. FIG. 2 illustrates an example method for peer-to-peer dynamic web page sharing. At step 100, browser 12a establishes a communication session with its associated web media server 14a. This may include clicking on an icon on a desktop of browser 12a to initiate page sharing. However, in

Claim No.	Claim	Prior Art Analysis
		certain embodiments, browser 12a may be registered with web media server 14a without actually sharing web pages with another browser 12. In certain embodiments, the communication session between browser 12a and web media server 14a includes outgoing channel 30a and incoming channel 32a. Browser 14a may submit requests for web pages and other web content using outgoing channel 30a and web media server 14a may communicate notifications and other information to browser 14a using incoming channel 32a. At step 102, browser 12a submits to web media server 14a one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, browser 12a may submit a request to co-browse with chachi@happydaycompany.com. For purposes of this description, it will be assumed that the browser 12 with which browser 12a desires to share is browser 12b; however, as discussed above, browser 12a may share with any suitable number of other browsers 12 according to particular needs. Ex. 1007, ¶[0034]. At step 104, web media server 14a receives the request to co-browse with chachi@happydaycompany.com. At step 106, web media server 14a may locate another web media server 14b with which browser 12b is associated, possibly using the email address or other identifier provided by browser 12a. Ex. 1007, ¶[0035].

Claim No.	Claim	Prior Art Analysis
		FIG. 3 illustrates an example communication system 40 operable to provide peer-to-peer simple web page sharing. System 40 includes browsers 12, web media servers 14, and web content server 18. In certain embodiments, system 40 includes firewalls or other security measures 25. In operation of system 40, browser 12a may request a web page sharing session with one or more other browsers 12 (in this example, browser 12b) and may submit this request to web media server 14a. Web media server 14a may locate the web media server associated with browser 12b in a substantially similar manner to that described above with reference to FIGS. 1 and 2. In one embodiment in which web media servers 14 are SIP endpoints, web media server 14a may locate web media server 14b using presence functionality or a SIP registrar/location function of SIP network 16 such as SIP softswitch, for example. In one embodiment, web media servers 14 are already registered with SIP network 16. Web media server 14a may establish a signaling session 26 with web media server 14b using network 16. In an embodiment in which network 16 is a SIP network, signaling session 26 may be a SIP signaling session. In one embodiment, once web media servers 14 have found each other using network 16, the established signaling session 26 is a direct connection between web media servers 14. Ex. 1007, ¶[0041].

Claim No.	Claim	Prior Art Analysis
		Browser 12a may submit a request to web content server 18 for one or more web pages using link 42a, for example. Links 42 may include an HTTP link or any other suitable type of link. The request may be submitted in any suitable format such as HTTP. Web content server 18 may return the requested web page to browser 12a. Browser 12a may communicate the URL or other suitable information regarding the requested web page to web media server 14a. Web media server 14a may communicate the URL and any other suitable information to web media server 14b, using media session 28 for example. Web media server 14b may communicate the URL and any other suitable information to browser 12b. Browser 12b may use the URL and any other suitable information to request from web content server 18 the web page that browser 12a requested. Ex. 1007, ¶[0043]. <i>A POSITA would have understood that, (1) “browser 12b” being contacted by “web media server 14b” to establish the communication session comprises receiving from the synchronization server a session invitation, and (2) communicating a URL associated with the web page selected by the host device (“browser 12a”) in the communication to browser 12b and its associated web media server constitutes an invitation including an identifier associated with a host device in the session invitation.</i>
1[b]	activating the session invitation	<i>Prajapat discloses activating the session invitation to send a request to join said</i>

Claim No.	Claim	Prior Art Analysis
	to send a request to join said synchronized browsing session to said synchronization server;	<i>synchronized browsing session to said synchronization server.</i> I incorporate by reference my analysis and the disclosures identified with respect to claim limitation 1[a]: Ex. 1007, ¶[0043]. Ex. 1007, Fig. 1. Although the illustrated embodiment depicts browsers 12 retrieving web pages from web content server 18, system 48 may be constructed such that UA and web media controller 54a is operable to retrieve web pages from web content server 18. In this example, web pages may be shared in a substantially similar manner to that described above with reference to FIGS. 1 and 2. Ex. 1007, ¶[0047]. <i>A POSITA would have understood that the “Browser 12a” communicating the URL to web media server 14b and browser 12b “us[ing] the URL . . . to request from the web content server 18 the web page that browser 12a requested” comprises activating the session invitation to send a request to join said synchronized browsing session to said synchronization server.</i>
1[c]	receiving web browsing interaction data from said synchronization server, [wherein	<i>Prajapat discloses receiving web browsing interaction data from said synchronization server[, wherein said web browsing interaction data is associated with:].</i>

Claim No.	Claim	Prior Art Analysis
	said web browsing interaction data is associated with]:	I incorporate by reference my analysis and the disclosures identified with respect to claim limitation 1[a]: Ex. 1007, ¶[0012]. Browsers 12, web media servers 14, and web content server 18 may each comprise an appropriate combination of hardware and software associated with one or more computers at one or more locations Ex. 1007, ¶[0014]. Web media server 14a may locate the appropriate web content server 18 that includes the web page requested by browser 12a. For example, browser 12a may submit a web site address to web media server 14a, and web media server 14a may locate web content server 18 using the web site address. Ex. 1007, ¶[0023]. In certain embodiments, either browser 12a or browser 12b may submit new action requests such as requests for web pages, requests to alter currently displayed web pages, or perform any other suitable actions according to particular needs. As an example, browser 12a may desire to perform a new action such as posting a form or clicking on a link within the current displayed web page. Browser 12a may contact web media server 14a based on, for example, the fact that links in the displayed web page have been transformed to references. Web media server 14a may register the new action request from browser 12a and may perform any suitable action.

Claim No.	Claim	Prior Art Analysis
		For example, web media server 14a may contact web content server 18 to retrieve another web page. Ex. 1007, ¶[0028]. As another example, browser 12b may desire to perform a new action such as posting a form or clicking on a link with the current displayed web page. Browser 12b may contact web media server 12b based on, for example, the fact that links in the displayed web page have been transformed to references. Web media server 14b may receive the new action request and forward the new action request, including any appropriate data, in a message to web media server 14a. Web media server 14a may perform any appropriate action based on the forwarded message received from web media server 14b. For example, web media server 14a may contact web content server 18 to retrieve another web page. In certain embodiments, web media server 14a may reject the new action request forwarded by web media server 14b. This may be based on, for example, various business rules or other factors relevant to particular implementations of the present invention. An error message may be generated when web media server 14a rejects a new action request forwarded by web media server 14b, such as a no-op or other suitable message. In certain embodiments, browsers 12 may be rendering multiple pages at the same time, using frames, iframes, or any other suitable techniques. It may be possible to

Claim No.	Claim	Prior Art Analysis
		represent the rendering of multiple pages at the same time as a content tree. The web media server 14 associated with each browser 12 may maintain this content tree. In one embodiment, the web media server 14 associated with each browser 12 maintains and preserves the content tree only while a given web page is being rendered. As the content tree in an associated browser 12 changes, changes to the content tree may be propagated back to the web media server 14 associated with the browser 12 to facilitate maintenance of an accurate reflection of the content tree of the browser 12. As an example, changes to the content tree in browser 12a may then be synchronized with other browsers 12 in a web page sharing session. As a content tree associated with a browser 12 is updated on the web media server 14 associated with the browser 12, multiple page load events may be generated from the web media server 14 to the browser 12 to cause full content synchronization. In certain embodiments, web page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events. As an example, at appropriate times when data in a web page form field changes, a JavaScript or other suitable event may be triggered to send a command to the appropriate web media server 14. If web media server 14b receives the command, for example, it may then be forwarded to web

Claim No.	Claim	Prior Art Analysis
		media server 14a. Web media server 14a may then send the updated metadata to web media server 14b, and events may be generated to the browsers 12 to update the web page form content if necessary (i.e. the originating browser 12 may not need the event). In certain embodiments, JavaScript events, such as onMouseOver events for example, may be kept in sync on the browsers 12 in a substantially similar manner. The JavaScript in the web pages rendered to browsers 12 may be modified so that in addition to performing the regular action, the respective web media server 14 may be notified. This may then be handled similarly to other events received by a web media server 14. Ex. 1007, ¶¶[0029-32]. <i>See Ex. 1007, Figs. 1, 3.</i> <i>A POSITA would understand that the user receiving the same web pages at the same time in the peer-to-peer dynamic session, as well as receiving and “alterations” of those web pages during the session as they occur corresponds to the claimed receiving web browsing interaction data from said synchronization server.</i>
1[c.i]	a website server that is independent of the synchronization server,	<i>Prajapat discloses that the web browsing interaction data is associated with a website server that is independent of the synchronization server.</i>

Claim No.	Claim	Prior Art Analysis
		I incorporate by reference my analysis and the disclosures identified with respect to claim limitation 1[c]: Ex. 1007, ¶[0012], [0028-32], Figs. 1, 3. Web content server 18 may include any suitable server or other computer for storing and communicating web pages. Web content server 18 may return a requested web page to web media server 14a. Web media server 14a may transform the returned web page into some intermediate form. In one embodiment, one or more links on the web page may be transformed into references and one or more links to images on the web page may also be transformed. The details of the transformation may depend on the syntax of the content being served. As merely an example, in an embodiment in which the retrieved web page includes HTML content, one transformation may need to be applied, while in the case of an IP phone display, another transformation may need to be applied. Ex. 1007, ¶[0024]. <i>A POSITA would understand that web content server 18, which retrieves web pages at the request of the web media servers, is a web site server independent of the web media servers administering the co-browsing session.</i>
1[c.ii]	and the host device that has initiated the	<i>Prajapat discloses that the web browsing interaction data is associated with the host device that has initiated the session invitation.</i>

Claim No.	Claim	Prior Art Analysis
	session invitation; and	I incorporate by reference my analysis and the disclosures identified with respect to claim limitation 1[c]: Ex. 1007, ¶¶[0012], [0028-32], Figs. 1, 3. <i>A POSITA would recognize that web pages chosen by the initiating web browser, including new action requests and alterations to displayed web pages correspond to the claimed web browsing interaction data that is associated with the hose device.</i>
1[d]	operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.	<i>Prajapat discloses operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server subsequent to the activation of the session invitation.</i> Browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages. For example, browsers 12 may be associated with any device, application, hardware, and/or software for displaying one or more types of media. Browsers 12 may include analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application. Furthermore, browsers 12 may be compatible with any suitable operating system according to particular needs. Reference to a browser 12 is meant to include reference to a user of browser 12,

Claim No.	Claim	Prior Art Analysis
		reference to a device including browser 12, reference to a user interface of browser 12, or any other suitable references as appropriate. A user of browser 12 may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12. Ex. 1007, ¶[0015]. In certain embodiments, either browser 12a or browser 12b may submit new action requests such as requests for web pages, requests to alter currently displayed web pages, or perform any other suitable actions according to particular needs. As an example, browser 12a may desire to perform a new action such as posting a form or clicking on a link within the current displayed web page. Browser 12a may contact web media server 14a based on, for example, the fact that links in the displayed web page have been transformed to references. Web media server 14a may register the new action request from browser 12a and may perform any suitable action. For example, web media server 14a may contact web content server 18 to retrieve another web page. Ex. 1007, ¶[0028]. <i>A POSITA would understand that taking action on the peer-to-peer dynamically shared web pages during the co-browsing session by altering the web pages or navigating away from the presently displayed web page disclose operating an application based on said web browsing</i>

Claim No.	Claim	Prior Art Analysis
		<i>interaction data received from said synchronization server to access a website server. Further, a POSITA would have understood that a requesting “a web page” from a “web content server,” as opposed to a “web media server,” comprises sending a request for webpage content to a website server independent of the synchronization server.</i> <i>Even if Prajapat did not disclose operating an application based on said web browsing interaction data received from said synchronization server to access a website server independent of the synchronization server, Wang does.</i> The present invention also includes a computer-executable program for enabling a computer device to function as a server apparatus for use in a computer collaboration system. The program enables the computer device to execute: a step of forming a group session control unit for creating a group session by integrating a plurality of individual sessions and for passing a command to an application execution unit; a step of forming a page navigation control unit for providing a web page common to each of the individual sessions; a step of forming a synchronization control unit for notifying each of the individual session destinations of the shared status of the web page; and a step of forming a mutual communication control unit for allowing a plurality of the individual session destinations to exchange

Claim No.	Claim	Prior Art Analysis
		a message. In the present invention, the program allows the group session control unit to execute a step of switching ownership of the initiative of web page operation. The program allows the page navigation control unit to execute a step of creating data by compiling the web page and an identification value corresponding to the data when a new web page is displayed and of storing the data and the identification value in association with each other in a storage device. Ex. 1006, ¶[0021]. FIG. 2 is a block diagram that illustrates the structure of the client device 12a and the server apparatus 14. As shown in FIG. 2, the client device 12a and the server apparatus 14 communicate through the network 16 using a protocol such as TCP/IP. The client device 12a includes browser means 20, page navigation means 22, synchronization control means 24, and mutual communication means 26. The page navigation means 22 includes initiative transfer means 28, and allows the client device 12a to access the server apparatus 14 directly and to acquire a web page when the client device 12a has ownership of the initiative of web page operation. In response to an instruction from a customer, the initiative transfer means 28 transmits, to the server apparatus 14, an HTTP request to transfer ownership of the initiative, and allows the server apparatus 14 to transfer ownership of the initiative of the web page operation to another client device. Immediately thereafter, snapshot data of the

Claim No.	Claim	Prior Art Analysis
		web page changed by the other client device is transmitted from the server apparatus 14 to the client device which has lost the initiative, thus making it possible to share the web page. Ex. 1006, ¶[0041].
[2]	The method of claim 1, wherein said invitation comprises a hyperlink associated with said synchronized browsing session.	<i>Claim 2 is rendered obvious by Prajapat in view of Wang.</i> <i>Prajapat discloses the method of claim 1, wherein said invitation comprises a hyperlink associated with said synchronized browsing session.</i> I incorporate by reference my analysis and the cited disclosures from Prajapat in claim limitation 1[a]: Ex. 1007, ¶¶[0015-17], [0019], [0034-35], [0043]. <i>A POSITA would have understood that the request (“invitation”) received by the guest device browser 12b comprises a hyperlink associated with said synchronized browsing session because the invitation includes a URL (“web media server 14b may communicate the URL and any other suitable information to browser 12b”), which is used by browser 12b to request the web page that browser 12a requested.</i> <i>Even if Prajapat did not disclose a hyperlink associated with the synchronized browsing session, Wang does.</i> I incorporate by reference my analysis and the disclosures cited from Wang with respect to claim

Claim No.	Claim	Prior Art Analysis
		2 in Ground 1 (Lebrun in combination with Wang): Ex. 1006, ¶¶[0015-16], [0049], Fig. 3. <i>A POSITA would have understood that Prajapat’s disclosure of a “browser 12b” being contacted through “web media server 14b” to establish the communication session could be modified to include a hyperlink as disclosed by Wang (“Invitation Acknowledgment, myURL address”) because the hyperlink and URL technique described by Wang was a commonly used, well known tool.</i> <i>A POSITA would have been motivated to combine Wang’s teachings of including a URL and hyperlink associated with the host device into Prajapat’s communication session invitation to join a co-browsing session, which includes a URL. Incorporating standard user interface and web technology, such as a hyperlink associated with a designated URL address, into Prajapat’s session notification would allow the guest device in Prajapat to join the collaborative browsing session as expected.</i>
[3]	The method of claim 1, wherein said invitation is received via a viable means of communication.	<i>Prajapat discloses the method of claim 1, wherein said invitation is received via a viable means of communication.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[b] above: Ex. 1007, ¶¶[0015-17], [0019], [0021], [0034], [0035], [0043]. Web media servers 14 may include any server, processor, computer, or other

Claim No.	Claim	Prior Art Analysis
		suitable component for communicating with browsers 12 and for communicating with each other. Web media servers 14 may communicate with other web media servers using network 16. In a particular embodiment, web media servers 14 are equipped to negotiate communication sessions with other web media servers 14 using session initiated protocol (SIP) or any other suitable standard signaling protocol. For example, web media servers 14 may be equipped to use a network 16 that includes a preexisting SIP network. Although web media servers 14 may use any suitable standard signaling protocol to perform their associated functionalities, this description focuses on an embodiment in which web media servers 14 are SIP-enabled endpoints and communicate using a preexisting SIP network 16. It should be understood, however, that any suitable standard signaling protocol such as media gateway control protocol (MGCP) or H.323 may be used without departing from the scope of the present invention. Ex. 1007, ¶[0018]. <i>See also Ex. 1007, Fig. 1.</i> <i>A POSITA would have understood that the communication system comprising the host and guest web browsers and web media servers that communicate among each other via standard network communications discloses that the invitation received by the guest device is communicated via a viable means of communication.</i>

Claim No.	Claim	Prior Art Analysis
4	The method of claim 1, wherein said web browsing interaction data further comprises cookie information associated with the website server.	<i>Prajapat discloses the method of claim 1, wherein said web browsing interaction data further comprises cookie information associated with the website server.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[c] above: Ex. 1007, ¶¶[0012], [0023], [0028-32], Figs. 1, 3. In a request to co-browse or otherwise, browser 12a may specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, a user of browser 12a may submit a request to co-browse with chachi@happydaycompany.com who is associated with browser 12b. Browser 12a may also submit requests for one or more web pages, for example by requesting a particular web site, to web media server 14a. The request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18, and any other suitable information. Ex. 1007, ¶[0017]. Via outgoing channel 30a or in any other suitable manner, web media server 14a may receive requests from browser 12a for one or more web pages. For example, browser

Claim No.	Claim	Prior Art Analysis
		12a may submit requests for one or more web pages by communicating a request to web media server 14a for a particular web site using the uniform resource locator (URL) of the web site. As discussed above, the request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server 18 associated with the requested web page, or any other suitable information Ex. 1007, ¶[0022]. <i>A POSITA would have understood that the request for web page including cookies comprises web interaction data for the co-browsing session received from the synchronization server (“web media server 14a”).</i>
[5]	The method of claim 4, wherein said web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window.	<i>Prajapat discloses the method of claim 4, wherein said web browsing interaction data further comprises information related to shared user input web browsing interactions depicted in a first web browser window.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim 4: Ex. 1007, ¶¶[0012], [0017], [0022-23], [0028-32], Figs. 1, 3. Browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages. For

Claim No.	Claim	Prior Art Analysis
		example, browsers 12 may be associated with any device, application, hardware, and/or software for displaying one or more types of media. Browsers 12 may include analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application. Furthermore, browsers 12 may be compatible with any suitable operating system according to particular needs. Reference to a browser 12 is meant to include reference to a user of browser 12, reference to a device including browser 12, reference to a user interface of browser 12, or any other suitable references as appropriate. A user of browser 12 may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12. A user associated with browser 12a may desire to view one or more web pages. The user associated with browser 12a may also desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b. Although only one browser 12b is illustrated and described, the present invention contemplates browser 12a sharing web pages with any number of other browsers 12 (i.e. browser 12b, browser 12c, browser 12d, and so on). To begin a co-browsing session, the user of browser 12a may need to

Claim No.	Claim	Prior Art Analysis
		establish a communication session with an associated web media server 14a. For example, the user of browser 12a may click on a desktop icon associated with browser 12a to establish a communication session with web media server 14a. Ex. 1007, ¶¶[0015-16]. <i>A POSITA would have understood that the sharing of and displaying of media such as web pages and synced JavaScript events that are done at the request of one user via a browser and displayed on the browser of a host and guest browser comprises user information related to shared user input web browsing interactions depicted in a first web browser window.</i>
[6]	The method of claim 5, wherein non-shared web browsing interactions are depicted in a second web browser window.	<i>Prajapat discloses the method of claim 5, wherein non-shared web browsing interactions are depicted in a second web browser window.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim 5: Ex. 1007, ¶¶[0012], [0015-17], [0022-23], [0028-32], Figs. 1, 3. Ex. 1007, Fig. 2. FIG. 2 illustrates an example method for peer-to-peer dynamic web page sharing. At step 100, browser 12a establishes a communication session with its associated web media server 14a. This may include clicking on an icon on a desktop of browser 12a to initiate page sharing. However, in certain embodiments, browser 12a may be

Claim No.	Claim	Prior Art Analysis
		registered with web media server 14a without actually sharing web pages with another browser 12. In certain embodiments, the communication session between browser 12a and web media server 14a includes outgoing channel 30a and incoming channel 32a. Browser 14a may submit requests for web pages and other web content using outgoing channel 30a and web media server 14a may communicate notifications and other information to browser 14a using incoming channel 32a. At step 102, browser 12a submits to web media server 14a one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, browser 12a may submit a request to co-browse with chachi@happydaycompany.com. For purposes of this description, it will be assumed that the browser 12 with which browser 12a desires to share is browser 12b; however, as discussed above, browser 12a may share with any suitable number of other browsers 12 according to particular needs. Ex. 1007, ¶[0034]. <i>A POSITA would have understood that before browser 12a requests to share “one or more web pages” with other browsers, a user associated with browser 12a may view but opt not to share certain web pages. Because these web pages are not shared, a POSITA would understand that they are depicted in a second web browser window.</i>
[7]	The method of claim 1, wherein said web browsing	<i>Prajapat discloses the method of claim 1, wherein said web browsing interaction data further</i>

Claim No.	Claim	Prior Art Analysis
	interaction data further comprises form data associated with the website server.	<i>comprises form data associated with the website server.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[c] above: Ex. 1007, ¶¶[0012], [0023], [0028-32]. <i>A POSITA would have understood that Prajapat expressly discloses web browsing interaction data comprising form data associated with the website server.</i>
[8]	The method of claim 1, wherein said web browsing interaction data further comprise a log-in into a restricted access webpage.	<i>Prajapat discloses the method of claim 1, wherein said web browsing interaction data further comprise a log-in into a restricted access webpage.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[c] above: Ex. 1007, ¶¶[0012], [0023], [0028-32]. In a request to co-browse or otherwise, browser 12a may specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, a user of browser 12a may submit a request to co-browse with chachi@happydaycompany.com who is associated with browser 12b. Browser 12a may also submit requests for one or more web pages, for example by requesting a particular web site, to web media server 14a. The request for a web page may specify the web page to retrieve and

Claim No.	Claim	Prior Art Analysis
		display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18, and any other suitable information. Ex. 1007, ¶[0017]. <i>A POSITA would understand that the disclosed “session information, cookies, parameters” or “any other suitable information” includes credentials or access information, which a POSITA would know is needed to access restricted web pages.</i>
9[pre]	A guest device for performing a synchronized browsing session administered by a synchronization server, comprising:	<i>Claim 9 is rendered obvious by Prajapat in view Wang.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[pre] above: Ex. 1007, ¶¶[0012], [0034], Fig. 2).
9[a]	a network interface adapted to communicate with said synchronization server; and	<i>Prajapat discloses a network interface adapted to communicate with said synchronization server.</i> FIG. 1 illustrates an example communication system 10 operable to provide peer-to-peer dynamic web page sharing. Communication system 10 includes browsers 12, web media servers 14a and 14b coupled via network 16, and web content server 18 coupled to web

Claim No.	Claim	Prior Art Analysis
		media server 14a via link 20. In general, web media servers 14 allow browser 12a to co-browse one or more web pages with browser 12b. The term co-browse may include one or more of the following situations: browser 12a and browser 12b display the same web pages at substantially the same time; browser 12a may alter web pages and browser 12b may view those alterations; browser 12b may alter web pages and browser 12a may view those alterations; or any other suitable situations. In one embodiment, system 10 is implemented to enable co-browsing in a call center environment such as a customer service environment. It should be understood, however, that system 10 may be implemented in any suitable environment where co-browsing may be desired. Ex. 1007, ¶[0015] (citing Fig. 1). Browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages. For example, browsers 12 may be associated with any device, application, hardware, and/or software for displaying one or more types of media. Browsers 12 may include analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application. Furthermore, browsers 12 may be compatible with any suitable operating system according to particular needs.

Claim No.	Claim	Prior Art Analysis
		Reference to a browser 12 is meant to include reference to a user of browser 12, reference to a device including browser 12, reference to a user interface of browser 12, or any other suitable references as appropriate. A user of browser 12 may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12. Ex. 1007, ¶[0015]. A communication session between web media server 14b and browser 12b may be established in any suitable manner. In one embodiment, web media server 14b contacts browser 12b to establish the communication session. In another embodiment, a communication session between web media server 14b and browser 12b already exists. In another embodiment (as will be discussed below in more detail), a user of browser 12a and a user of browser 12b are engaged in a telephone conversation. In this example, the user of browser 12a may verbally tell the user of browser 12b to establish a communication session with web media server 14b. In certain embodiments, the communication session between browser 12b and web media server 14b may include an outgoing channel 30b and an incoming channel 32b. Outgoing channel 30b may include a hypertext transfer protocol (HTTP) channel or any other suitable type of channel, and incoming channel 32b may include a LongPoll event channel or any other

Claim No.	Claim	Prior Art Analysis
		suitable type of channel. For example, browser 14b may submit requests for web pages and other web content using outgoing channel 30b and web media server 14b may communicate notifications and other information to browser 14b using incoming channel 32b. In one embodiment, the communication session between browser 12b and web media server 14b may be established over a firewall or other security measure 25b. Ex. 1007, ¶[0021]. <i>See Ex. 1007, Figs. 1, 3.</i> <i>A POSITA would have understood that the communication system disclosed in Prajapat includes a network connection between the browsers 12 and the synchronization server (“web media server”), thereby disclosing a network interface of the guest device.</i>
9[b]	a processor configured to:	<i>Prajapat discloses a processor.</i> Browsers 12, web media servers 14, and web content server 18 may each comprise an appropriate combination of hardware and software associated with one or more computers at one or more locations. These components of system 10 may share data storage, communications, or other resources according to particular needs. For example, functionality described in connection with browser 12a, web media server 14a, and web content server 18 may be provided using a single computer system or other device, which in a particular

Claim No.	Claim	Prior Art Analysis
		embodiment might include a single server system. Furthermore, functionality described in connection with browsers 12, web media servers 14, and web content server 18 may be provided using any suitable software components. Each computer system may include one or more suitable input devices, output devices, mass storage media, processors, memory, or other components for receiving, processing, storing, and communicating information according to the operation of system 10. In a distributed. Ex. 1007, ¶[0014]. <i>A POSITA would have understood that Prajapat expressly discloses that the web browsers are associated with one or more computers that include processors.</i>
9[b.i]	receive from the synchronization server a session invitation including a session identifier associated with a host device;	<i>Prajapat discloses that the processor of the guest web browser is configured to receive from the synchronization server a session invitation including a session identifier associated with a host device.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[a]: Ex. 1007, ¶¶[0015-17], [0019], [0034] (referencing Fig. 2), [0035], [0043]).
9[b.ii]	activate the session invitation to send a request to join said synchronized	<i>Prajapat discloses that the processor is configured to activate the session invitation to send a request to join said synchronized browsing session to said synchronization server via said network interface.</i>

Claim No.	Claim	Prior Art Analysis
	browsing session to said synchronization server via said network interface;	I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[b]: Ex.1007, ¶¶[0043], [0047] (referencing Fig. 1).
9[b.iii]	receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with:	<i>Prajapat discloses a processor configured to receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[c]: Ex. 1007, ¶¶[0012], [0028], Fig. 1.
9[b.iii.1]	a website server that is independent of the synchronization server, and	<i>Prajapat discloses a processor configured to receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with a website server that is independent of the synchronization server.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[c.i]: Ex. 1007, Fig. 1, ¶[0024].
9[b.iii.2]	the host device that has initiated the session invitation; and	<i>Prajapat discloses a processor configured to receive web browsing interaction data from said synchronization server, wherein said web browsing interaction data is associated with the host device that has initiated the session invitation.</i>

Claim No.	Claim	Prior Art Analysis
		I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[c.i]: Ex. 1007, ¶[0028].
9[b.iv]	operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation.	<i>Prajapat discloses a processor configured to operate an application based on said web browsing interaction data received from said synchronization server to access the website server that is independent of the synchronization server subsequent to the activation of the session invitation.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitation 1[d]: Ex. 1007, ¶¶[0012], [0028].
[10]	The apparatus of claim 9, further comprising a memory adapted to store one or more software modules for controlling said processor.	<i>Prajapat discloses the apparatus of claim 9 further comprising a memory adapted to store one or more software modules for controlling said processor.</i> Browsers 12, web media servers 14, and web content server 18 may each comprise an appropriate combination of hardware and software associated with one or more computers at one or more locations. These components of system 10 may share data storage, communications, or other resources according to particular needs. For example, functionality described in connection with browser 12a, web media server 14a, and

Claim No.	Claim	Prior Art Analysis
		web content server 18 may be provided using a single computer system or other device, which in a particular embodiment might include a single server system. Furthermore, functionality described in connection with browsers 12, web media servers 14, and web content server 18 may be provided using any suitable software components. Each computer system may include one or more suitable input devices, output devices, mass storage media, processors, memory, or other components for receiving, processing, storing, and communicating information according to the operation of system 10. In a distributed. Ex. 1007, ¶[0014]. <i>A POSITA would have understood that the general purpose processors configured to perform the described functions would have comprised a memory adapted to store one or more software modules for controlling that processor.</i>
[11]	The apparatus of claim 9, wherein said invitation comprises a hyperlink associated with said synchronized browsing session and said hyperlink is received from the host device via a viable means of communication.	<i>Prajapat in view of Wang discloses the apparatus of claim 9, wherein said invitation comprises a hyperlink associated with said synchronized browsing session and said hyperlink is received from the host device via a viable means of communication.</i> I incorporate by reference my analysis and the disclosures cited from Prajapat with respect to claim limitations [2] (citing Ex. 1007, ¶[0043]; Ex. 1006, ¶¶[0015-16], [0049], Fig. 3) and [3] (citing Ex. 1007, ¶¶[0019], [0021]).

Claim No.	Claim	Prior Art Analysis
[12]	The apparatus of claim 11, further comprising a user interface adapted to initiate said processor to send said request in response to a user input.	<i>Prajapat discloses the apparatus of claim 11 further comprising a user interface adapted to initiate said processor to send said request in response to a user input.</i> Browsers 12, web media servers 14, and web content server 18 may each comprise an appropriate combination of hardware and software associated with one or more computers at one or more locations. These components of system 10 may share data storage, communications, or other resources according to particular needs. For example, functionality described in connection with browser 12a, web media server 14a, and web content server 18 may be provided using a single computer system or other device, which in a particular embodiment might include a single server system. Furthermore, functionality described in connection with browsers 12, web media servers 14, and web content server 18 may be provided using any suitable software components. Each computer system may include one or more suitable input devices, output devices, mass storage media, processors, memory, or other components for receiving, processing, storing, and communicating information according to the operation of system 10. In a distributed embodiment of system 10, particular components of system 10 may be communicatively coupled to one another using one or more local area networks (LANs), metropolitan area networks (MANs), wide area networks (WANs), a

Claim No.	Claim	Prior Art Analysis
		global computer network such as the Internet, or any other wireline, optical, wireless, or other links. Browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages. For example, browsers 12 may be associated with any device, application, hardware, and/or software for displaying one or more types of media. Browsers 12 may include analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application. Furthermore, browsers 12 may be compatible with any suitable operating system according to particular needs. Reference to a browser 12 is meant to include reference to a user of browser 12, reference to a device including browser 12, reference to a user interface of browser 12, or any other suitable references as appropriate. A user of browser 12 may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12. Ex. 1007, ¶¶[0014-15]. Browser 12a may submit a request to web content server 18 for one or more web pages using link 42a, for example. Links 42 may include an HTTP link or any other suitable

Claim No.	Claim	Prior Art Analysis
		type of link. The request may be submitted in any suitable format such as HTTP. Web content server 18 may return the requested web page to browser 12a. Browser 12a may communicate the URL or other suitable information regarding the requested web page to web media server 14a. Web media server 14a may communicate the URL and any other suitable information to web media server 14b, using media session 28 for example. Web media server 14b may communicate the URL and any other suitable information to browser 12b. Browser 12b may use the URL and any other suitable information to request from web content server 18 the web page that browser 12a requested. Ex. 1007, ¶[0043]. <i>A POSITA would have understood that the guest browser 12b using the URL to request the web page that browser 12a requested discloses a user interface adapted to initiate said processor to send said request in response to a user input.</i> <i>Even if Prajapat did not disclose a user interface adapted to initiate said processor to send said request in response to a user input, Wang does.</i> I incorporate by reference my analysis and the disclosures cited from Wang with respect to claim limitations [2] in Ground 1: Ex. 1006, ¶¶[0020], [0049].
[13]	The apparatus of claim 12, wherein	<i>Claim 12 is rendered obvious by Prajapat in view of Wang.</i>

Claim No.	Claim	Prior Art Analysis
	said user input comprises activation of said hyperlink for initializing sending of said request to join said synchronized browsing session.	I incorporate by reference my analysis and the disclosures from Prajapat and Wang with respect claim limitations 1[b] (Ex. 1007, ¶¶[0037], [0043], [0047], Fig. 1.) and [2] (Ex. 1007, ¶[0043]; Ex. 1006, ¶¶[0015-16], [0049], Fig. 3).
[14]	The apparatus of claim 9, further comprising a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window.	<i>Prajapat discloses the apparatus of claim 9, further comprising a user interface adapted to depict shared user input web browsing interactions in a shared web browsing window.</i> I incorporate by reference my analysis and the disclosures from Prajapat and Wang with respect to claim 12: Ex. 1007, ¶¶[0014-15]. In certain embodiments, browsers 12 may be rendering multiple pages at the same time, using frames, iframes, or any other suitable techniques. It may be possible to represent the rendering of multiple pages at the same time as a content tree. The web media server 14 associated with each browser 12 may maintain this content tree. In one embodiment, the web media server 14 associated with each browser 12 maintains and preserves the content tree only while a given web page is being rendered. As the content tree in an associated browser 12 changes, changes to the content tree may be propagated back to the web media server 14 associated with the browser 12 to facilitate maintenance of an accurate reflection of the content tree of the

Claim No.	Claim	Prior Art Analysis
		browser 12. As an example, changes to the content tree in browser 12a may then be synchronized with other browsers 12 in a web page sharing session. As a content tree associated with a browser 12 is updated on the web media server 14 associated with the browser 12, multiple page load events may be generated from the web media server 14 to the browser 12 to cause full content synchronization. In certain embodiments, web page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events. As an example, at appropriate times when data in a web page form field changes, a JavaScript or other suitable event may be triggered to send a command to the appropriate web media server 14. If web media server 14b receives the command, for example, it may then be forwarded to web media server 14a. Web media server 14a may then send the updated metadata to web media server 14b, and events may be generated to the browsers 12 to update the web page form content if necessary (i.e. the originating browser 12 may not need the event). In certain embodiments, JavaScript events, such as onMouseOver events for example, may be kept in sync on the browsers 12 in a substantially similar manner. The JavaScript in the web pages rendered to browsers 12

Claim No.	Claim	Prior Art Analysis
		may be modified so that in addition to performing the regular action, the respective web media server 14 may be notified. This may then be handled similarly to other events received by a web media server 14. Ex. 1007, ¶¶[0030-32]. <i>A POSITA would understand that the suitable interface for submitting requests for and displaying media such as web pages would include standard internet browser windows on standard operating systems at the time of the disclosure. Further, a POSITA would understand that Prajapat's disclosure of the use of "frames" to display the dynamic interactions of the users with the web pages would constitute depictions in a web browser window.</i>
[15]	The apparatus of claim 14, wherein information related to said shared user input web browsing interactions comprises web browsing interaction data	<i>Prajapat discloses the apparatus of claim 14, wherein information related to said shared user input web browsing interactions comprises web browsing interaction data.</i> I incorporate my analysis and the disclosures of Prajapat cited with respect to claim 14: Ex. 1007, ¶¶[0031-32].
[16]	The apparatus of claim 14, wherein said shared user input web browsing interactions further comprise a log-in	<i>Prajapat in view of Wang discloses the apparatus of claim 14, wherein said shared user input web browsing interactions further comprise a log-in into a restricted access webpage.</i> I incorporate my analysis and the disclosures of Prajapat and Wang cited with respect to claim 8:

Claim No.	Claim	Prior Art Analysis
	into a restricted access webpage.	Ex. Ex. 1007, ¶¶[0012], [0017], [0031]; Ex. 1006, ¶¶[0064], [0067-68]).
[17]	The apparatus of claim 14, wherein said shared user input web browsing interactions are depicted in a first web browser window.	<i>Prajapat discloses the apparatus of claim 14, wherein said shared user input web browsing interactions are depicted in a first web browser window.</i> I incorporate my analysis and the disclosures of Prajapat cited with respect to claim 5: Ex. 1007, ¶¶[0015-16], [0031-32].
[18]	The apparatus of claim 17, wherein non-shared web browsing interactions are depicted in a non-shared web browser window	<i>Prajapat discloses the apparatus of claim 17, wherein non-shared web browsing interactions are depicted in a non-shared web browser window.</i> I incorporate my analysis and the disclosures of Prajapat cited with respect to claim 6: Ex. 1007, ¶¶[0030], [0034].

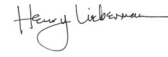
X. CONCLUSION

374. For the reasons presented above, it is my opinion that the applied references render obvious claims 1-18 of the '145 patent.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false

statements and the like so made are punishable by fine or imprisonment, or both,
under Section 1001 of Title 18 of the United States Code.

Dated: December 16, 2022



Henry A. Lieberman