



Demonstratives of Patent Owner Samesurf, Inc.

Case Nos.: IPR2023-00339, IPR2023-00341, IPR2023-00342
USPTO Patent Trial and Appeal Board
March 27, 2024

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

1

SAMESURF EX. 2009

The Challenged '591, '145, and '448 Patents



'591 Patent (-00342)



US008527591B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 8,527,591 B2**
(45) Date of Patent: ***Sep. 3, 2013**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(75) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **Actual Works, Inc.**, Los Angeles, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 296 days.
This patent is subject to a terminal disclaimer.

(21) Appl. No.: **12/783,743**

(22) Filed: **May 20, 2010**

(65) **Prior Publication Data**
US 2011/0289157 A1 Nov. 24, 2011

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"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
* cited by examiner
Primary Examiner — Jungwon Chang
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.; David V. Jafari

-00342; Ex. 1001 at Cover
-00342 Pet. at 1

'145 Patent (-00339)



US009185145B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,185,145 B2**
(45) Date of Patent: ***Nov. 10, 2015**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(71) Applicant: **Actual Worlds, Inc.**, Los Angeles, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 208 days.
This patent is subject to a terminal disclaimer.

(21) Appl. No.: **13/951,789**

(22) Filed: **Jul. 26, 2013**

(65) **Prior Publication Data**
US 2013/0311664 A1 Nov. 21, 2013

Related U.S. Application Data
(63) Continuation of application No. 12/783,743, filed on May 20, 2010, now Pat. No. 8,527,591.

(58) **Field of Classification Search**
CPC — H04L 65/1009; H04L 51/32; H04L 51/046; H04L 65/403; G06F 17/30873
USPC — 709/205, 203; 715/733, 753
See application file for complete search history.

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(Continued)

OTHER PUBLICATIONS
"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
Primary Examiner — Jungwon Chang
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a guest device, utilizing the transfer of URL and form data information. The present invention further 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

-00339; Ex. 1001 at Cover
-00339 Pet. at 1

'448 Patent (-00341)



US009483448B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,483,448 B2**
(45) Date of Patent: ***Nov. 1, 2016**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A HOST DEVICE**

(71) Applicant: **Samesurf, Inc.**, Beverly Hills, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.
This patent is subject to a terminal disclaimer.

(21) Appl. No.: **14/830,710**

(22) Filed: **Aug. 19, 2015**

(65) **Prior Publication Data**
US 2015/0358386 A1 Dec. 10, 2015

Related U.S. Application Data
(63) Continuation of application No. 12/783,735, filed on May 20, 2010.

(58) **Field of Classification Search**
None
See application file for complete search history.

(56) **References Cited**
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2004/0100707 A1 5/2004 Hayner
2005/0097107 A1 5/2005 Ibert
2005/0108328 A1 5/2005 Burkland
(Continued)

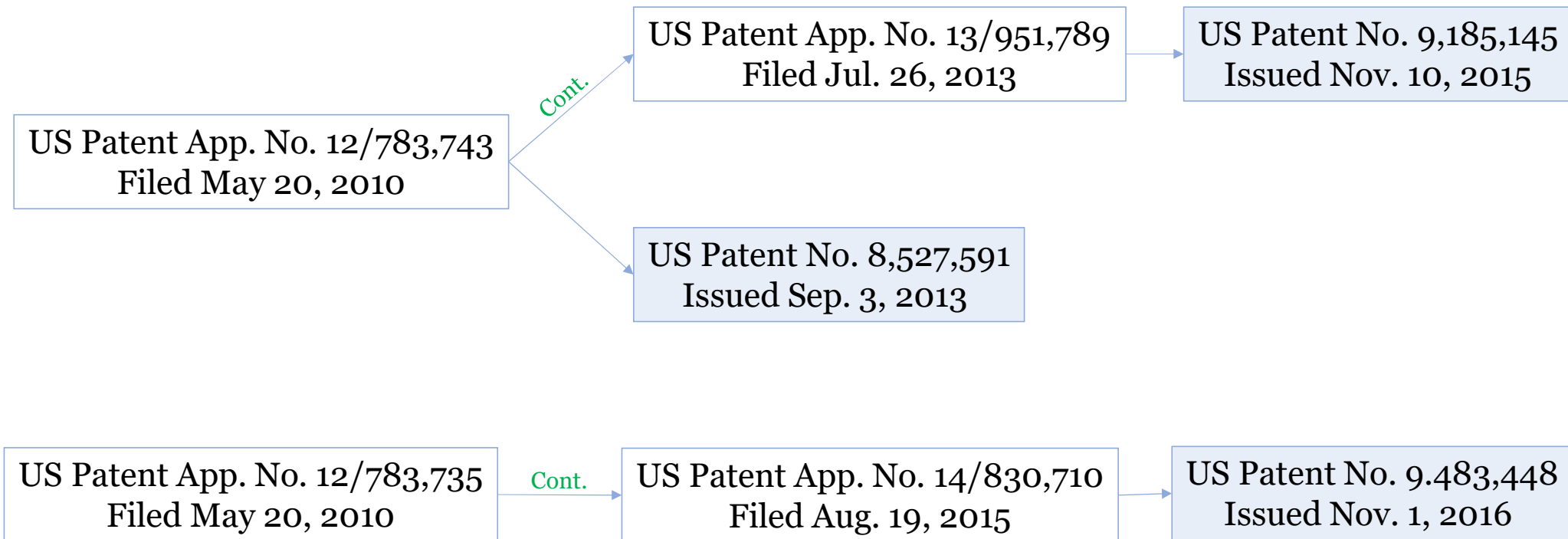
OTHER PUBLICATIONS
"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.*
(Continued)
Primary Examiner — Scott B Christensen
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a host device, utilizing the transfer of URL and form data information. The present invention further describes a method for establishing a synchronized browsing

-00341; Ex. 1001 at Cover
-00341 Pet. at 1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Challenged '591, '145, and '448 Patents



Roadmap to Today's Presentation



- Prior Art Examples: Screen & Webpage Sharing
- Shortcomings of the Prior Art
- Primary Benefits of the Invention
- The Claimed Invention: Synchronized Browsing
- The Claimed Invention: The Synchronization Server
- The Claimed Invention: The Synchronized Browsing Session
- The Claimed Invention: How It Works
- Review of the Asserted References
- The Claimed Invention vs. Asserted References: Key Distinctions

Prior Art Examples: Screen & Webpage Sharing



1. Screen Sharing

- Broadcasts continuous screenshots of the host screen in large files or packets.

2. Web page sharing

- Involves participants requesting and receiving web pages from a “middleman” server that acts as a “go-between” between the participants and the web content server.
- Limited to sharing individual web pages.

-00339 POR at 7-8, Ex. 1001 at 2:30-34; -00341 POR at 7-8, Ex. 1001, 2:30-34; -00342 POR at 7-8, Ex. 1001, 2:23-27.

Shortcomings of the Prior Art

1. High resource utilization levels for CPU, GPU, and bandwidth
2. Noticeable levels of latency and screen pixelation
3. Possible disclosure of sensitive screen elements like credit card numbers and passwords
4. Lacks synchronization of full experience
5. No support for multi-user interactivity

-00341: POR at 7-8; -00339: POR at 6-8; -00342: POR at 7-8.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Primary Benefits of the Invention

1. Pirnazar's invention does not materially impose more bandwidth or processing power requirements than simply browsing the internet using standard, conventional methods.
2. Low levels of latency
3. Protection for the broadcasting host's private information
4. Provides a synchronized browsing experience
5. Support for multi-user interactivity

-00341: POR at 2-3, 6-10, Ex. 1001, 2:38-48, 5:34-38; -00339: POR, at 5, 7-11, Ex. 1001, 2:38-48, 5:33-36; -00342: POR at 7-11, Ex. 1001, 2:32-40, 5:22-25

The Claimed Invention: Synchronized Browsing

The present invention allows two or more persons browsing the internet to share their internet browsing experience and have all users simultaneously browse and fully interact with web sites, games, virtual worlds, or other online applications in real time. To share their internet browsing

information between browser clients. In a synchronized browsing session, two or more people may read the same article, watch the same video, or shop for the same item automatically, without the hassle of coordinating user input.

-00341: Ex. 1001, at 5:22-33; -00339: Ex. 1001, at 5:22-33; -00342: Ex. 1001, at 5:11-22.

-00341: POR, at 14; -00339: POR, at 14-15; -00342: POR, at 15-16.

What is Synchronized Browsing?

1.[1. Preamble] A method performed by a host device for establishing a *synchronized browsing session*⁴ between the host device and an invitee device, comprising:

[1.a] sending a request to establish the *synchronized browsing session* to a *synchronization server*;

[1.b] receiving a confirmation message from the *synchronization server* including a session identifier generated by the *synchronization server*, wherein the session identifier is associated with the host device and the established *synchronized browsing session*;

[1.c] sending an invitation to an invitee device to join the *synchronized browsing session*, wherein the invitation includes the session identifier;

[1.d] recording a *shared web browsing interaction* responsive to determining that a *web browsing interaction* of the host device within a web browsing window is a *sharable web browsing interaction*

[1.e] sending a request for webpage content to a website server independent of the *synchronization server*

[1.f] subsequent to sending the request for webpage content to the website server, transmitting *information related to the shared web browsing interaction* to the *synchronization server*

[1.f.i] wherein the *information related to the shared web browsing interaction* is to be processed by a browser of the invitee device and enables the invitee device to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device

[1.f.ii] wherein the *synchronization server* transmits the *information related to the shared web browsing interaction* to the invitee device in response to receiving the *information related to the shared web browsing interaction* from the host device, and

[1.f.iii] wherein the invitee device retrieves data from the website server in response to *receiving the information related to the shared web browsing interaction* from the *synchronization server*, the data associated with the webpage content requested by the host device and the *information related to the shared web browsing interaction*; and

[1.g] receiving, responsive to sending the request for webpage content to the website server and after transmitting the *information related to the shared web browsing interaction* to the *synchronization server*, the requested webpage content from the website server

-00341; Ex. 1001, 23:29-24:8, POR at 11-12

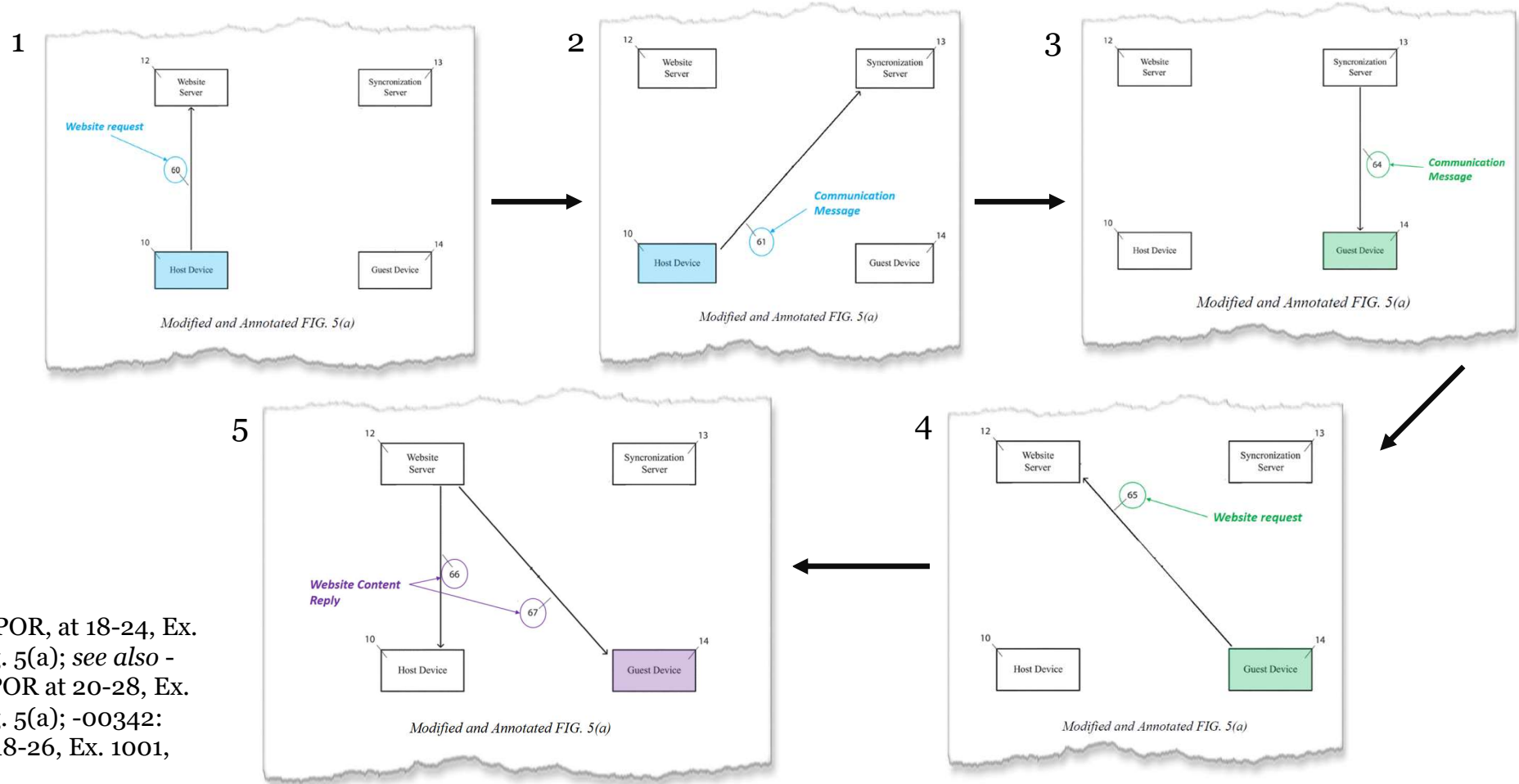
A “synchronized browsing session” is a browsing session in which a “host device” shares its internet browsing interactions within a website with a “guest device,” via the synchronization server,” in a **simultaneous real-time fashion** in order to support a multitude of synchronized use cases.

-00341: POR, at 14, Ex. 1001, at 2:48-54; 5:22-33, 5:36-6:3; *see also* -00339: POR, at 14-15, Ex. 1001, at 2:47-53; 5:22-33, 5:37-67; -00342: POR, at 15-16, Ex. 1001, at 2:40-46; 5:11-22, 5:26-56.

A “synchronization server” establishes and facilitates a synchronized browsing session between host device 10 and guest device 14 and relays web browsing interaction data from the host device to the guest device.

-00341: POR, at 15, Ex. 1001, 9:47-49; *see also* -00339: POR at 15, Ex. 1001, 9:34-36; -00342: POR, at 16, Ex. 1001, 9:24-26.

The Claimed Invention: The Synchronization Server



-00341: POR, at 18-24, Ex. 1001, Fig. 5(a); see also -00339: POR at 20-28, Ex. 1001, Fig. 5(a); -00342: POR, at 18-26, Ex. 1001, Fig. 5(a).

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prosecution History: Web Browsing Interaction

Reasons for Allowance

the client). Further, the claims presents that it is actually determined that the web browsing interaction is a shareable web browsing interaction, which is an active step that must be performed, meaning that the system could also determine that a web browsing interaction within the web browsing window is not a shareable interaction. These changes together are not considered to be fairly taught or suggested by the prior art of record in view of claims 1 and 13, as a whole.



-00341: Sur-reply at 4-5, 16-17, Ex. 1002 at 20 (Notice of Allowance), Ex. 2008 at 10

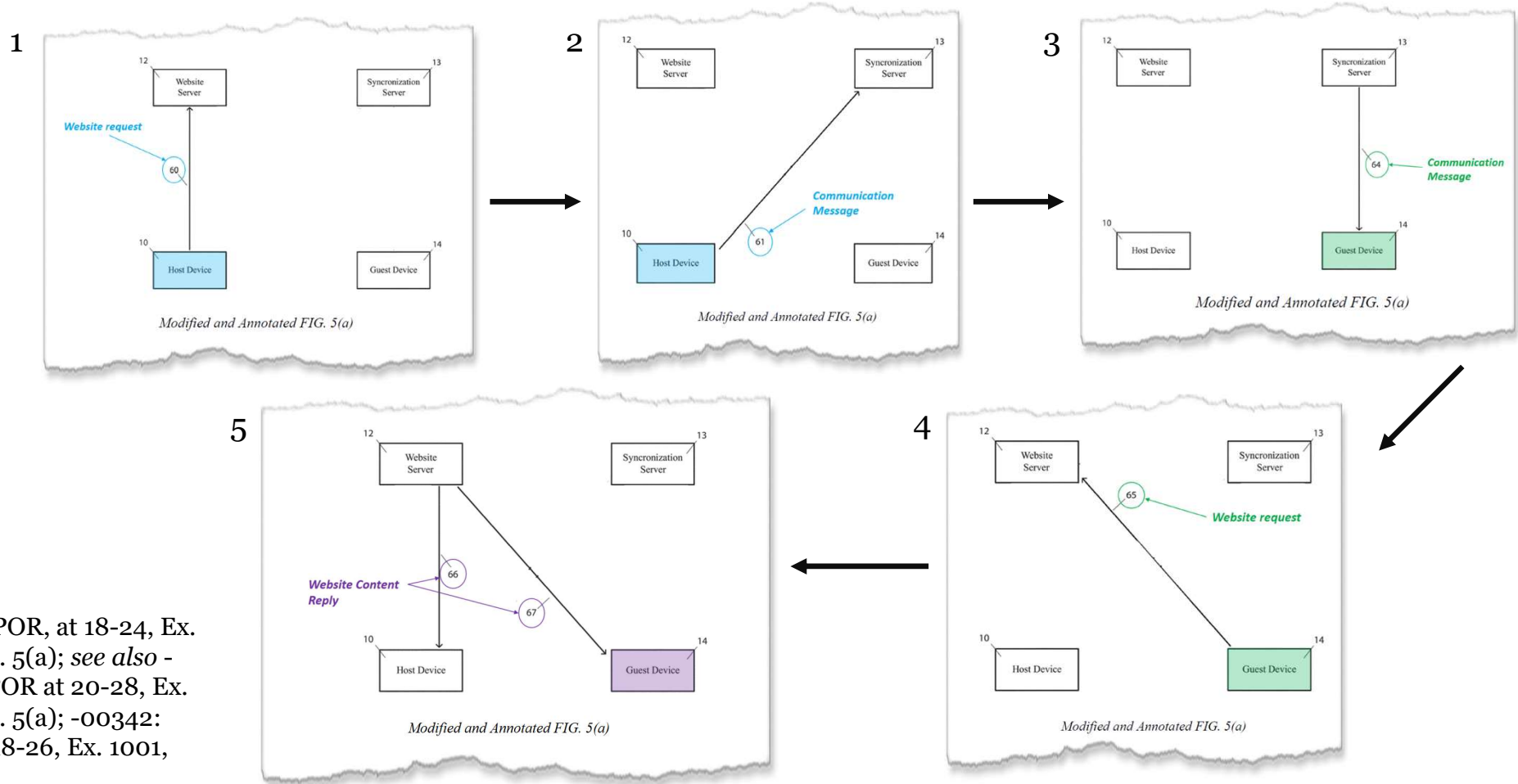
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

'448 Patent, Limitation [1.c]: ***sending an invitation*** to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier;

'145 Patent, Limitation [1.a]: ***receiving*** from the synchronization server ***a session invitation*** including a session identifier associated with a host device;

-00341: POR at 11-12, 14-15, Ex. 1001, claim 1, 23:40-42; -
00339: POR at 11-12, 16, Ex. 1001, claim 1, 22:65-67

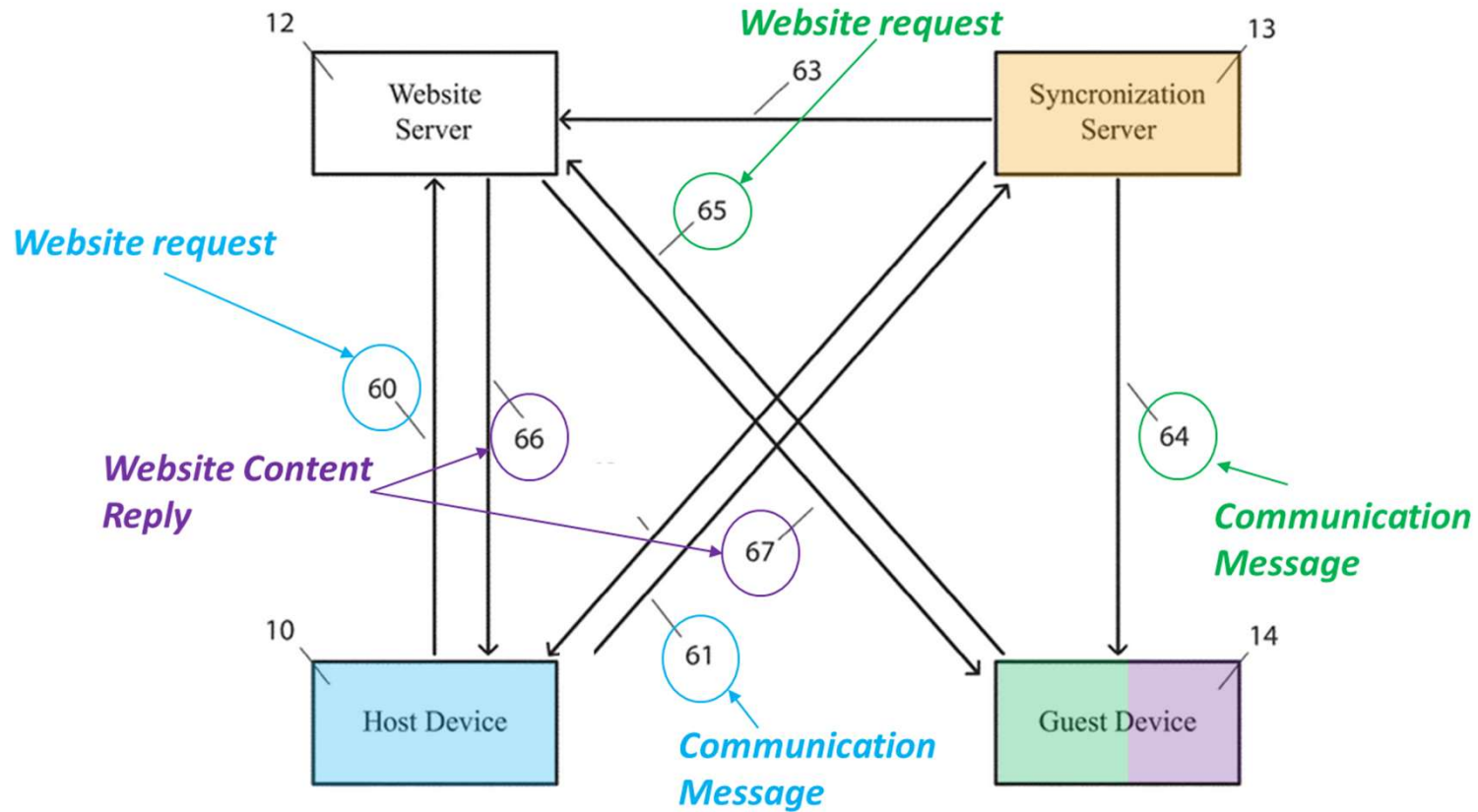
The Claimed Invention: How Synchronized Browsing Works



-00341: POR, at 18-24, Ex. 1001, Fig. 5(a); see also -00339: POR at 20-28, Ex. 1001, Fig. 5(a); -00342: POR, at 18-26, Ex. 1001, Fig. 5(a).

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention: Consolidated Steps



-00339, POR at 20-37; -00341, POR at 18-34; -00342, POR at 18-26

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Asserted References: Lebrun, Prajapat and Wang



Lebrun (WO 00/48110)

Prajapat (US 2005/0021626A1)

Wang (US 2005/0033656A1)

PCT WORLD INTELLECTUAL PROPERTY ORGANIZATION
International Bureau

INTERNATIONAL APPLICATION PUBLISHED UNDER THE PATENT COOPERATION TREATY (PCT)

(51) International Patent Classification: G06F 17/60	(11) International Publication Number: WO 00/48110
(22) International Filing Date: 11 February 2000 (11.02.00)	(43) International Publication Date: 17 August 2000 (17.08.00)
(30) Priority Data: 09/249,226 11 February 1999 (11.02.99) US 09/273,803 22 March 1999 (22.03.99) US 09/361,640 26 July 1999 (26.07.99) US 09/466,533 17 December 1999 (17.12.99) US	(81) Designated States: AE, AL, AM, AT, AU, AZ, BA, BB, BG, BR, BY, CA, CH, CN, CR, CU, CZ, DE, DK, DM, EE, ES, FI, GB, GD, GE, GR, HU, ID, IL, IN, IS, JP, KR, KG, KP, KZ, LC, LK, LR, LS, LT, LU, LV, MA, MD, MG, MK, MN, MW, MX, NO, NZ, PL, PT, RO, RU, SD, SE, SG, SI, SK, SL, TJ, TM, TR, TT, TZ, UA, UG, UZ, VN, YU, ZA, ZW, ARIPO patent (GB, GM, KE, LS, MW, SD, SL, SZ, TZ, UG, ZW), Eurasian patent (AM, AZ, BY, KG, KZ, MD, RU, TJ, TM), European patent (AT, BE, CH, CY, DE, DK, ES, FI, FR, GB, GR, IE, IT, LU, MC, NL, PT, SE), OAPI patent (BF, BJ, CF, CG, CI, CM, GA, GN, GW, ML, MR, NE, NG, SN, TD, TG).
(71) Applicant: EZLOGIN.COM [US/US]; Suite 275, 4699 Old Ironsides Drive, Santa Clara, CA 95054 (US).	(73) Inventors: LEBRUN, Jean-Noël; Paris (FR); KRUTA, Francois; Paris (FR).
(74) Agent: SWERNOFSKY, Steven, A.; Swernofsky Law Group, P.O. Box 390013, Mountain View, CA 94039-0013 (US).	
(54) Title: PERSONALIZED ACCESS TO WEB SITES	

-00342; Ex. 1005 at Cover

United States

(12) Patent Application Publication (10) Pub. No.: **US 2005/0021626 A1**
(43) Pub. Date: **Jan. 27, 2005**

(54) **PEER-TO-PEER DYNAMIC WEB PAGE SHARING** (52) U.S. CL. **709/205**

(75) Inventors: **Suresh Prajapat, Santa Clara, CA (US); Michael P. Lepore, Marlborough, MA (US); Andrew R. Cleashy, Newburyport, MA (US)**

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(73) Assignee: **Cisco Technology, Inc.**

(21) Appl. No.: **10/444,482**

(22) Filed: **May 22, 2003**

Publication Classification
(51) Int. Cl. **G06F 15/16**

Abstract:
According to a particular embodiment of the present invention, a communication system includes a first browser operable to submit requests for one or more web pages and a request to share the one or more requested web pages with another browser, the request to share specifying the other browser. The communication system also includes a web media server operable, in response to the request to share, to: (1) establish a communication session with the first browser; (2) establish a media session and a signaling session with a remote web media server, the remote web media server being associated with the other browser that the first browser specified in the request to share, the signaling session including a standard signaling protocol; (3) receive web page information from the first browser; and (4) communicate shared web page information to the remote web media server using the media session.

-00339; Ex. 1007 at Cover

United States

(12) Patent Application Publication (10) Pub. No.: **US 2005/0033656 A1**
(43) Pub. Date: **Feb. 10, 2005**

(54) **COLLABORATION SYSTEM SUITABLE FOR ON-LINE SHOPPING** (30) Foreign Application Priority Data
Aug. 5, 2003 (JP) 2003-286578

(75) Inventors: **Xiaozhou Wang, Yamato-shi (JP); Masaki Ishibashi, Yamato-shi (JP); Kazuhiro Yabuta, Yamato-shi (JP); Orika Itoh, Yokohama-shi (JP)**

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Research Triangle Park, NC 27709 (US)

(73) Assignee: **International Business Machines Corporation, Armonk, NY**

(21) Appl. No.: **10/828,978**

(22) Filed: **Apr. 21, 2004**

Publication Classification
(51) Int. Cl. **G06F 17/30**
(52) U.S. CL. **705/26**

Abstract:
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. Each of the client devices includes means for synchronizing displays on the plurality of client devices.

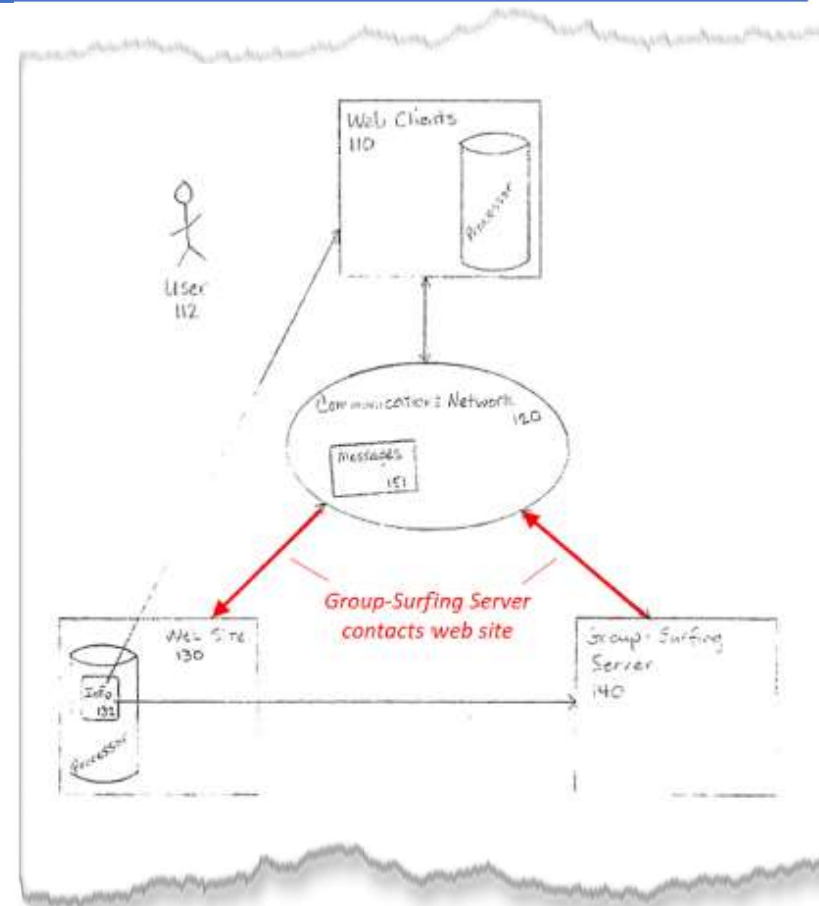
-00341; Ex. 1006 at Cover

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Asserted References: Lebrun

Lebrun discloses a “middleman” server that:

1. receives the webpage requests from the participants;
2. transmits those requests to the webpage server on behalf of the participants;
3. receives the webpages from the website servers; and
4. transmits the received webpages to the devices participating in the browsing session.



-00339, -00341, -00342, Ex. 1005 at Figure 3

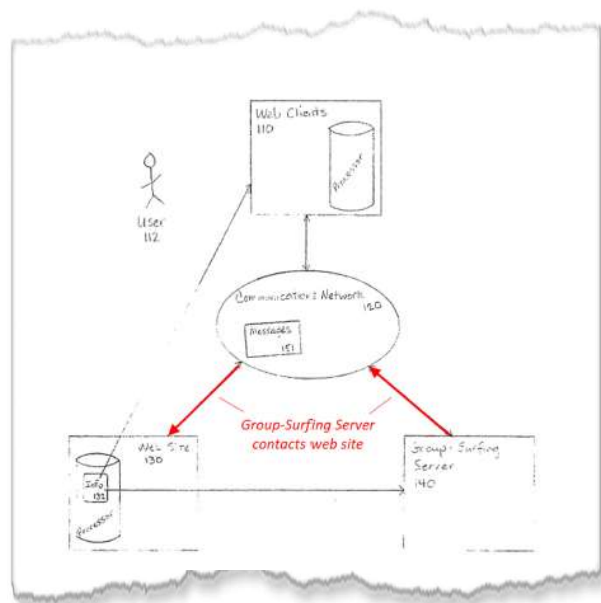
-00339, POR at 5; -00341, POR at 5-6; -00342; POR at 6

-00339 POR at 47-49, -00341 POR at 38-39, -00342 POR at 33-35

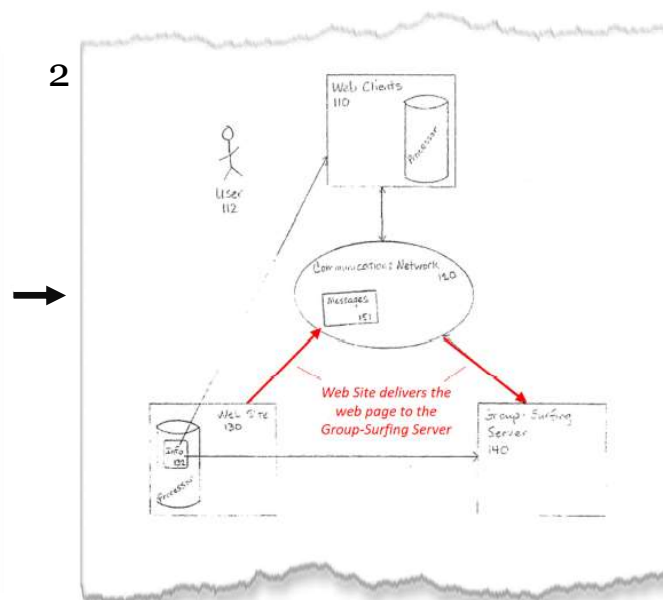
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Architecture and Operation of Lebrun

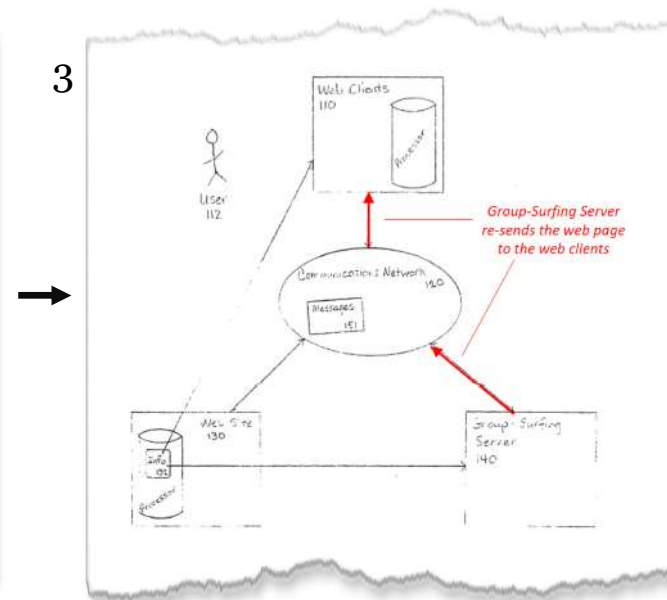
1



2



3



-00339 POR at 47-49, -00341 POR at 38-39, -00342 POR at 33-35

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Lebrun Does Not Teach the Claimed Invitation

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.

The Asserted Prior Art: Lebrun Does Not Teach an Invitation

10 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-

15 151.) 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. The web client 110 can alternatively specify that the session is open to anyone. The

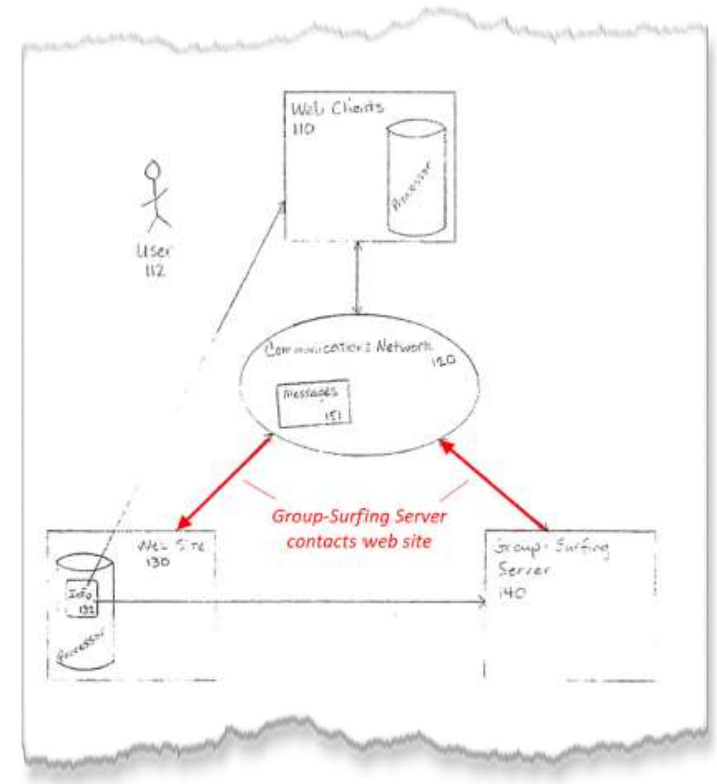
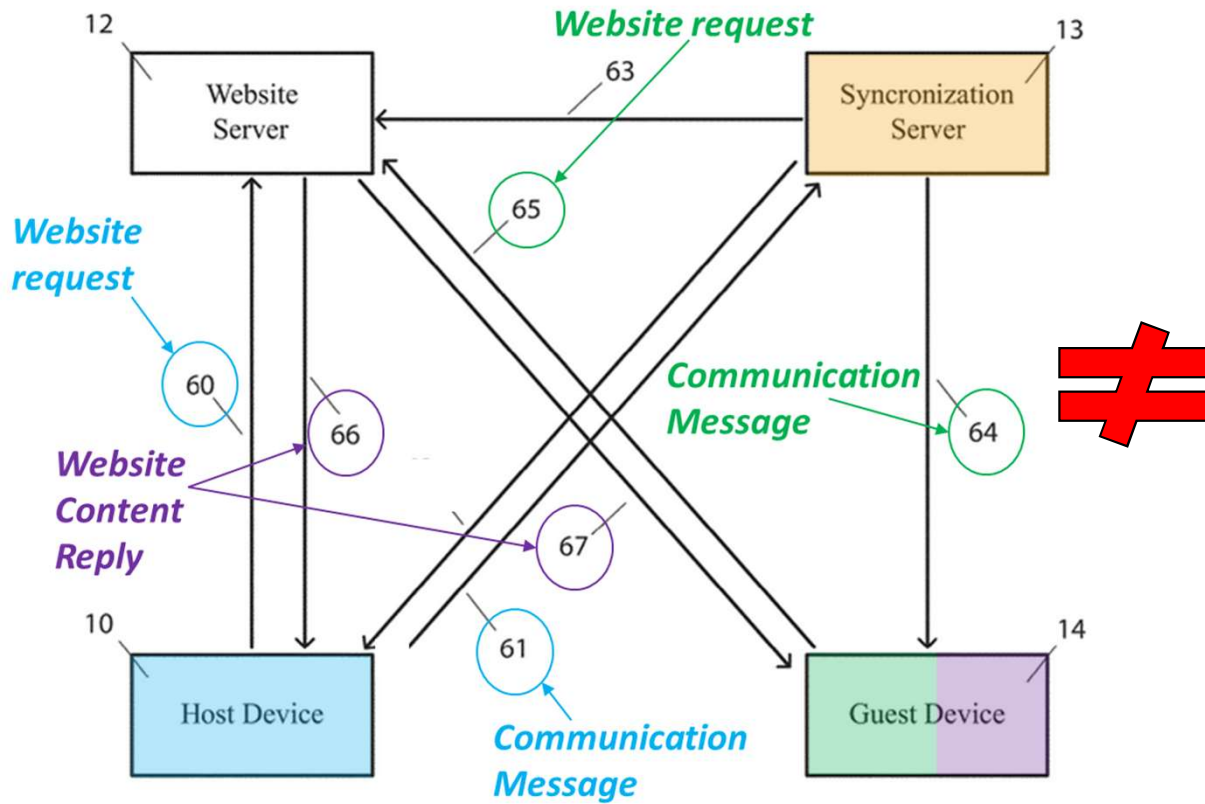
25

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

-00341 POR at 40-42, Sur-reply at 11-13, Ex. 1005, 32:14-25

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samesurf vs. Lebrun: Differing Architecture



-00339, POR at 20-37; -00341, POR at 18-34; -00342, POR at 18-26

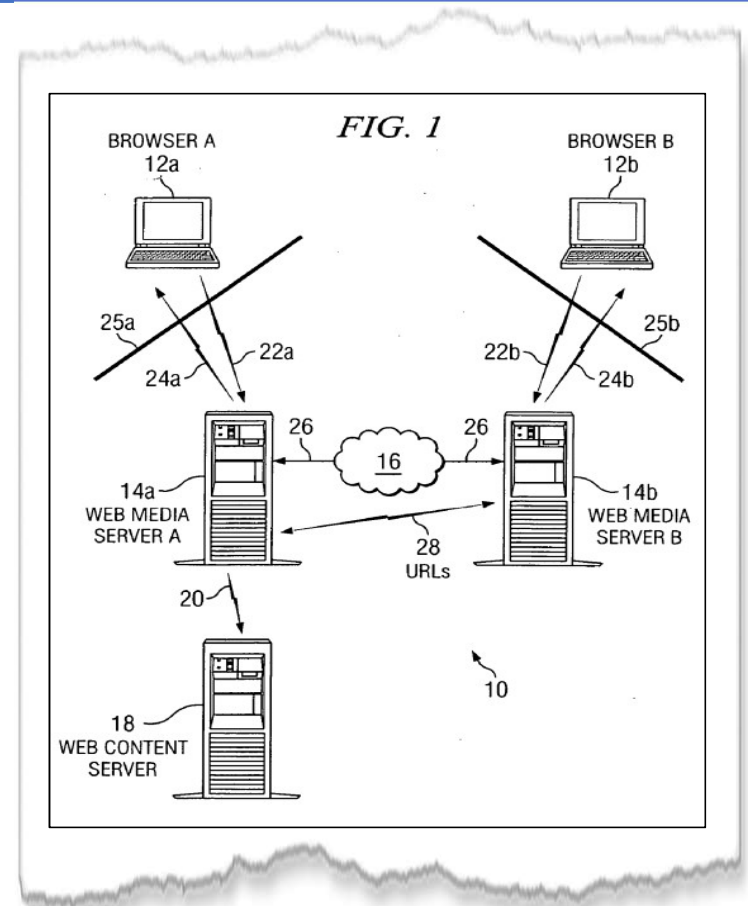
-00339, -00341, -00342, Ex. 1005 at Figure 3
-00339 POR at 47-49, -00341 POR at 38-39, -00342 POR at 33-35

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Asserted References: Prajapat

Prajapat discloses a “middleman” server that:

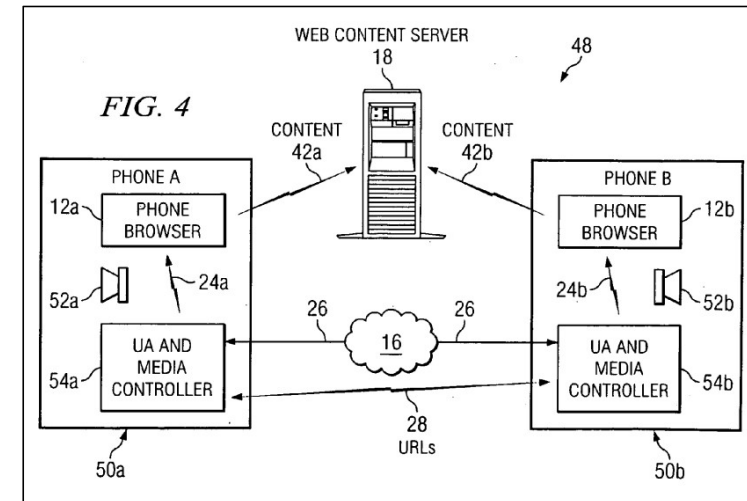
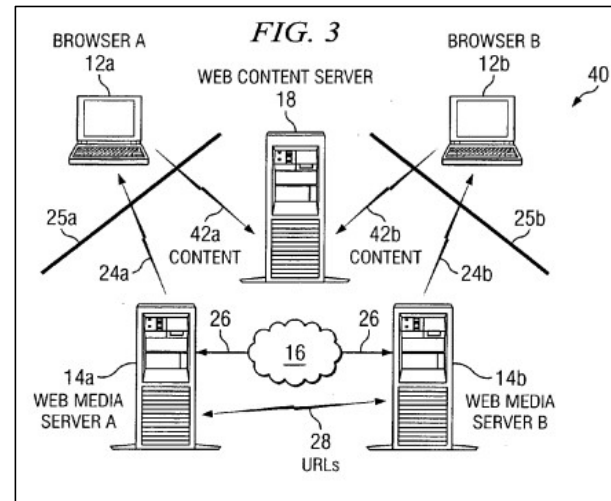
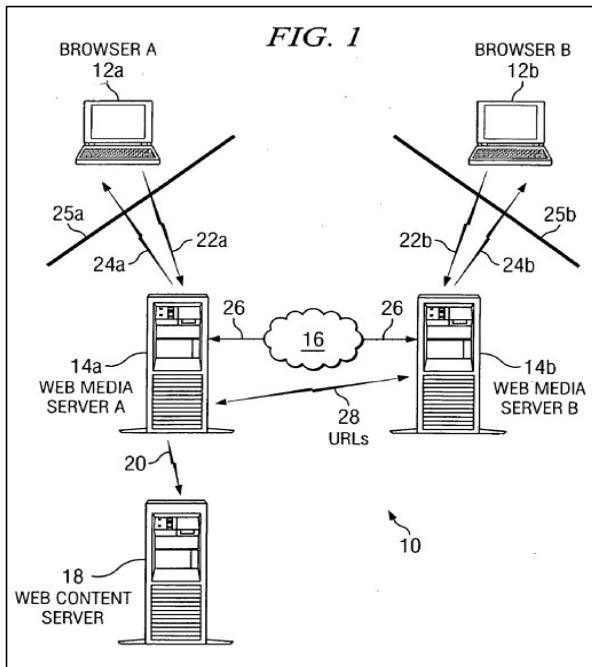
1. receives the webpage requests from the participants;
2. transmits those requests to the webpage server on behalf of the participants;
3. receives the webpages from the website servers;
4. transforms the received webpage into a renderable, intermediate form; and
5. transmits the received webpages to the devices participating in the browsing session.



-00339, POR at 5, 56; -00341, POR at 5-6, 60-61; -00342; POR at 6, 55-56

-00339, -00341, -00342, Ex. 1007 at Figure 1

The Embodiments of Prajapat



- Peer-to-Peer Dynamic Web Page Sharing: Ex. 1007 at [0012-40]
- Peer-to-Peer Simple Web Page Sharing: Ex. 1007 at [0041-43]
- Phone-to-Phone Web Page Sharing: Ex. 1007 at [0044-48]

-00339, -00341, -00342, Ex. 1007 at Ex. 1007, Figs. 1, 3, 4

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

“Prajapat’s dynamic web page sharing embodiment is incompatible with either the simple web page sharing or phone-to-phone web page sharing.”

- Stacy Friedman

-00339, POR at 68-69, Ex. 2004, ¶ 64 ; -00341, POR at 69-73, Ex. 2004, ¶ 65; -00342; POR at 67-69, Ex. 2004, ¶ 54.

Prajapat's Embodiments are Incompatible

*“Prajapat’s dynamic web page sharing embodiment **is incompatible with** either the simple web page sharing or phone-to-phone web page sharing.”*

*“FIG. 1, corresponding to the dynamic web page sharing, **is an entirely different architecture and message flow** than FIG. 3 (simple web page sharing) or FIG. 4 (phone-to-phone web page sharing).”*

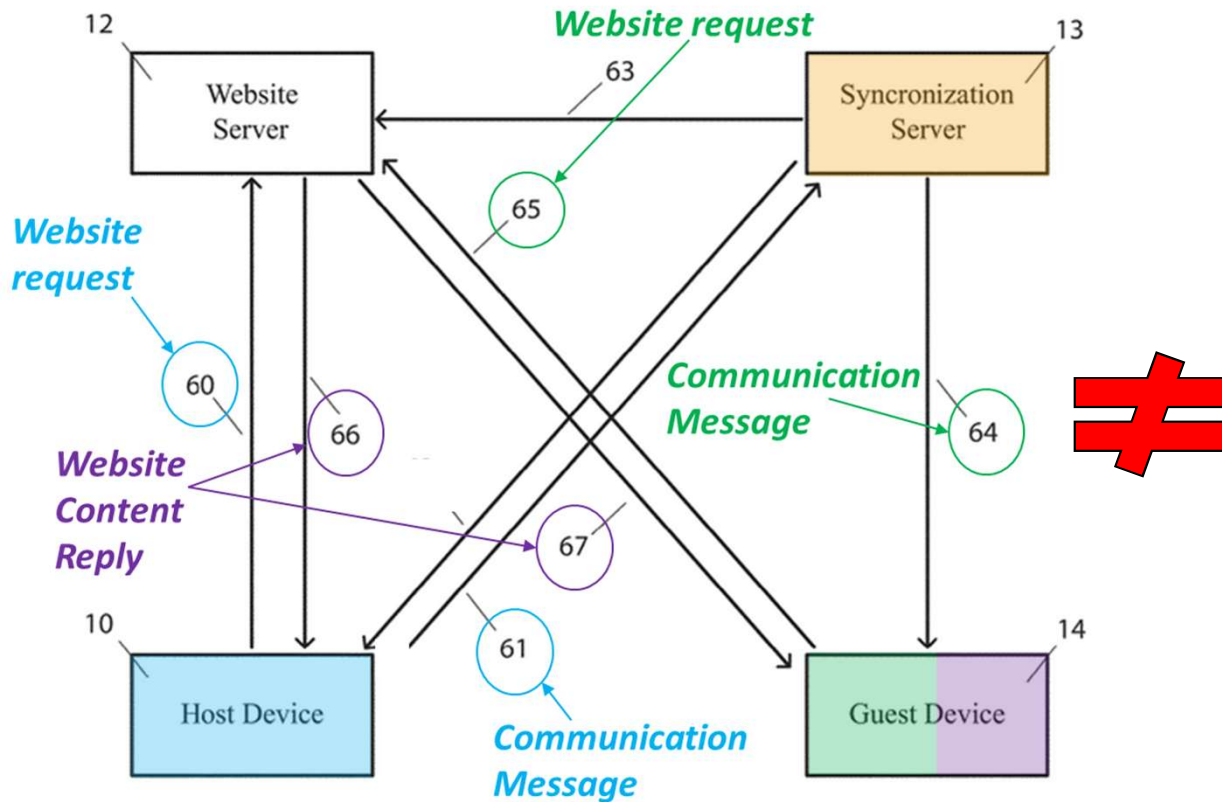
*“[I]t is clear from the figures [] that the dynamic web page sharing embodiment is **distinct** from the simple web page sharing or phone web page sharing embodiments.”*

- Stacy Friedman

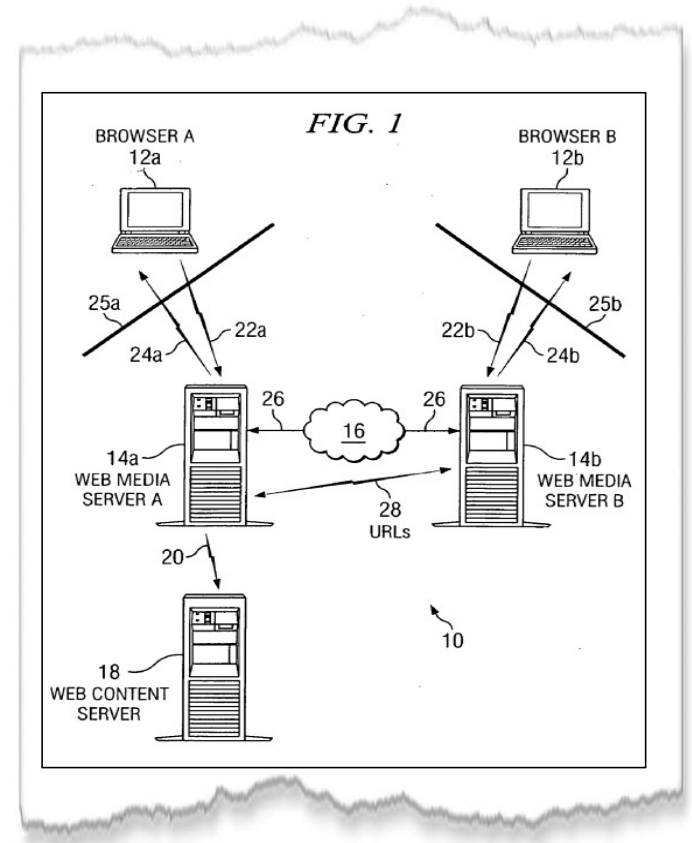
-00339, POR at 68-69, Ex. 2004, ¶¶ 64-65 ; -00341, POR at 69-73, Ex. 2004, ¶¶ 65-66; -00342; POR at 67-69, Ex. 2004, ¶¶ 54-55.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samesurf vs. Prajapat: Differing Architectures



-00339, POR at 20-37; -00341, POR at 18-34; -00342, POR at 18-26

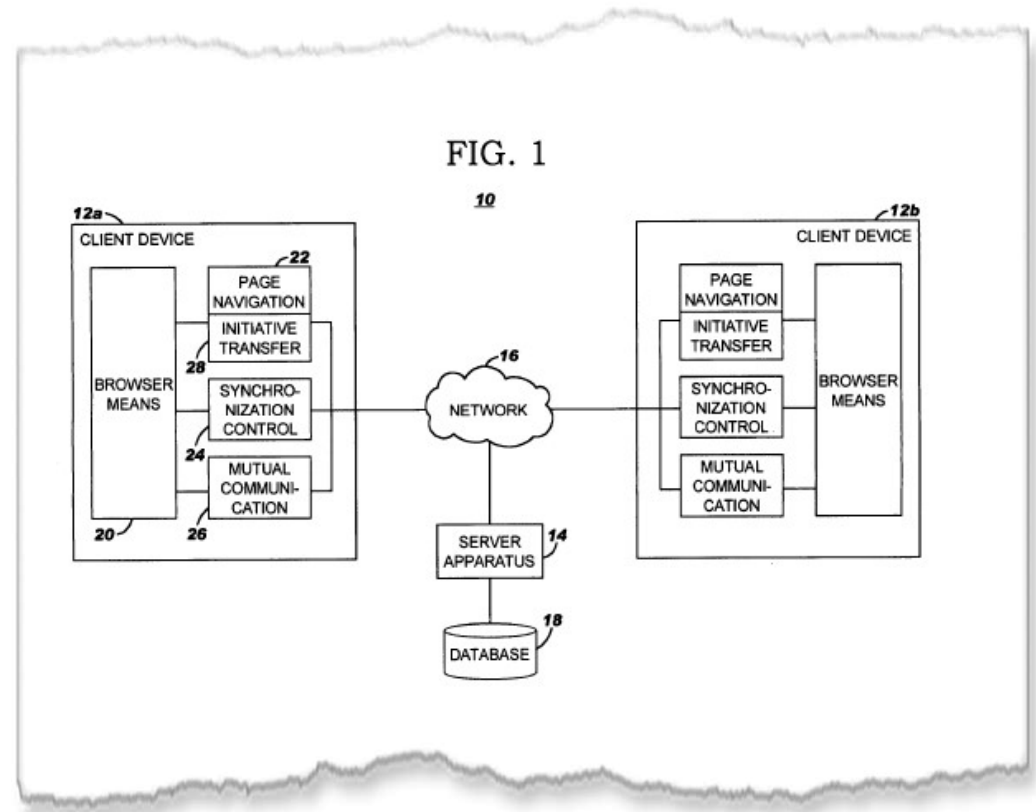


-00339, -00341, -00342, Ex. 1007 at Figure 1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Asserted References: Wang

- Wang teaches:
 - The “server apparatus” requests and receives web content from the website server
 - The “page navigation control unit” (“PNC”) creates and stores “snapshot data” representing the web content
 - In response to a “page synchronization request,” the “server apparatus” transmits the webpage to the web clients



-00339, -00341, -00342, Ex. 1006 at Figure 1

-00339, POR at 71-76, Ex. 2004, ¶¶ 66-67, 79-85; -00341, POR at 39-40, 42, 53-54, Ex. 2004, ¶¶ 67-68; -00342; POR at 69-70, Ex. 2004, ¶¶ 56-57, 81-87

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Architecture and Operation of Wang

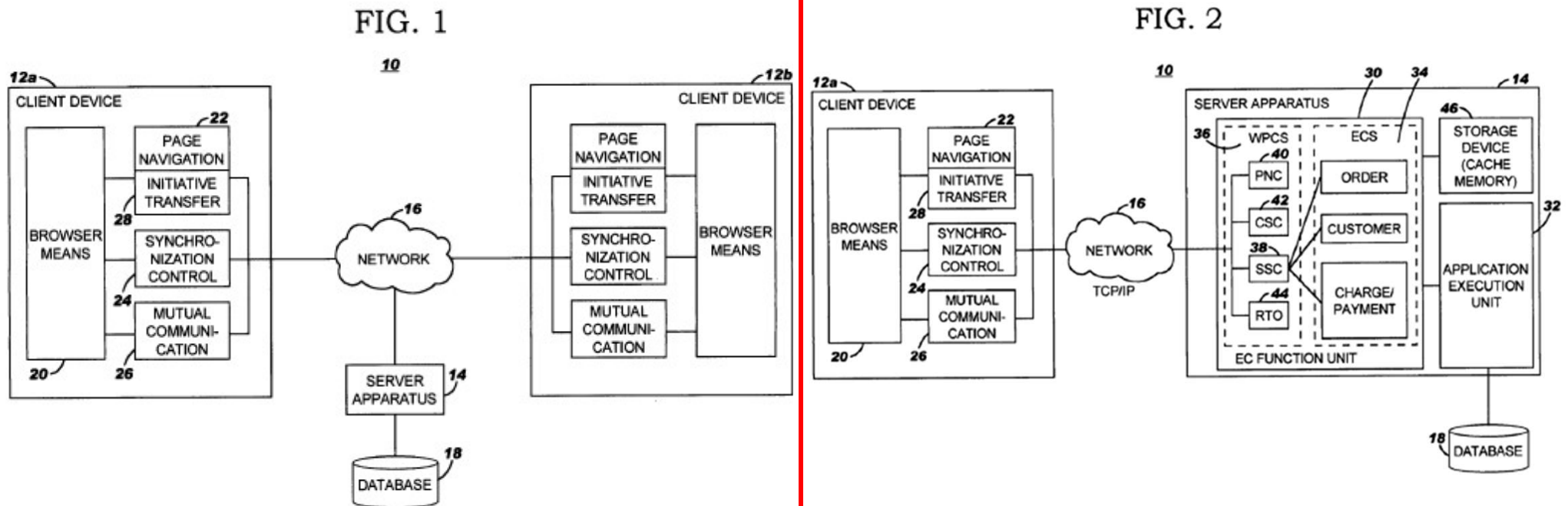
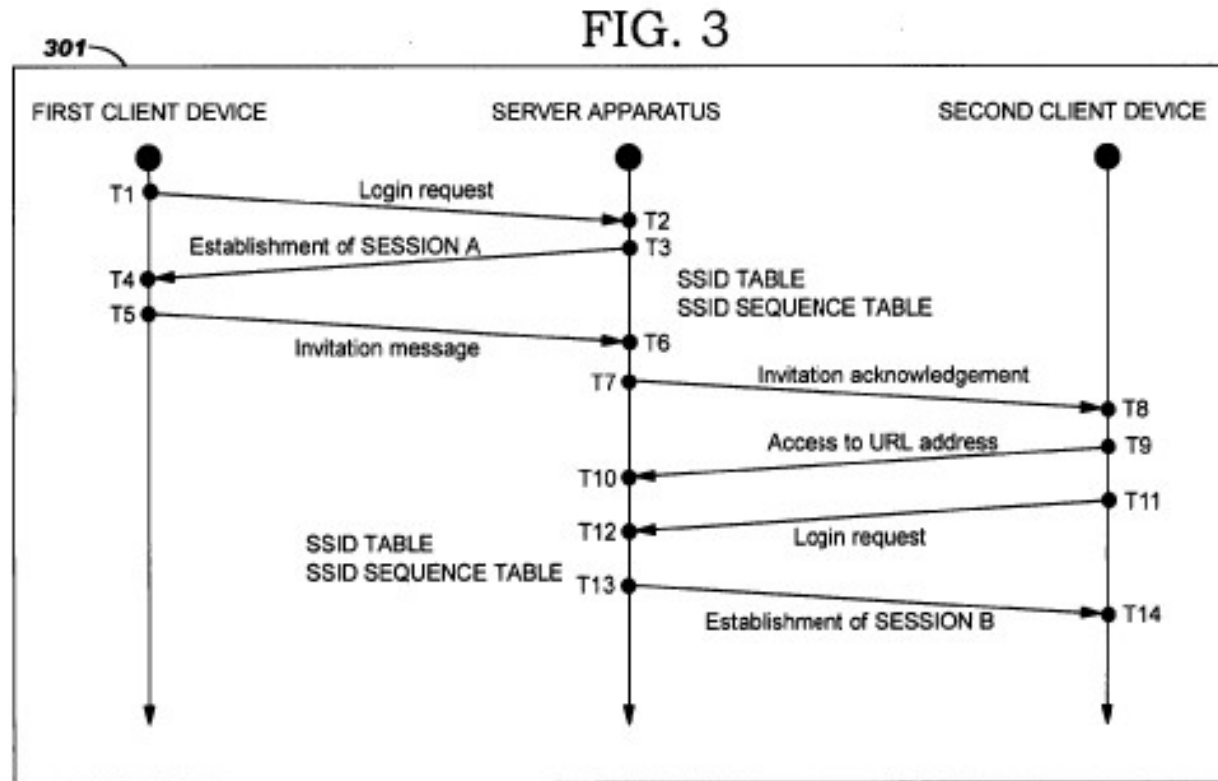


Figure 2 of Wang

-00339, POR at 71-76, Ex. 2004, ¶¶ 66-67, 79-85, Ex. 1006, Figs. 1, 2; -
00341, POR at 39-40, 42, 53-54, Ex. 2004, ¶¶ 67-68, Ex. 1006, Figs. 1, 2; -
00342; POR at 69-70, Ex. 2004, ¶¶ 56-57, 81-87, Ex. 1006, Figs. 1, 2

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Wang Does Not Teach the Claimed Invitation



-00339, POR at 71-76, Ex. 2004, ¶¶ 66-67, 79-85, Ex. 1006, Figs. 3; -00341, POR at 39-42, 72-73, Ex. 2004, ¶¶ 67-68, 82-89, Ex. 1006, Fig. 3; -00342; POR at 69-70, Ex. 2004, ¶¶ 56-57, 81-87, Ex. 1006, Fig. 3

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Wang Does Not Teach a Synchronization Server

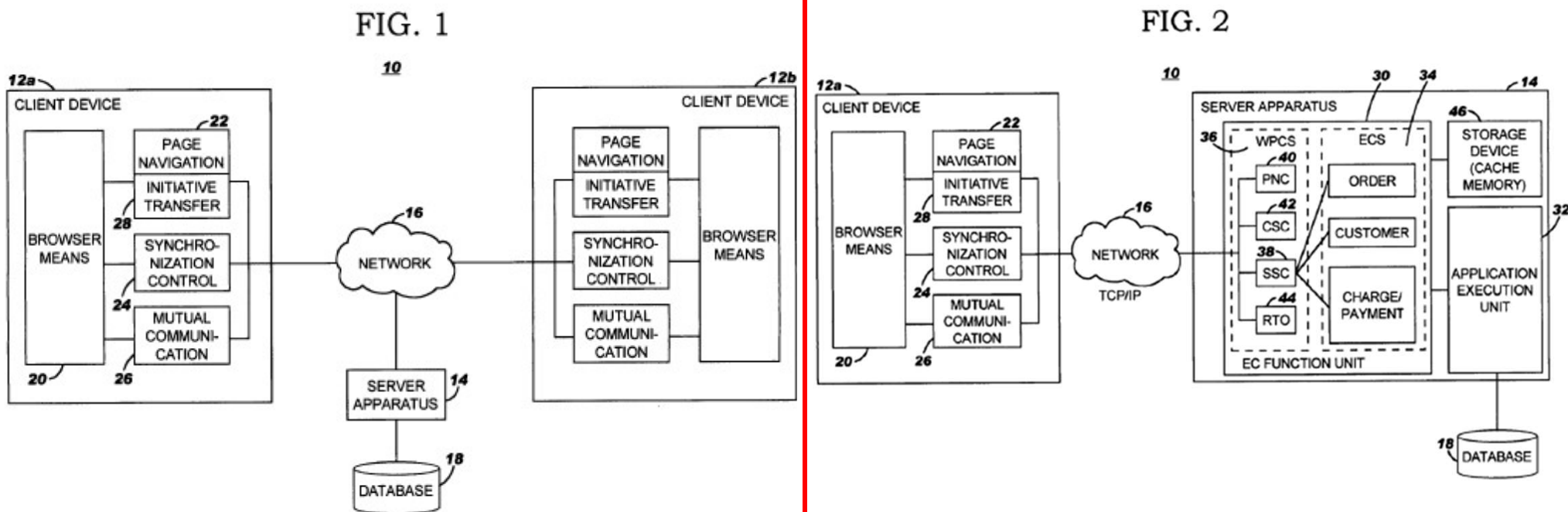
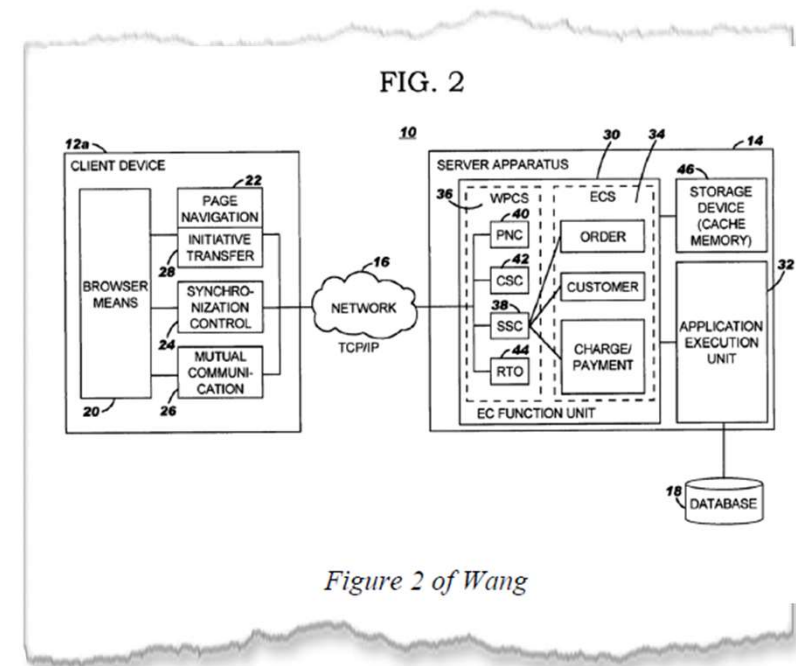
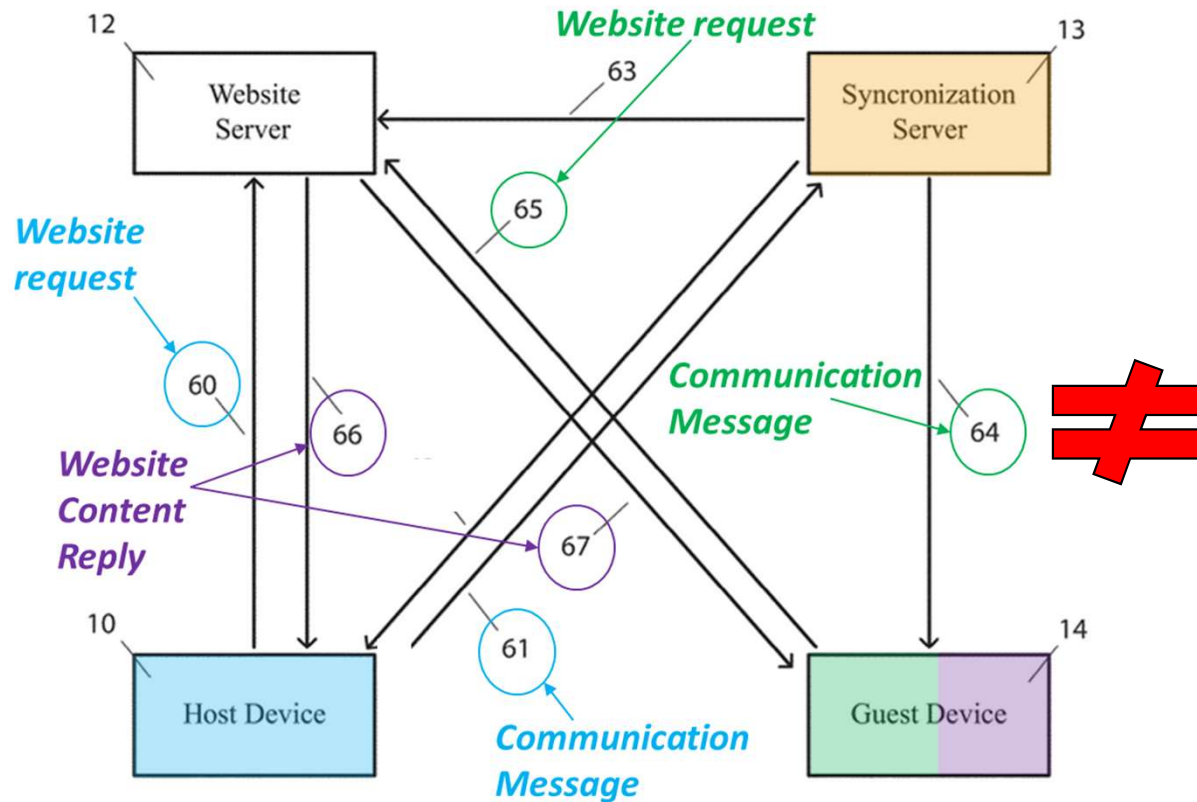


Figure 2 of Wang

-00339, POR at 71-76, Ex. 2004, ¶¶ 66-67, 79-85, Ex. 1006, Figs. 3; -00341, POR at 39-40, Ex. 2004, ¶¶ 67-68, 82-89, Ex. 1006, Fig. 3; -00342; POR at 69-70, Ex. 2004, ¶¶ 56-57, 81-87, Ex. 1006, Fig. 3

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samesurf vs. Wang: Differing Architectures



-00339, POR at 20-37; -00341, POR at 18-34; -00342, POR at 18-26

-00339, -00341, -00342, Ex. 1006 at Figure 2

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samesurf vs. Asserted References: Key Distinctions



1. The claimed invention is synchronized
2. The claimed synchronization server is not found in the asserted references
3. The claimed synchronized browsing session is not found in the asserted references
4. The claimed guest devices request and retrieve substantially the same web content as the host from the web server
5. The architecture is different: the asserted references employ a middle-man server and thus do not disclose a synchronization server

-00339, -00341, -00342, POR at 8-10, Pet. Replies, each at 1-2, PO Sur-Replies, each at 7; -00339, PO Sur Reply at 9, POR at 8-10, 14-37; -00341 PO Sur Reply at 9, POR at 18-34; -00342 PO Sur Reply at 8, POR at 9-11, 18-26, Sur-reply at 5-6

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention is Synchronized



In each Reply, Petitioner argued for the first time that—

“There is ***no requirement*** in the claims that any content be “synchronized” as between the host and guest devices, viewed “simultaneously” (or near simultaneously), nor “coordinated” in any manner ...”

(Emphasis added)

-00339, -00341, -00342, Pet. Replies, each at 1-2

The Claimed Invention is Synchronized



The preamble is limiting:

However, "the preamble constitutes a limitation when the claim(s) depend on it for antecedent basis." *C.W. Zumbiel Co., Inc. v. Kappos*, 702 F.3d 1371, 1385 (Fed. Cir. 2012) (citing *Catalina Mktg. Int'l, Inc. v. Coolsavings.com, Inc.*, 289 F.3d 801, 808 (Fed. Cir. 2002))

-00339, PO Sur Reply at 9; -00341 , PO Sur Reply at 9; -00342 PO Sur Reply at 8

In re Fought, 941 F.3d 1175, 1178 (Fed. Cir. 2019)



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention is Synchronized



'448 Claim 1 (in-part)—

A method performed by a host device for **establishing a synchronized browsing session** between the host device and an invitee device

...

sending a request **to establish the synchronized browsing session**

...

wherein the session identifier is associated with the host device and **the established synchronized browsing session**

...

sending an invitation to an invitee device **to join the synchronized browsing session**

-00341 PO Response at 14-28

-00341 PO Sur-Reply at 9

The Claimed Invention is Synchronized



'145 Claim 1 (in-part)—

A method performed by a guest device for **joining a synchronized browsing session administered by a synchronization server**

...

activating the session invitation to send a request to join said **synchronized browsing session** to said synchronization server

-00339 PO Response at 14-28

-00339 PO Sur-Reply at 9

The Claimed Invention is Synchronized



'591 Claim 1 (in-part)—

[1.Preamble] A method for a guest device **performing a synchronized browsing session administered by a synchronization server**

...

[1.c] receiving from the synchronization server a notification that guest device has joined the **synchronized browsing session**

...

[1.d] 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; and

-00342 PO Response at 15-26

-00342 PO Sur-Reply at at 1, 3-8

The Claimed Invention is Synchronized



In the District Court, the Petitioner took an entirely contrary position in stating—

11 (citations omitted)). Here, the claim language makes clear that sending and receiving
12 information for simultaneous interactions is the focus of the Asserted Claims.² This

-00339, -00341, -00342, PO Sur-Replies, each at 7
Ex. 2006, 7:11-12; *see also* 2:16-21; 3:26-4:3; 6:12-14; Ex. 2007,
1:20-25; 3:16-17; 4:2-6; 5:2-4.



U.S. District Court S.D. Cal., Case No.: 3:22-CV-00412-RSH-DDL

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention is Synchronized



In doing so, Petitioner specifically cited to supporting language from each challenged claim—

-00339, -00341, -00342, PO Sur-Replies, each at 7



U.S. District C

14 ² See, e.g., '591 patent cl. 1 (“sending a request by the guest device to join the
15 synchronized browsing session ... receiving from the synchronization server a
16 notification that guest device has joined the synchronized browsing session ... a
17 website being accessed in real-time by a host device...”); '145 patent cl. 1 (“receiving
18 from the synchronization server a session invitation ... activating the session
19 invitation to send a request to join said synchronized browsing session ... receiving
20 web browsing interaction data ... associated with: a website ..., and the host device
21 that has initiated the session invitation...”); '448 patent at cl. 1 (“sending a request
22 to establish the synchronized browsing session ... receiving a confirmation message
23 ... sending an invitation to an invitee device to join the synchronized browsing
24 session ... sending a request for webpage content to a website ... receiving,
25 responsive to sending the request for webpage content ... the requested webpage
26 content from the website.”). Ex. 2006, footnote-2

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention is Synchronized



Petitioner unambiguously confirmed its understanding of the claims as necessarily requiring simultaneous interaction—

-00339, -00341, -
00342, PO Sur-Replies,
each at 7

12 activity. *Cf. Repifi*, 2022 WL 794981, at *2. When distilled to their primary
13 elements, the Asserted Patents claim steps to send and receive information for
14 simultaneous interaction. These are the very activities that make humans human.

Ex. 2006, 6:12-14



U.S. District Court S.D. Cal., Case No.: 3:22-CV-00412-RSH-DDL

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention is Synchronized



Petitioner then reinforced its statements of understanding within their Reply Brief—

-00339, -00341, -00342, PO Sur-Replies, each at 7

2 receiving, and simultaneous interaction focus in the claims). These are the core steps
3 required to practice the invention as claimed (e.g.: (1) sending a request by a first
4 device to join a synchronized browsing session; (2) receiving information at a second
5 device about the website content accessed; and (3) accessing the website content by
6 the second device for synchronizing the session). See Mot. at 7-16.

Ex. 2007, 5:2-6



U.S. District Court S.D. Cal., Case No.: 3:22-CV-00412-RSH-DDL

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention is Synchronized



In its Order denying Petitioner's Motion to Dismiss, the District Court stated that—

“The asserted claims are not merely directed to sending and receiving information for simultaneous interaction. Rather, *the asserted claims are specifically directed to performing a synchronized browsing session between two electronic devices* (a host device and a guest/invitee device) *via a synchronization server.*” (emphasis added)

-Hon. Robert S. Huie, United States District Judge



Ex. 2005, 10:4-11:21

-00339, -00341, -00342, PO Sur-Replies, each at 8

U.S. District Court S.D. Cal., Case No.: 3:22-CV-00412-RSH-DDL

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Invention is Synchronized



The District Court further concluded that—

“[T]he claims are directed to a specific solution that is rooted in computer technology to overcome a problem specifically arising in the realm of computer networks—using a synchronization server to administer synchronized browsing sessions in order to overcome the bandwidth and processing issues of the prior art.”

-00339, -00341, -00342, PO Sur-Replies, each at 8

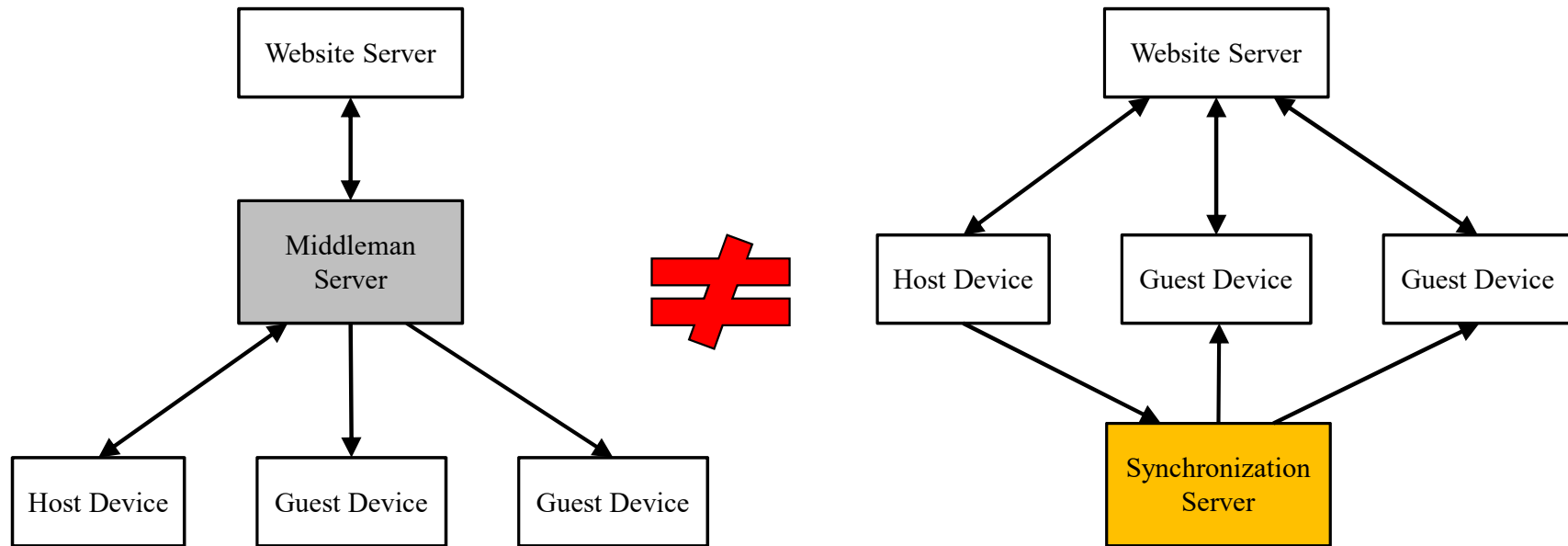
Ex. 2005, 11:23-27



U.S. District Court S.D. Cal., Case No.: 3:22-CV-00412-RSH-DDL

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

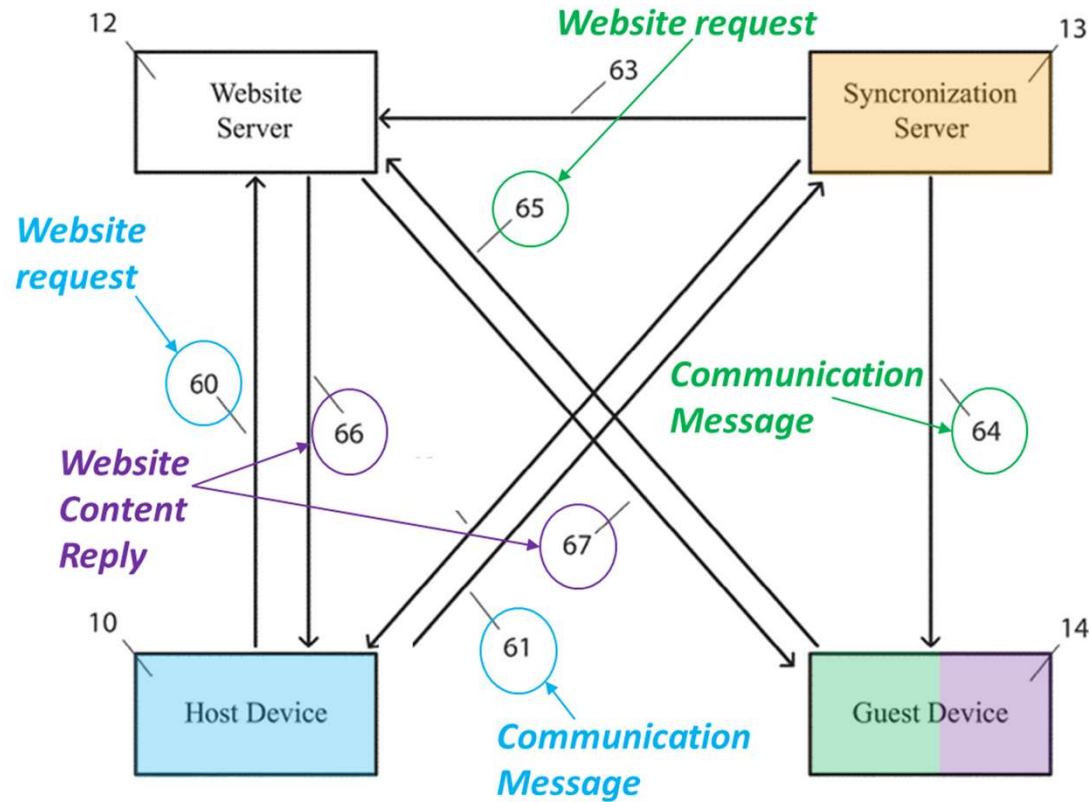
The Claimed Synchronization Server is Novel



See also -00342: POR, at 1-11, 17-26, 31-36, 54-64, Sur-Reply at 1, Exs. 1005-1007; -00339: POR, at 1-11, 20-27, 30-39, 43-53, 54-65, Exs. 1005-1007; -00341: POR, at 1-10, 18-27, 38-40, 58-69, Exs. 1005-1007.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claimed Synchronization Server is Novel



-00339, POR at 20-37; -00341, POR at 18-34; -00342, POR at 18-26

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Synchronized Browsing Session: Not Found in the Asserted References

(57)

ABSTRACT

The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a guest device, utilizing the transfer of URL and form data information. The present invention further

TECHNICAL FIELD OF THE INVENTION

The present invention relates in general to 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.

There is a need in the art for an internet enabled collaboration, online commerce, and social networking innovation that facilitates real time sharing of a more complete internet experience. Specifically, there is a need for a device that allows all users in a session to interact with, discuss, log in separately or together, and 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. It is to these ends that the present invention has been developed.

-00341 Ex. 1001, 2:45-55; -00339 Ex. 1001, 2:46-54;
-00342 Ex. 1001, 2:37-47

-00341 Ex. 1001, -00339 Ex. 1001, -00342 Ex. 1001 (Abstract and Technical Field of the Invention Sections)
-00341 PO Response at 8-10; -00339 PO Response at 8-10; -00342 Response at 9-11; PO Sur-Reply at 5-6

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

“The present invention...”

“When a patent thus describes the features of the ‘present invention’ as a whole, this description limits the scope of the invention.”

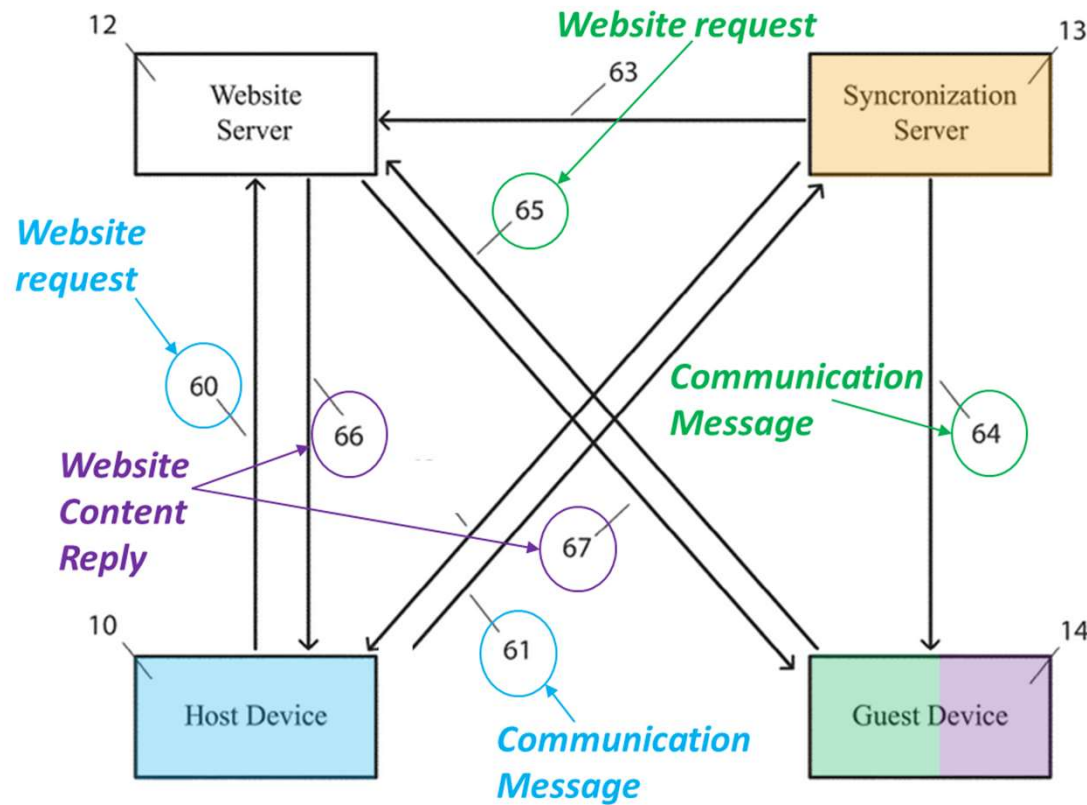


-00342, PO Sur-Reply at 6

Verizon Servs. Corp. v. Vonage Holdings Corp., 503 F.3d 1295, 1308 (Fed. Cir. 2007)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Claimed Host and Guest Devices Request and Retrieve Substantially the Same Web Content

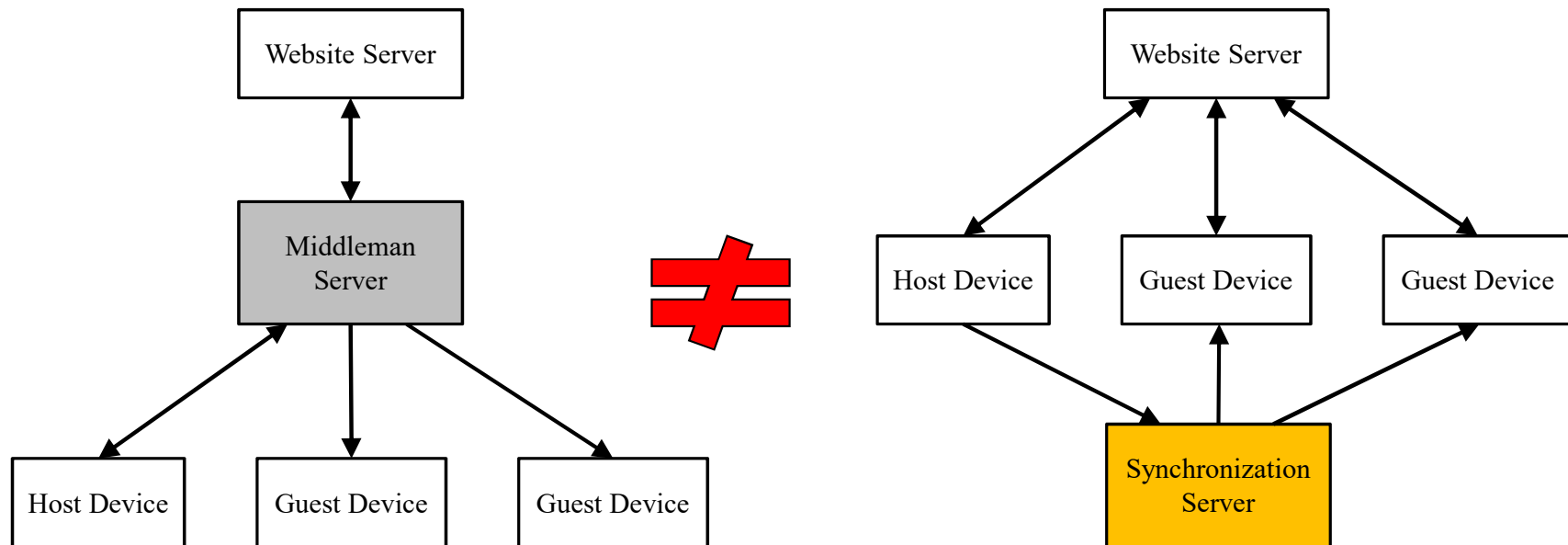


-00339, POR at 20-37; -00341, POR at 18-34; -00342, POR at 18-26

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Different Architecture: The Asserted References Do Not Disclose a Synchronization Server

The architecture is different: the asserted references employ a middle-man server and thus do not disclose a synchronization server

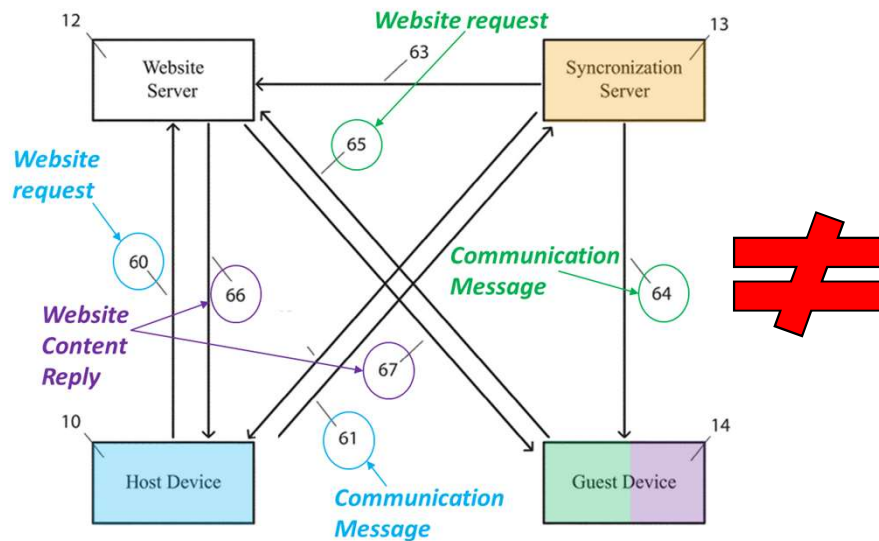


See also -00342: POR, at 1-11, 17-26, 31-36, 54-64, Sur-Reply at 1, Exs. 1005-1007; -00339: POR, at 1-11, 20-27, 30-39, 43-53, 54-65, Exs. 1005-1007; -00341: POR, at 1-10, 18-27, 38-40, 58-69, Exs. 1005-1007.

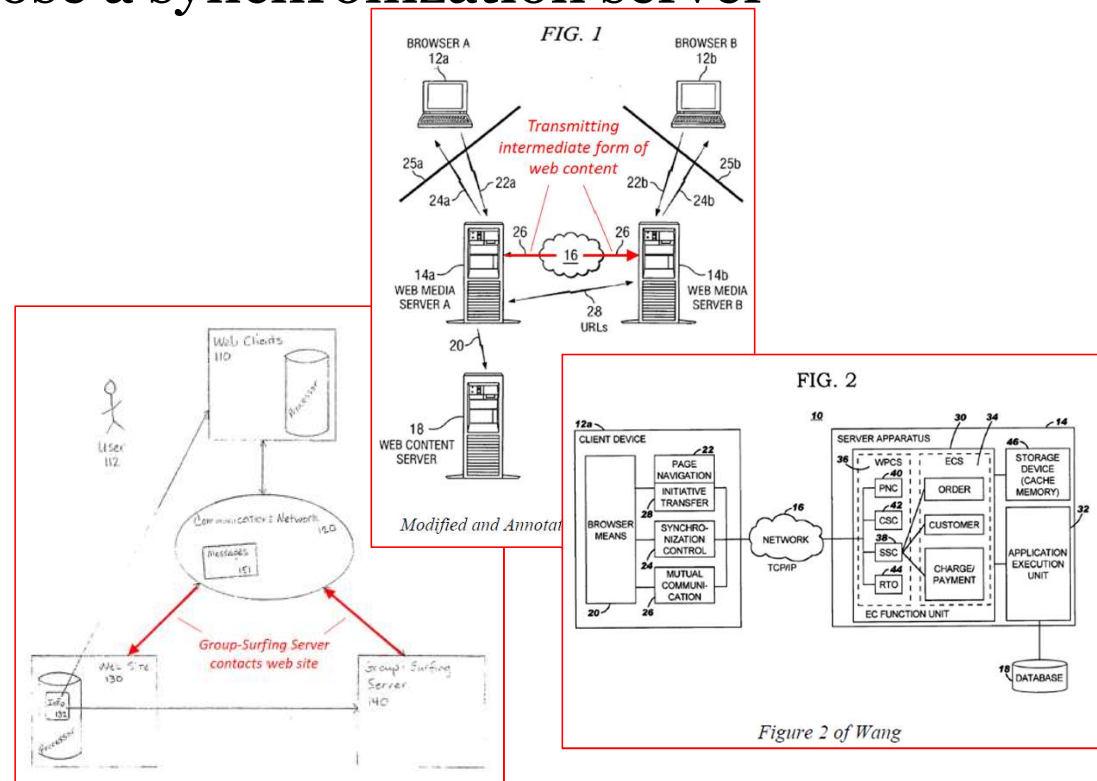
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

No Synchronization Server

The architecture is different: the asserted references employ a middle-man server and thus do not disclose a synchronization server



-00339, POR at 20-37; -00341, POR at 18-34; -00342, POR at 18-26



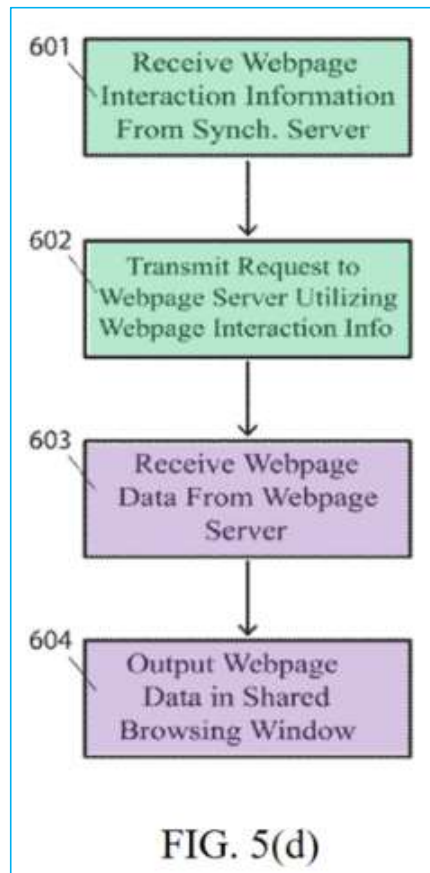
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner Arguments are Insufficient

1. Lebrun's partial web page is not web browsing interaction data
2. Lebrun program fragment
3. Lebrun form filling
4. Lebrun's users never use a "cookie" to retrieve a webpage
5. Prajapat's embodiments are incompatible
6. Prajapat's "simple peer-to-peer webpage sharing" is not synchronized

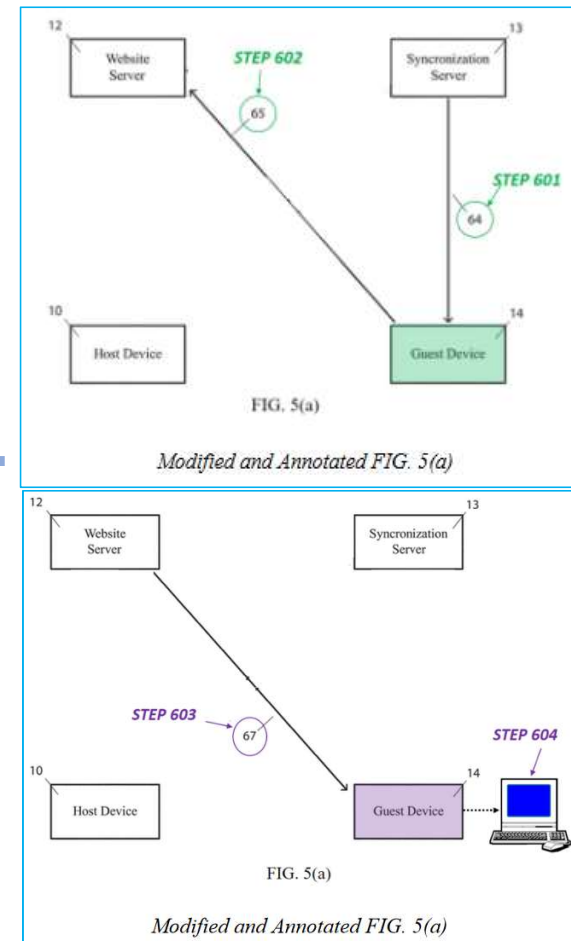
-00339: POR at 27, 30-37, 50-52; 59-65, PO Sur-Reply at 14-19; Ex. 2004 at ¶ 68-71; , -00341 POR at 5, 31, 34, 39, 52-54, 63-69; -00342 POR at 36, 42Sur-reply at 13-17; -00339, -00341, -00342, Ex. 1007 at [12, 40-48], Ex. 1007, Figs. 1, 3, 4

Lebrun's Partial Webpage is Not Web Browsing Interaction Data



Interaction Data

Webpage Data



-00339: POR at 27, 30-37, 50-51; PO Sur-Reply at 14-15; 17-19; Ex. 2004 at ¶ 68-71; , -00341 POR at 31, 34, 39, -00342 POR at 36

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Construction: Web Browsing Interaction Data Terms

- “web browsing interaction data” / “information related to the shared web browsing interaction”
 - Plain and ordinary meaning should apply
 - Otherwise, “data describing interactions performed on a website by a host device”
 - Is not webpage data received as a result of web browsing interaction

“We have recognized that when a patent “repeatedly and consistently” characterizes a claim term in a particular way, it is proper to construe the claim term in accordance with that characterization.”

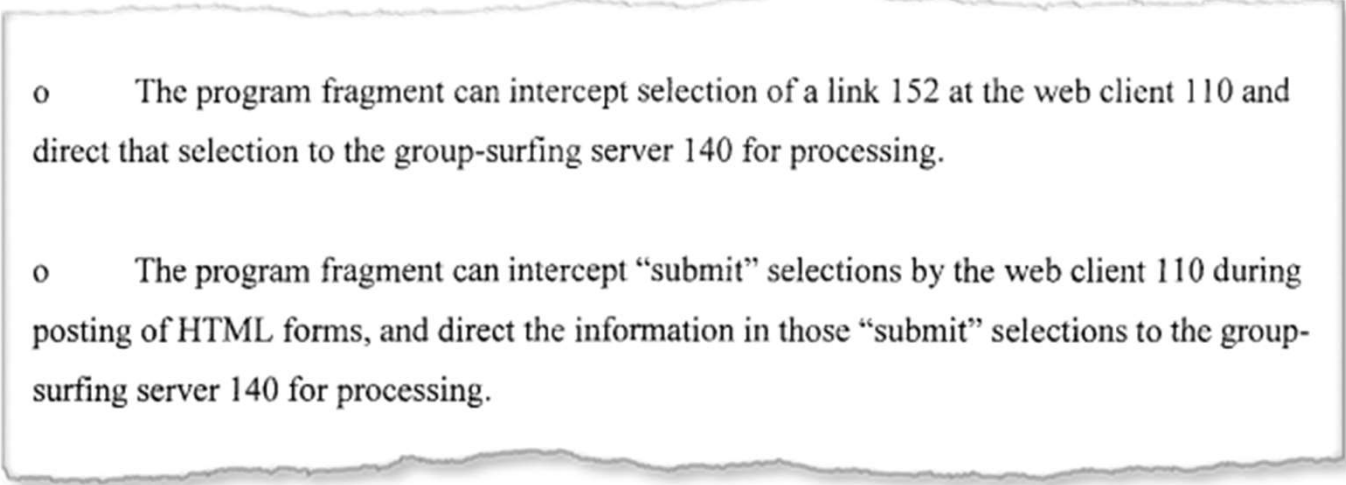


-00339, -00341, PO Responses at 40 and 36 respectively

GPNE Corp. v. Apple, Inc., 830 F. 3d 1365, 1370 (Fed. Cir. 2016)

Lebrun's "Program Fragment" Does Not Meet Limitation 145:[1.c], 448:[1.f.i]-[1.f.iii]

- Lebrun discloses the **opposite** of the claim requirement: it discloses sending a link **from** the host device **to** the "group surfing server," (*i.e.*, the "synchronization server"), not **from** the "group surfing server" **to** the guest device

- 
- o 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.
 - o 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.

-00339: POR at 50-52; PO Sur-Reply at 14; Ex. 1005, 37:5-10; -00341: POR at 52-54

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Lebrun's "Form Data" Does Not Meet Limitation 448:[1.f.i]-[1.f.iii]

- Lebrun's form data is not used by the guest devices to access a website server, as required in 448:[1.f.i]-[1.f.iii]

[1.f.i] wherein the *information related to the shared web browsing interaction* is to be processed by a browser of the invitee device and enables the invitee device to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device

448:[1.f.i];
see also [1.f.ii],
[1.f.iii]

- o 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.

Lebrun

-00341: POR at 52-54; Ex. 1005, 37:8-10

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Lebrun's "Form Data" Does Not Meet Limitation 145:[1.d]

- Lebrun's form data is not used by the guest devices to access a website server, as required in 145:[1.d]

[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.

145:[1.d]

- o 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.

Lebrun

-00339: PO Sur-Reply at 16-17; Ex. 1005, 37:8-10

Lebrun's users never use a "cookie" to retrieve a webpage

surfing server 140. In alternative embodiments, the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added.

Lebrun 43:13-22

72. Similarly, Lebrun states “[i]n alternative embodiments, the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added.” Lebrun at 43:20-22. In my opinion, a POSITA would not have thought that receiving a list of pointers or URLs to pages that others have already viewed and optionally chosen to share with the group was related to the claimed “synchronized browsing session,” but rather a link sharing system. As above, there is nothing “synchronized” about navigating to a URL that someone else had previously navigated to and chosen to share.

-00342 PO Resp. at 42 citing Ex. 2004, Declaration of Stacy Friedman at ¶72

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Lebrun's "Cookie" Does Not Meet Limitation 591:[1.d]

- Lebrun does not disclose receiving: 1) data being accessed in real-time; 2) URL of the website being accessed in real-time; AND 3) cookie information

[1.d] 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; and

591:[1.d]

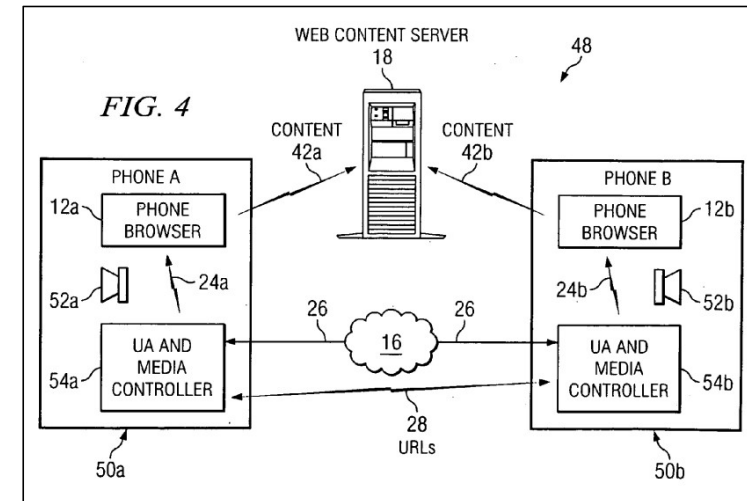
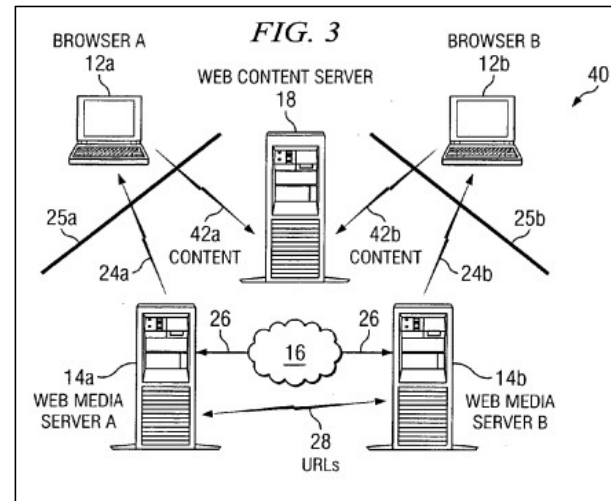
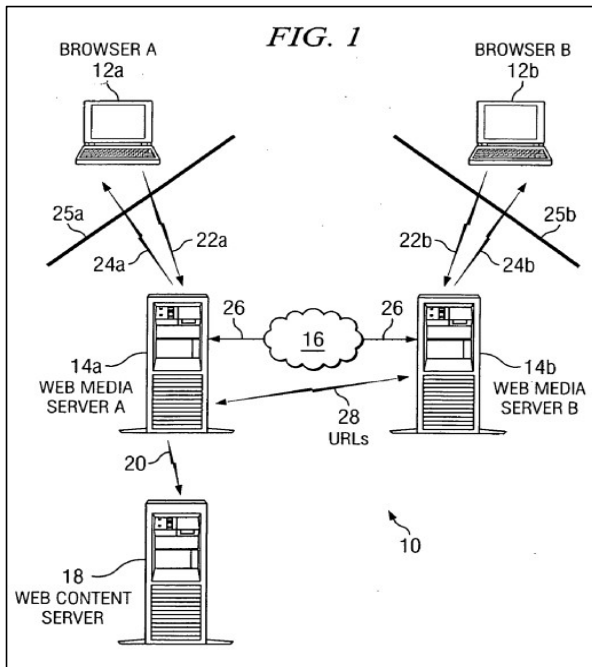
surfing server 140. In alternative embodiments, the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added.

Lebrun

POR at 8, 28-29, 43-48, PO Sur-Reply at 13-17; citing Ex. 2004, Decl. of Stacy Friedman at ¶¶44, 67; -00339 POR at 7-8; -00341 POR at 8

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Embodiments are Incompatible



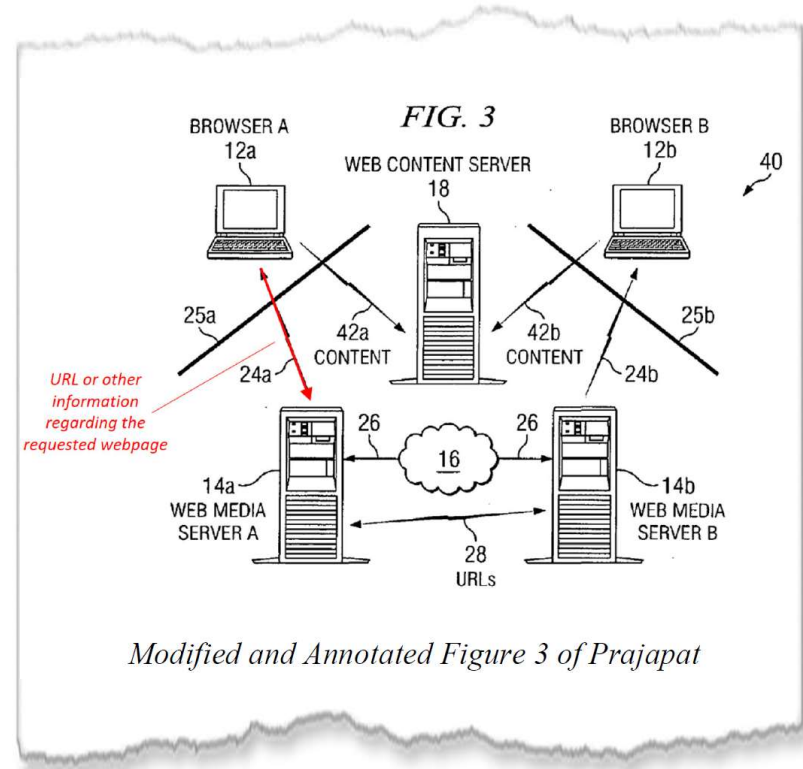
- Peer-to-Peer Dynamic Web Page Sharing: Ex. 1007 at [0012-40]
- Peer-to-Peer Simple Web Page Sharing: Ex. 1007 at [0041-43]
- Phone-to-Phone Web Page Sharing: Ex. 1007 at [0044-48]

-00339, -00341, -00342, Ex. 1007 at [12, 40-48], Ex. 1007, Figs. 1, 3, 4

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's "simple webpage sharing" is not synchronized

Prajapat's "simple webpage sharing" does not teach or suggest that the two browsers are simultaneously, or even nearly simultaneously, sharing internet browsing on the same web page in real time, *i.e.*, that the browsers are engaged in a "synchronized browsing session," as stated in the claims.



-00339, POR at 59-65; -00341, POR at 5, 63-69, Ex. 1007, ¶¶ 41-43, Ex. 2004, ¶¶ 61-66, 78)

-00339: POR at 61; -00341: POR at 65; -00342: POR at 60

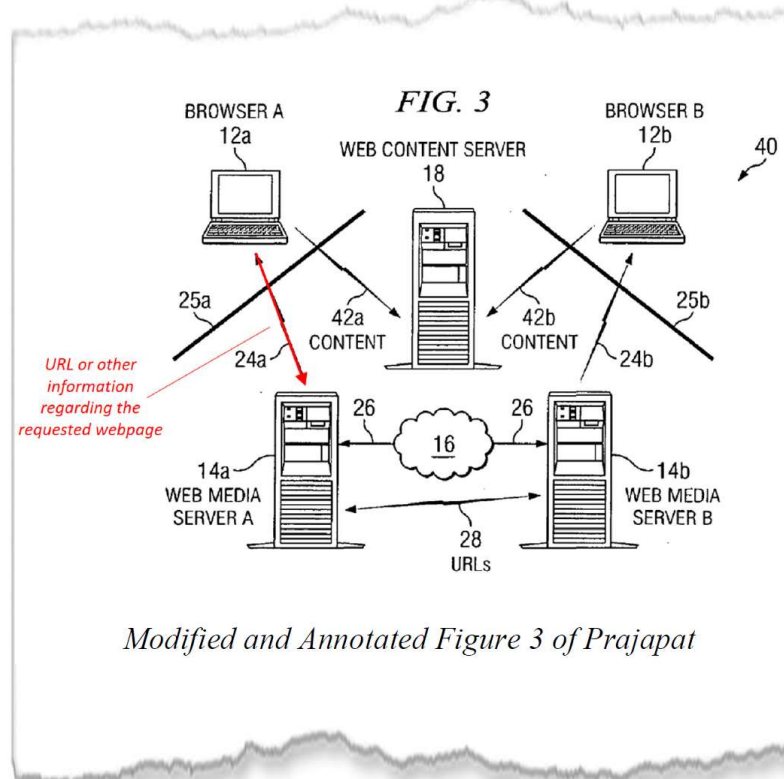
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's "simple webpage sharing" is not synchronized

"[I]n the simple web page sharing embodiment, the first browser doesn't forward the URL to the web media server (for forwarding on to the other web media server and then second browser) until after it has already received the web page."

"...That means the user of that first browser may be clicking or scrolling at the same time as the URL is being sent to the second browser. The two browsers, even if they may be viewing some portion of the same web page, are not actually synchronized as that term is used in Prajapat."

- Stacy Friedman, '448 Patent -00341, Ex. 2004, ¶ 63.



-00339: POR at 61; -00341: POR at 65; -00342: POR at 60

Key Takeaways



1. Samesurf's synchronization server and synchronized browsing session are novel inventions
2. None of the asserted art describes a synchronization server
3. Each of the asserted art relates to webpage sharing, not synchronized browsing
4. Samesurf's host and guest devices request and receive web content from the web server
5. Each of the prior art devices receives web content through a middleman server

-00339, -00341, -00342, POR at 8-10, Pet. Replies, each at 1-2, PO Sur-Replies, each at 7; -00339, PO Sur Reply at 9, POR at 8-10, 14-37; -00341 PO Sur Reply at 9, POR at 18-34; -00342 PO Sur Reply at 8, POR at 9-11, 18-26, Sur-reply at 5-6;

See also citations from slides 5-63

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

'448 Patent Claim 1



1.[1. Preamble] A method performed by a host device for establishing a *synchronized browsing session*⁴ between the host device and an invitee device, comprising:

[1.a] sending a request to establish the *synchronized browsing session* to a *synchronization server*;

[1.b] receiving a confirmation message from the *synchronization server* including a session identifier generated by the *synchronization server*, wherein the session identifier is associated with the host device and the established *synchronized browsing session*;

[1.c] sending an invitation to an invitee device to join the *synchronized browsing session*, wherein the invitation includes the session identifier;

[1.d] recording a *shared web browsing interaction* responsive to determining that a *web browsing interaction* of the host device within a web browsing window is a *sharable web browsing interaction*

[1.e] sending a request for webpage content to a website server independent of the *synchronization server*

[1.f] subsequent to sending the request for webpage content to the website server, transmitting *information related to the shared web browsing interaction* to the *synchronization server*

[1.f.i] wherein the *information related to the shared web browsing interaction* is to be processed by a browser of the invitee device and enables the invitee device to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device

[1.f.ii] wherein the *synchronization server* transmits the *information related to the shared web browsing interaction* to the invitee device in response to receiving the *information related to the shared web browsing interaction* from the host device, and

[1.f.iii] wherein the invitee device retrieves data from the website server in response to *receiving the information related to the shared web browsing interaction* from the *synchronization server*, the data associated with the webpage content requested by the host device and the *information related to the shared web browsing interaction*; and

[1.g] receiving, responsive to sending the request for webpage content to the website server and after transmitting the *information related to the shared web browsing interaction* to the *synchronization server*, the requested webpage content from the website server

-00341; Ex. 1001
-00341 PO Resp. at 11-12

'448 Patent Claims (1/4)



What is claimed is:

1. A method performed by a host device for establishing a synchronized browsing session between the host device and an invitee device, comprising:

sending a request to establish the synchronized browsing session to a synchronization server;

receiving a confirmation message from the synchronization server including a session identifier generated by the synchronization server, wherein the session identifier is associated with the host device and the established synchronized browsing session;

sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier;

recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;

sending a request for webpage content to a website server independent of the synchronization server;

subsequent to sending the request for webpage content to the website server, transmitting information related to the shared web browsing interaction to the synchronization server,

wherein the information related to the shared web browsing interaction is to be processed by a browser of the invitee device and enables the invitee device to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device;

wherein the synchronization server transmits the information related to the shared web browsing interaction to the invitee device in response to receiving the information related to the shared web browsing interaction from the host device, and

wherein the invitee device retrieves data from the website server in response to receiving the information related to the shared web browsing interaction from the synchronization server, the data associated with the webpage content requested by the host device and the information related to the shared web browsing interaction; and

receiving, responsive to sending the request for webpage content to the website server and after transmitting the information related to the shared web browsing interaction to the synchronization server, the requested webpage content from the website server.

-00341; Ex. 1001

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

'448 Patent Claims (2/4)



2. The method of claim 1, further comprising receiving a notification message indicative of the invitee device joining the synchronized browsing session.

3. The method of claim 1, further comprising activating a hyperlink on a website to initialize the sending of the request to establish the synchronized browsing session.

4. The method of claim 1, wherein the invitation comprises a hyperlink for joining the synchronized browsing session.

5. The method of claim 1, wherein the invitation is sent to the invitee device via:

a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium that would be suitable for transmitting the invitation.

6. The method of claim 1, wherein information related to the shared web browsing interactions comprises a URL, form data, cookie information, or script data.

7. The method of claim 1, wherein the session identifier associated with the established synchronized browsing session comprises:

an identification number;
a passkey;
a URL;
MAC address; or
other unique indicator such that the synchronized browsing session may be identified for joining the session.

8. The method of claim 1, wherein the web browsing window is capable of accepting both shared and non-shared web browsing interactions.

9. The method of claim 8, wherein web browsing interactions of the host device determined to be non-shared web browsing interactions are depicted in a non-shared web browser window that is separate from the web browsing window.

10. The method of claim 1, further comprising:
receiving, from the synchronization server, a reply message, wherein the reply message includes an adcode, an adcode identification code, XML, a modified URL address, cookie information, form data, script data, user input information, or attached files.

-00341; Ex. 1001

'448 Patent Claims (3/4)



11. An apparatus for establishing a synchronized browsing session between a host device and an invitee device, comprising:

- a network interface adapted to communicate with a synchronization server; and
- a processor adapted to:
 - send a request from the host device to establish the synchronized browsing session to the synchronization server via the network interface;
 - receive a confirmation message from the synchronization server including a session identifier generated by the synchronization server, wherein the session identifier is associated with the host device and the established synchronized browsing session;
 - send an invitation from the host device to the invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier;
 - record a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;
 - send a request for webpage content to a website server independent of the synchronization server;

transmit, subsequent to sending the request for webpage content to the website server, information related to the shared web browsing interaction to the synchronization server,

wherein the information related to the shared web browsing interactions is to be processed by an application of the invitee device, and enables the invitee device to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device;

wherein the synchronization server transmits the information related to the shared web browsing interaction to the invitee device in response to receiving the information related to the shared web browsing interaction from the host device, and

wherein the invitee device retrieves data from the website server in response to receiving the information related to the shared web browsing interaction from the synchronization server, the data associated with the webpage content requested by the host device and the information related to the shared web browsing interaction; and

receive, responsive to sending the request for webpage content to the website server and after transmitting the information related to the shared web browsing interaction to the synchronization server, the requested webpage content from the website server.

-00341; Ex. 1001

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

'448 Patent Claims (4/4)



12. The apparatus of claim 11, further comprising a user interface adapted to initiate the processor to send the request in response to a user input, wherein the user input comprises activation of a hyperlink on a website or third party application for initializing the sending of the request to establish the synchronized browsing session.

13. The apparatus of claim 11, wherein the session identifier associated with the established synchronized browsing session comprises:

- an identification number;

- a passkey;

- URL;

- MAC address; or other unique indicator such that the synchronized browsing session may be identified for joining the session.

14. The apparatus of claim 11, wherein the web browsing window is capable of accepting both shared and non-shared web browsing interactions.

15. The apparatus of claim 14, wherein web browsing interactions of the host device determined to be non-shared web browsing interactions are depicted in a non-shared web browser window that is separate from the web browsing window.

16. The apparatus of claim 11, wherein the processor is further adapted to:

- receive, from the synchronization server, a reply message, wherein the reply message includes an adcode, an adcode identification code, XML, a modified URL address, cookie information, form data, script data, user input information, or attached files.

'145 Patent Claim 1



1.[1. Preamble] 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.

-00339; Ex. 1001
-00339 PO Resp. at 11-12

'145 Patent Claims (1/3)



1. A method performed by a guest device for joining a synchronized browsing session administered by a synchronization server, comprising:

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 to said synchronization server;

receiving 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

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.

-00339; Ex. 1001

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

'145 Patent Claims (2/3)



9. A guest device for performing a synchronized browsing session administered by a synchronization server, comprising:

- a network interface adapted to communicate with said synchronization server; and

- a processor configured to:

 - receive from the synchronization server a session invitation including a session identifier associated with a host device;

 - activate the session invitation to send a request to join said synchronized browsing session to said synchronization server via said network interface;

 - 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; and

 - 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.

-00339; Ex. 1001

'145 Patent Claims (3/3)



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.

'591 Patent Claim 1



1.[1.Preamble] A method for a guest device performing a *synchronized browsing session* administered by a *synchronization server*, comprising:

[1.a] detecting an activation of a hyperlink associated with the *synchronized browsing session* by a *guest device*;

[1.b] sending a request by the guest device to join the *synchronized browsing session* to the *synchronization server* in response to the activation of the hyperlink;

[1.c] receiving from the synchronization server a notification that guest device *has joined the synchronized browsing session*;

[1.d] 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*; and

[1.e] operating a browser by the guest device *based on the data* received from the synchronization server.

-00342; Ex. 1001
-00342 PO Resp. at 11

'591 Patent Claims (1/3)



What is claimed is:

1. A method for a guest device performing a synchronized browsing session administered by a synchronization server, comprising:

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 to the synchronization server in response to the activation of the hyperlink;

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; and

operating a browser by the guest device based on the data received from the synchronization server.

2. The method of claim 1, further comprising receiving an invitation to join the synchronized browsing session.

3. The method of claim 2, wherein the invitation comprises the hyperlink associated with the synchronized browsing session.

4. The method of claim 2, wherein the invitation further comprises a session identifier.

5. The method of claim 2, wherein the invitation is received via:

a social network communication;

a news feed;

an email message;

an instant message communication;

a micro-blogging communication;

a text message communication; or

other communication medium.

6. The method of claim 1, wherein information related to the shared user input web browsing interaction comprises:

form data;

java script data; or

other web browsing interaction data.

-00342; Ex. 1001
-00342 PO Resp. at 11

'591 Patent Claims (2/3)



7. The method of claim 1, wherein the shared user input web browsing interaction is depicted in a first web browser window.

8. The method of claim 7, wherein non-shared web browsing interactions are depicted in a second web browser window.

9. The method of claim 1, wherein the shared user input web browser action further comprises a log-in into a restricted-access webpage.

10. An apparatus for a guest device performing a synchronized browsing session administered by a synchronization server, comprising:

- a network interface adapted to communicate with the synchronization server; and

- a processor adapted to:

 - detect an activation of a hyperlink associated with the synchronized browsing session by a guest device;

 - send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink;

 - receive 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; and
 - operate a browser by the guest device based on the data received from the synchronization server.

11. The apparatus of claim 10, further comprising a user interface adapted to initiate the processor to send the request in response to a user input.

12. The apparatus of claim 11, wherein the user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.

13. The apparatus of claim 10, further comprising a memory adapted to store one or more software modules for controlling the processor.

-00342; Ex. 1001
-00342 PO Resp. at 11

'591 Patent Claims (3/3)



14. The apparatus of claim 10, wherein the hyperlink is received from a host device via:

- a social network communication;
- a news feed;
- an email message;
- an instant message communication;
- a micro-blogging communication;
- a text message communication; or
- other communication medium.

15. The apparatus of claim 10, further comprising a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.

16. The apparatus of claim 10, wherein information related to the shared user input web browsing interaction comprises:

- form data;
- java script data; or
- other web browsing interaction data.

17. The apparatus of claim 10, wherein the shared user input web browsing interaction is 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.

-00342; Ex. 1001
-00342 PO Resp. at 11

The Problems With the State of the Art in 2010

- Problems with “desktop or screen sharing”:
 - Desktop or screen sharing operates by broadcasting continuous screenshots of the host screen
 - Allows users to simply view the same internet content, but does not enable simultaneous or nearly simultaneous interactions.
 - Requires high levels of bandwidth and computer processing power and therefore are inadequate for interacting in a simultaneous manner.
 - Noticeable levels of latency and pixelation.
 - Leads to disclosure of sensitive screen elements.

the host; (3) or with no log in credentials whatsoever. While some current methods such as “desktop or screen sharing” allow users to simply view the same internet content, these methods do not enable all users in a session to click, input, and log into those experiences in a simultaneous or nearly simultaneous manner. Furthermore, these methods are also less appealing because they work by broadcasting continuous screenshots of the host screen in large files or packets and require high levels of bandwidth and computer processing power. As a result of their high bandwidth and processing power requirements, current methods such as desktop sharing are inadequate for enabling larger groups to all view and fully interact with that interactive content in a simultaneous manner. Finally, current methods such as “desktop or screen shar-

-00342: Ex. 1001, at 2:18-31, Ex. 2004, at ¶¶ 41-42, POR, at 9-10; -00339: Ex. 1001, at 2:25-38, Ex. 2004, at ¶¶ 51-52, POR, at 9;
-00341: Ex. 1001, at 2:26-38, Ex. 2004, at ¶¶ 52-53, POR, at 8-9.

The Problems With the State of the Art in 2010

- Problems with “webpage sharing”:
 - “Webpage sharing” relies upon a central system that acts as a middleman or proxy to fetch webpage data from a web server which forwards to multiple web browsers
 - No meaningful coordination amongst users’ browsing activity.
 - Introduces latency and additional resource usage.

40. The second category relates to sharing the HTML webpage data returned by a web server in response to a web request. As discussed below, several prior art systems relied upon a central system acting as a middleman or proxy to fetch webpage data from a web server and forward that data to multiple web browsers. Like link sharing, webpage sharing using a middleman can present the same webpage data to multiple users but does not otherwise coordinate users' browsing activity in any meaningful way. For example, after two different users receive the same webpage data from a middleman server, both users may interact with the rendering of that webpage data in their own web browsers independently (for example, one user may scroll down the page to read additional content while the other does not). Additionally, using a middleman server to fetch webpages, especially one that performs processing on that webpage data before forwarding it, introduces latency and additional resource usage.

-00339 POR at 6-11; -00341 POR at 6-10; -00342 POR at 7-11

-00342: Ex. 2004, at ¶ 40; *see also* -00339: Ex. 2004, at ¶ 50; -003341: Ex. 2004, at ¶ 51.

Solutions to problems in the Prior Art

To minimize the limitations in the prior art, and to minimize other limitations that will be apparent upon reading and understanding the present specification, the present invention 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.

The present invention allows two or more persons browsing the internet to share their internet browsing experience and have all users simultaneously browse and fully interact with web sites, games, virtual worlds, or other online applications in real time. To share their internet browsing experience, the present invention utilizes the passing of certain data such as URL information, form data, scripts (including java script), cookies, or other types of data information between browser clients. In a synchronized browsing session, two or more people may read the same article, watch the same video, or shop for the same item automatically, without the hassle of coordinating user input. Furthermore, utilization of the present invention does not materially impose more bandwidth or processing power requirements than simply browsing the internet using standard, conventional methods.

-00342: Ex. 1001, at 2:51-60, 5:11-25; POR, at 10-11; -00339: Ex. 1001, at 2:58-67, 5:22-36, POR, at 9-10; -00341: Ex. 1001, at 2:59-3:3, 5:22-37, POR, at 9-10.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Prior Art References Did Not Solve These Problems

- The asserted prior art references (Lebrun, Prajapat, and Wang) do not disclose a “synchronization server”:
 - Instead, the asserted prior art references require that a “middleman” server “continuously request, receive, reassemble, and deliver webpage content to the participants”

First, the '591 Patent claims require a “synchronization server,” which as shown by PO throughout its submissions herein, is vastly different in terms of form, function, and purpose than Lebrun’s “Group Surfing Server,” Prajapat’s “Web Media Server” and Wang’s “Server Apparatus.” Session participants in Lebrun, Prajapat and Wang engage in a resource intensive “page sharing” process that requires that a “middleman” server continuously request, receive, reassemble, and deliver webpage content to the participants via the middleman server’s interactions with the web server. In the '591 Patent claims, the guest devices in PO’s system

-00342: Patent Owner Sur-Reply, at 1.

See also -00342: POR, at 1-6, Exs. 1005-1007; -00339: POR, at 1-6, Exs. 1005-1007; -00341: POR, at 1-6, Exs. 1005-1007.

The Inventions Described and Claimed in the Patents

- The key terms of claim 1 of the '448 patent:
 - “host device”/“invitee device”
 - “synchronized browsing session”
 - “synchronization server”
 - “shared web browsing interaction”/“information related to the shared web browsing interaction”
 - “webpage content”
 - “website server”

1. A method performed by a host device for establishing a synchronized browsing session between the host device and an invitee device, comprising:
sending a request to establish the synchronized browsing session to a synchronization server;
receiving a confirmation message from the synchronization server including a session identifier generated by the synchronization server, wherein the session identifier is associated with the host device and the established synchronized browsing session;
sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier;
recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;
sending a request for webpage content to a website server independent of the synchronization server;

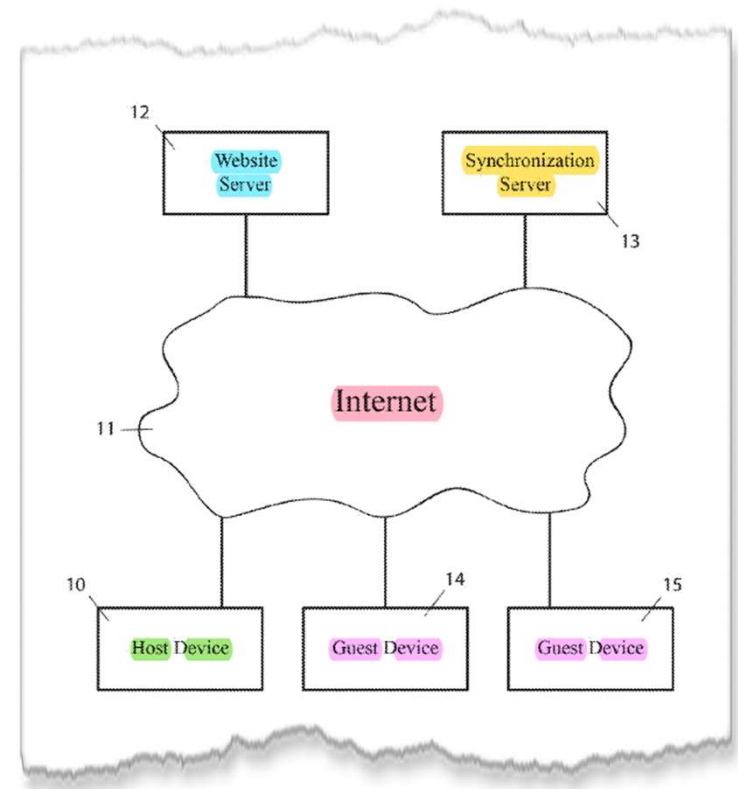
subsequent to sending the request for webpage content to the website server, transmitting information related to the shared web browsing interaction to the synchronization server,
wherein the information related to the shared web browsing interaction is to be processed by a browser of the invitee device and enables the invitee device to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device;
wherein the synchronization server transmits the information related to the shared web browsing interaction to the invitee device in response to receiving the information related to the shared web browsing interaction from the host device, and
wherein the invitee device retrieves data from the website server in response to receiving the information related to the shared web browsing interaction from the synchronization server, the data associated with the webpage content requested by the host device and the information related to the shared web browsing interaction; and
receiving, responsive to sending the request for webpage content to the website server and after transmitting the information related to the shared web browsing interaction to the synchronization server, the requested webpage content from the website server.

-00341: Ex. 1001, at 23:30-24:8.

The “Host Device”/“Invitee Device”

- The “host device” and the “invitee device” (aka “guest device”):
 - Are independent of each other
 - Are independent of the synchronization server
 - Are independent of the website server
 - Are both connected to the Internet

-00341: POR, at 13; *see also* -00339: POR, at 12-14; -00342: POR, at 13-14.



-00341: Ex. 1001, at Figure 1(a); *see also* -00339: Ex. 1001, at Figure 1(a); -00342: Ex. 1001, at Figure 1(a).

The “Host Device”/“Invitee Device”

- The “host device” shares “webpage interactions” with the “invitee device” via the “synchronization server” and the invitee device receives “webpage interactions” from the synchronization server.”

-00341: POR, at 13; *see also* -00339: POR, at 14.

In alternative embodiments of the present invention, a synchronized browsing session may be conducted by more than one device. In such embodiments, webpage interactions performed by any controlling party will be forwarded to the other attendees in the synchronized browsing session. As such, a leading device, such as host device 10, may be defined as a device that possesses control within the synchronized browsing session, wherein webpage interactions performed by the leading device within shared browsing window 17 are forwarded to synchronization server 13. In yet other embodiments of the present invention, control within the synchronized browsing session may be passed from one attending device to another.

A following device, such as guest device 14, may be defined as any device that receives relayed webpage interactions from synchronization server 13. In exemplary embodiments, relayed webpage interactions may include data such as URL, form data, scripts, advertising codes, or other information. A following device that does not possess

-00341: Ex. 1001, at 7:1-19; *see also* -00339: Ex. 1001, at 6:62-7:13; -00342: Ex. 1001, at 6:51-7:2.

The “Synchronized Browsing Session”

- A “synchronized browsing session” is a browsing session in which a “host device” shares its internet browsing interactions within a website with a “guest device,” via the synchronization server,” in a ***simultaneous real-time fashion*** in order to support a multitude of synchronized use cases.

-00341: POR, at 14; *see also* -00339: POR, at 14-15; -00342: POR, at 15-16.

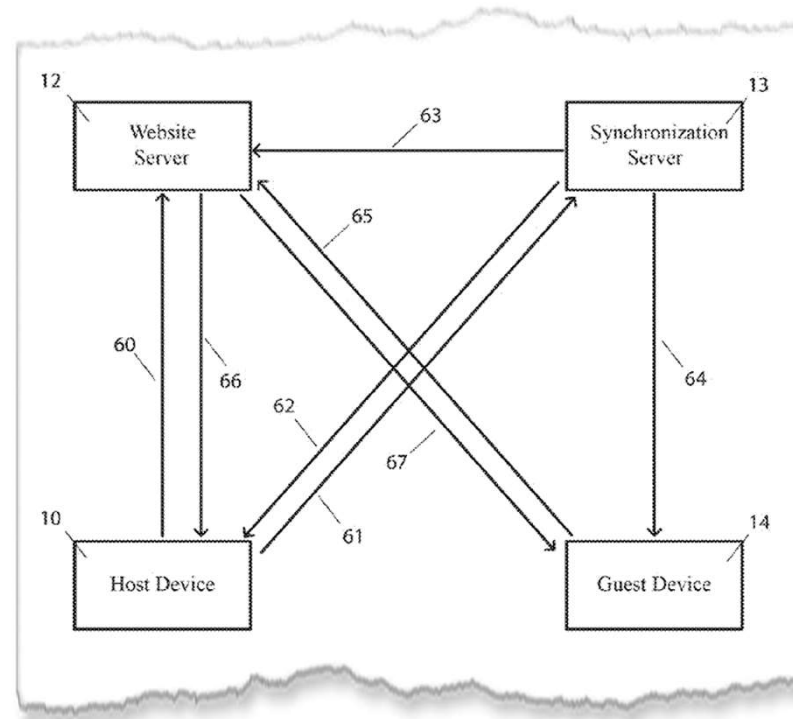
experience. Specifically, there is a need for a device that allows all users in a session to interact with, discuss, log in separately or together, and share internet browsing in real time for online activities such as shopping together, booking travel together, watching or listening to media together, and browsing the internet together in a simultaneous fashion from different devices and/or locations. It is to these ends

The present invention allows two or more persons browsing the internet to share their internet browsing experience and have all users simultaneously browse and fully interact with web sites, games, virtual worlds, or other online applications in real time. To share their internet browsing experience, the present invention utilizes the passing of certain data such as URL information, form data, scripts (including java script), cookies, or other types of data information between browser clients. In a synchronized browsing session, two or more people may read the same article, watch the same video, or shop for the same item automatically, without the hassle of coordinating user input.

-00341: Ex. 1001, at 2:48-54; 5:22-33; *see also* -00339: Ex. 1001, at 2:47-53; 5:22-33; -00342: Ex. 1001, at 2:40-46; 5:11-22.

How the “Synchronization Server” Facilitates a “Synchronized Browsing Session”

FIG. 5(a) illustrates a block diagram of exemplary data communication transferred between components of the present invention during a synchronized browsing session. FIG. 5(a) shows host device 10, website server 12, synchronization server 13 and guest device 14 transmitting data communication for a synchronized browsing session.



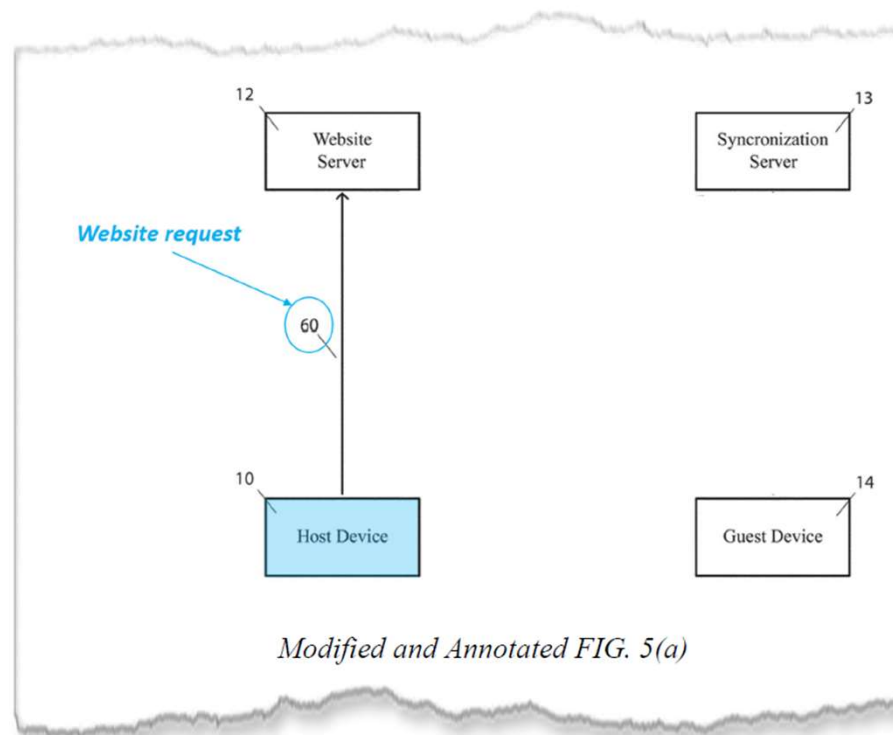
-00341: Ex. 1001, at 16:5-10; *see also* -00339: Ex. 1001, at 15:53-58; -00342: Ex. 1001, at 15:42-47.

-00341: Ex. 1001, at Figure 5(a); *see also* -00339: Ex. 1001, at Figure 5(a); -00342: Ex. 1001, at Figure 5(a).

Step 1 – Host Device Transmits a Website Request 60 to Website Server

As previously discussed, host device 10 may initialize and conduct a synchronized browsing session through communication with synchronization server 13. During a synchronized browsing session, host device 10 may transmit website request 60 to website server 12. In an exemplary embodiment, website request 60 is a data communication message sent to request webpage content at a designated location, such as website server 12. For example, website request 60 sent to the United States Patent and Trademark Office (“USPTO”) webpage, www.uspto.gov, would comprise a message sent to request website data content at the USPTO’s webpage www.uspto.gov.

-00341: Ex. 1001, at 16:11-22; *see also* -00339: Ex. 1001, at 15:59-16:3; -00342: Ex. 1001, at 15:48-59.



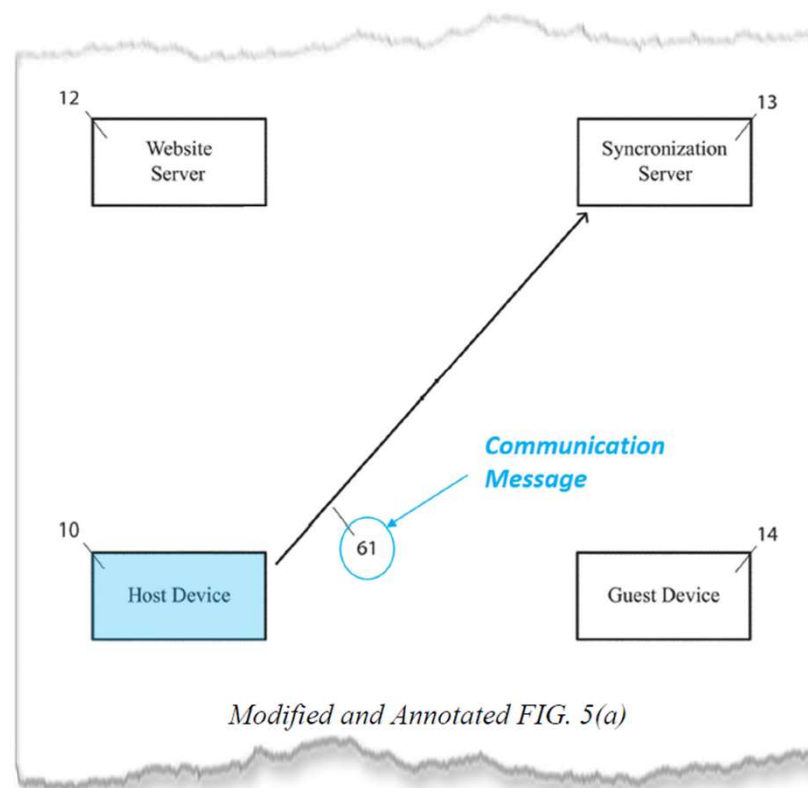
-00341: POR, at 19; *see also* -00339: POR, at 21; -00342: POR, at 19.

Step 2 – Host Device Transmits a Communication Message 61 to the Synchronization Server

During an exemplary synchronized browsing session, after host device 10 transmits website request 60 to website server 12, host device 10 transmits communication message 61 to synchronization server 13. Communication message

In Step 501, synchronization server 13 receives communication message 61 from host device 10. As previously described, communication message 61 includes webpage interaction information, such as a URL address, form data, java script, cookies, or other data communication. In Steps

other attendees in the synchronized browsing session. As such, a leading device, such as host device 10, may be defined as a device that possesses control within the synchronized browsing session, wherein webpage interactions performed by the leading device within shared browsing window 17 are forwarded to synchronization server 13. In



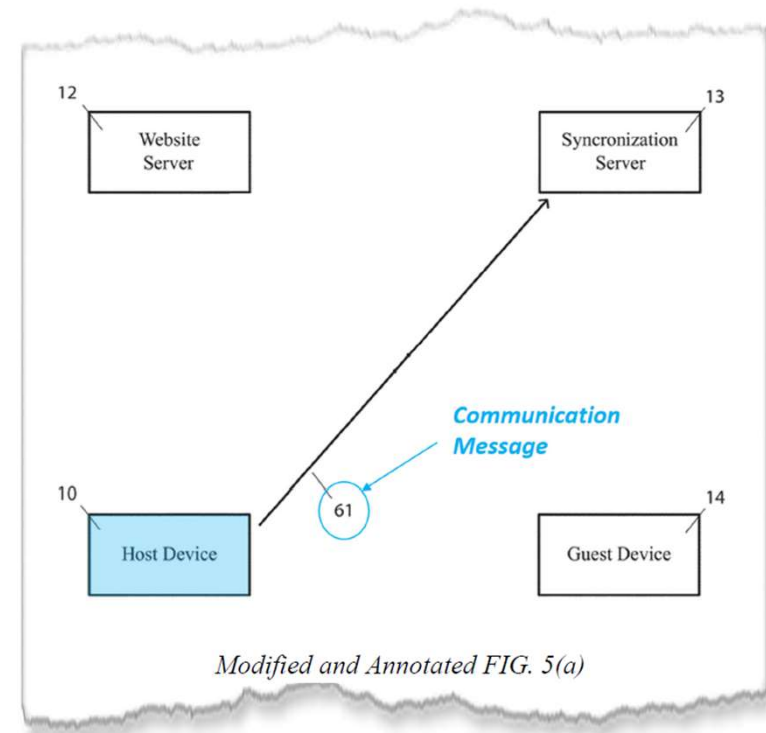
-00341: Ex. 1001, at 16:31-34, 18:54-60, 7:5-10; see also -00339: Ex. 1001, at 16:12-15, 18:34-38, 6:66-7:4; -00342: Ex. 1001, at 16:1-4, 18:23-27, 6:55-60.

-00341: POR, at 21; see also -00339: POR, at 22; -00342: POR, at 20.

Step 2 – Host Device Transmits a Communication Message 61 to the Synchronization Server, cont'd.

- **Communication message 61:**

- Is sent from the host device to the synchronization server
- Includes webpage interaction data performed by the host device, such as:
 - a URL address, form data, java script, cookies, or other data communication
- Is formulated by the host device without any interaction with the website server



Ex. 1001, at 16:31-34, 18:54-60, 7:5-10; see also -00339: POR at 16-23, Ex. 1001, at 16:12-15, 18:34-38, 6:66-7:4; -00342: POR at 18-22, Ex. 1001, at 16:1-4, 18:23-27, 6:55-60; -00341: POR at 16-17, 19-22

-00341: POR, at 21; see also -00339: POR, at 22; -00342: POR, at 20.

Step 3 –Synchronization Server Forwards a Communication Message 64 to Guest Device(s)

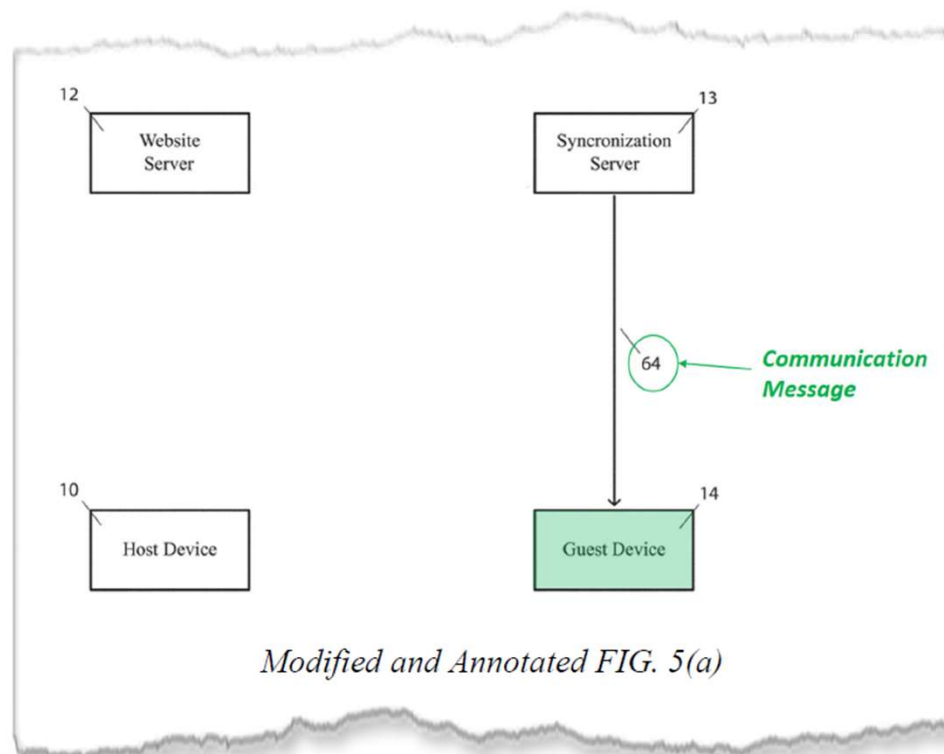
After host device 10 transmits communication message 61 to synchronization server 13, synchronization server 13 forwards communication message 64 to guest devices. In the

A following device, such as guest device 14, may be defined as any device that receives relayed webpage interactions from synchronization server 13. In exemplary

sage 64. In exemplary embodiments, information in communication message 64, including URL, form data, cookies or other data, is transmitted in website request 65.

device 14. Communication message 64 may be used by guest device 14 to formulate website request 65 to be sent from guest device 14 to website server 12. Website request

sage 64. In exemplary embodiments, information in communication message 64, including URL, form data, cookies or other data, is transmitted in website request 65.



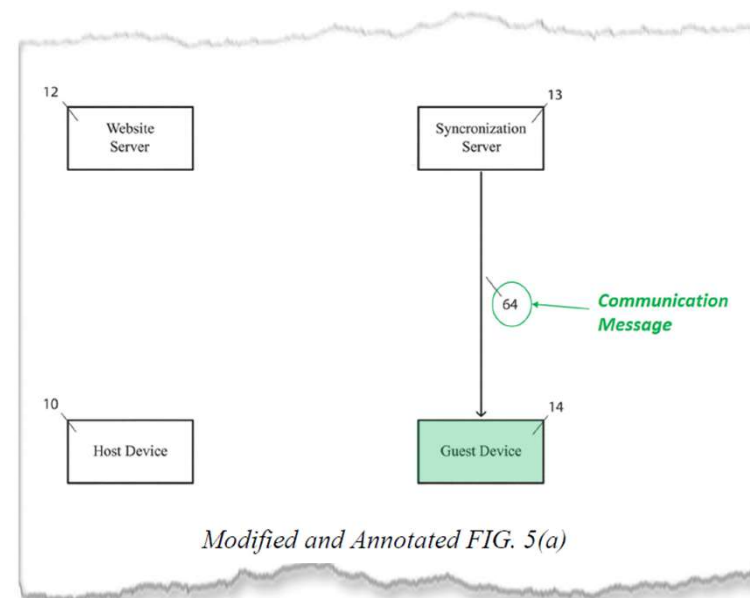
Modified and Annotated FIG. 5(a)

-00341: Ex. 1001, at 17:15-17, 16:62-65, 7:5-16; see also -00339: Ex. 1001, at 16:62-64, 16:42-45, 6:66-7:10; -00342: Ex. 1001, at 16:51-53, 16:31-34, 6:55-66.

-00341: POR, at 22; see also -00339: POR, at 23; -00342: POR, at 21.

Step 3 –Synchronization Server Forwards a Communication Message 64 to Guest Device(s), cont'd.

- **Communication message 64:**
 - Is sent from the synchronization server to the guest devices without any interaction with the website server
 - Includes relayed webpage interaction data from the host device, such as:
 - URL, form data, cookies, or other data, which is transmitted in website request 65
 - Is used by the guest device to formulate website request 65



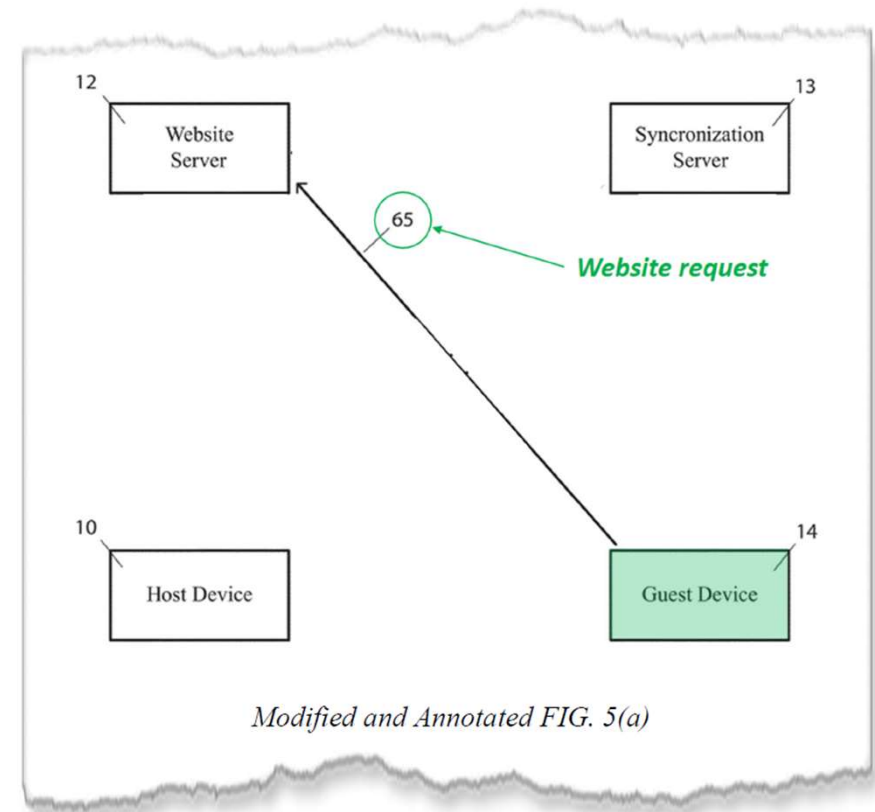
-00341: Ex. 1001, at 17:15-17, 16:62-65, 7:5-16; see also -00339: POR at 16-23, Ex. 1001, at 16:62-64, 16:42-45, 6:66-7:10; -00342: POR at 18-22, Ex. 1001, at 16:51-53, 16:31-34, 6:55-66; -00341: POR at 16-17, 19-22

-00341: POR, at 22; see also -00339: POR, at 23; -00342: POR, at 21.

Step 4 –The Guest Device(s) Formulate a Website Request 65 From Communication Message 64

device 14. Communication message 64 may be used by guest device 14 to formulate website request 65 to be sent from guest device 14 to website server 12. Website request 65 is a data communication message transmitted by guest device 14 to website server 12. In exemplary embodiments, website request 65 should be similar or identical to website request 60.

request 60 sent by host device 10. Guest device 14 formulates website request 65 by processing communication message 64. In exemplary embodiments, information in communication message 64, including URL, form data, cookies or other data, is transmitted in website request 65.



Modified and Annotated FIG. 5(a)

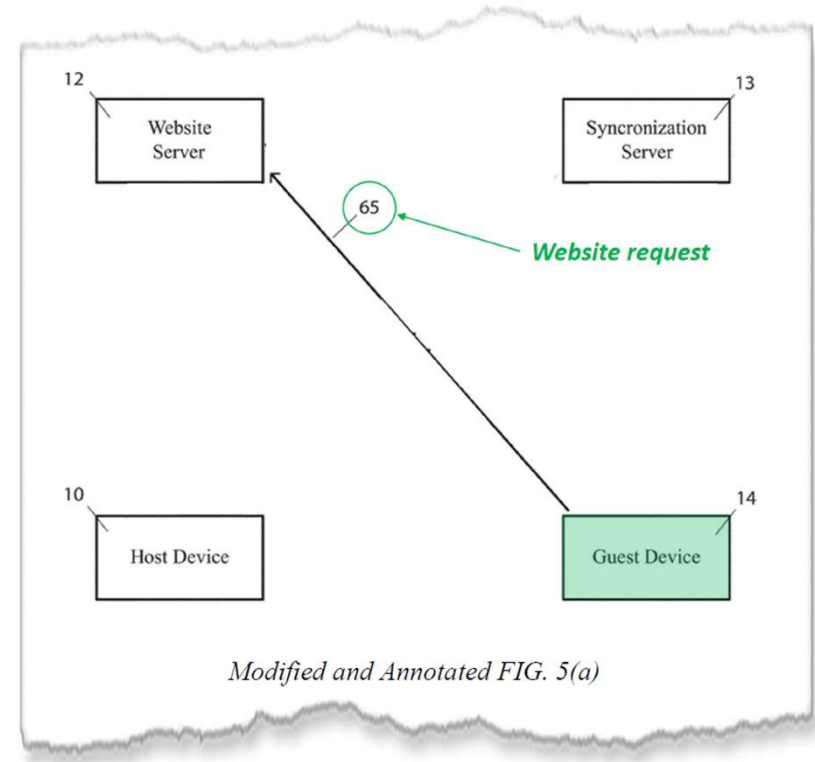
-00341: Ex. 1001, at 17:21-27, 19:48-52; *see also* -00339: Ex. 1001, at 16:67-6, 19:23-27; -00342: Ex. 1001, at 16:56-62, 19:12-16.

-00341: POR, at 23; *see also* -00339: POR, at 25; -00342: POR, at 23.

Step 4 –The Guest Device(s) Formulate a Website Request 65
From Communication Message 64, cont'd.

- **Website Request 65:**

- Is sent from the guest devices to the website server
- Includes information in communication message 64, including:
 - URL, form data, cookies, or other data
- Is similar or identical to website request 60



-00341: Ex. 1001, at 17:21-27, 19:48-52; *see also* -00339: Ex. 1001, at 16:67-6, 19:23-27; -00342: Ex. 1001, at 16:56-62, 19:12-16.

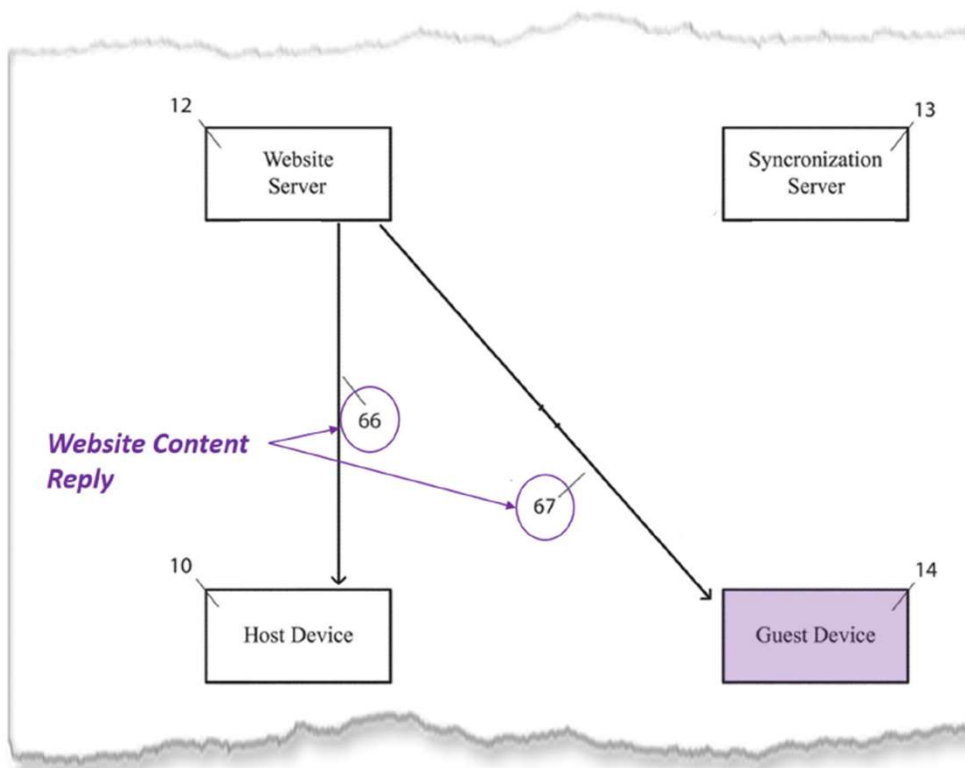
-00341: POR, at 23; *see also* -00339: POR, at 25; -00342: POR, at 23.

Step 5 – Website Content is Sent Independently from the Website Server to Both the “Host Device” and the “Guest Device(s)”



In exemplary embodiments, website request 65 is identical to website request 60 such that website content reply 67, the data content sent by website server 12 in response to website request 65, is similar or identical to website content reply 66. As such, in a synchronized browsing session between host device 10 and guest device 14, audio and visual output of shared browsing window 17 on guest device 14 is similar or identical to that on host device 10 unless personalization settings, such as private cookie information, are triggered for one of the devices on the site.

-00341: Ex. 1001, at 17:60-18:2; *see also* -00339: Ex. 1001, at 17:38-47; -00342: Ex. 1001, at 17:27-36.



-00341: POR, at 24; *see also* -00339: POR, at 26; -00342: POR, at 24.

The Alleged Prior Art: Lebrun, Prajapat and Wang

Lebrun (WO 00/48110)

PCT WORLD INTELLECTUAL PROPERTY ORGANIZATION International Bureau	
INTERNATIONAL APPLICATION PUBLISHED UNDER THE PATENT COOPERATION TREATY (PCT)	
(51) International Patent Classification: G06F 17/60	(11) International Publication Number: WO 00/48110 (43) International Publication Date: 17 August 2000 (17.08.00)
(21) International Application Number: PCT/US00/03790 (22) International Filing Date: 11 February 2000 (11.02.00)	(81) Designated States: AE, AL, AM, AT, AU, AZ, BA, BB, BG, BR, BY, CA, CH, CN, CR, CU, CZ, DE, DK, DM, EE, ES, FI, GB, GD, GE, GH, GM, GR, HU, ID, IL, IN, IS, JP, KE, KG, KP, KR, KZ, LC, LK, LR, LS, LU, LV, MA, MD, MG, MK, MN, MW, MX, NO, NZ, PL, PT, RO, RU, SD, SE, SG, SI, SK, SL, TJ, TM, TR, TT, TZ, UA, UG, UZ, VN, YU, ZA, ZW, ARIPO patent (GBL, GMA, KE, LS, MW, SD, SL, SZ, TZ, UG, ZW), Eurasian patent (AM, AZ, BY, KG, KZ, MD, RU, TJ, TM), European patent (AT, BE, CH, CY, DE, DK, ES, FI, FR, GB, GR, IE, IT, LU, MC, NL, PT, SE), OAPI patent (BF, BJ, CF, CG, CI, CM, GA, GN, GW, ML, MR, NE, NG, SN, TD, TG).
(30) Priority Data: 09/249,226 11 February 1999 (11.02.99) US 09/273,803 22 March 1999 (22.03.99) US 09/361,640 25 July 1999 (25.07.99) US 09/466,533 17 December 1999 (17.12.99) US	(71) Applicant: EZLOGIN.COM [US/US]; Suite 275, 4699 Old Ironsides Drive, Santa Clara, CA 95054 (US). (72) Inventors: LEBRUN, Jean-Noël; Paris (FR). KRUTA, Francois; Paris (FR). (74) Agent: SWERNOFSKY, Steven, A.; Swernofsky Law Group, P.O. Box 390013, Mountain View, CA 94039-0013 (US).
(54) Title: PERSONALIZED ACCESS TO WEB SITES	

-00342; Ex. 1005 at Cover

Prajapat (US 2005/0021626A1)

United States (12) Patent Application Publication Prajapat et al.		(10) Pub. No.: US 2005/0021626 A1 (43) Pub. Date: Jan. 27, 2005
(54) PIER-TO-PEER DYNAMIC WEB PAGE SHARING	(52) U.S. CL. 709/205	(57) ABSTRACT According to a particular embodiment of the present invention, a communication system includes a first browser operable to submit requests for one or more web pages and a request to share the one or more requested web pages with another browser, the request to share specifying the other browser. The communication system also includes a web media server operable, in response to the request to share, to: (1) establish a communication session with the first browser; (2) establish a media session and a signaling session with a remote web media server, the remote web media server being associated with the other browser that the first browser specified in the request to share, the signaling session including a standard signaling protocol; (3) receive web page information from the first browser; and (4) communicate shared web page information to the remote web media server using the media session.
(73) Assignee: Cisco Technology, Inc. (21) Appl. No.: 10/444,482 (22) Filed: May 22, 2003 Publication Classification (51) Int. Cl.: G06F 15/16		

-00339; Ex. 1007 at Cover

Wang (US 2005/0033656A1)

United States (12) Patent Application Publication Wang et al.		(10) Pub. No.: US 2005/0033656 A1 (43) Pub. Date: Feb. 10, 2005
(54) COLLABORATION SYSTEM SUITABLE FOR ON-LINE SHOPPING	(30) Foreign Application Priority Data Aug. 5, 2003 (JP) 2003-286578	Publication Classification (51) Int. Cl.: G06F 17/30 (52) U.S. CL. 705/26
(75) Inventors: Xiaozhou Wang, Yamato-shi (JP); Masaki Ishibashi, Yamato-shi (JP); Kazuhiro Yabuta, Yamato-shi (JP); Orika Itoh, Yokohama-shi (JP) Correspondence Address: David R. Irvin IBM Corporation T81/062 PO Box 12195 Research Triangle Park, NC 27709 (US) (73) Assignee: International Business Machines Corporation, Armonk, NY (21) Appl. No.: 10/828,978 (22) Filed: Apr. 21, 2004		

-00341; Ex. 1006 at Cover

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samesurf claims a different concept than Lebrun



In my opinion, Petitioner's reliance on Lebrun is misplaced. The Lebrun reference specifically discloses using a central group-surfing server for fetching webpage data and re-sending that data to participating group-surfing clients. That process is not within the scope of the claims of the '145 Patent. As discussed above, the claimed "web browsing interaction data" relates to interaction data sent in web requests, not webpage data received from web servers in response to those requests. ... In contrast, with Lebrun, the group-surfing server itself accesses the website server and forwards the retrieved webpages to each participating web client. Therefore, no web client in Lebrun receives web browsing interaction data."

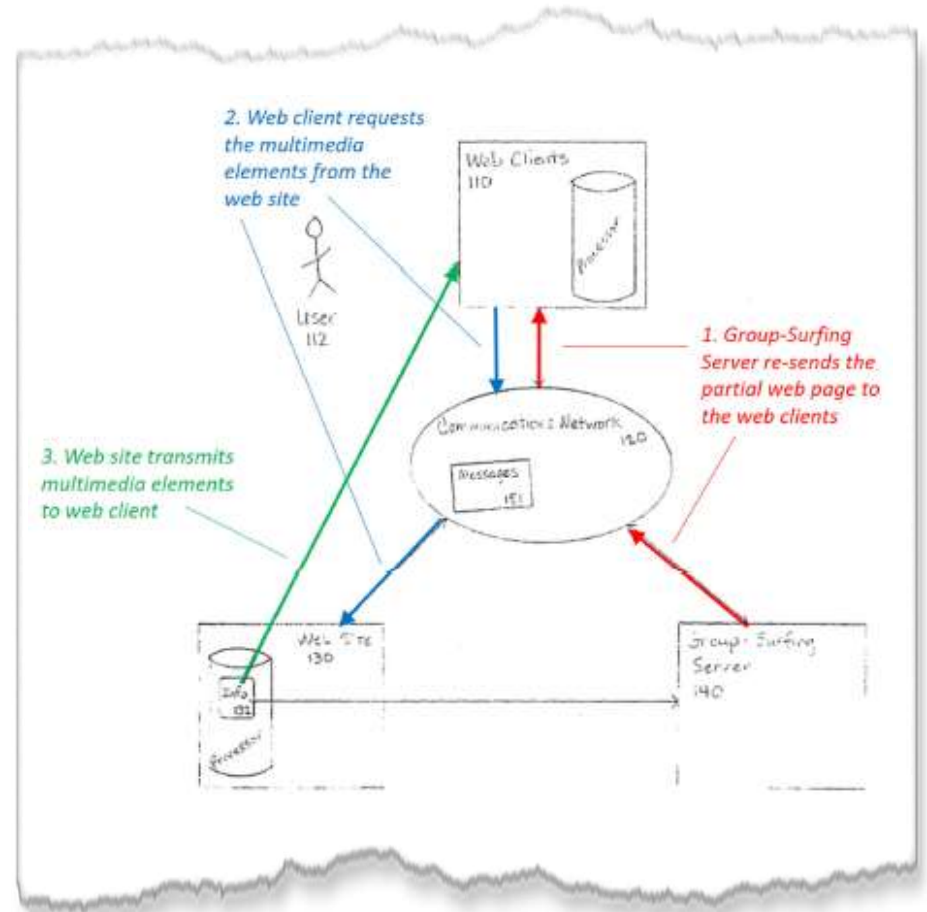
Stacy Friedman, -00339 Ex. 2004, ¶ 68-73; See also Stacy Friedman -00341 Ex. 2004, ¶ 69-74 and Stacy Friedman, -00342 Ex. 2004, ¶ 58-73.

The Group Surfing Server Directs the Web Site Server

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.

Alternative Operation of Lebrun

Lebrun describes partial webpage being re-sent to each client wherein each web client separately requests the embedded multimedia elements directly from the website



-00339 POR at 50, -00341 POR at 39, -00342 POR at 36

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samesurf claims a different concept than Lebrun



“[T]he correct reading of the ’145 Patent reveals that web browser interaction data that is used in a web request to access a web server is distinct from the webpage data received from that web server in response to the request. In my opinion, the Petition does not recognize the same distinction.”

- Stacy Friedman, -00339 Ex. 2004, ¶ 71.

“Nothing in Lebrun teaches or suggests that partial web page information (without multimedia elements) is sent from a controlling web client to Lebrun’s group-surfing server and then re-sent to participating web clients, and the Petition does not argue as much.”

-Stacy Friedman, -00341 Ex. 2004, ¶ 73.

The Alleged Prior Art: Lebrun, Prajapat and Wang

Lebrun (WO 00/48110)

PCT WORLD INTELLECTUAL PROPERTY ORGANIZATION International Bureau	
INTERNATIONAL APPLICATION PUBLISHED UNDER THE PATENT COOPERATION TREATY (PCT)	
(51) International Patent Classification ⁷ : G06F 17/60	(11) International Publication Number: WO 00/48110 (43) International Publication Date: 17 August 2000 (17.08.00)
(21) International Application Number: PCT/US00/03790 (22) International Filing Date: 11 February 2000 (11.02.00)	(81) Designated States: AE, AL, AM, AT, AU, AZ, BA, BB, BG, BR, BY, CA, CH, CN, CR, CU, CZ, DE, DK, DM, EE, ES, FI, GB, GD, GE, GH, GM, HR, HU, ID, IL, IN, IS, JP, KE, KG, KP, KR, KZ, LC, LK, LR, LS, LU, LV, MA, MD, MG, MK, MN, MW, MX, NO, NZ, PL, PT, RO, RU, SD, SE, SG, SI, SK, SL, TJ, TM, TR, TT, TZ, UA, UG, UZ, VN, YU, ZA, ZW, ARIPO patent (GBL, GM, KE, LS, MW, SD, SL, SZ, TZ, UG, ZW), Eurasian patent (AM, AZ, BY, KG, KZ, MD, RU, TJ, TM), European patent (AT, BE, CH, CY, DE, DK, ES, FI, FR, GB, GR, IE, IT, LU, MC, NL, PT, SE), OAPI patent (BF, BJ, CF, CG, CI, CM, GA, GN, GW, ML, MR, NE, NG, SN, TD, TG).
(30) Priority Data: 09/249,226 11 February 1999 (11.02.99) US 09/273,803 22 March 1999 (22.03.99) US 09/361,640 25 July 1999 (25.07.99) US 09/466,533 17 December 1999 (17.12.99) US	(73) Inventors: LEBRUN, Jean-Noël ; KRUTA, Francois , Paris (FR). (74) Agent: SWERNOFSKY, Steven, A. ; Swernofsky Law Group, P.O. Box 390013, Mountain View, CA 94039-0013 (US).
(54) Title: PERSONALIZED ACCESS TO WEB SITES	

-00342; Ex. 1005 at Cover

Prajapat (US 2005/0021626A1)

 US 20050021626A1	
United States Patent Application Publication Prajapat et al.	
(19) Pub. No.: US 2005/0021626 A1 (43) Pub. Date: Jan. 27, 2005	(54) PEER-TO-PEER DYNAMIC WEB PAGE SHARING
(75) Inventors: Surendra Prajapat , Santa Clara, CA (US); Michael P. Lepore , Marlborough, MA (US); Andrew R. Cleashy , Newburyport, MA (US)	(57) ABSTRACT
Correspondence Address: BAKER BOTTS L.L.P. 2001 ROSS AVENUE SUITE 600 DALLAS, TX 75201-2980 (US)	
(73) Assignee: Cisco Technology, Inc.	
(21) Appl. No.: 10/444,482	
(22) Filed: May 22, 2003	
Publication Classification (51) Int. Cl. ⁷ G06F 15/16	

-00339; Ex. 1007 at Cover

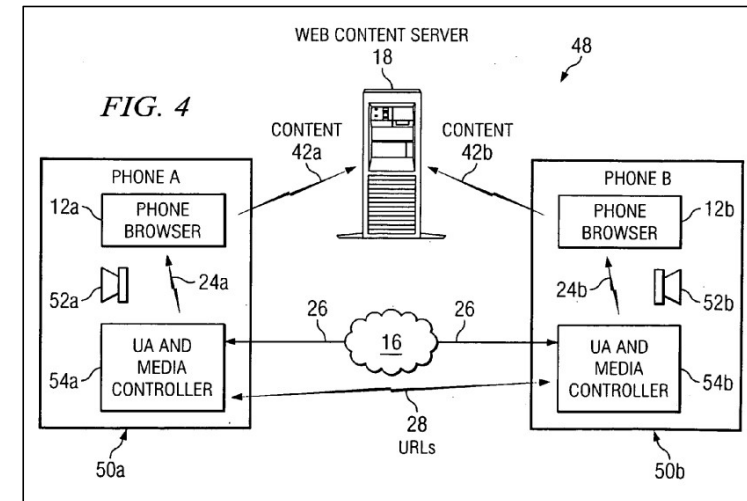
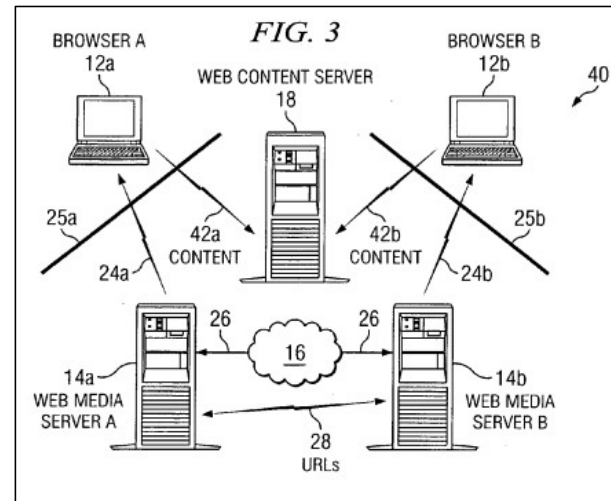
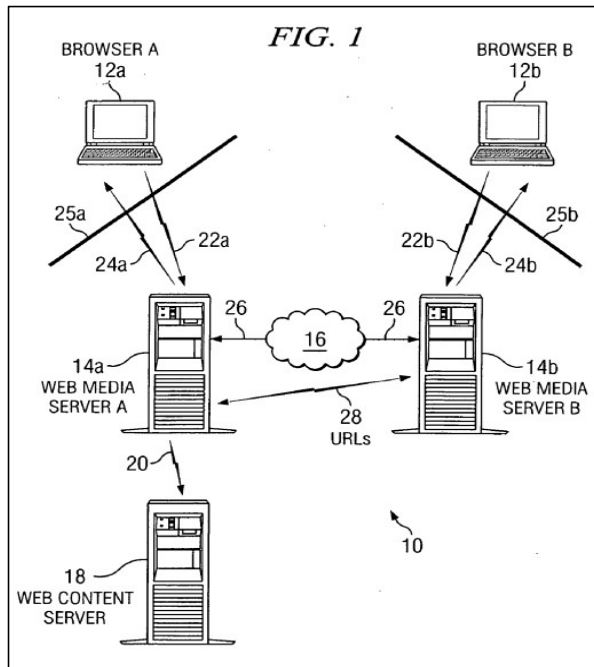
Wang (US 2005/0033656A1)

 US 20050033656A1	
United States Patent Application Publication Wang et al.	
(19) Pub. No.: US 2005/0033656 A1 (43) Pub. Date: Feb. 10, 2005	(54) COLLABORATION SYSTEM SUITABLE FOR ON-LINE SHOPPING
(75) Inventors: Xiaozhou Wang , Yamato-shi (JP); Masaaki Ishibashi , Yamato-shi (JP); Kazuhiro Yabuta , Yamato-shi (JP); Orika Itoh , Yokohama-shi (JP)	(57) ABSTRACT
Correspondence Address: David R. Irvin IBM Corporation T81/062 PO Box 12195 Research Triangle Park, NC 27709 (US)	
(73) Assignee: International Business Machines Corporation , Armonk, NY	
(21) Appl. No.: 10/828,978	
(22) Filed: Apr. 21, 2004	

-00341; Ex. 1006 at Cover

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Peer-to-Peer Web Page Sharing



- Peer-to-Peer Dynamic Web Page Sharing: Ex. 1007 at [0012-40]

- Peer-to-Peer Simple Web Page Sharing: Ex. 1007 at [0041-43]

- Phone-to-Phone Web Page Sharing: Ex. 1007 at [0044-48]

Ex. 1007, Fig. 1

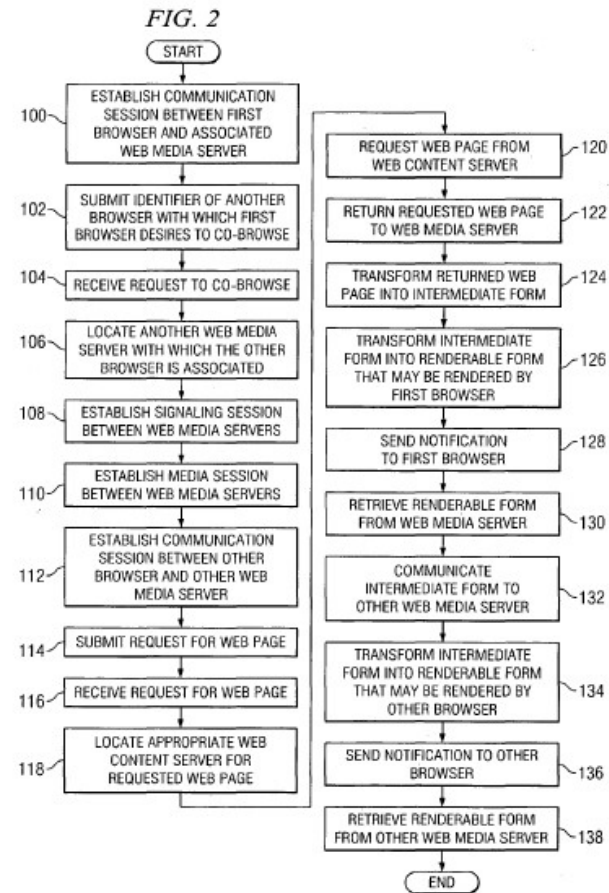
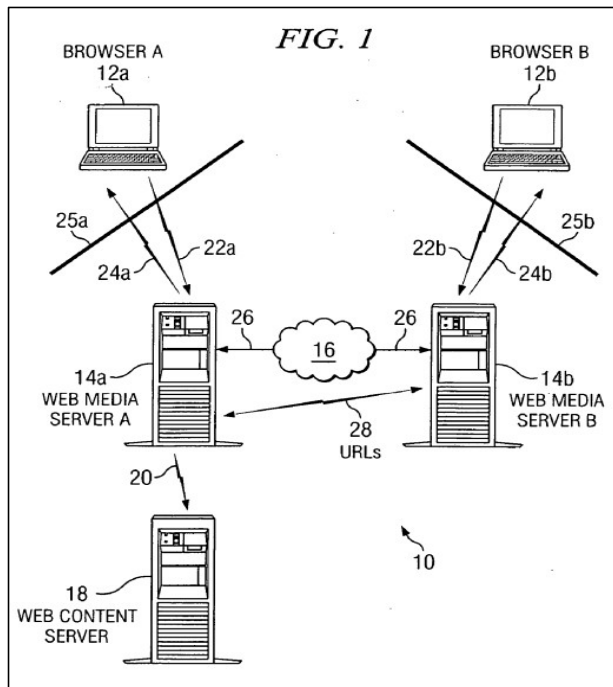
Ex. 1007, Fig. 3

Ex. 1007, Fig. 4

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Dynamic Peer-to-Peer Web Page Sharing

-00339 Ex. 1007, Figs. 1 and 2

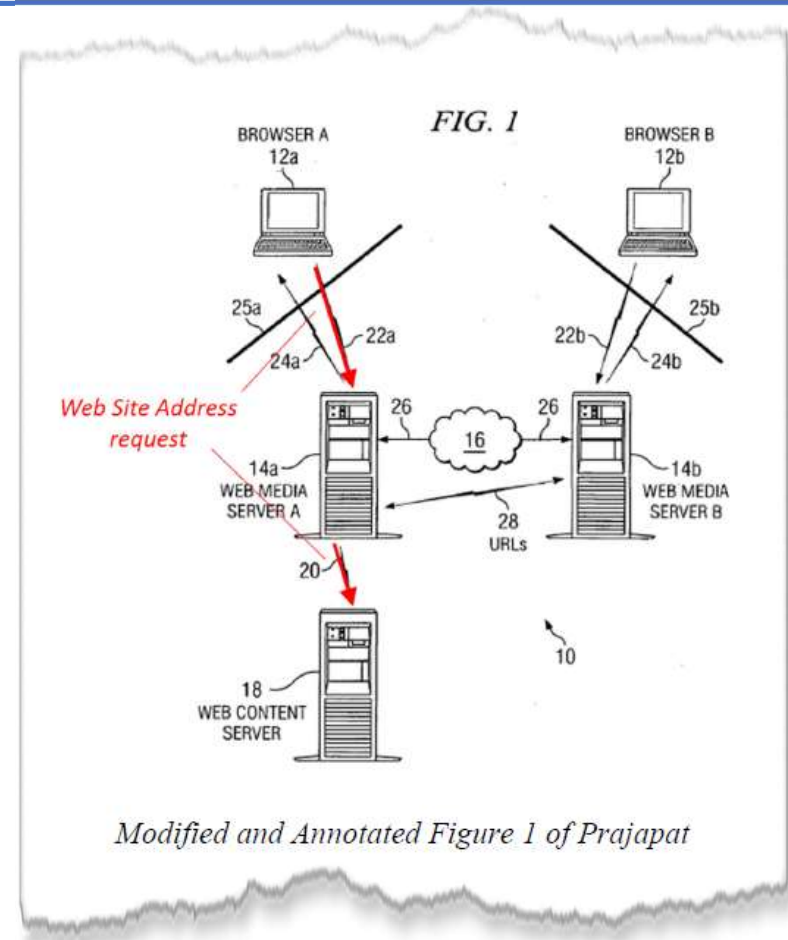


Dynamic Peer-to-Peer Web Page Sharing

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Dynamic Peer-to-Peer Web Page Sharing

- First, “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.”

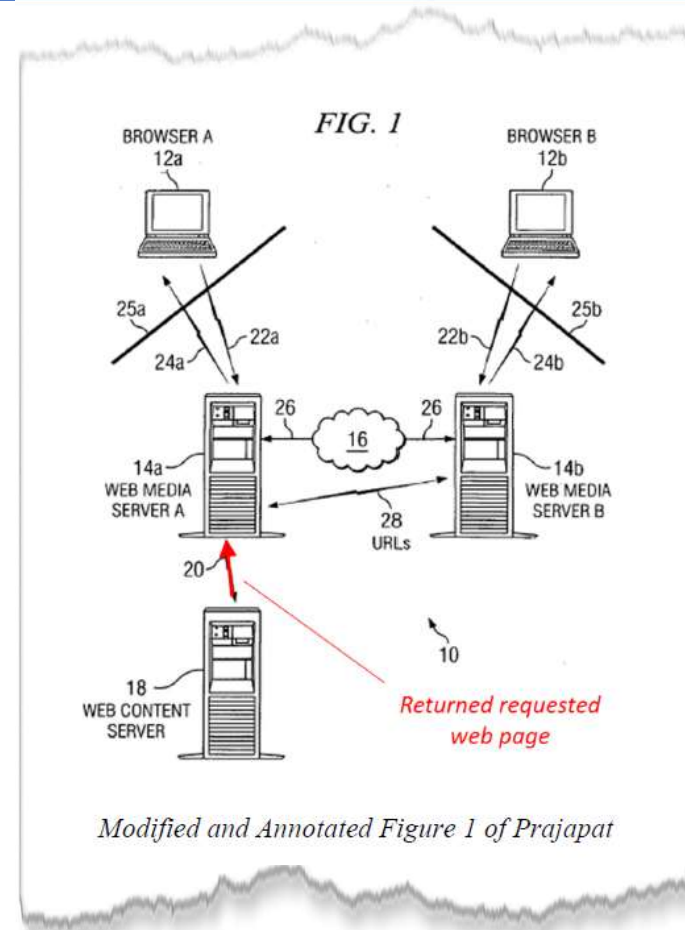


-00339: POR at 55; -00341 at POR 59; -00342 at POR 54

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Dynamic Peer-to-Peer Web Page Sharing

- Second, “[w]eb content server 18 may return a requested web page to web media server 14a.”



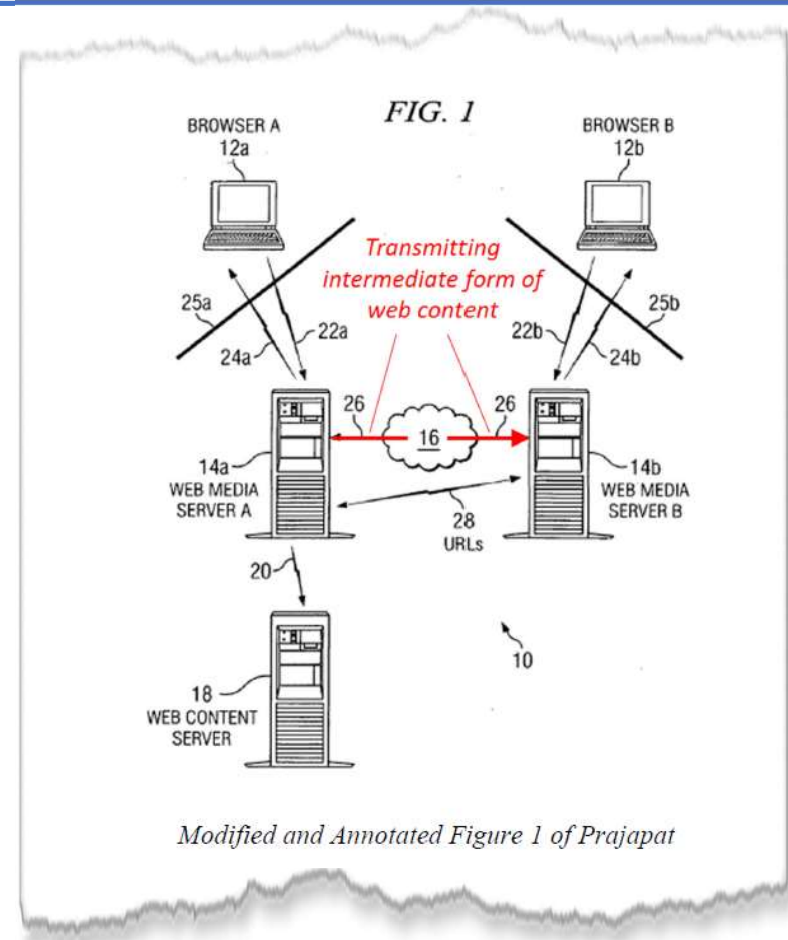
Ex. 1007, [0024]; see also [0037])

-00339: POR at 56; -00341 POR at 60; -00342 POR at 55

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Dynamic Peer-to-Peer Web Page Sharing

- Third, the “Web media server 14a may transform the returned web page into some intermediate form” “that may be rendered by browser 12a.”
- Fourth, the web media server 14a transmits the intermediate form of the web content to web media server 14b, which is associated with browser 14b.

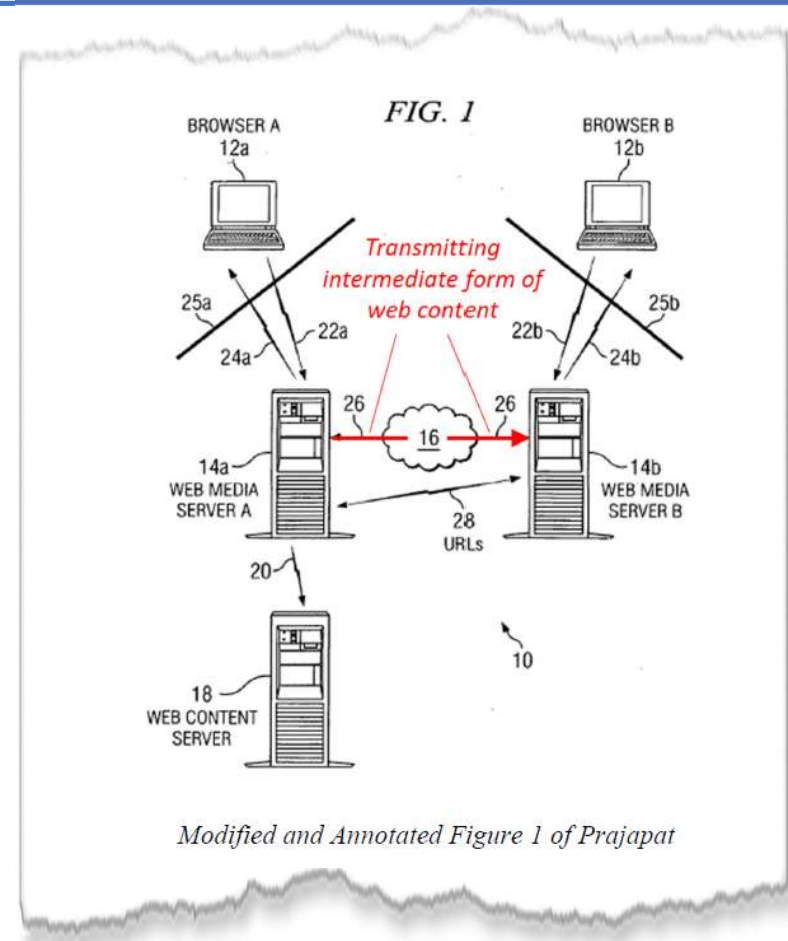


Ex. 1007, [0024-26]; see also [0037-39]).

-00339: POR at 58; -00341 at POR 62; -00342 at POR 57

Prajapat's Dynamic Peer-to-Peer Web Page Sharing

- Web media server 14b then transforms the intermediate form of the retrieved webpage into a renderable form that may be rendered by browser 12b.

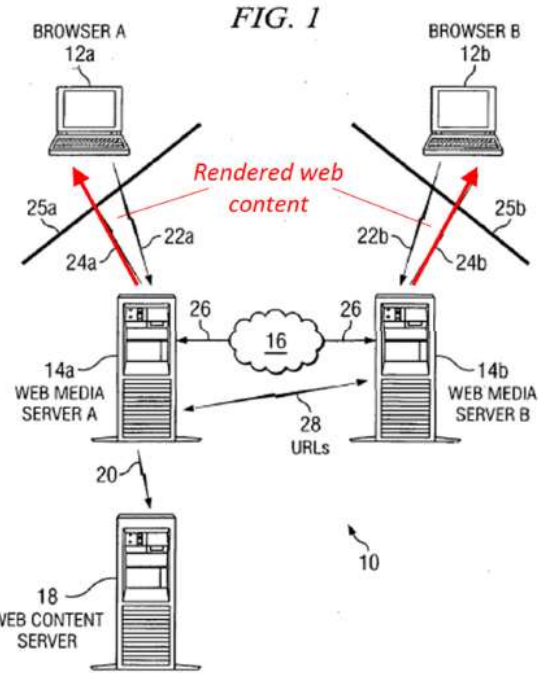


(-00339: Ex. 1007, [0025-0026]; see also [0038-0039]).

-00339: POR at 58

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

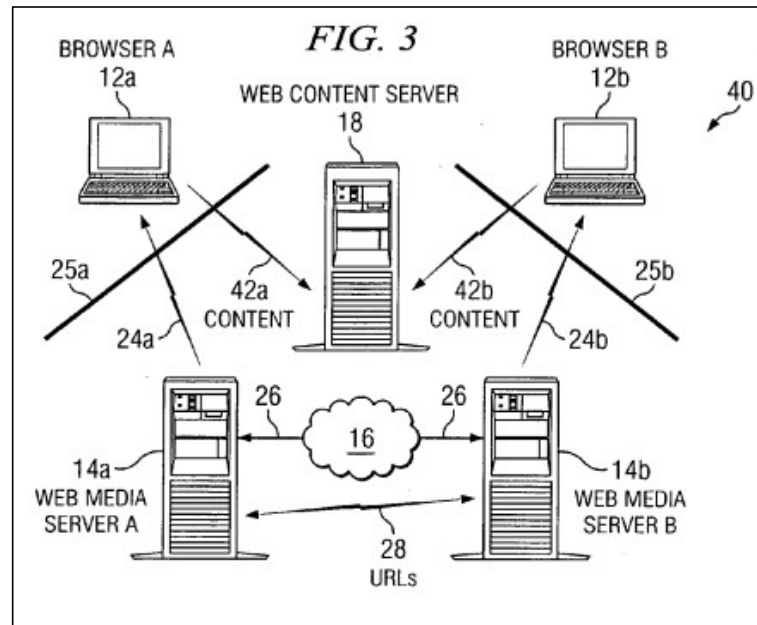
- Fifth, the rendered form of the web content is transmitted from the web media servers to their respective browsers.



Ex. 1007, [0025-26]; see also [0038-39]).

-00339: POR at 59; -00341: POR at 63; -00342: at 58

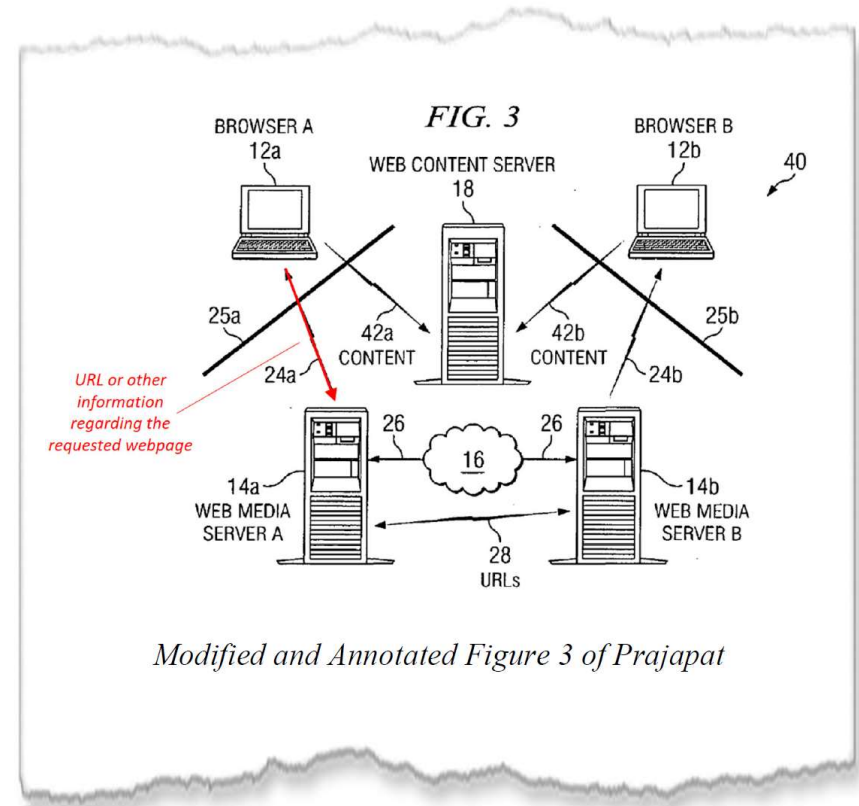
-00339 Ex. 1007, Fig. 3



Simple Peer-to-Peer Web Page Sharing

Prajapat's Simple Peer-to-Peer Web Page Sharing

- First, browser 12a “submit[s] a request to web content server 18 for one or more web pages using link 42a” and “[w]eb content server 18 [] return[s] 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.” (Ex. 1007, [0041]).



-00339: POR at 60; -00641: POR at 64; -00342: POR at 59

-00339: POR at 61

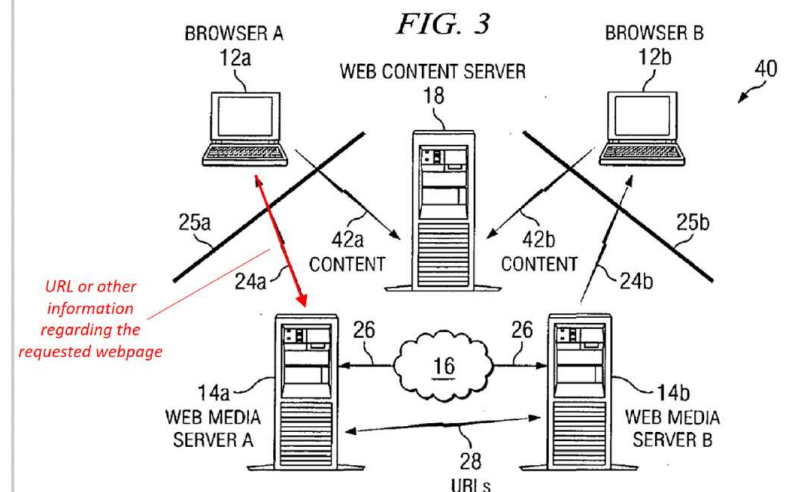
Samesurf claims a different concept than Prajapat's Simple Peer-to-Peer Web Page Sharing



“[I]n the simple web page sharing embodiment, the first browser doesn’t forward the URL to the web media server (for forwarding on to the other web media server and then second browser) until after it has already received the web page.”

“...That means the user of that first browser may be clicking or scrolling at the same time as the URL is being sent to the second browser. The two browsers, even if they may be viewing some portion of the same web page, are not actually synchronized as that term is used in Prajapat.”

- Stacy Friedman, '448 Patent -00341, Ex. 2004, ¶ 63.

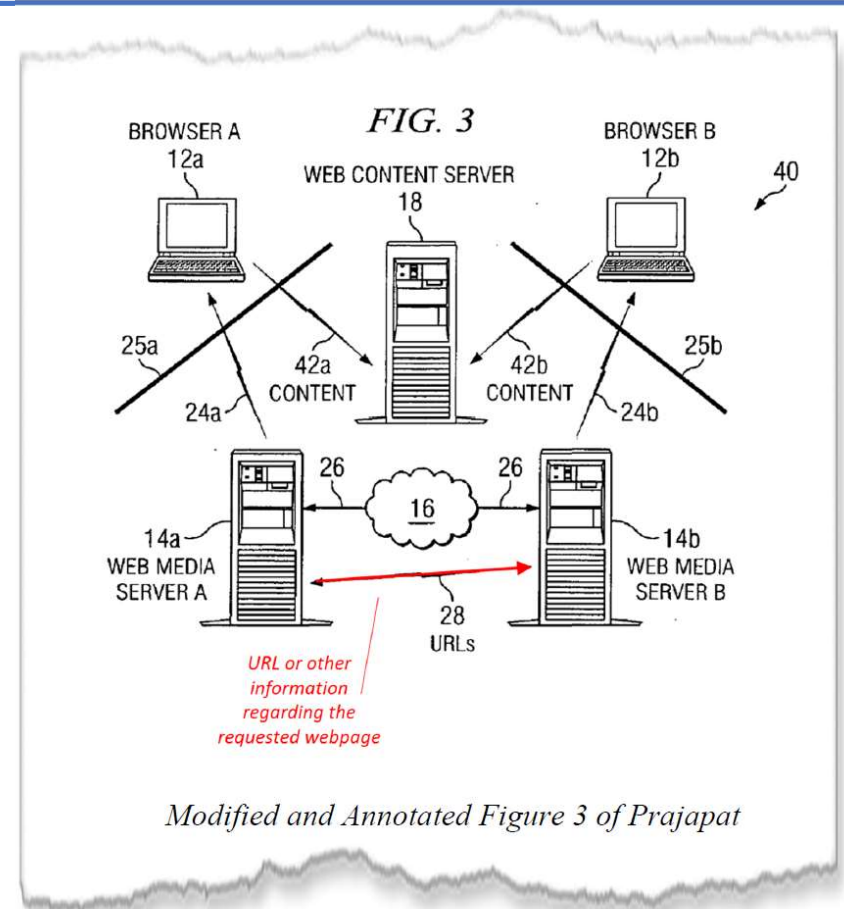


Modified and Annotated Figure 3 of Prajapat

-00339: POR at 61; -00341: POR at 65; -00342: POR at 60

Prajapat's Simple Peer-to-Peer Web Page Sharing

- Second, “[w]eb media server 14a may communicate the URL and any other suitable information to web media server 14b, using media session 28 for example.” (Ex. 1007, [0041]).

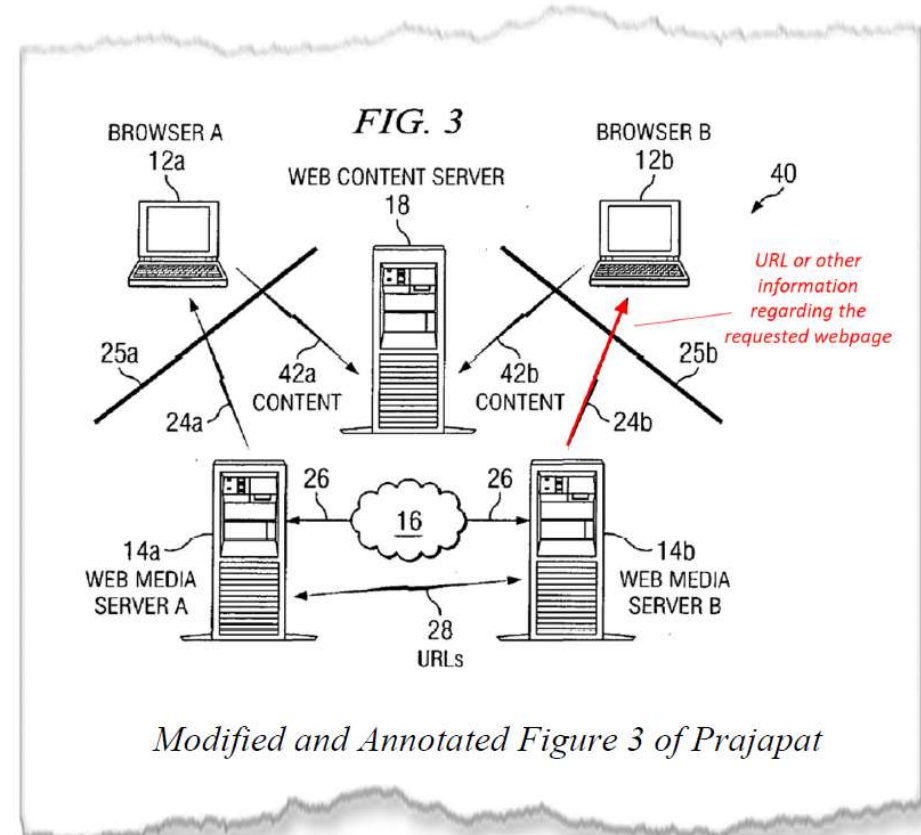


-00339: POR at 61; -00341: POR at 65; -00342: POR at 60

-00339: POR at 62

Prajapat's Simple Peer-to-Peer Web Page Sharing

- Third, “[w]eb media server 14b may communicate the URL and any other suitable information to browser 12b.” (Ex. 1007, [0041]).

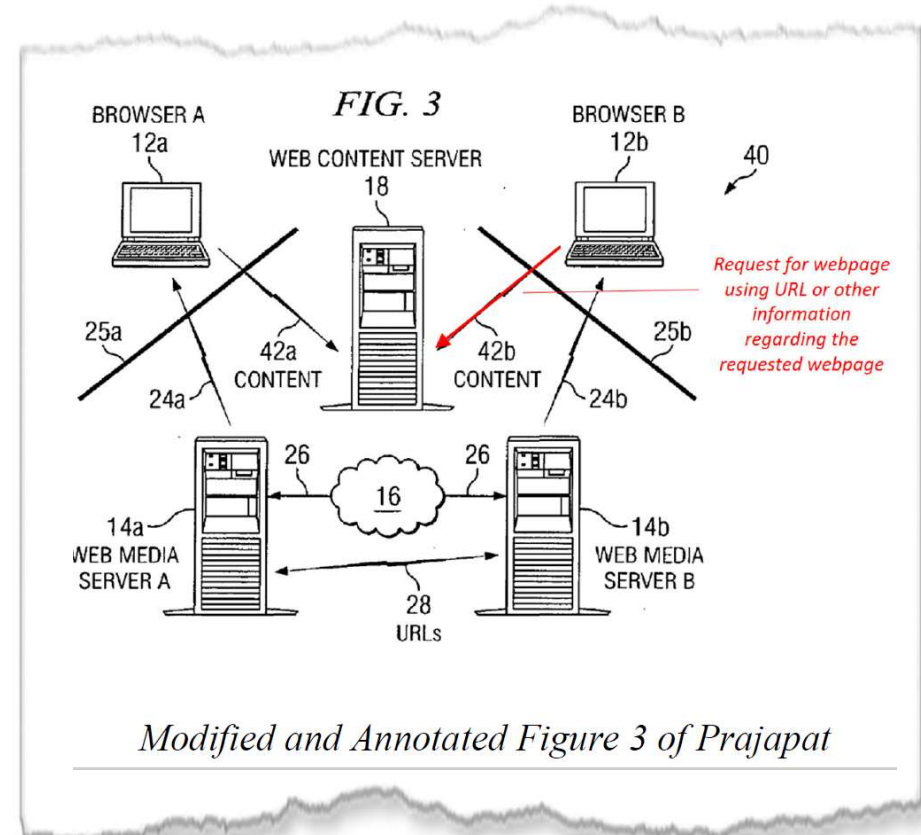


-00339: POR at 62; -00341: POR at 66; -00342: POR at 61

-00339: POR at 63; : POR at 65; -00342: POR at 62

Prajapat's Simple Peer-to-Peer Web Page Sharing

- Fourth, “[b]rowser 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, [0041]).



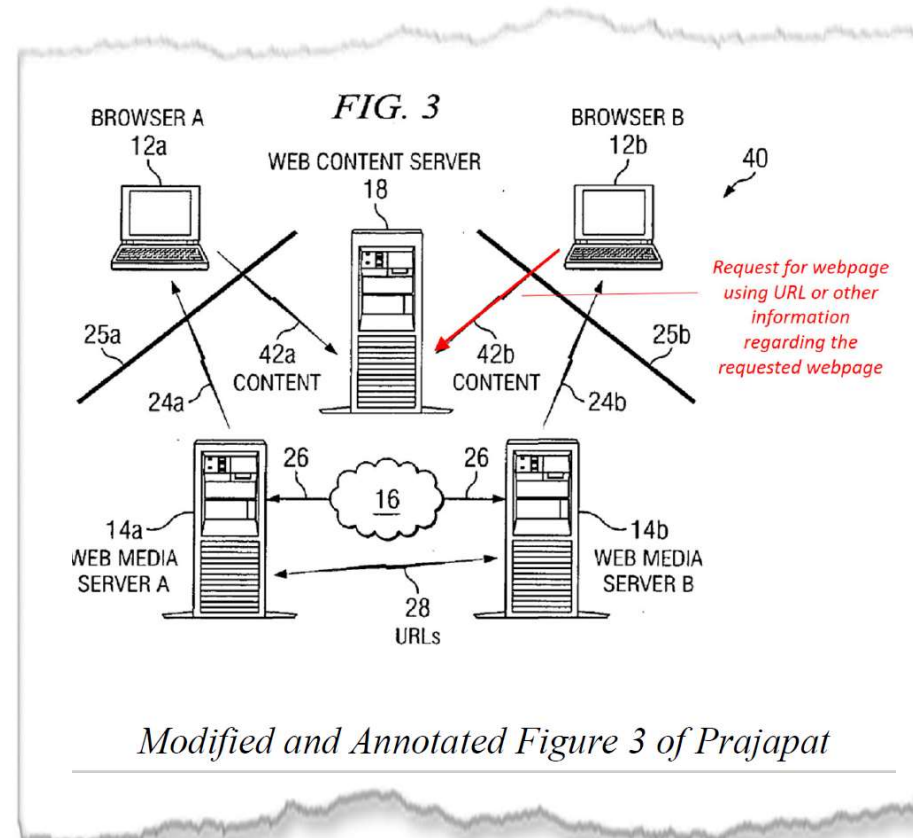
-00339: POR at 63; -00341: POR at 67; -00342: POR at 62

-00339: POR at 64 ; -00341: POR at 68; -00342: POR at 63

Samesurf claims a different concept than Prajapat's Simple Peer-to-Peer Web Page Sharing



- Peer-to-peer simple web page sharing teaches transmission of a URL (or other suitable information regarding the requested webpage) from one browser to another browser, in an “any time” sequence.
- There is no suggestion that the transmission is “simultaneous,” in “real-time,” or temporally coordinated.
- Similar to posting a webpage bookmark URL or emailing the URL from one device to another device using email servers.



-00339: POR at 64-65; -00341: POR at 63-64; -00342: POR at 63

-00339: POR at 64; -00341: POR at 63; -00342: POR at 63

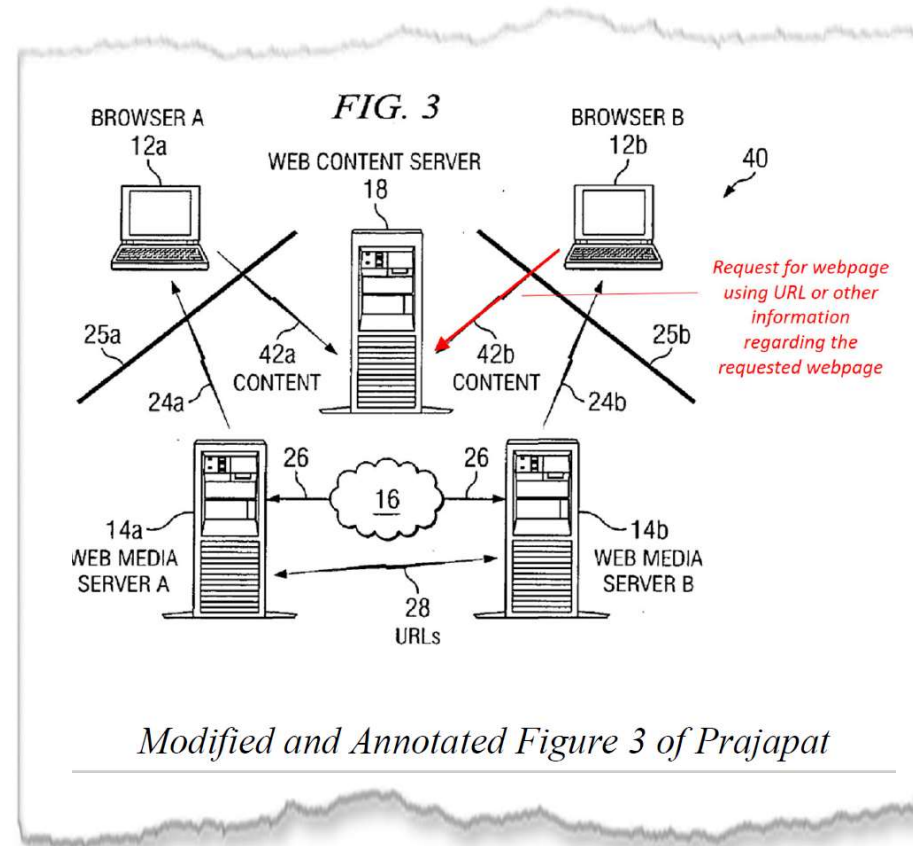
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samesurf claims a different concept than Prajapat's Simple Peer-to-Peer Web Page Sharing



“Uncoordinated sharing of links is plainly outside the scope of the claims.”

- Stacy Friedman, Ex. 2004, ¶¶74-77.

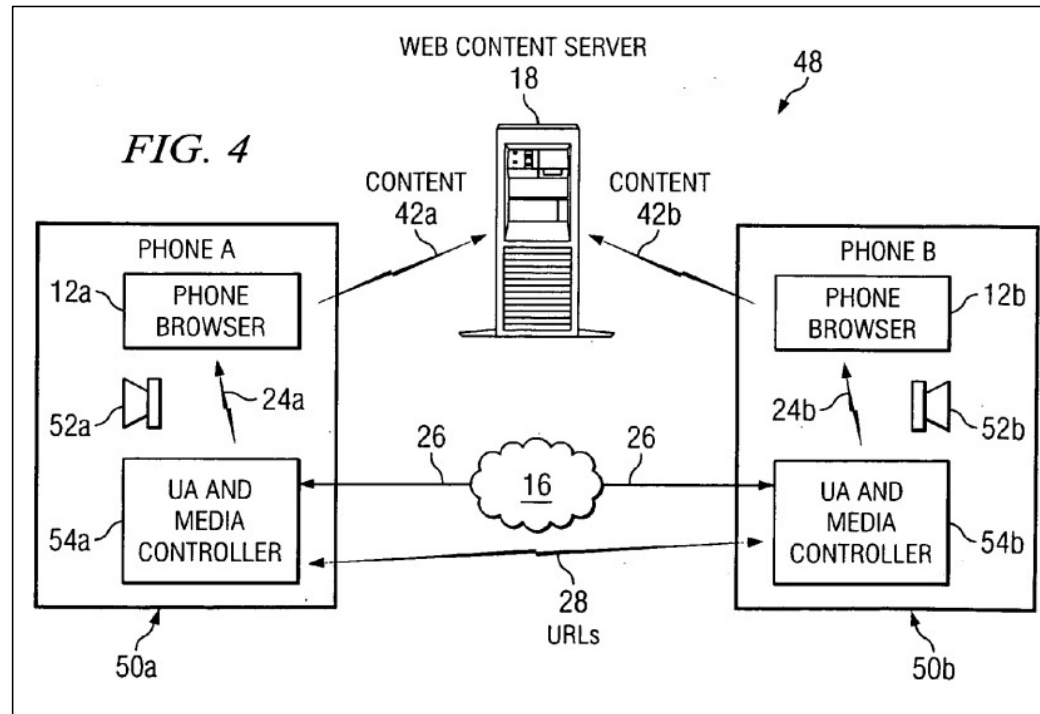


-00339: POR at 64-65

-00339: POR at 64; -00341: POR at 65; -00342: POR at 62

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Phone-to-Phone Web Page Sharing



Phone-to-Phone Web Page Sharing

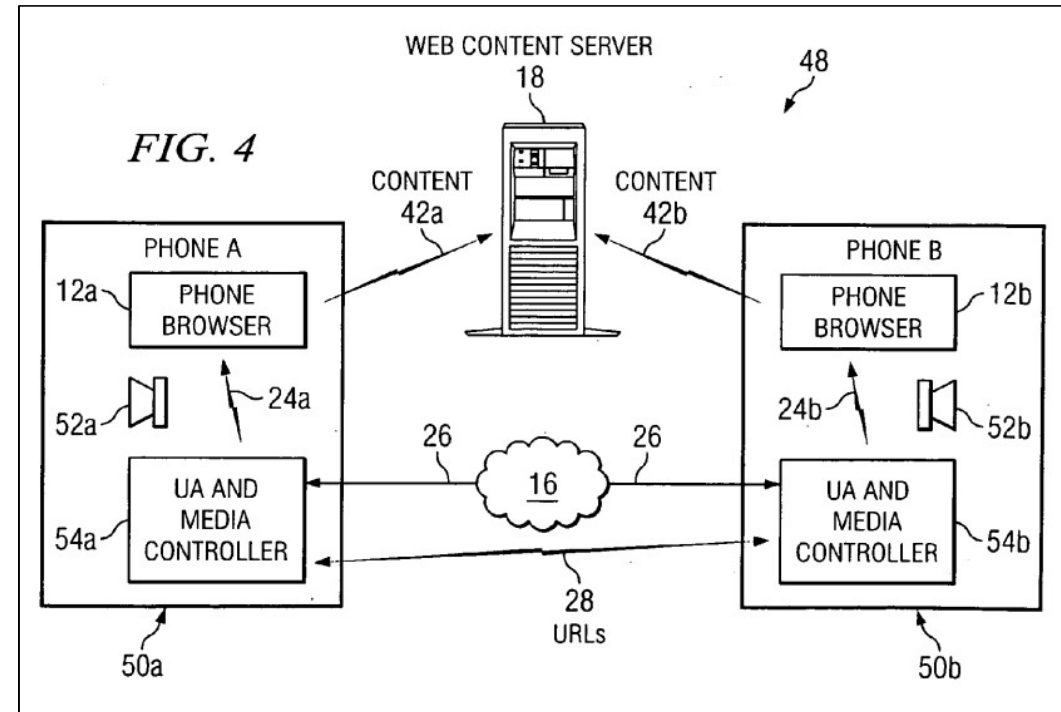
-00339 Ex. 1007, Fig. 4

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Phone-to-Phone Web Page Sharing

[0044] FIG. 4 illustrates an example communication system 48 operable to provide peer-to-peer web page sharing using at least two phones 50. Although phones 50 are

[0045] In operation, a user of phone 50a may make a telephone call to a user of phone 50b and may include in the phone call a request to share web pages. The request to share



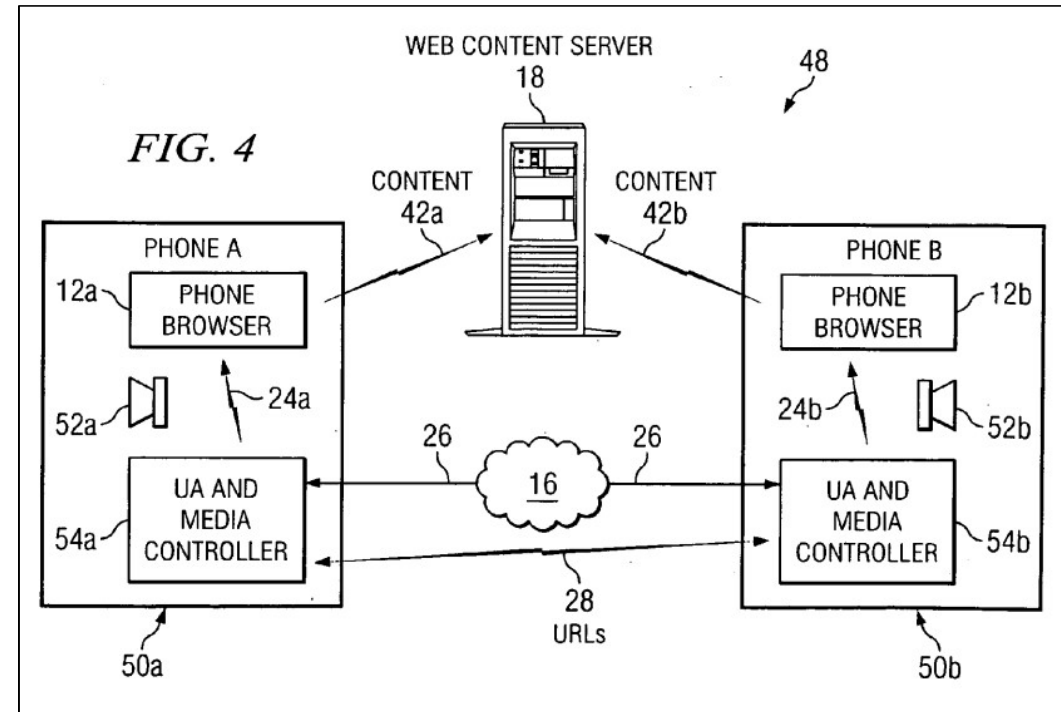
Ex. 1007, [0044], [0045]

Ex. 1007, Fig. 4

Prajapat's Phone-to-Phone Web Page Sharing

[0046] In the illustrated embodiment, a user of phone 50a may request one or more web pages from web content server 18 using phone browser 12a and link 42. Link 42 may include an HTTP link or any other suitable type of link. Phone 50a may request the one or more web pages using the URL of the web pages for example. Browser 12a may communicate the URL and any other suitable information to UA and media controller 54a, which may communicate the URL and any other suitable information to UA and media controller 54b using media session 28. UA and media controller 54b may communicate a notification to phone browser 12b, using incoming channel 32b for example, and phone browser 12b may retrieve the URL from UA and media controller 54b. Phone browser 12b may use the URL to request the web page from web content server 18. In one embodiment, the users of browsers 12 may continue to engage in a voice session during the web page sharing session.

Ex. 1007, [0046]



Ex. 1007, Fig. 4

Samesurf claims a different concept than Prajapat's Phone-to-Phone Web Page Sharing



“[T]he premise of sharing a web page URL with someone else while on remaining a phone call, as in Prajapat’s phone-to-phone embodiment, implies that the callers would need to talk to each other in order to coordinate their user inputs (“okay, now scroll down three lines and click the ‘submit’ button.”)”

- Stacy Friedman, -00341: Ex. 2004, ¶ 64

-00339, POR at 59-65, 68-69, Ex. 2004, ¶ 63; -00341, POR at 5, 63-69, Ex. 2004, ¶ 64; -00342 POR at 63-67, Ex. 2004, ¶ 53; Ex. 1007, ¶¶ 41-43

Prajapat's Simple and Phone to Phone Web Page Sharing Does Not Contemplate Synchronized Browsing



“Prajapat does not describe either the simple web page sharing embodiment or the phone-to-phone web page sharing embodiment as a ‘cobrowsing session’ but only a ‘web page sharing session.’”

- Stacy Friedman, -00341: Ex. 2004, ¶ 62

-00339, POR at 59-65, 68-69, Ex. 2004, ¶ 61; -00341, POR at 5, 63-69, Ex. 2004, ¶ 62; -00342 POR at 63-67, Ex. 2004, ¶ 51; Ex. 1007, ¶¶ 41-43
Compare Ex. 1007 at [0041], [0046] (“web page sharing session”) with [0016] (“co-browsing session”).

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat's Simple and Phone to Phone Web Page Sharing Does Not Contemplate Synchronized Browsing



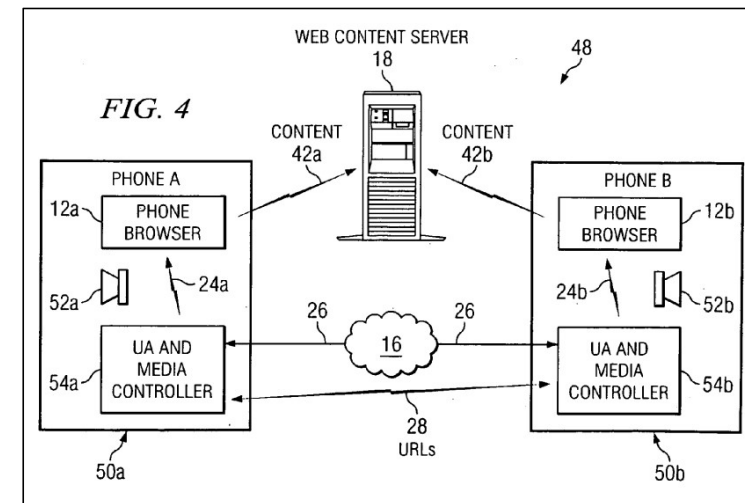
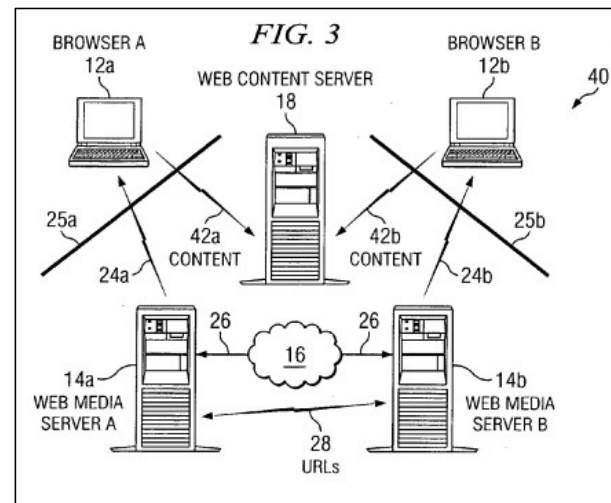
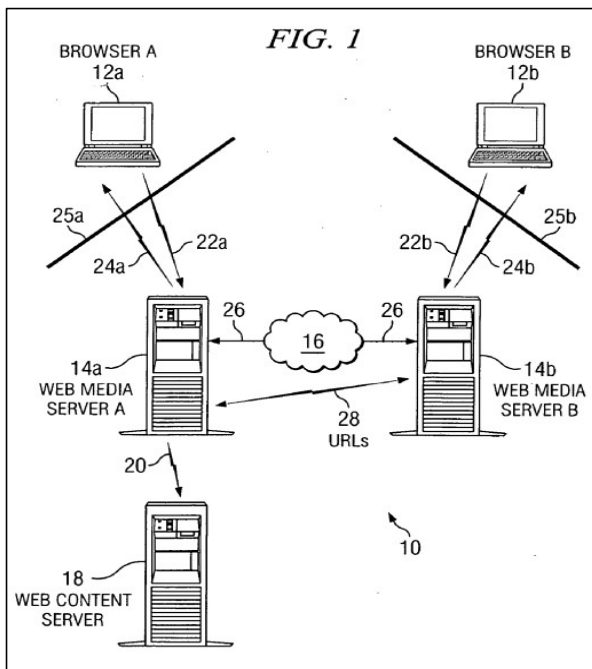
“[O]nly the co-browsing, dynamic web page sharing embodiments of Prajapat are described as ‘synchronized.’”

- Stacy Friedman, -00341: Ex. 2004, ¶ 62

-00339, POR at 59-65, 68-69, Ex. 2004, ¶ 61; -00341, POR at 5, 63-69, Ex. 2004, ¶ 64; -00342 POR at 63-67, Ex. 2004, ¶ 51; Ex. 1007, ¶¶ 41-43

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



“Prajapat’s dynamic web page sharing embodiment is incompatible with either the simple web page sharing or phone-to-phone web page sharing.”

-00339, POR at 59-65, 68-69, Ex. 2004, ¶ 64; -
00341, POR at 5, 63-69, Ex. 2004, ¶ 64; -00342
POR at 63-67, Ex. 2004, ¶ 54; Ex. 1007, ¶¶ 41-43

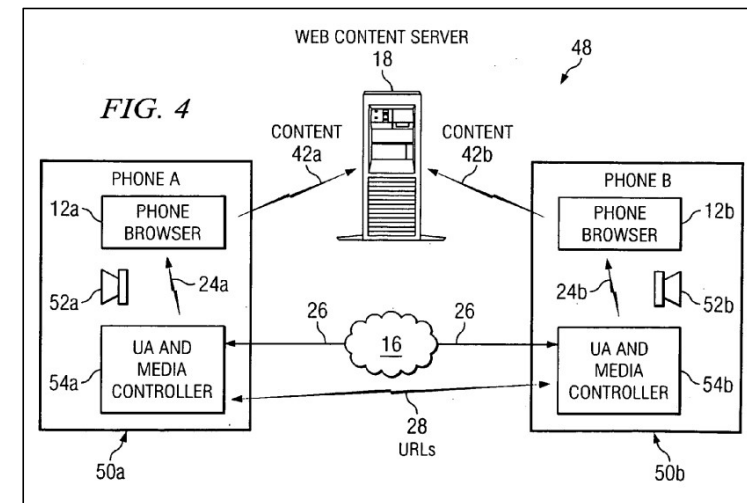
- Stacy Friedman, -00341: Ex. 2004, ¶ 65

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



“[I]t is clear from the figures [] that the dynamic web page sharing embodiment is distinct from the simple web page sharing or phone web page sharing embodiments.”

- Stacy Friedman, Ex. 2004, ¶ 66.



- Stacy Friedman, Ex. 2004, ¶ 66.

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



“In order to render a web page, a browser must obviously receive the web page content from somewhere. In dynamic web page sharing, the browser receives the content from a web media server that has already fetched it from the web content server; in simple or phone-to-phone sharing, the browser receives the content from the web content server directly.”

- Stacy Friedman, Ex. 2004, ¶ 65.

-00341 Ex. 2004, ¶ 65

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



“It would make no sense to combine the dynamic web page sharing embodiment with either the simple or phone-to-phone web page sharing embodiments because then the content would be fetched twice from the web content server, turned into an intermediate form once (by the web media server), and forwarded to the browser at the same time as the browser is receiving a nonintermediate form of the web page content directly from the web content server.”

- Stacy Friedman, Ex. 2004, ¶ 65.

-00341 Ex. 2004, ¶ 65

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



“Thus, the hypothetical combination would end with a browser receiving two different versions of the same web page at the same time, which is a nonsensical result.”

- Stacy Friedman, Ex. 2004, ¶ 65.

-00341 Ex. 2004, ¶ 65

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



- For example, Simple Web Page Sharing (Fig. 3) only states that *web media servers may locate each other* in a substantially similar manner to that described in Figs. 1 and 2.

[0041] 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

Ex. 1007, [0041]

-00341 Ex. 1007, [0041]

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



- For example, Phone to Phone Web Page Sharing (Fig. 4) only states that *UA and media controller may locate each other* in a substantially similar manner to that described in Figs. 1, 2, and 3.

[0045] In operation, a user of phone **50a** may make a telephone call to a user of phone **50b** and may include in the phone call a request to share web pages. The request to share web pages may be made using UA and media controller **54a**. For purposes of web page sharing, UA and media controller **54a** may locate UA and media controller **54b** in substantially the same manner as described above with reference to **FIGS. 1, 2, and 3**. For example, UA and media controllers **54** may use a standard signaling protocol such as SIP and may use one or more functions associated with the standard signaling protocol to locate each other.

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.

- For example, Phone to Phone Web Page Sharing (Fig. 4) only states that *when UA and media controller are operable to retrieve web pages from the web content server*, web pages may be shared in a substantially similar manner to that described in Figs. 1 and 2.

[0044] FIG. 4 illustrates an example communication system 48 operable to provide peer-to-peer web page sharing using at least two phones 50. Although phones 50 are ...

[0047] 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.

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



- Prajapat does not “expressly indicate[] that the web page sharing of **Figure 3** is the same as that described in the dynamic web page sharing embodiment of Figures 1 and 2.”

[0044] FIG. 4 illustrates an example communication system 48 operable to provide peer-to-peer web page sharing using at least two phones 50. Although phones 50 are ...

[0047] 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.

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



- Prajapat only indicates that when “constructed such that UA and web media controller 54a is operable to retrieve web pages from web content server 18,” the web page sharing of **Figure 4**, **not Figure 3**, is the same as that described in the dynamic web page sharing embodiment of Figures 1 and 2.

[0044] FIG. 4 illustrates an example communication system 48 operable to provide peer-to-peer web page sharing using at least two phones 50. Although phones 50 are ...

[0047] 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.

Compare '448 Patent -00341 Ex. 1007, [0044-47] with IPR2022-00342, Paper 12 at 40 (citing Ex. 1007, [0047])

'448 Patent -00341 Ex. 1007, [0044-47]

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



- Prajapat only describes a method of incorporating dynamic web page sharing to phone-to-phone web page sharing, not simple web page sharing.

[0044] FIG. 4 illustrates an example communication system 48 operable to provide peer-to-peer web page sharing using at least two phones 50. Although phones 50 are ...

[0047] 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.

Prajapat does not contemplate combining its web sharing embodiments in the manner suggested by Petitioner.



- Incorporating dynamic web page sharing to phone-to-phone web page sharing requires the system to be reconstructed to resemble Figs. 1 and 2, wherein the UA and web media controller, rather than the browser, retrieves web pages from the web content server.
- This construction differs from simple web page sharing.

[0044] FIG. 4 illustrates an example communication system 48 operable to provide peer-to-peer web page sharing using at least two phones 50. Although phones 50 are

...

[0047] 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.

Petitioner Has Not Met Its Burden of Proving that a POSITA Would Have Been Motivated to Combine Lebrun with Wang or Prajapat with Wang



“A POSITA would not have been motivated to combine Wang with either Lebrun or Prajapat due to the incompatible system architectures and purposes.”

- Wang’s system is designed to store a snapshot of page data locally to the server performing the synchronization and distribute that snapshot data to participating client browsers.
 - “Note that the snapshot data may be an HTML file, an XML file, or an SGML file, all of which may have already been compiled by linking text, hypertext, image data and the like together.” Wang at [0061].
- A POSITA would think that Lebrun’s preferred embodiment of sending ‘only the page 153 itself without any multimedia elements (such as ...images)’ teaches away from the snapshot data of Wang that is ‘compiled by linking text, hypertext, image data and the like together.’”

Petitioner Has Not Met Its Burden of Proving that a POSITA Would Have Been Motivated to Combine Lebrun with Wang or Prajapat with Wang



“A POSITA would not have been motivated to combine Wang with either Lebrun or Prajapat due to the incompatible system architectures and purposes.”

- A POSITA would not have been motivated to combine an architecture like Prajapat, having multiple “web media servers” and a different “renderable form” for each browser, with the system of Wang that has a single server and compiles the same snapshot data for all browsers, because those system architectures are incompatible alternatives.
- Due to these differences, “a POSITA would have understood that the system can produce either single snapshot data [i.e. Wang] or multiple renderable forms [i.e. Prajapat], but it cannot do both simultaneously.”

All of the Limitations of the Claims of the '448, '591 and '145 Patents Are in Dispute



Petitioner contends that not all limitation of the '448, '591, and '145 Patents are in dispute. Petitioner is wrong. A determination of obviousness pursuant to Section 103 requires an examination of the claims “as a whole” and therefore all claim limitations are always in dispute. *GE v. Raytheon Techs. Corp.*, 983 F.3d 1334, 1352 (Fed. Cir. 2020).

- Pursuant to 35 U.S.C. § 316(e), Petitioner bears the burden of proving invalidity throughout the entire IPR proceeding, i.e., that the claims of the '145 Patent, as a whole, would have been obvious to a POSITA. *FanDuel, Inc. v. Interactive Games LLC*, 966 F.3d 1334, 1342 (Fed. Cir. 2020).
- “A patentee technically has no ‘burden’ to do anything to defend the validity of its patent other than hold the patent challenger to its own burden of persuasion.” *E.I. DuPont de Nemours & Co. v. Synvina C.V.*, 904 F.3d 996, 1008 (Fed. Cir. 2018); 37 C.F.R. §§ 42.107(a)

All of the Limitations of the Claims of the '448, '591 and '145 Patents Are in Dispute



Petitioner further contends that “PO did not challenge any claim limitation under any construction of ‘web browsing interaction data’ other than its proposed construction.” Pet. Reply, 9.

- PO has no obligation to show validity under Petitioner’s alleged construction and the Board is not required to accept any of Petitioner’s arguments. Therefore, the Board could correctly find that Petitioner has not met its burden of proving obviousness, even under Petitioner’s (incorrect) construction.

The Samesurf Patents



(12)

United States Patent

Pirnazar

(54)

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

(58)

Field of Classification Search
None
See application file for complete search history.

(59)

References Cited

(10)

Patent No.:

US 9,483,448 B2

(45)

Date of Patent:

*Nov. 1, 2016

(12)

United States Patent

Pirnazar

(54)

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

(58)

Field of Classification Search
CPC ... H04L 65/1069; H04L 51/32; H04L 51/046; H04L 65/403; G06F 17/30873
USPC 709/205, 203; 715/733, 753
See application file for complete search history.

(10)

Patent No.:

US 9,185,145 B2

(45)

Date of Patent:

*Nov. 10, 2015

(12)

United States Patent

Pirnazar

(54)

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

(58)

Field of Classification Search
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(10)

Patent No.:

US 8,527,591 B2

(45)

Date of Patent:

*Sep. 3, 2013

-00341 Ex. 1001, -00339 Ex. 1001, -00342 Ex. 1001

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Challenged '591, '145, and '448 Patents



'591 Patent (-00342)



US008527591B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 8,527,591 B2**
(45) Date of Patent: ***Sep. 3, 2013**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(75) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **Actual Works, Inc.**, Los Angeles, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 296 days.
This patent is subject to a terminal disclaimer.

(21) Appl. No.: **12/783,743**
(22) Filed: **May 20, 2010**
(65) **Prior Publication Data**
US 2011/0289157 A1 Nov. 24, 2011

7,533,146 B1 5/2009 Kumar
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Primary Examiner — Jungwon Chang
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.; David V. Jafari

-00342; Ex. 1001 at Cover
-00342 Pet. at 1

'145 Patent (-00339)



US009185145B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,185,145 B2**
(45) Date of Patent: ***Nov. 10, 2015**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(71) Applicant: **Actual Worlds, Inc.**, Los Angeles, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 208 days.
This patent is subject to a terminal disclaimer.

(21) Appl. No.: **13/951,789**
(22) Filed: **Jul. 26, 2013**
(65) **Prior Publication Data**
US 2013/0311664 A1 Nov. 21, 2013
Related U.S. Application Data
(63) Continuation of application No. 12/783,743, filed on May 20, 2010, now Pat. No. 8,527,591.

(58) **Field of Classification Search**
CPC — 1004; 65/1009; 1004; 51/32; 1004; 51/046; 1004; 65/403; G06F 17/30873
USPC — 709/205, 203; 715/733, 753
See application file for complete search history.

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(Continued)
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"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
Primary Examiner — Jungwon Chang
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a guest device, utilizing the transfer of URL and form data information. The present invention further 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

-00339; Ex. 1001 at Cover
-00339 Pet. at 1

'448 Patent (-00341)



US009483448B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,483,448 B2**
(45) Date of Patent: ***Nov. 1, 2016**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A HOST DEVICE**

(71) Applicant: **Samesurf, Inc.**, Beverly Hills, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.
This patent is subject to a terminal disclaimer.

(21) Appl. No.: **14/830,710**
(22) Filed: **Aug. 19, 2015**
(65) **Prior Publication Data**
US 2015/0358386 A1 Dec. 10, 2015
Related U.S. Application Data
(63) Continuation of application No. 12/783,735, filed on May 20, 2010.

(58) **Field of Classification Search**
None
See application file for complete search history.

(56) **References Cited**
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(Continued)
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"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
(Continued)
Primary Examiner — Scott B Christensen
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a host device, utilizing the transfer of URL and form data information. The present invention further describes a method for establishing a synchronized browsing

-00341; Ex. 1001 at Cover
-00341 Pet. at 1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner fails to show that Lebrun and Wang discloses limitation [1.c]: sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier.

Petitioner's Reply Argument No. 1:

- “Lebrun’s session creation message 151, which includes an identifier for the group-surfing session, discloses this limitation [1.c].” Pet. Reply, 7

Patent Owner’s 1st Response to Argument No. 1:

- Petitioner incorrectly states that Lebrun discloses that “[t]he host sends the message [(i.e. “session-creation message”)] that is forwarded to the invitee, which meets the limitation.” Pet. Reply, 8.
- However, Lebrun does not describe forwarding the “session-creation message” to the invitee and Petitioner does not cite to anywhere in Lebrun that states otherwise. Id.
- Lebrun’s “session-creation message” is sent to the group-surfing server and terminates after arriving at the group-surfing server.
- Lebrun’s “session-creation message” is never sent to the web clients.

10 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-

15 151.) 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. The web client 110 can alternatively specify that the session is open to anyone. The

25

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

Petitioner fails to show that Lebrun and Wang discloses limitation [1.c]: sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier.

Petitioner's Reply Argument No. 1:

- “Lebrun’s session creation message 151, which includes an identifier for the group-surfing session, discloses this limitation [1.c].”

Patent Owner’s 2nd Response to Argument No. 1:

- Petitioner is incorrect that “the group-surfing server (SS) then informs the participants (invitees) that they are invited to join the session.” Pet. Reply, 8.
- Lebrun does not describe the “session creation message” as an “invitation to an invitee device to join the synchronized browsing session.”
- The “session-creation message,” “includes **identifiers** for a set of web clients 110 **participating in, permitted to participate in, or forbidden from participating in**, that session” (Ex. 1005, 32:14-16) and the group-surfing server “responds by... **informing the participants in the group-surfing session** [(i.e. web clients **participating in** not invitees **permitted to participate in**)]” (Id., 32:26- 28).

10 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-

15 151.) 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. The web client 110 can alternatively specify that the session is open to anyone. The

25 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

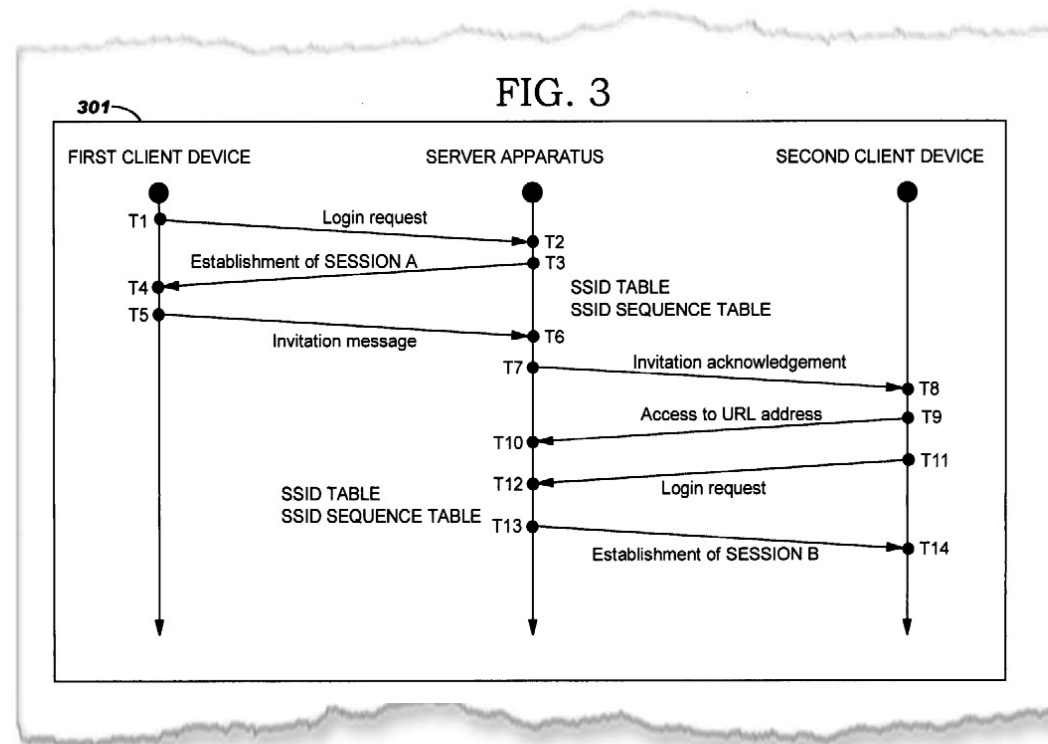
Petitioner fails to show that Lebrun and Wang discloses limitation [1.c]: sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier.

Petitioner's Reply Argument No. 2:

- "POSITA would have been motivated to combine Wang's 'communications means' with Lebrun's 'first web client.'

Patent Owner's 2nd Response to Argument No. 1:

- With regard to Wang, Figure 3 illustrates that the invitation message is sent to the "server apparatus."
- However, only an acknowledgement or notice of the invitation (not the invitation itself) is sent by the "server apparatus" to the invitee device.
- Indeed, Wang's "communication means" merely "enabl[e] the client device to display a message for other client devices" (Ex. 1006, ¶120) and this is not an "invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier."



Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;

Petitioner's Reply Argument No. 1:

- Petitioner asserts "the POR did not acknowledge the Board's preliminary finding or provide any basis for challenging it" (Pet. Reply, 9).

Patent Owner's 1st Response to Argument No. 1:

- The Board's preliminary finding simply summarized Petitioner's position from the petition. PO challenged Petitioner's position in its POR (POR, 42-44).

Limitation [1.d]:

Lebrun fails to disclose:

[1.d] recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction.

Petitioner cites Lebrun, 45:15-16 as disclosing "recording a shared web browsing interaction," stating "[w]hen a page is selected, the program fragment records this information and transmits it to the group-surfing server." Pet. 25-26. The full citation which is reproduced below shows that the Petitioner mischaracterizes the disclosure.

When the controlling web client 110 selects a link 152 on the page 153, the selection is caught by the program fragment, which sends the selection to the group-surfing server 140 as described below (preferably using a protocol operating on top of TCP/IP).

(Ex. 1005, 45:13-19).

Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;

Petitioner's Reply Argument No. 1:

- Petitioner asserts "the POR did not acknowledge the Board's preliminary finding or provide any basis for challenging it" (Pet. Reply, 9).

Patent Owner's 1st Response to Argument No. 1:

- The Board's preliminary finding simply summarized Petitioner's position from the petition. PO challenged Petitioner's position in its POR (POR, 42-44).

As is clearly evident from the language Petitioner cites, the program fragment does not "*record* ... a shared web browsing interaction," as required by the claim language. Instead, it "catches" or "intercepts" the link selected by the controlling web client and sends that selection to the group-surfing server.

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.

(Ex. 1005, 37:5-6).

"Catching" or "intercepting" a selected link is not the same as recording a shared web browsing interaction. In the case of catching or intercepting, the selection is prevented from being transmitted to its original destination (*i.e.* the website server). Instead, it is "caught/intercepted" and redirected to the group-surfing server, which employs the selected link to present the related webpage to all of the web clients that are participating in the session. (Ex. 2004, ¶74).

Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;.

Petitioner's Reply Argument No. 1:

- Petitioner asserts "the POR did not acknowledge the Board's preliminary finding or provide any basis for challenging it" (Pet. Reply, 9).

Patent Owner's 1st Response to Argument No. 1:

- The Board's preliminary finding simply summarized Petitioner's position from the petition. PO challenged Petitioner's position in its POR (POR, 42-44).

The claimed invention of the '448 Patent does something very different. Rather than "catching" or "intercepting" the link that is selected by the host device and then diverting it to the synchronization server, the "web browsing interaction" is instead recorded and transmitted to the "synchronization server." (Ex. 2004, ¶74). In this manner, the selection of the link by the host device continues to its original destination and enables the "host device" to access the webpage from the website server, as opposed to the "synchronization server" accessing the webpage and presenting it to the host device.

Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;.

Petitioner's Reply Argument No. 2:

- Petitioner asserts "[t]he POR provides no rationale as to why catching/intercepting is different from recording." Pet. Reply, 10.

Patent Owner's 1st Response to Argument No. 2:

- it is Petitioner's burden to prove that the limitations are met, especially when the terms are clearly different.
- This is especially the case when the terms themselves are clearly different, as explained in both the POR and Mr. Friedman's declaration. POR, 43-44; Ex. 2004, ¶74.

that the host device (and not the synchronization server) "send[] a request for webpage content to a website server." Put another way, Lebrun's disclosure that a controlling web client's link selection is "caught" means that Lebrun's "program fragment" intercepts and redirects that link selection information to the group-surfing server, rather than recording that data for subsequent transmission to the synchronization server (as required by elements [1.d] and 1[f]) while also requesting that link from the website server (as required by element [1.e]).

- Stacy Friedman, Ex. 2004, ¶74

Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;.

Petitioner's Reply Argument No. 3:

- Petitioner asserts that "Lebrun discloses that the program fragment can manage databases; a POSITA would understand that it is capable of 'recording' such information." Pet. Reply, 10, citing Ex. 1005, 49:13-14; Ex. 1003, ¶¶162-163.

Patent Owner's 1st Response to Argument No. 2:

- However, neither Petitioner's cited disclosure in Lebrun, *i.e.* **Ex. 1005, 49:13-14**, nor its reliance on the cited portions of its expert's declaration support this assertion. The cited portions of its expert's declaration do not mention or cite to the Lebrun passage that Petitioner relies on.

e. Lebrun Discloses 1[d] of Claim 1

161. Lebrun discloses **recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction.**

162. Lebrun discloses **recording a shared web browsing interaction.** The '448 patent states that host and guest devices may have "synchronized browsing software" designed to allow a user to "participate in a synchronized browsing session." **Ex. 1001, 7:52-55.** This software may be integrated into "the native browser control components of commonly used web browsers" or may comprise a "an add-on or plug-in to commonly used internet browsing software." **Id., 7:58-65; 8:1-7.** The "shared browsing window" is an "element of synchronized browsing software," "where in the webpage interactions of host device 10, or other leading device, are relayed to following devices in the synchronized browsing session." **Id., 8:8-12.** Lebrun discloses a "program fragment" that is loaded at each "web client" and allows for the "group-surfing server" to interface and affect the operation of a "web client." **Ex. 1005, 36:21-25;**

A POSITA would have understood that the "program fragment" in Lebrun relates to the "synchronized browsing software." Lebrun discloses that a "controlling web client" selects a "progression of pages" that is presented to other web clients the session. **Ex. 1005, 34:15-17; 35:26-28.** When a page is selected, the "program fragment" records this interaction and transmits it to the "group-surfing server." **Ex. 1005, 45:15-16.** The user sends a "next-page message" to the "group-surfing server," indicating the next page in the progression of web pages shared to other web clients. **Ex. 1005, 45:21-29.**

163. For example, Lebrun explains that "Web Page Look Ahead" is where a user can "allow a second user (or a set of such second users) temporary access to a set of web sites, possibly with the temporary access restricted to a subset of the information or services offered by those web sites." **Ex. 1005, 6:19-32; 37:27-38:17.** Here, a "controlling web client" can select web pages for "look ahead" before designating them as next pages in the progression of web pages. **Ex. 1005, 37:29-31.** This determination of whether a "look ahead" web page will be shared to other users requires the "controlling web client" to record the user's determination (i.e., an interaction) on whether to share the web page. Specifically, the interaction is a setting to determine if a "look ahead" page is shared or accessible by others participating in the session. Similarly, Lebrun also discloses "Web Page Special Access" where the "controlling web client" is able to designate

web pages as "special access," which determines whether a web page is presented to "other web clients." **Ex. 1005, 38:19-27.** Again, when a "controlling web client" determines if a "special access" page is displayed to "other web clients," a user must necessarily interact with the "web client," which then records this interaction. **Id. 37:27-38:1.** Lastly, Lebrun discloses "Web Page Automatic Form Completion," which is "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." **Id. 39:4-8.** Here, the "controlling web client" records the information being input into the HTML form (i.e., a web browsing interaction) is presented (i.e., shared) to "each participating web client." **Ex. 1005, 39:4-8.**

-00341: Sur-reply at 14, Ex.1003 at 66-68

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;.

Petitioner's Reply Argument No. 3:

- Petitioner asserts that "Lebrun discloses that the program fragment can manage databases; a POSITA would understand that it is capable of 'recording' such information." Pet. Reply, 10, citing Ex. 1005, 49:13-14; Ex. 1003, ¶¶162-163.

Patent Owner's 1st Response to Argument No. 2:

- However, neither Petitioner's cited disclosure in Lebrun, *i.e.* **Ex. 1005, 49:13-14**, nor its reliance on the cited portions of its expert's declaration support this assertion.
- The cited portions of its expert's declaration do not mention or cite to the Lebrun passage that Petitioner relies on.

e. Lebrun Discloses 1[d] of Claim 1

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162. Lebrun discloses **recording a shared web browsing interaction.** The '448 patent states that host and guest devices may have "synchronized browsing software" designed to allow a user to "participate in a synchronized browsing session." **Ex. 1001, 7:52-55.** This software may be integrated into "the native browser control components of commonly used web browsers" or may comprise a "an add-on or plug-in to commonly used internet browsing software." **Id., 7:58-65, 8:1-7.** The "shared browsing window" is an "element of synchronized browsing software," "where in the webpage interactions of host device 10, or other leading device, are relayed to following devices in the synchronized browsing session." **Id., 8:8-12.** Lebrun discloses a "program fragment" that is loaded at each "web client" and allows for the "group-surfing server" to interface and affect the operation of a "web client." **Ex. 1005, 36:21-25.**

-00341: Sur-reply at 14, Ex.1003 at 66

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;

Petitioner's Reply Argument No. 3:

- Petitioner asserts that "Lebrun discloses that the program fragment can manage databases; a POSITA would understand that it is capable of 'recording' such information." Pet. Reply, 10, citing Ex. 1005, 49:13-14; Ex. 1003, ¶¶162-163.

Patent Owner's 1st Response to Argument No. 2:

- However, neither Petitioner's cited disclosure in Lebrun, *i.e.* **Ex. 1005, 49:13-14**, nor its reliance on the cited portions of its expert's declaration support this assertion.
- The cited portions of its expert's declaration do not mention or cite to the Lebrun passage that Petitioner relies on.

A POSITA would have understood that the "program fragment" in Lebrun relates to the "synchronized browsing software." Lebrun discloses that a "controlling web client" selects a "progression of pages" that is presented to other web clients the session. Ex. 1005, 34:15-17; 35:26-28. When a page is selected, the "program fragment" records this interaction and transmits it to the "group-surfing server." Ex. 1005, 45:15-16. The user sends a "next-page message" to the "group-surfing server," indicating the next page in the progression of web pages shared to other web clients. Ex. 1005, 45:21-29.

163. For example, Lebrun explains that "Web Page Look Ahead" is where a user can "allow a second user (or a set of such second users) temporary access to a set of web sites, possibly with the temporary access restricted to a subset of the information or services offered by those web sites." Ex. 1005, 6:19-32, 37:27-38:17. Here, a "controlling web client" can select web pages for "look ahead" before designating them as next pages in the progression of web pages. Ex. 1005, 37:29-31. This determination of whether a "look ahead" web page will be shared to other users requires the "controlling web client" to record the user's determination (*i.e.*, an interaction) on whether to share the web page. Specifically, the interaction is a setting to determine if a "look ahead" page is shared or accessible by others participating in the session. Similarly, Lebrun also discloses "Web Page Special Access" where the "controlling web client" is able to designate

-00341: Sur-reply at 14, Ex.1003 at 67

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner fails to show that Lebrun and Wang discloses limitation [1.d]: recording a shared web browsing interaction responsive to determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction;.

Petitioner's Reply Argument No. 3:

- Petitioner asserts that "Lebrun discloses that the program fragment can manage databases; a POSITA would understand that it is capable of 'recording' such information." Pet. Reply, 10, citing Ex. 1005, 49:13-14; Ex. 1003, ¶¶162-163.

Patent Owner's 1st Response to Argument No. 2:

- However, neither Petitioner's cited disclosure in Lebrun, *i.e.* **Ex. 1005, 49:13-14**, nor its reliance on the cited portions of its expert's declaration support this assertion.
- The cited portions of its expert's declaration do not mention or cite to the Lebrun passage that Petitioner relies on.

web pages as "special access," which determines whether a web page is presented to "other web clients." Ex. 1005, 38:19-27. Again, when a "controlling web client" determines if a "special access" page is displayed to "other web clients," a user must necessarily interact with the "web client," which then records this interaction. Id. 37:27-38:1. Lastly, Lebrun discloses "Web Page Automatic Form Completion," which is "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." Id. 39:4-8. Here, the "controlling web client" records the information being input into the HTML form (i.e., a web browsing interaction) is presented (i.e., shared) to "each participating web client." Ex. 1005, 39:4-8.

-00341: Sur-reply at 14, Ex.1003 at 68

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.



Petitioner's Reply Argument No. 1:

- Petitioner asserts "POR does not mention the Board's preliminary finding that the Petition's proffered evidence meets this limitation" (Pet. Reply, 9).

Patent Owner's 1st Response to Argument No. 1:

- The Board's preliminary finding simply summarized Petitioner's position from the petition. PO challenged Petitioner's position in its POR (POR, 44-47).

Limitation [1.e]:

Lebrun in view of Wang fails to disclose:

[1.e] sending a request for webpage content to a website server independent of the synchronization server.

Lebrun only discloses the controlling web client sending a session creation message that identifies an initial page to the group-surfing server, which then retrieves the webpage and sends it to the participating web clients (including the controlling web client). (Ex. 1005, 32:9-31).

Since all website requests that are made by the controlling web client are sent to the group-surfing server and not the website server, Lebrun fails to disclose the controlling web client sending a request for webpage content to the website server independent of the synchronization server.

Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.



Petitioner's Reply Argument No. 1:

- Petitioner asserts "POR does not mention the Board's preliminary finding that the Petition's proffered evidence meets this limitation" (Pet. Reply, 9).

Patent Owner's 1st Response to Argument No. 1:

- The Board's preliminary finding simply summarized Petitioner's position from the petition. PO challenged Petitioner's position in its POR (POR, 44-47).

Moreover, as explained above for limitation [1.d], Lebrun teaches that the request for webpage content by the controlling web client is prevented from reaching the website server because it is "intercepted" or "caught" by the program fragment and redirected to the group-surfing server, which presents the webpage to the web clients. (Lebrun 37:5-6, 45:13-19; Ex. 2004, ¶74). Therefore, not only does Lebrun fail to disclose the host device "sending a request for webpage content to a website server," but it also fails to disclose that the host device does so "independent of the synchronization server [(group-surfing server)]."

Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.



Petitioner's Reply Argument No. 1:

- Petitioner asserts “POR does not mention the Board’s preliminary finding that the Petition’s proffered evidence meets this limitation” (Pet. Reply, 9).

Patent Owner’s 1st Response to Argument No. 1:

- The Board’s preliminary finding simply summarized Petitioner’s position from the petition. PO challenged Petitioner’s position in its POR (POR, 44-47).

Petitioner also asserts that the following from Lebrun discloses this limitation:

In alternative embodiments, *where no cookies or other data related to identity are involved*, each web client 110 can receive the next page 153 directly from the website 130.

(Pet. 27 citing Ex. 1005, 35: 17-19).

Petitioner is incorrect. This alternative embodiment is only applicable in cases

“where no cookies or other data related to identity are involved.” *Id.* Therefore, this embodiment does not disclose any ’448 Patent claim limitations because claim [1.b] of the ’448 Patent specifically requires a “session identifier [that] is associated with the host device and the established synchronized browsing session.”

Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.



Petitioner's Reply Argument No. 1:

- Petitioner asserts "POR does not mention the Board's preliminary finding that the Petition's proffered evidence meets this limitation" (Pet. Reply, 9).

Patent Owner's 1st Response to Argument No. 1:

- The Board's preliminary finding simply summarized Petitioner's position from the petition. PO challenged Petitioner's position in its POR (POR, 44-47).

Moreover, although this alternative embodiment discloses that the web clients "receive the next page directly from the website," it does not state that the host device is responsible for sending the request. Indeed, while the web client may receive the page from the website, it is still the group-surfing server, rather than the controlling web client, that is responsible for "directing" or "causing" the website to send the next page directly to the web client. (Ex. 1005, 35:6-8; 32:29-31). Therefore, Lebrun only discloses, at best, that the group-surfing server, and not the controlling web client, is "sending a request for webpage content to a website server."

Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.



Petitioner's Reply Argument No. 1:

- Petitioner asserts "POR does not mention the Board's preliminary finding that the Petition's proffered evidence meets this limitation" (Pet. Reply, 9).

Patent Owner's 1st Response to Argument No. 1:

- The Board's preliminary finding simply summarized Petitioner's position from the petition. PO challenged Petitioner's position in its POR (POR, 44-47).

Petitioner further asserts that Wang discloses this limitation. Pet. at 27. In particular, Petitioner relies on Wang's "page navigation means." *Id.* Wang describes the page navigation means as a component of the client device that "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." (Ex. 1006, ¶41; Ex. 2004, ¶85). However, the client device does not "send[] a request for webpage content to a website server independent of the synchronization server." (Ex. 2004, ¶85). Instead, the client device sends a request for webpage content to the server apparatus, not the website server, and "[e]ach of the client devices 12a and 12b acquires a web page stored by the server apparatus 14 in a database 18." (Ex. 1006, ¶39).

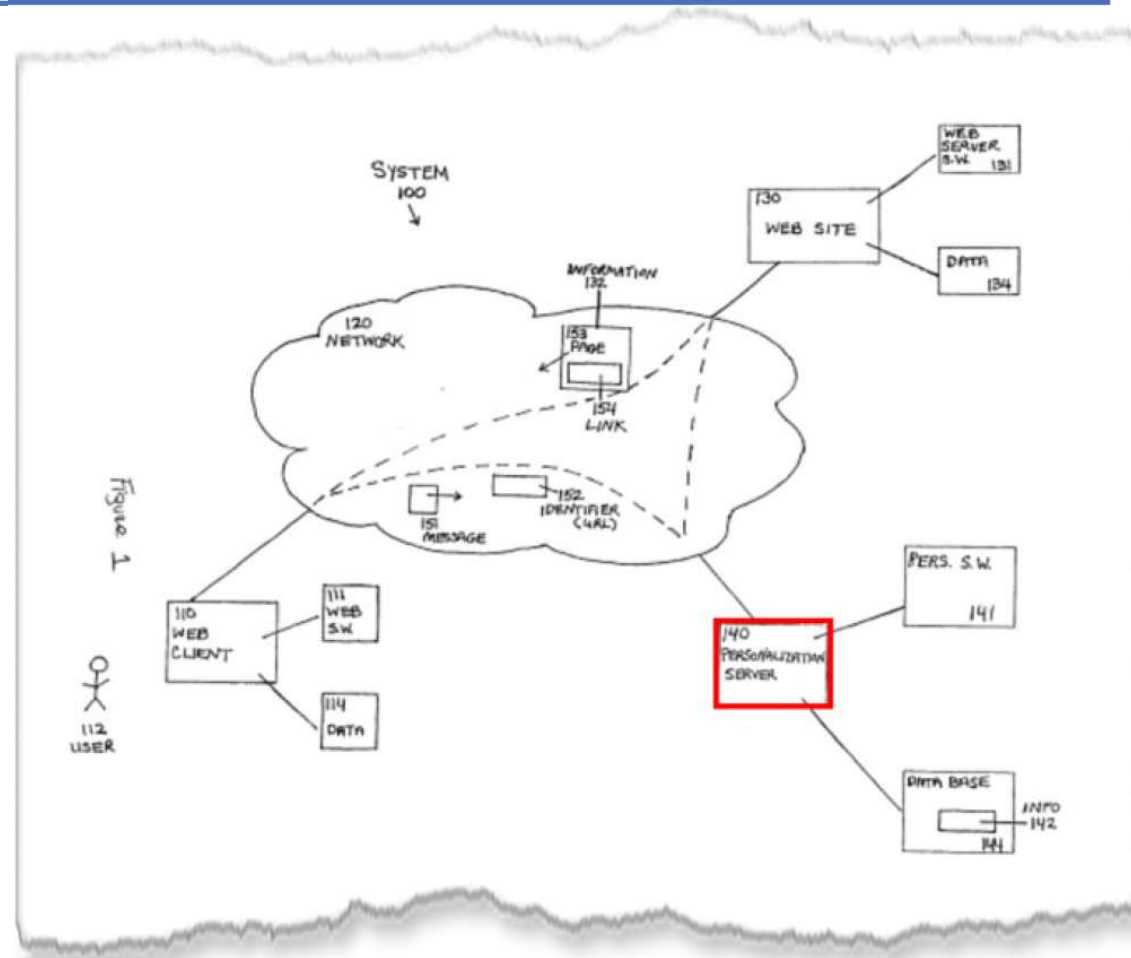
Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.

Petitioner's Reply Argument No. 2:

- Petitioner relies upon Fig. 1 of Lebrun to show that this limitation is disclosed: “As shown in FIG. 1, annotated below, “identifier 152” is a URL, and the web site 130 sends the initial page 153 directly to the web client 110, as indicated by the arrow at “Page 153.” Ex. 1005, FIG. 1.

Patent Owner's 1st Response to Argument No. 1:

- “Figure 1 shows a block diagram of a system for access to personalized web sites” (Ex. 1005, 12:1-2) and is directed to a system mediated by a “personalization server,” as illustrated in the annotated Figure 1, as opposed to the group-surfing server that Petitioner incorrectly contends is analogous to the synchronization server. Ex. 1005, 12:1-9.
- The system illustrated in Figure 1, which Petitioner relies upon, does not even include the group-surfing server as a component. *Id.*



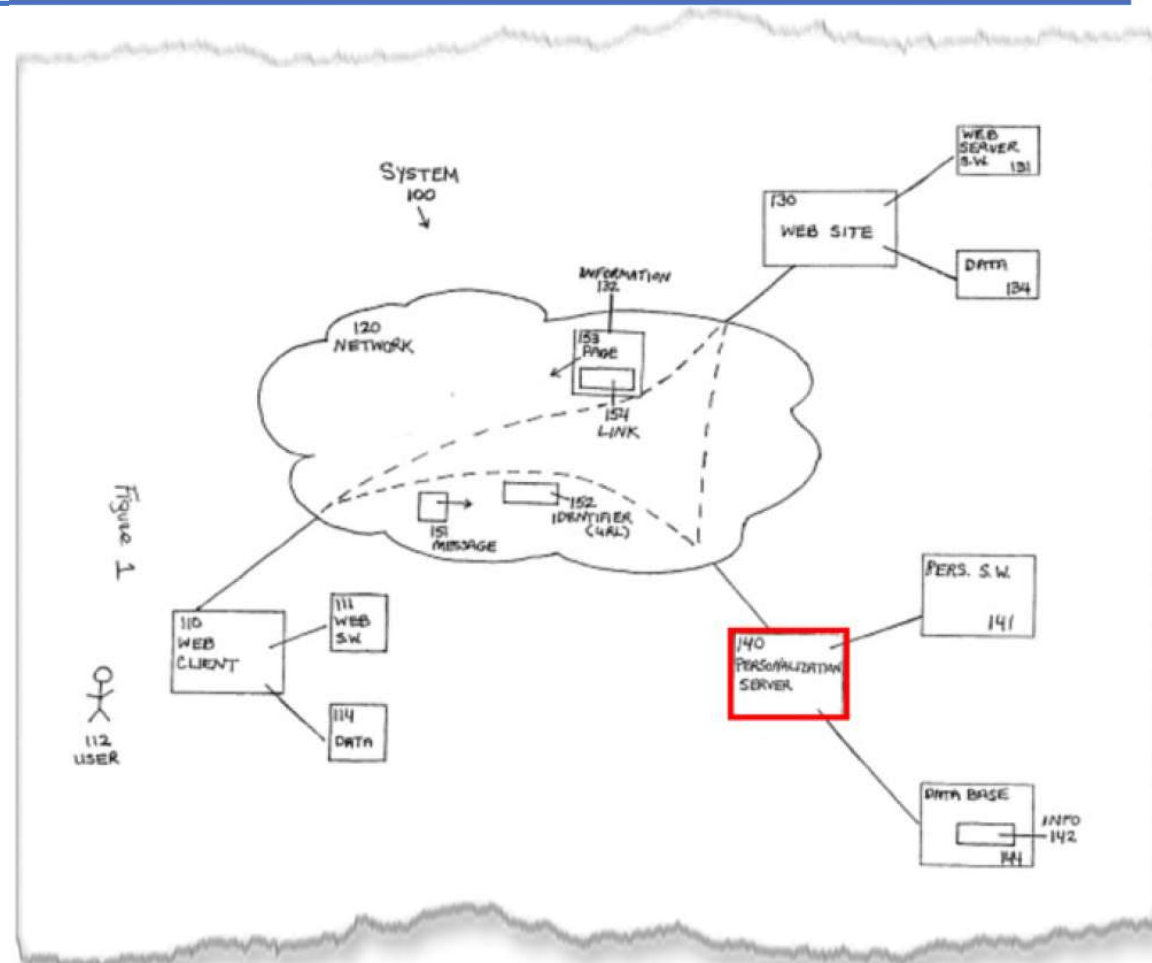
Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.

Petitioner's Reply Argument No. 2:

- Petitioner relies upon Fig. 1 of Lebrun to show that this limitation is disclosed: "As shown in FIG. 1, annotated below, "identifier 152" is a URL, and the web site 130 sends the initial page 153 directly to the web client 110, as indicated by the arrow at "Page 153." Ex. 1005, FIG. 1.

Patent Owner's 2nd Response to Argument No. 2:

- Petitioner attempts to combine two entirely different systems. In doing so, Petitioner describes Figure 1 by relying on disclosures that Lebrun makes with regard to Figure 3, but never provides any reason why a POSITA would be motivated to combine these two different systems. Moreover, Petitioner does not even acknowledge its reliance on two different systems. Accordingly, Petitioner's argument fails to address the arguments set forth in the POR.
- Petitioner also fails to address any of the arguments in the POR with regard to Wang's failure to disclose this limitation.



Petitioner fails to show that Lebrun and Wang discloses limitation [1.e]: sending a request for webpage content to a website server independent of the synchronization server.

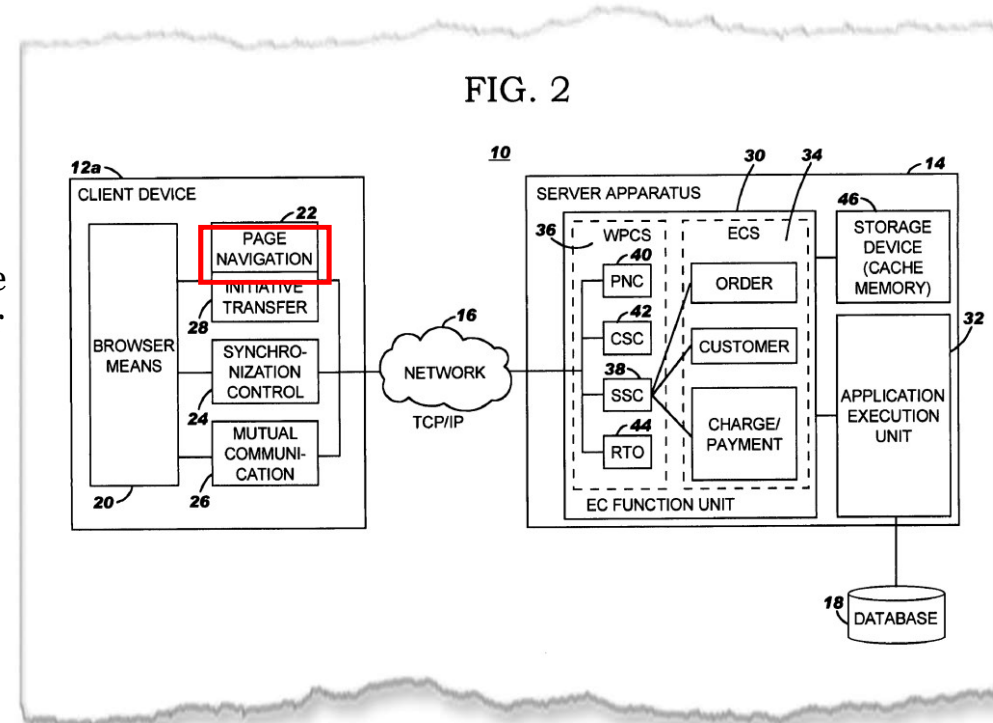


Petitioner's Reply Argument No. 3:

- Petitioner further asserts that Wang discloses this limitation. Pet. at 27. In particular, Petitioner relies on Wang's "page navigation means." Id.

Patent Owner's 1st Response to Argument No. 3:

- Wang describes the page navigation means as a component of the client device that "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." (Ex. 1006, ¶41; Ex. 2004, ¶85).
- The client device does not "send[] a request for webpage content to a website server independent of the synchronization server." (Ex. 2004, ¶85).
- Petitioner also fails to address any of the arguments in the POR with regard to Wang's failure to disclose this limitation.



It the original Petition, Petitioner stated that “[a] POSITA would have understood that a ‘group-surfing server’ receiving a ‘next-page’ message from the ‘controlling web client,’ meets this limitation.”

In its POR, PO responded:

- A “next-page message” is a command from the controlling web client directing the group-surfing server to “contact[] the web site 130 having that next page 153..., and direct[] that target web site 130 to deliver that next page 153 to the group-surfing server 140 itself.” (Ex. 1005, 45:21-29).
- While the claimed “information related to the shared web browsing interaction” must be “transmitted to the invitee device,” per limitations [1.f.i-iii] and [1.g], Lebrun’s “next-page message” simply communicates a directive from the controlling web client to the group-surfing server and is never transmitted to a web client, processed by a web client browser, or enables the web client to generate a request (see, e.g., Ex. 1005, 45:21-26). (Ex. 2004, ¶¶70-73).

Petitioner does not address the arguments in the POR that Lebrun’s “nextpage message” does not constitute “information related to the shared web browsing interaction.”

Petitioner fails to show that Lebrun and Wang discloses limitation [1.f]

Patent Owner's Response to Petitioner's Reply:

- Petitioner also does not address arguments in the POR with regard to Wang. Pet. Reply, 12-13; POR, 47-48.
- In the POR, PO argued that Petitioner relies upon two disclosures, citing ¶¶15 and 21 in Wang to disclose this limitation. (Pet. 29, citing Ex. 1006, ¶¶15, 21).
- Neither Petitioner, nor its expert, explain how these disclosures satisfy the claim limitation. Pet. 29; Ex.1003, ¶170. They also fail to explain why “[a] POSITA would have been motivated to combine Wang’s notification to ‘individual session destinations’ with Lebrun’s ‘web client.’” *Id.*

Petitioner also relies upon two disclosures, citing ¶¶15 and 21 in Wang to disclose this limitation. (Pet. 29, citing Ex. 1006, ¶¶15, 21). Neither Petitioner, nor its expert, explain how these disclosures satisfy the claim limitation. Pet. 29; Ex.1003, ¶170. They also fail to explain why “[a] POSITA would have been motivated to combine Wang’s notification to ‘individual session destinations’ with Lebrun’s ‘web client.’” *Id.*

Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.i]

Petitioner's Reply Argument No. 1:

- Petitioner argues that the “claim recites only that the IRTTSWBI ‘enables the invitee device to generate a request to retrieve substantially the same webpage content.’” Pet. Reply, 14.

Patent Owner's 2nd Response to Argument No. 1:

- Although Petitioner argues that the “claim recites only that the IRTTSWBI ‘enables the invitee device to generate a request to *retrieve* substantially the same webpage content’” (second emphasis added), Petitioner somehow concludes, despite the plain language of the claim, that “neither ‘retrieving’ nor ‘receiving’ are required.” Pet. Reply, 14.
- This flies in the face of what the Board clearly noted as a distinction between the terms “receive” in Lebrun and “retrieve” in the claims. '448 Institution at 25 n.10.

¹⁰ We note that, although Petitioner states “Lebrun discloses that ‘each web client’ can *retrieve* the next web page ‘directly from the web site,’” Lebrun’s description states that in some embodiments “each web client 110 can *receive* the next page 153 directly from the web site 130.” Pet. 30 (citing Ex. 1005, 35:17–19) (emphasis added); Ex. 1005, 35:18–19 (emphasis added).

25

Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.i]

Petitioner's Reply Argument No. 2:

- In an attempt to show Lebrun discloses the “retrieve” limitation, Petitioner cites to Lebrun, 35:17-19 and Lebrun 46:1-2.

Patent Owner's 1st Response to Argument No. 2:

- Lebrun, 35:17-19 is inapt since that particular embodiment requires no identifying information (POR, 50).
- Lebrun 46:1-2 is also inapt since a “request” for multimedia elements does not sufficiently explain whether the request is one to “retrieve” or “receive.”
- Petitioner's reliance on its expert's declaration is also inapt because Petitioner's expert simply assumes, without providing any basis, that the “receive” and “retrieve” limitations of claims are met. Pet. Reply, 14 citing Ex. 1003, ¶¶165, 173, 180.

In alternative embodiments, where no “cookies” or other data related to identity are involved, each web client 110 can receive the next page 153 directly from the web site 130. In some such alternative embodiments, the group-surfing server 140 may retrieve that next page 153 itself from the target web site 130, and re-send that next page 153 to each web client 110 participating in the session. In other such alternative embodiments, the group-

elements (such as embedded sound, images, or program fragments). Each participating web client 110 requests those multimedia elements directly from the web site 130.

Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.i]: wherein the information related to the shared web browsing interaction is to be processed by a browser of the invitee device and enables the invitee device to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device

Petitioner’s Reply Argument No. 3:

- Petitioner also incorrectly asserts that Wang discloses this limitation by means of its “client synchronization control unit (CSC) of the server apparatus,” which “gives the web page or the snapshot data to the client devices among which the web page is to be shared.” (Petition at 30-31 citing Ex. 1006, ¶¶23, 43).

Patent Owner’s 1st Response to Argument No. 3:

- Here, the server apparatus is passing “web page or the snapshot data to the client devices.” (Ex. 1006, ¶43).
- Web pages or snapshot data do not constitute “information related to the shared web browsing interaction.” (Ex. 2004, ¶¶36-39).
- Moreover, Wang teaches that the web page or the snapshot data is “given” or “displayed” to the client devices from the server apparatus, rather than the client devices “generat[ing] a request to retrieve substantially the same webpage content as the request for the webpage content from the host device” as required by the claim language.

Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.ii]

Petitioner’s Reply Argument No. 1:

- Similar to Petitioner’s argument for limitation [1.c], Petitioner argues that the “transmitting” of this limitation subpart is disclosed by Lebrun’s group-surfing server informing participants in the group-surfing session.

Patent Owner’s 1st Response to Argument No. 1:

- Petitioner relies upon the same disclosure that was relied upon for limitation [1.c] to disclose the “transmitting” subpart of this limitation.
- Petitioner is incorrect for the same reasons discussed with regard to limitation [1.c]:
 - For example, Lebrun’s “session-creation message” is never sent to the web clients. It is only sent to the group-surfing server.
 - For example, Lebrun does not describe the “session creation message” as an “invitation to an invitee device to join the synchronized browsing session.”

10 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-

15 151.) 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. The web client 110 can alternatively specify that the session is open to anyone. The

25 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

Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.ii]

Petitioner's Reply Argument No. 1:

- Similar to Petitioner's argument for limitation [1.c], Petitioner argues that the "transmitting" of this limitation subpart is disclosed by Lebrun's group-surfing server informing participants in the group-surfing session.

Patent Owner's 2nd Response to Argument No. 1:

- Petitioner cannot rely on the same disclosure to satisfy multiple claim limitations.
- Moreover, Petitioner argues there is no requirement for "synchronization." Pet. Reply, 16-17. Petitioner is incorrect for the same reasons discussed above.

As discussed regarding limitation [1.c], PO *acknowledges* that Lebrun's group-surfing server (SS) informs the participants (invitees) that they are invited to join the session. *See supra* Section III.B. This action is the recited "transmitting" of this limitation subpart.

Petitioner cannot rely on the same disclosure to satisfy multiple claim limitations.



“Where a claim lists elements separately, “the clear implication of the claim language” is that those elements are “distinct component[s]” of the patented invention.”



-00341, PO Sur-Reply at 18-19

Dickinson & Co. v. Tyco Healthcare Grp., LP, 616 F.3d 1249, 1254 (Fed. Cir. 2010)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner cannot rely on the same disclosure to satisfy multiple claim limitations.



The prior art disclosure of an accelerometer with an output signal could not be applied as teaching both the claimed limitations of “deceleration signal” and an “inclination signal.”



-00341, PO Sur-Reply at 18-19

Hopkins Manufacturing Corp. v. Cequent Performance Products, Inc. (IPR 2015- 00613, Paper 9 at 11-12, August 7, 2015)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.iii]

Petitioner's Reply Argument:

- Petitioner relies on two previously incorrect assumptions and arguments as purporting to demonstrate that Lebrun discloses limitation [1.f.iii]. First, that retrieving and receiving are the same. Second, a reliance on Lebrun inapplicable Figure 1.

Patent Owner's Response to Petitioner's Reply Argument:

- First, as explained above, it is Petitioner's burden to describe why "retrieving" and "receiving" are the same despite these different terms being used separately in the claim language, which Petitioner fails to do.

¹⁰ We note that, although Petitioner states "Lebrun discloses that 'each web client' can *retrieve* the next web page 'directly from the web site,'" Lebrun's description states that in some embodiments "each web client 110 can *receive* the next page 153 directly from the web site 130." Pet. 30 (citing Ex. 1005, 35:17–19) (emphasis added); Ex. 1005, 35:18–19 (emphasis added).

25

-00341 Institution at 25 n.10.

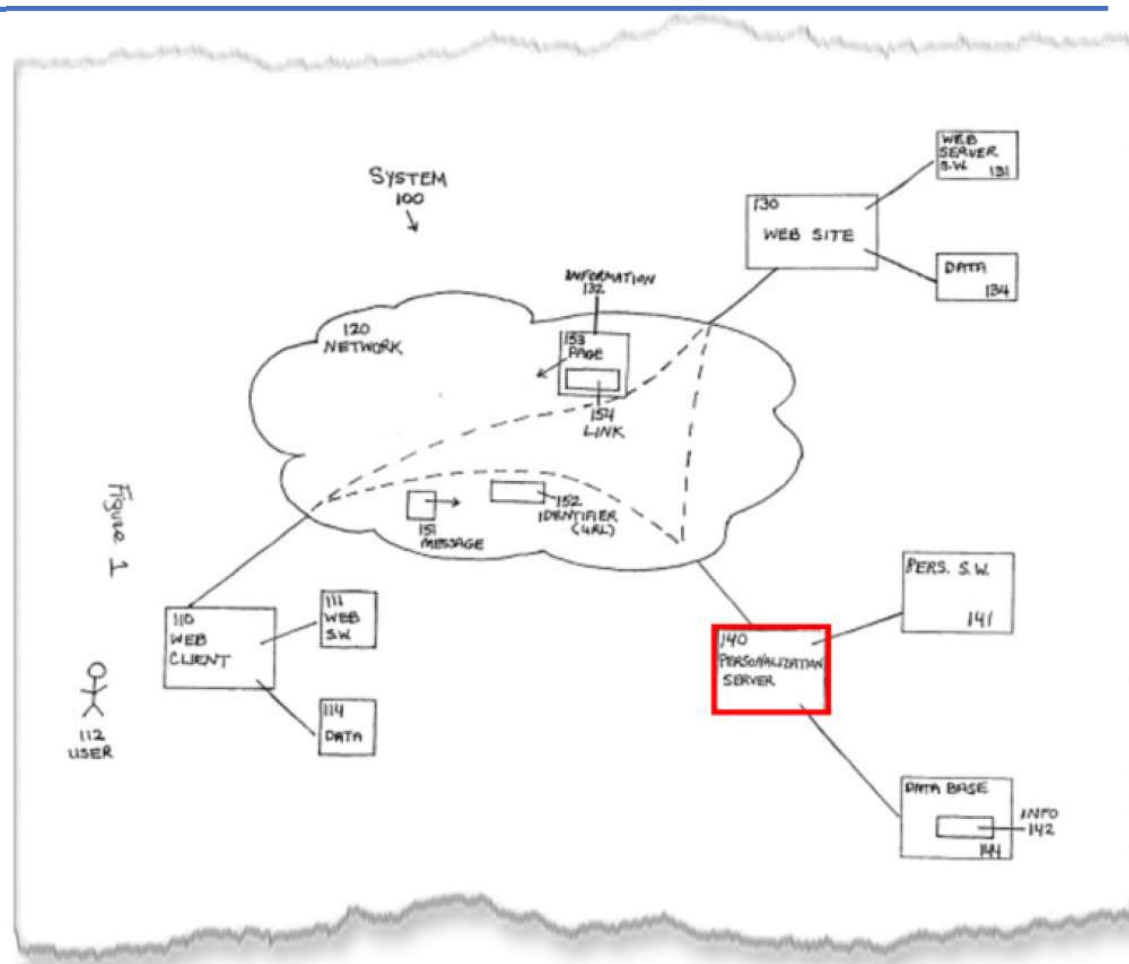
Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.iii]

Petitioner's Reply Argument:

- Petitioner relies on two previously incorrect assumptions and arguments as purporting to demonstrate that Lebrun discloses limitation [1.f.iii]. First, that retrieving and receiving are the same. Second, a reliance on Lebrun inapplicable Figure 1.

Patent Owner's Response to Petitioner's Reply Argument:

- Second, Petitioner relies on the same inapplicable system illustrated by Figure 1, as discussed above, supra, to argue that the "content sent from the web site to the web clients is the result of requests from the web clients." Pet. Reply, 17-18.
- The system illustrated in Figure 1, which Petitioner relies upon, does not even include the group-surfing server as a component. *Id.*
- Finally, Petitioner fails to meet its burden of why a POSITA would be motivated to combine Lebrun and Wang to meet this limitation.



Petitioner fails to show that Lebrun and Wang discloses limitation [1.f.iii]

Petitioner's Reply Argument:

- Petitioner incorrectly asserts that Wang discloses this limitation through the CSC component of the server apparatus.

Patent Owner's Response to Petitioner's Reply Argument:

- That portion reads: "The CSC 42 gives the web page or the snapshot data to the client devices among which the web page is to be shared, so that the same web page is displayed synchronously on the plurality of different client devices." (Ex. 1006, ¶43).
- Here, the server apparatus operates through its CSC component to display a web page to the client devices rather than the claimed step whereby the invitee device itself "retrieves data from the website server."
- Moreover, Petitioner and its expert provide no discernable reasoning underlying their assertion that "[a] POSITA would have been motivated to combine Wang's 'server apparatus' with integration and synchronization functionality with Lebrun's 'group-surfing server.'" (Pet. 34).

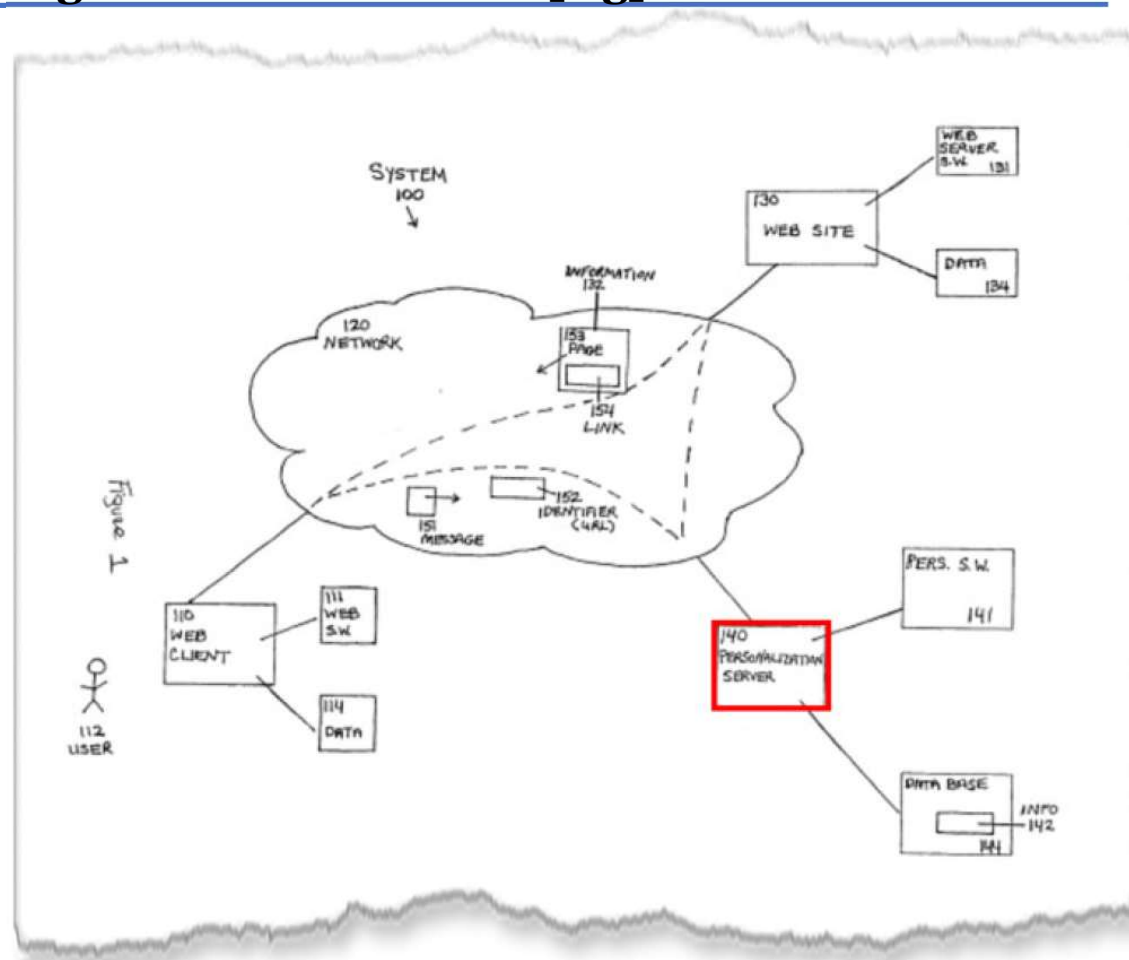
Petitioner fails to show that Lebrun and Wang discloses limitation [1.g]

Petitioner's Reply Argument No. 1:

- Similar to Petitioner's argument with regard to limitation [1.e], Petitioner relies on the same inapplicable system illustrated by Figure 1 to argue that that this limitation is met. Pet. Reply, 18-19.

Patent Owner's 2nd Response to Argument No. 1:

- The system illustrated in Figure 1, which Petitioner relies upon, does not even include the group-surfing server as a component. *Id.*
- Petitioner is incorrect that the limitation is met when "Lebrun discloses that '[i]n a preferred embodiment, the web site 130 includes a processor ... 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.'" Pet. Reply, 18.
- This disclosure does not refute PO's assertion that "Lebrun fails to disclose the host device 'sending the request for webpage content to the website server.'" POR, 56.



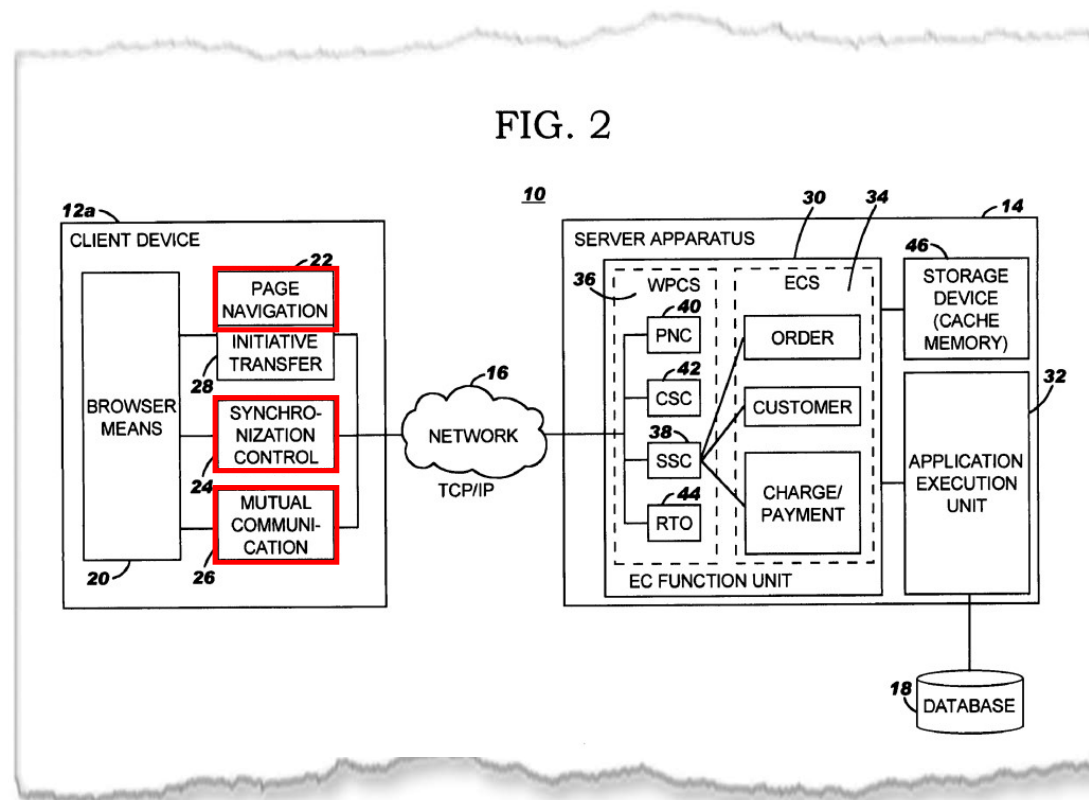
Petitioner fails to show that Lebrun and Wang discloses limitation [1.g]

Petitioner's Reply Argument No. 2:

- Petitioner incorrectly relies on the function of the “page navigation means 22, synchronization control means 24, and mutual communication means 26” of Wang's server apparatus to disclose this limitation.

Patent Owner's 1st Response to Argument No. 2:

- The client device in Wang is still receiving the requested webpage content from the server apparatus as opposed to the website server, as required by the claim limitation. (Pet. 35 citing Ex. 1006, ¶43-44).
- Moreover, Petitioner and its purported expert provide no discernable reasoning underlying their assertion that “[a] POSITA would have been motivated to combine Wang's ‘server apparatus’ with synchronization functionality with Lebrun's ‘group-surfing server.’” Pet. 34.



The Challenged '591, '145, and '448 Patents



'591 Patent (-00342)

'145 Patent (-00339)

'448 Patent (-00341)

US008527591B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 8,527,591 B2**
(45) Date of Patent: ***Sep. 3, 2013**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(75) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **Actual Works, Inc.**, Los Angeles, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 296 days. This patent is subject to a terminal disclaimer.

(21) Appl. No.: **12/783,743**

(22) Filed: **May 20, 2010**

(65) **Prior Publication Data**
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Primary Examiner — Jungwon Chang
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.; David V. Jafari

US009185145B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,185,145 B2**
(45) Date of Patent: ***Nov. 10, 2015**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(71) Applicant: **Actual Worlds, Inc.**, Los Angeles, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 208 days. This patent is subject to a terminal disclaimer.

(21) Appl. No.: **13/951,789**

(22) Filed: **Jul. 26, 2013**

(65) **Prior Publication Data**
US 2013/0311664 A1 Nov. 21, 2013

Related U.S. Application Data
(63) Continuation of application No. 12/783,743, filed on May 20, 2010, now Pat. No. 8,527,591.

(58) **Field of Classification Search**
CPC — H04L 65/1069; H04L 51/32; H04L 51/046; H04L 65/403; G06F 17/30873
USPC — 709/205, 203; 715/733, 753
See application file for complete search history.

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"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
Primary Examiner — Jungwon Chang
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a guest device, utilizing the transfer of URL and form data information. The present invention further 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

US009483448B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,483,448 B2**
(45) Date of Patent: ***Nov. 1, 2016**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A HOST DEVICE**

(71) Applicant: **Samesurf, Inc.**, Beverly Hills, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days. This patent is subject to a terminal disclaimer.

(21) Appl. No.: **14/830,710**

(22) Filed: **Aug. 19, 2015**

(65) **Prior Publication Data**
US 2015/0358386 A1 Dec. 10, 2015

Related U.S. Application Data
(63) Continuation of application No. 12/783,735, filed on May 20, 2010.

(58) **Field of Classification Search**
None
See application file for complete search history.

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(Continued)

OTHER PUBLICATIONS
"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.*
(Continued)
Primary Examiner — Scott B Christensen
(74) Attorney, Agent, or Firm — Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a host device, utilizing the transfer of URL and form data information. The present invention further describes a method for establishing a synchronized browsing

-00342; Ex. 1001 at Cover
-00342 Pet. at 1

-00339; Ex. 1001 at Cover
-00339 Pet. at 1

-00341; Ex. 1001 at Cover
-00341 Pet. at 1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

'591 Patent Claim Element [1.a] and [1.b]



[1.a] detecting an activation of a hyperlink associated with the *synchronized browsing session* by a guest device;

[1.b] sending a request by the guest device to join the *synchronized browsing session* to the *synchronization server* in response to the activation of the hyperlink;



Petitioner failed to meet their burden with respect to at least '591 Patent Claim Elements [1.a] and [1.b] -00342; Ex. 1001, Claim 1

- Lebrun only talks about a guest device “add[ing] itself to the session” and Petitioner cannot rely on Wang’s “invitation acknowledgment, myURL address” because that same element cannot also be the used for “a URL of the website” by step [1.d]

-00342 PO Resp. at 45-46

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.

-00342; Ex. 1005 Lebrun at 31:1-33:10
“Creating a Group-Surfing Session”

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]; Ex. 1003, Ex. 1003, ¶¶139-41. A POSITA would have recognized that the “identifier” in the 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

-00342 Pet. at 45-46

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

1. Petitioner's Reply Argument No. 1:

- “Neither the claims nor the specification require any synchronous sharing, despite PO's arguments to the contrary.”

Patent Owner's 1st Response to Argument No. 1:

'591 Claim 1 (in-part)—

[1.Preamble] A method for a guest device **performing a synchronized browsing session administered by a synchronization server**

...

[1.c] receiving from the *synchronization server* a notification that guest device has joined the **synchronized browsing session**

...

[1.d] 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; and

-00342; Ex. 1001
-00342 PO Sur-Reply at 1, 3-8

1. Petitioner's Reply Argument No. 1:

- “Neither the claims nor the specification require any synchronous sharing, despite PO’s arguments to the contrary.”

Patent Owner's 2nd Response to Argument No. 1:

The '591 Specification and Prosecution History Each Support This Understanding—

- “Internet browsing involving ***real-time, simultaneous passing of the various data types*** (i.e., ***URLs, and cookies***) ***related to user input action by a host device on a webpage.***” Ex. 1002 (Office Action Response dated May 6, 2013), 57.
- “*Cookie information* has been included in order to help clarify that this particular website interaction information is being sent between devices. Websites are modified based on cookie information of the requesting devices, and in order to have a successful synchronization session, cookie information is passed between a host device and one or more guest devices. *Without such passing of the cookie information related to the host device the one or more guest devices may not see the same website as the host device.*” Ex. 1002, 56-57 (emphasis in original and emphasis added).
- In the same Response, the inventors amended the independent claims to add the phrase: “**where the data relates to a website being accessed in real-time.**” Ex. 1002, 50-52. The examiner found that this limitation distinguished the amended claims over the prior art and thus issued a notice of allowance. Ex. 1002, 21.

-00342 Ex. 1002 at 21 and 56-57
-00342 PO Sur-Reply at 4-5

1. Petitioner's Reply Argument No. 1:

- “Neither the claims nor the specification require any synchronous sharing, despite PO’s arguments to the contrary.”

Patent Owner’s 3rd Response to Argument No. 1:

As discussed on prior slides, Petitioner’s own prior statements and the Judge Huie’s (Southern District of California) disagree with this argument.



“The asserted claims are not merely directed to sending and receiving information for simultaneous interaction. Rather, *the asserted claims are specifically directed to performing a synchronized browsing session between two electronic devices (a host device and a guest/invitee device) via a synchronization server.*” (emphasis added)

-Hon. Robert S. Huie, United States District Judge

-00342 Ex. 1002 at 21 and 56-57

-00342 PO Sur-Reply at 2, 4-5, Ex. 2005, 10:4-21

1. Petitioner's Reply Argument No. 1:

- “Neither the claims nor the specification require any synchronous sharing, despite PO’s arguments to the contrary.”

Patent Owner’s 4th Response to Argument No. 1:

- Petitioner’s reliance on PO’s expert testimony or that of Petitioner’s own expert do not cure Petitioner’s argument regarding “synchronized browsing”

not require “synchronously sharing the same web browsing experiences.” PO’s expert (Mr. Friedman) was merely asked whether elements [1.d] and [1.e] recite the term “synchronized browsing session,” to which he answered “[b]y itself, no, it does not.” Ex. 1033, 193:19-23. Petitioner carefully avoided asking about similar terms that do appear in elements [1.d] and [1.e], including “real-time” and “synchronization server.” Regardless, Petitioner does not address Mr. Friedman’s opinion that a POSITA would understand “the plain and ordinary meaning of ‘synchronized browsing session’ [to] necessarily exclude[] any ‘browsing session’ that is not ‘synchronized.’” Ex. 2004, ¶68. Similarly, Petitioner’s citations to its own expert’s declaration is of no support, as this merely constitutes Petitioner’s expert’s declaration statements regarding whether the certain terms appear in claim elements. *E.g.*, Ex. 1034, ¶10. Notably, as discussed, *supra* FN2, Petitioner’s expert did not consider Petitioner’s admission in its prior Motion to Dismiss that the claims of the ‘591 do require synchronous browsing. Similarly, Petitioner’s expert ignores the term “real-time” in element [1.d].

1. Petitioner's Reply Argument No. 2:
 - "[t]he claims also do not recite any architecture that would solve any problems purportedly caused by 'middleman' servers"
- 00342 Pet. Reply at 3

- Patent Owner's Response to Argument No. 2:
- The '591 specification explains the precise benefits of the claimed architecture.
- 00342 PO Sur-Reply at 5-6, 11

The present invention allows two or more persons browsing the internet to share their internet browsing experience and have all users simultaneously browse and fully interact with web sites, games, virtual worlds, or other online applications in real time. To share their internet browsing experience, the present invention utilizes the passing of certain data such as URL information, form data, scripts (including java script), cookies, or other types of data information between browser clients. In a synchronized browsing session, two or more people may read the same article, watch the same video, or shop for the same item automatically, without the hassle of coordinating user input. Furthermore, **utilization of the present invention** does not materially impose more bandwidth or processing power requirements than simply browsing the internet using standard, conventional methods.

-00342 Ex. 1001 at 5:11-25

-00342 PO Sur-Reply at 5-6,11

Additional '591 Specification Support



(57)

ABSTRACT

The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a guest device, utilizing the transfer of URL and form data information. The present invention further

TECHNICAL FIELD OF THE INVENTION

The present invention relates in general to 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.

DETAILED DESCRIPTION OF THE DRAWINGS

...

The present invention allows two or more persons browsing the internet to share their internet browsing experience and have all users simultaneously browse and fully interact with web sites, games, virtual worlds, or other online applications in real time. To share their internet browsing experi-

-00342 Ex. 1001

-00342 Response at 9-11; -00342 PO Sur-Reply at 5-6

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

“The present invention ...”

“When a patent thus describes the features of the ‘present invention’ as a whole, this description limits the scope of the invention.”



-00342, PO Sur-Reply at 6

Verizon Servs. Corp. v. Vonage Holdings Corp., 503 F.3d 1295, 1308 (Fed. Cir. 2007)

1. Petitioner's Reply Argument No. 3:
 - Petitioner contends that Lebrun and Wang or Lebrun and Prajapat discloses limitation [1.d].

- Patent Owner's Response to Argument No. 3:
- The plain language of the claims requires that the URL and cookie information must be the data that relates to a website being accessed in real-time by a host device.

[1.d] 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; and*

This understanding is further supported by the '591 Patent prosecution history wherein the Applicant explained in an Office Action Response that the "Applicant's claimed invention" is "Internet browsing involving ***real-time, simultaneous passing of the various data types (i.e., URLs, and cookies)*** related to user input action by a host device on a webpage." Ex. 1002, 56

-00342 PO Sur-Reply at 15-16

1. Petitioner's Reply Argument No. 3:
 - Petitioner contends that Lebrun and Wang or Lebrun and Prajapat discloses limitation [1.d].

Patent Owner's 2nd Response to Argument No. 3:

- The Lebrun embodiment relied upon by Petitioner for the passing of cookie information does not actually pass that cookie information on to the host or guest devices but instead "relays only a list of pointers (such as URLs)."

-00342 PO Resp. at 42 citing Lebrun 43:13-22 and Ex. 2004, ¶¶66, 69-73.

surfing server 140. In alternative embodiments, the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added.

Lebrun 43:13-22

72. Similarly, Lebrun states "[i]n alternative embodiments, the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added." Lebrun at 43:20-22. In my opinion, a POSITA would not have thought that receiving a list of pointers or URLs to pages that others have already viewed and optionally chosen to share with the group was related to the claimed "synchronized browsing session," but rather a link sharing system. As above, there is nothing "synchronized" about navigating to a URL that someone else had previously navigated to and chosen to share.

-00342 PO Resp. at 42 citing Ex. 2004, Declaration of Stacy Friedman at ¶72

'591 Patent (-00342) Petitioner fails to show that any combination of the cited references discloses at least limitations [1.d] and [1.e]



1. Petitioner's Reply Argument No. 3:

- Petitioner contends that Lebrun discloses limitation [1.d] at Ex. 1005, Lebrun 49:1-3. -00342 Pet. Reply at 11.

Patent Owner's 2nd Response to Argument No. 3:

- But there is no disclosure in Lebrun that shows that both a "URL of the website and cookie information associated with the website and the host device" are sent **from** the "group-surfing server" (*i.e.*, the "synchronization server") **to** the web client (*i.e.*, the "guest device").

-00342 PO Sur-Reply at 14-15

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)

-00342 Ex. 1005, Lebrun 49:1-3

45. In a different process, a client may send an "import-export" message to a group-surfing server, "directing import or export of information relating to websites (such as bookmarks, 'cookies,' or user registrations at participating web sites 130)." Lebrun at 49:1-3. Lebrun also states that "[t]he controlling web client 110 can import or export information related to web sites 130, including bookmarks, 'cookies,' and user registrations at participating web sites 130." Lebrun at 41:9-12. However, Lebrun does not otherwise discuss the use of this imported or exported information, nor does it teach or suggest that the import/export process relates to the group-surfing process where the group-surfing server fetches web pages and re-sends them to web clients. For example, with respect to Figure 4, the import or export process is described at flow points 290-292, while the group-surfing session is performed at flow points 230-236. *See* Lebrun at 45:6-46:15, 48:29-49:15, Figure 4. In other words, Lebrun does not teach that the import/export process is in any way related to the steps of performing the group-surfing session. Moreover, in my opinion, a POSITA would not have thought that a process labelled "import or export" and described as in Lebrun would be related to a synchronized browsing session as claimed.

-00342 PO Resp. at 30 citing Ex. 2004, Declaration of Stacy Friedman at ¶45

1. Petitioner's Reply Argument No. 4:
 - Petitioner contends that Lebrun discloses limitation [1.e] by operating a browser with a URL alone. -00342 Pet. Reply at 13.

Patent Owner's 2nd Response to Argument No. 4:

- But there is no disclosure in Lebrun that shows that both a URL and a cookie, received from the synchronization server, are used to operate a browser.

-00342 PO Sur-Reply at 16-17

67. For the same reason, the Petition fails to show that claim elements 1[e] or 10[b][v] are met. The Petition states “[a] POSITA would have understood the second web client 110 receiving the page *or* the URLs of the page from the group-surfing server 140 to comprise a guest device operating a browser based on the data received from the synchronization server.” Petition at 32, emphasis added. The antecedent for the claimed “data” requires *both* a URL and cookie data, but the Petition acknowledges only one or the other.

-00342 PO Sur-Reply at 17 citing Ex. 2004, Declaration of Stacy Friedman at ¶67

The Challenged '591, '145, and '448 Patents



'591 Patent (-00342)

US008527591B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 8,527,591 B2**
(45) Date of Patent: ***Sep. 3, 2013**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(75) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **Actual Works, Inc.**, Los Angeles, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 296 days. This patent is subject to a terminal disclaimer.

(21) Appl. No.: **12/783,743**

(22) Filed: **May 20, 2010**

(65) **Prior Publication Data**
US 2011/0289157 A1 Nov. 24, 2011

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"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
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Primary Examiner—Jungwon Chang
(74) Attorney, Agent, or Firm—Jafari Law Group, Inc.; David V. Jafari

-00342; Ex. 1001 at Cover
-00342 Pet. at 1

'145 Patent (-00339)

US009185145B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,185,145 B2**
(45) Date of Patent: ***Nov. 10, 2015**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A GUEST DEVICE**

(71) Applicant: **Actual Worlds, Inc.**, Los Angeles, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 208 days. This patent is subject to a terminal disclaimer.

(21) Appl. No.: **13/951,789**

(22) Filed: **Jul. 26, 2013**

(65) **Prior Publication Data**
US 2013/0311664 A1 Nov. 21, 2013

Related U.S. Application Data
(63) Continuation of application No. 12/783,743, filed on May 20, 2010, now Pat. No. 8,527,591.

(58) **Field of Classification Search**
CPC — 1041, 65/1009; 1041, 51/32; 1041, 51/046; 1041, 65/403; G06F 17/30873
USPC — 709/205, 203; 715/733, 753
See application file for complete search history.

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"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
Primary Examiner—Jungwon Chang
(74) Attorney, Agent, or Firm—Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a guest device, utilizing the transfer of URL and form data information. The present invention further 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

-00339; Ex. 1001 at Cover
-00339 Pet. at 1

'448 Patent (-00341)

US009483448B2

(12) **United States Patent**
Pirnazar

(10) Patent No.: **US 9,483,448 B2**
(45) Date of Patent: ***Nov. 1, 2016**

(54) **METHOD AND APPARATUS FOR THE IMPLEMENTATION OF A REAL-TIME, SHARABLE BROWSING EXPERIENCE ON A HOST DEVICE**

(71) Applicant: **Samesurf, Inc.**, Beverly Hills, CA (US)

(72) Inventor: **Kambiz David Pirnazar**, Los Angeles, CA (US)

(73) Assignee: **SAMESURF, INC.**, Beverly Hills, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days. This patent is subject to a terminal disclaimer.

(21) Appl. No.: **14/830,710**

(22) Filed: **Aug. 19, 2015**

(65) **Prior Publication Data**
US 2015/0358386 A1 Dec. 10, 2015

Related U.S. Application Data
(63) Continuation of application No. 12/783,735, filed on May 20, 2010.

(58) **Field of Classification Search**
None
See application file for complete search history.

(56) **References Cited**
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(Continued)
OTHER PUBLICATIONS
"Why WebEx? Discover the benefits of real-time web collaboration in your organization." Cisco WebEx LLC, 2009.
(Continued)
Primary Examiner—Scott B Christensen
(74) Attorney, Agent, or Firm—Jafari Law Group, Inc.

(57) **ABSTRACT**
The present invention describes a method and apparatus for the implementation of a real-time, sharable web browsing experience on a host device, utilizing the transfer of URL and form data information. The present invention further describes a method for establishing a synchronized browsing

-00341; Ex. 1001 at Cover
-00341 Pet. at 1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The Claims of the '145 Patent Are Valid

- Neither combination of Lebrun and Wang (Ground 1) or Prajapat and Wang (Ground 2) results in any claim of the 145 patent:
 - Each of Lebrun’s “group surfing server,” Prajapat’s web media server, and Wang’s “server apparatus”:
 - requests and receives **web content** from a website server and
 - sends the **web content** to the web clients
 - This is **unlike** the claimed “synchronization server,” which sends “web browsing interaction data” to the guest device (limitation [1.c]):
 - “web browsing interaction data” is **not** web content received from a website server
 - the guest device, **not** the “synchronization server,” accesses the website server (limitation [1.d])

-00339, -00341, -00342, POR at 8-10, Pet. Replies, each at 1-2, PO Sur-Replies, each at 7; -00339, PO Sur Reply at 9, POR at 8-10, 14-37; -00341 PO Sur Reply at 9, POR at 18-34; -00342 PO Sur Reply at 8, POR at 9-11, 18-26, Sur-reply at 5-6

- PETITIONER'S ARGUMENT NO. 1: the claim term "web browsing interaction data" means "data related to web browsing interactions"
 - RESPONSE: This is **not** the legally correct construction:
 - Petitioner simply moves words to arrive at construction
 - Petitioner fails to consult the specification to determine what this phrase would have meant to a POSITA when reading the entire specification, as required by *Phillips*
 - Petitioner's expert's opinion that there is no "special or specific meaning given to the term in the specification" is of no help.

-00339: Pet. Reply, at 5; PO Sur-Reply, at 3; Ex. 1034, ¶ 13

- PETITIONER’S ARGUMENT NO. 2: The claims of the '145 patent do not require simultaneous browsing
 - RESPONSE: This, too, is **not** the legally correct construction:
 - The claims are directed to “a method performed by a guest device for joining a **synchronized browsing session** administered by a synchronization server”
 - The operation of the application to access a website server [limitation [1.d] occurs “subsequent to the activation of the session invitation” to “join said synchronized browsing session.”

-00339: PO Sur-Reply, at 1-2, 6-9; Ex. 1001, at 22:62-64; 23:1-23; 23:11-15

- PETITIONER’S ARGUMENT NO. 3: The claims of the '145 patent do not recite any architecture that would solve any problems caused by a “middleman” server
 - RESPONSE: The claims describe how, in a “synchronized browsing session”:
 - The “guest device” receives, from the “synchronization server,” “web browsing interaction data.”
 - An application on the “guest device” operates, “based on said web browsing interaction data,” to access the website server
 - This claimed “architecture” does not require that the “synchronization server” receive or send web content, meaning that the use of the “synchronization server” does not material impose more bandwidth or processing power than requirements than simply browsing the internet using standard, conventional methods.”

-00339: Pet. Reply, at 3; PO Sur-Reply, at 11-12

- PETITONER'S ARGUMENT NO. 5: Lebrun's "group surfing server" sends a "webpage 'without any multimedia elements (such as embedded sound, images, or program fragments), which is later populated directly from the website."
 - RESPONSE: The webpage, without multimedia elements, is not "web browsing interaction data":
 - The webpage without multimedia elements is received by the "group surfing server" **from** a website server and then forwarded by the "group surfing server" to the guest device, *i.e.*, it is the **result** of a website interaction and **not** the interaction itself.

-00339: Pet. Reply, at 10-11, 13; POR, at 51; PO Sur-Reply, at 14-15; 17-19; Ex. 2004, at ¶ 68-71.

Lebrun's "Group Surfing Server" Does Not Meet Limitation [1.c]

- PETITIONER'S ARGUMENT NO. 4: Operation of the "group surfing server" of Lebrun "causes the **web site 130 to deliver** the initial page 153 to the web clients" and thus discloses limitation [1.c]

[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

- RESPONSE: Limitation [1.c] requires that the "web browsing interaction data" be sent to the "guest device" **from the "synchronization server"** (i.e., Lebrun's "group surfing server") **not** from the website

-00339: Pet. Reply, at 10; PO Sur-Reply, at 13

Lebrun's "Group Surfing Server" Does Not Meet Limitation [1.c]

- PETITIONER'S ARGUMENT NO. 6: the "links" intercepted and used by the program fragment residing on the guest device are "web browsing interaction data"
- RESPONSE: According to Lebrun (Ex. 1005, 37:5-10), these links are sent to the "group surfing server for "processing," which involves the group surfing server requesting and receiving the web content from the website and then forwarding to the clients.
 - Limitation [1.c] requires that the "web browsing interaction data" be sent from the "synchronization server" (*i.e.*, the "group surfing server") to the guest devices.
 - Lebrun, however, discloses sending a link **from** the client to the "group surfing server," (*i.e.*, the "synchronization server"), which is the opposite of limitation [1.c]

-00339: Pet. Reply, at 12; PO Sur-Reply, at 15-16

- PETITONER'S ARGUMENT NO. 7: the information to complete an HTML form is "web browsing interaction data."
- RESPONSE: Lebrun discloses that the "program fragment" intercepts form data **only** the when the "submit" button is pressed, and that the "group surfing server" only presents HTML form information "as each field is completed, or when the entire form is completed, or at other times."
- There is no requirement in Lebrun that the HTML form data is shared among web clients in "real time" or "in simultaneous fashion," e.g., as each character is inputted.

-00339: Pet. Reply, at 12-13; PO Sur-Reply, at 16-17.

Prajapat's "Peer-to-Peer Simple Web Page Sharing" Does Not Describe A Synchronized Browsing Session.

- PETITONER'S ARGUMENT NO. 7: the information to complete an HTML form is "web browsing interaction data."
 - RESPONSE: Lebrun discloses that the "program fragment" intercepts form data **only** the when the "submit" button is pressed, and that the "group surfing server" only presents HTML form information "as each field is completed, or when the entire form is completed, or at other times."
 - There is no requirement in Lebrun that the HTML form data is shared among web clients in "real time" or "in simultaneous fashion," e.g., as each character is inputted.

-00339: Pet. Reply, at 12-13; PO Sur-Reply, at 16-17.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE