

Patent No. 9,483,448 – Petition for *Inter Partes* Review

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTUIT INC.,
Petitioner

v.

SAMESURF, INC.,
Patent Owner.

Inter Partes Review No. IPR2023-00341
Patent 9,483,448 B2

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 9,483,448**

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EXHIBIT LIST (37 C.F.R. § 42.63(e))

Exhibit	Description
1001	U.S. Patent No. 9,483,448
1002	File History of U.S. Patent No. 9,483,448
1003	Declaration of Henry Lieberman
1004	Curriculum Vitae of Henry Lieberman
1005	International Patent Pub. No. WO 00/48110 to Lebrun et al. (“Lebrun”)
1006	U.S. Patent Pub. No. 2005/0033656 to Wang et al. (“Wang”)
1007	U.S. Patent Pub. No. 2005/0021626 to Prajapat et al. (“Prajapat”)
1008	“NCSA Mosaic, Project Profile,” University of Illinois, National Center for Supercomputing Applications (available at: https://www.ncsa.illinois.edu/research/project-highlights/ncsa-mosaic/)
1009	“Netscape Communications Corp.,” Henry R. Norr, August 28, 2017, Encyclopedia Britannica, Inc. (available at: https://www.britannica.com/topic/Netscape-Communications-Corp)
1010	“50 Years of Email,” cloudHQ, April 6, 2021 (available at: https://www.prnewswire.com/news-releases/50-years-of-email-301262676.html)
1011	“The History of Email: Major Milestones from 50 Years,” Kasey Steinbrinck, January 28, 2021, Email on Acid Ina Fried, (available at: https://www.emailonacid.com/blog/article/email-marketing/history-of-email/)
1012	“10 Instant Messaging Services that Used to Be Popular,” Elise Moreau, May 3, 2021, Lifewire Tech for Humans (available at: https://www.lifewire.com/once-popular-old-instant-messaging-services-3486135)

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1013	“Timeline of Social Media,” Wikipedia (available at: https://en.wikipedia.org/wiki/Timeline_of_social_media)
1014	“Hyperlink,” Wikipedia (available at: https://en.wikipedia.org/wiki/Hyperlink)
1015	U.S. Patent No. 5,708,780 to Levergood, et al.
1016	“Session Identification URI,” W3C Working Draft WD-session-id-960221, w3 Org (available at: https://www.w3.org/TR/WD-session-id.html)
1017	“Giving Web a Memory Cost Its Users Privacy,” John Schartz, September 4, 2001, New York Times (available at: https://www.nytimes.com/2001/09/04/business/giving-web-a-memory-cost-its-users-privacy.html)
1018	“GroupWeb: A WWW Browser as Real Time Groupware,” Saul Greenberg and Mark Roseman, CHI ’96 ACM Conference on Human Factors in Computing Systems, April 13-18, 1996 (available at: https://dl.acm.org/doi/pdf/10.1145/257089.257317)
1019	“Let’s Browse: A Collaborative Web Browsing Agent,” IUI ’99: ACM Proceedings of the 4th International Conference on Intelligent User Interfaces, December 1998 (available at: https://dl.acm.org/doi/10.1145/291080.291092)
1020	“Letizia: An Agent that Assists Web Browsing,” Henry Lieberman, <i>International Joint Conference on Artificial Intelligence</i> , 1995 (available at: https://web.media.mit.edu/~lieber/Lieberary/Letizia/Letizia-AAAI/Letizia.html)
1021	U.S. Patent No. 6,353,822 to Lieberman
1022	“Google Docs,” Wikipedia (available at: https://en.wikipedia.org/wiki/Google_Docs)

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1023	“Google Announces Google Docs & Spreadsheets,” October 11, 2006, Google Press Release, (available at: http://googlepress.blogspot.com/2006/10/google-announces-google-docs_11.html)
1024	“The History of JavaScript: Everything You Need to Know,” T.J. DeGroat, August 19, 2019, Springboard (available at: https://www.springboard.com/blog/data-science/history-of-javascript/)
1025	“Adobe Flash,” Wikipedia (available at: https://en.wikipedia.org/wiki/Adobe_Flash)
1026	“What Does AJAX Even Stand For?,” Jay Hoffman, March 4, 2019, The History of The Web (available at: https://thehistoryoftheweb.com/what-does-ajax-even-stand-for/)
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I. INTRODUCTION

In accordance with 35 U.S.C. §§ 311-319 and 37 C.F.R. §§ 42.100 *et seq.*, Petitioner Intuit Inc. (“Intuit” or “Petitioner”) requests *inter partes* review of all claims of United States Patent No. 9,483,448 to Pirnazar, titled “Method and Apparatus for the Implementation of a Real-Time, Sharable Browsing Experience on a Host Device” (the “’448 patent”; “Ex. 1001”). The ’448 patent is assigned to Samesurf, Inc. (“Samesurf” or “Patent Owner”) according to the assignment records at the United States Patent and Trademark Office.¹

The ’448 patent adds nothing novel or non-obvious to the technology that existed in the prior art at the time of the earliest possible priority date. While the ’448 specification leaves the reader with the impression that Samesurf believed that no one had previously conceived of the concept, that was not the case. The concept of collaborative web browsing/co-browsing was already well-known and in use by the priority date of the ’448 patent, including in web-based collaborative systems. The prior art provides unmistakable evidence that co-browsing’s history reaches as far back as the founding of the World Wide Web and the first web

¹ Petitioner reserves the right to challenge in any litigation Samesurf’s standing to assert the ’448 patent and any related patents.

browsers, the introduction of the first commercial websites, and the development of collaborative systems and collaborative web-based software.

Each of the concepts of the '448 patent – requesting and receiving website data using a web browser, sending a hyperlink invitation, use of Web session identifiers, collaborative web browsing using multiple devices, and operating a browser or an application based on web data received – were already well-known in collaborative systems and web browsing before the earliest effective priority date of the '448 patent, as shown in the asserted prior art and background references. For example, Lebrun is directed to resolving the same problem as the '448 patent, “providing, for a group of related users, simultaneous access to a sequence of web sites,” and discloses a collaborative web browsing system “in which multiple related users can simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same time.” Ex. 1005, 4:1-4, 6-11. Wang, titled “Collaboration System Suitable for On-Line Shopping,” also discloses a collaborative browsing system, group session initiation sequence, and group session operation in much the same manner and operation as the '448 patent. Ex. 1005, Abstract. Prajapat, titled “Peer-to-Peer Dynamic Web Page Sharing,” discloses a collaborative browsing system that operates in a similar manner to the '448 patent, allowing multiple

client browsers to “co-browse one or more webpages” together using web media servers as the synchronizing service. Ex. 1007, ¶¶[0009-10], [0012-13].

II. MANDATORY NOTICES

A. Real Party-in-Interest (37 C.F.R. § 42.8(b)(1))

Petitioner Intuit Inc. is the real party-in-interest. Further, Petitioner certifies that no other party exercised control or could have exercised control over, the preparation or filing of this Petition. Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney is attached hereto.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

Petitioner is aware of the following related matters: Patent Owner asserts U.S. Patent Nos. 9,185,145; 9,483,448; and 8,527,591 against Petitioner in *Samesurf, Inc. v. Intuit Inc.*, No. 3:22-cv-00412-RSH-DDL LL-KSC (U.S.D.C., Southern District of California, filed March 29, 2022) (the “District Court Litigation”); and, filed concurrently herewith, Petition for *Inter Partes* Review of U.S. Patent No. 8,527,591 and Petition for *Inter Partes* Review of U.S. Patent No. 9,185,145.

C. Designation of Lead and Backup Counsel (37 C.F.R. § 42.8(b)(3)) and Service of Information (37 C.F.R. § 42.8(b)(4))

Petitioner designates Jennifer R. Bush (Reg. No. 50,784) as lead counsel and Michael J. Sacksteder (*pro hac vice*), Geoffrey R. Miller (*pro hac vice*), Daniel

Ledesma (*pro hac vice*), and Christopher L. Larson (Reg. No. 68,243) as back-up counsel.

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D. Fees for *Inter Partes* Review (37 C.F.R. § 42.15(a))

The Director is authorized to charge the fee specified by 37 C.F.R. § 42.15(a) to Deposit Account No. 19-2555.

III. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to 37 C.F.R. § 42.104(a) that the '448 patent is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

IV. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to 37 C.F.R. §§ 42.22(a)(1) and 42.104(1)-(2), Intuit challenges claims 1-16 of the '448 patent.

A. Prior Art Patents and Printed Publications

The '448 patent issued from U.S. Patent Application No. 12/783,743 (“’743 application”), filed on May 20, 2010 (“effective filing date”). Ex. 1001.

Petitioner applies prior art with a priority date earlier than the effective filing date, and reserves the right to challenge the effective filing date in any litigation.

The following references are pertinent to the ground of unpatentability:

1. International Patent Pub. No. WO 00/48110 (“Lebrun”) filed on February 11, 2000 and published on August 17, 2000. Lebrun is prior art under at least 35 U.S.C. §§ 102(a) and 102(b). Ex. 1005.

2. U.S. Patent Appl. Pub. No. 2005/0021626 (“Prajapat”), filed on May 22, 2003 and published on January 27, 2005. Prajapat is prior art under at least 35 U.S.C. §§ 102(b) and 102(e). Ex. 1007.

3. U.S. Patent Appl. Pub. No. 2005/0033656 (“Wang”), filed on April 21, 2004 and published on February 10, 2005. Wang is prior art under at least 35 U.S.C. §§ 102(b) and 102(e). Ex. 1006.

B. Grounds for Challenge

This petition, supported by the Declaration of Henry Lieberman (“Lieberman Decl.”) (Ex. 1003), requests cancellation of claims 1-16 as unpatentable under 35 U.S.C. § 103. *See* 35 U.S.C. § 314(a); Ex. 1003, ¶¶55-67. The grounds include the following:

Ground 1	Claims 1-16	35 U.S.C. § 103 ² over Lebrun in view of Wang
Ground 2	Claims 1-16	35 U.S.C. § 103 over Prajapat in view of Wang

V. OVERVIEW OF THE '448 PATENT

A. Background

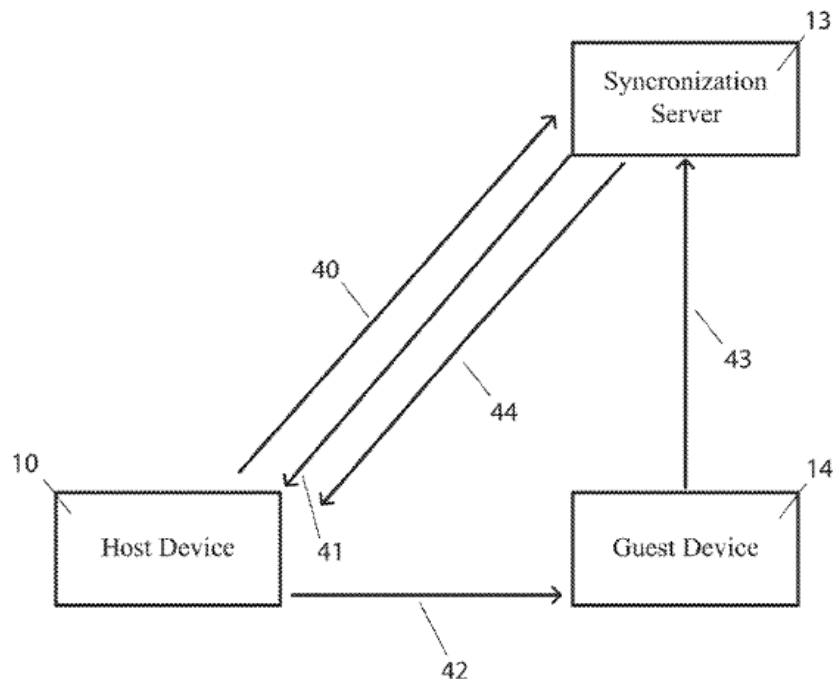
The '448 patent adds nothing novel or non-obvious to the technology that existed in the prior art at the time of the earliest possible priority date, because each of the recited functions were well-known in collaborative systems and web browsing before the earliest effective priority date of the '448 patent. *See* Ex. 1003, ¶¶11-16, 68-111 (State of the Art).

B. '448 Patent Specification

The '448 patent purports to solve the problem of enabling multiple users to share an Internet browsing session simultaneously using different devices at different locations. Ex. 1001, 2:48-54; *see also id.*, 8:8-34, 9:47-49. The '448 patent purportedly enables users to invite and join other users in browsing the Internet together in a synchronized browsing session. *Id.*, 3:27-36; Ex. 1003, ¶¶21-42.

² References in this Petition to 35 U.S.C. are to the pre-AIA version of the statute.

Figure 2(a) illustrates the communication between the components “to initialize a synchronized browsing session,” which include a host device, a synchronization server, and a guest device. Ex. 1001, 10:27-33, Fig. 2.

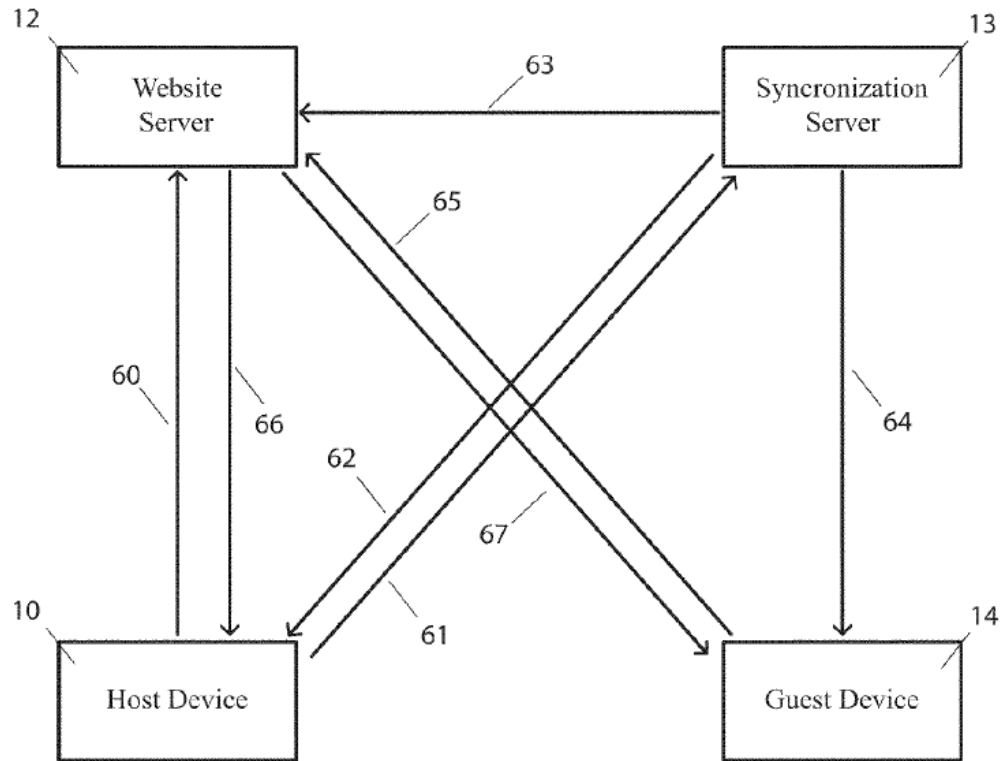


These devices may be personal computers, smartphones, or other personal computing devices with a visual user interface and network connection. *Id.*, 6:18-36. The host device initiates the synchronized browsing session and invites the guest device to join. *Id.*, 10:34-49. The synchronization server facilitates the synchronized browsing session between the devices, and also consists of generic components. *Id.*, 9:43-49; Ex. 1003, ¶¶27-31.

The '448 patent describes the sequence for synchronized browsing: the host device sends an initialization request to the synchronization server, which confirms the request and creates a session identifier, which “may comprise an identification

number, passkey, URL, MAC address, or other unique indicator” to identify and initiate the session. *See* Ex. 1001, 9:65-10:5, 10:34-42, 11:50-56. Upon confirmation, the host device sends a session invitation to prospective guest devices. *Id.*, 10:43-46. The invitation may be sent via email, instant message or social network, and includes the session identifier and a hyperlink. *Id.*, 11:57-12:12, Figs. 4(b)-4(e). The guest device may then join the synchronized browsing session by clicking the hyperlink. *Id.*, 11:62-64. Once joined, the synchronization server notifies the host device that a guest device has joined. *Id.*, 12:31-42; Ex. 1003, ¶¶32-37.

Figure 5(a) illustrates the data communication between the system components once the session has been established. Ex. 1001, 16:5-10, Fig. 5(a).



The host device transmits typical web requests to website servers through the Internet, which reply with the requested website content. *Id.*, 16:13-30, Fig. 5(a). Following each request, the host device sends a second communication message to the synchronization server, “webpage interaction data” that may include “the URL address of website server 12, cookie information, form data, java script, or other user inputted information or attached files.” *Id.*, 16:31-37, Fig. 5(a). The synchronization server forwards the message, which may include the URL address, cookie information, form data, etc. to the guest device. *Id.*, 16:62-17:4, 17:16-21, Fig. 5(a). The guest device uses the message to make an identical website request to the website server, which replies with substantially similar

content to that sent to the host device. *Id.*, 8:22-34, 17:60-18:2, Fig. 5(a); Ex. 1003, ¶¶38-41.

Alternatively, the host device may indicate not to share the webpage interaction data to the guest device, which unshared webpage interaction data is displayed in a separate, unshared window. Ex. 1001, 16:37-42, 20:30-43, 20:57-60; Ex. 1003, ¶¶42-45.

C. Prosecution History

The '448 patent was filed on August 19, 2015 as Application Serial No. 14/830,710 (the '710 application"), as a continuation of U.S. Application No. 12/783,735, filed on May 20, 2010. Ex. 1001, 1:6-11. The effective filing date of the '448 patent is no earlier than May 20, 2010; for the purposes of this Petition, the claims of the '448 patent are presumed entitled to the earliest possible effective filing date and subject to the pre-AIA provisions of the Patent Statute,³ With all statutory references in this Petition to the applicable pre-AIA provisions. The analysis presented herein would be substantially identical under the corresponding

³ Petitioner expressly reserves the right to argue that one or more of the claims are not entitled to the earliest possible effective filing date and that the AIA prior art provisions apply to such claims.

AIA provisions. The prosecution history is detailed further in the accompanying declaration. Ex. 1003, ¶¶46-50.

VI. LEVEL OF ORDINARY SKILL IN THE ART

Petitioner submits that a person having ordinary skill in the art at the time of the invention (“POSITA”) would have had a bachelor’s degree in computer science, computer engineering, or electrical engineering, or the equivalent, and at least two years of work experience in software development and/or web-based software. Additional education could have substituted for professional experience, and significant work experience could have substituted for formal education. Ex. 1003, ¶¶1-10, 17-20.

VII. CLAIM CONSTRUCTION (37 C.F.R. § 42.104(B)(3))

Claim terms subject to *inter partes* review are to be “construed using the same claim construction standard that would be used to construe the claim in a civil action under 35 U.S.C. § 282(b), including construing the claim in accordance with the ordinary and customary meaning of such claim as understood by one of

ordinary skill in the art and the prosecution history pertaining to the patent.”

37 C.F.R. § 42.100(b).⁴

For purposes of this Petition, the challenged claims are interpreted according to their plain and ordinary meaning.⁵ Ex. 1003, ¶¶51-54.

VIII. OVERVIEW OF THE ASSERTED PRIOR ART

A. Lebrun

International Application Publication WO 00/48110, titled “Personalized Access to Web Sites” to Lebrun et al. (“Lebrun”) has an international filing date of February 11, 2000, and a publication date of August 17, 2000. Ex. 1005, Title. Lebrun is therefore prior art to the ’448 patent under pre-AIA §§ 102(a) and

⁴ Petitioner expressly reserves the right to challenge one or more claims (and claim terms) of the ’448 patent for failure to satisfy the requirements of 35 U.S.C. §§ 101 or 112, which cannot be raised in these proceedings. *See* 35 U.S.C. § 311(b).

Nothing in this Petition shall be construed as waiver of such challenge, or agreement that the requirements of 35 U.S.C. §§ 101 or 112 are met with for any claim of the ’448 patent.

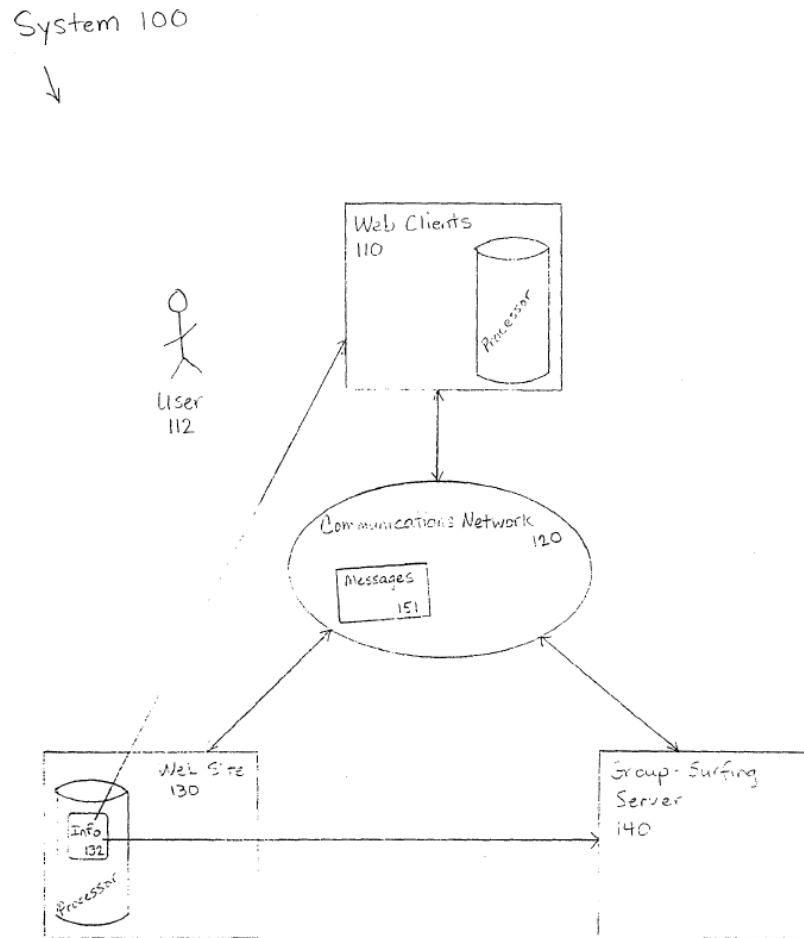
⁵ For the avoidance of any doubt, nothing in this Petition is a waiver of any arguments, positions, or appellate rights of Petitioner, including, but not limited to claim construction.

102(b). Lebrun was not cited by the applicant or examiner during prosecution.

Ex. 1001, References Cited; Ex. 1003, ¶112.

Lebrun is directed to resolving the same problem as the '448 patent, “providing, for a group of related users, simultaneous access to a sequence of web sites,” and discloses a collaborative web browsing system “in which multiple related users can simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same time.” Ex. 1003, ¶¶113-14; Ex. 1005, 4:1-4, 6-11; *see also id.*, 4:14-20.

Figure 3 of Lebrun depicts the collaborative web browsing system, including “a set of web client 110, a communication network 120, at least one web site 130, and a group surfing server 140.” Ex. 1003, ¶¶115-16; Ex. 1005, 29:25-28, Fig. 3.



Lebrun discloses a sequence to create and participate within a group surfing session in similar manner as the '448 patent. Ex. 1003, ¶¶117-19; Ex. 1005, 32:1-27. The server invites the other web clients to the group session and delivers the group to a destination web site. *Id.*, 32:26-31; *see also id.*, 44:5-13, Fig. 4. Other web clients may join the group surfing session by sending “a session-join message” with the session identifier, to which the server responds by adding the client and notifying the group of the new participant. *Id.*, 33:1-10; *see also id.*, 44:16-45:7, Fig. 4.

B. Wang

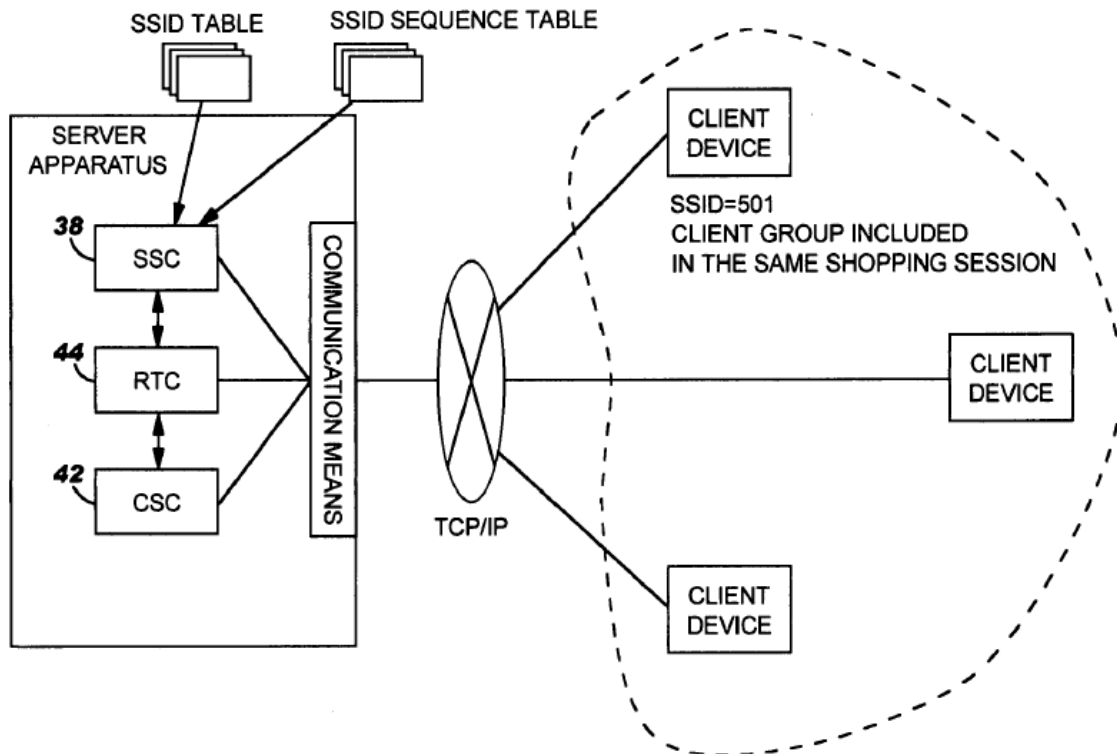
U.S. Patent Application Publication No. 2005/0033656, titled “Collaboration System Suitable for On-Line Shopping” to Wang et al. (“Wang”) has a filing date of April 21, 2004, and a publication date of February 10, 2005. Ex. 1006, Title. Wang is therefore prior art to the ’448 patent under pre-AIA 35 U.S.C. §§ 102(b) and 102(e). Wang was not cited by the applicant or examiner during prosecution of the ’448 patent. Ex. 1001, References Cited; Ex. 1003, ¶120.

Wang discloses a collaborative browsing system, group session initiation sequence, and group session operation in much the same manner and operation as the ’448 patent. Ex. 1003, ¶121. Wang’s system includes the same system components. Ex. 1003, ¶121; Ex. 1006, Abstract.

Wang, like Lebrun, is directed to the problem of synchronizing a group browsing session involving multiple users. Ex. 1006, ¶¶[0009-10]. Wang resolves the problem by allowing a user to send a group session request to the synchronization server, which creates the group browsing session, assigns it a session identifier, and sends an invitation containing “a dedicated URL address” that an invited user may click to join the session. Ex. 1003, ¶122; Ex. 1006, ¶¶[0015], [0046-48]. The synchronization server then synchronizes the presentation of selected web pages to all participating devices. Ex. 1003, ¶125; Ex. 1006, ¶¶[0018-19], [0045-49], [0054-55].

Figure 11 depicts Wang’s collaborative browsing system. Ex. 1003, ¶¶126-27; Ex. 1006, ¶[0063], Fig. 11.

FIG. 11

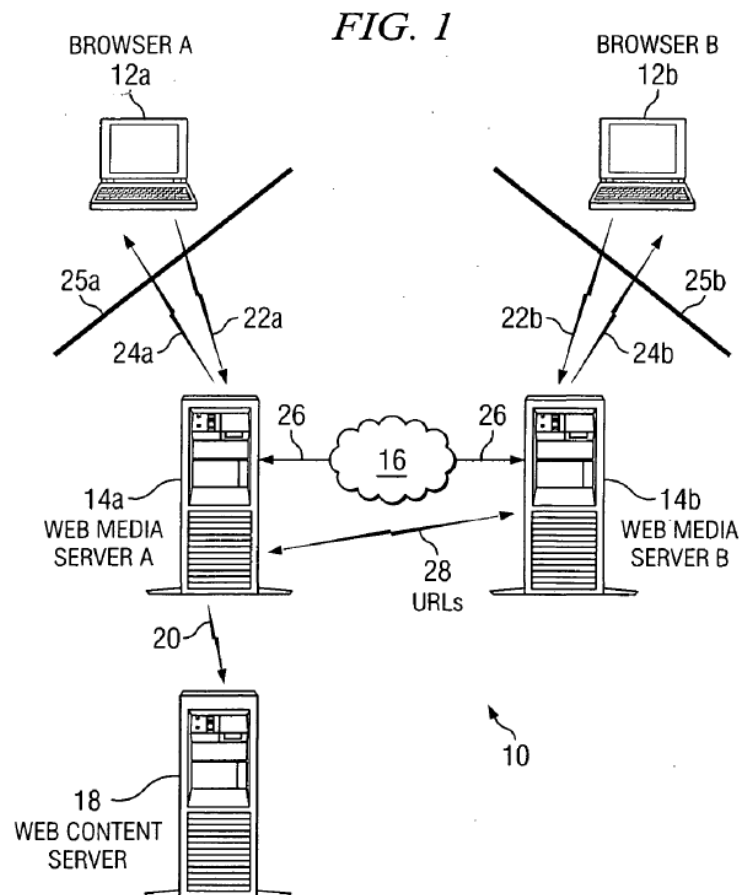


C. Prajapat

U.S. Patent Application Publication No. 2005/0021626, titled “Peer-to-Peer Dynamic Web Page Sharing” to Prajapat et al. (“Prajapat”) has a filing date of May 22, 2003, and a publication date of January 27, 2005. Ex. 1007, Title. Prajapat is therefore prior art to the ’448 patent under pre-AIA 35 U.S.C. §§ 102(b) and 102(e). Prajapat was not cited by the applicant or examiner during prosecution of the ’448 patent. Ex. 1001, References Cited; Ex. 1003, ¶128.

Prajapat also discloses a collaborative browsing system that operates in a similar manner to the '448 patent. Ex. 1003, ¶129. Prajapat's system allows multiple client browsers to “co-browse one or more webpages” together using web media servers as the synchronizing service, and defines “co-brows[ing]” broadly. Ex. 1003, ¶129; Ex. 1007, ¶¶[0009-10], [0012-13].

Figure 1 depicts Prajapat's collaborative browsing system. Ex. 1003, ¶¶130-31; Ex. 1007, ¶[0012], Fig. 1.



A client browser initiates a co-browsing session by identifying one or more client browsers identified by email address and requesting its web media server

establish a co-browsing session with the identified browsers. Ex. 1003, ¶132; Ex. 1007, ¶¶[0016-17], [0034-35]. The web media server responds by locating the web media servers associated with each identified browser and establishing a co-browsing session with both the browsers and associated web media servers. Ex. 1003, ¶132; Ex. 1007, ¶¶[0019-21], [0035]. Once established, any of the participating client browsers may submit web page requests to their respective web media servers, which collectively synchronize the retrieval and display of the requested web content on each client browser. Ex. 1003, ¶¶133-34; Ex. 1007, ¶¶[0022-26], [0036-39].

D. Motivation to Combine Lebrun with Wang

A POSITA would have been motivated to combine Lebrun with Wang because both are directed to solving problems regarding collaborative browsing of web pages by multiple users in a synchronized manner. *See* Ex. 1005, 4:1-4 (stating that “there is no convenient and simple technique for providing, for a group of related users, simultaneous access to a sequence of web sites.”); Ex. 1006, ¶¶[0009-10] (describing synchronization problems using conventional methods and explaining that such “problems may be solved if web pages are shared using the collaborative technology” described therein); *see also* Ex. 1005, 4:6-10; Ex. 1006, ¶[0013]. A POSITA therefore would have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative,

synchronized manner. *See KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 421 (2007) (“When there is a design need or market pressure to solve a problem and there are a finite number of identified, predictable solutions, a person of ordinary skill has good reason to pursue the known options within his or her technical grasp.”); Ex. 1003, ¶135.

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, ¶136. 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 result would be a combination of prior art elements according to known methods yielding predictable results. *See KSR*, 550 U.S. at 417; Ex. 1003, ¶136. Further motivation to combine these references for specific claim limitations are discussed below in conjunction with those limitations. *Id.*, ¶¶135-38, 289-292.

E. Motivation to Combine Prajapat with Wang

A POSITA would also have been motivated to combine Prajapat with Wang. Prajapat, like Wang, is directed to solving problems related to collaborative browsing via multiple web media servers and user devices to “improve efficiency

in a communication system when sharing web pages.” Ex. 1007, ¶[0005], Fig. 2; Ex. 1006, ¶¶[0009-10], [0013]; Ex. 1003, ¶139. Moreover, both Prajapat and Wang disclose synchronizing the retrieval and display of web pages to all client devices participating in a co-browsing session using a synchronization service comprised of a single server (Wang) or multiple web media servers (Prajapat). Ex. 1003, ¶140; Ex. 1006, ¶¶[0018-19], [0045-49], [0054-55]; Ex. 1007, ¶¶[0022-26], [0036-39]. A POSITA would therefore have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative, synchronized manner. *KSR*, 550 U.S. at 421; Ex. 1003, ¶141. Furthermore, a POSITA would have recognized that to the extent Prajapat does not explicitly disclose user web page requests independent of a “web media server,” it would have been obvious to incorporate Wang’s functionality permitting users to request web pages from any location on the web. *See* Ex. 1003, ¶142; Ex. 1006, ¶¶[0021], [0041-44], [0054-56]. The result would be a combination of prior art elements according to known methods yielding predictable results (e.g., a browser plug-in allowing requests of web pages independent of a dedicated web media server). *See KSR*, 550 U.S. at 417; Ex. 1003, ¶143. Further motivation to combine these references for specific claim limitations are discussed below in conjunction with those limitations. *Id.* ¶¶139-43, 289-291, 293.

IX. GROUNDS FOR INVALIDITY

A petition for *inter partes* review must demonstrate “a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” 35 U.S.C. § 314(a). This petition exceeds the threshold.

At this stage of the proceedings, Intuit does not have a burden to identify and rebut secondary considerations. Rather, Samesurf must first present a *prima facie* case for such considerations, which Intuit should then have the chance to rebut. *Sega of Am., Inc. v. Uniloc USA, Inc.*, IPR2014-01453, Paper No. 11, at *20 (P.T.A.B. Mar. 10, 2015). For that reason, the Board typically rejects arguments against institution based on objective indicia, so that the petitioner can have a fair opportunity to address any secondary indicia evidence on reply. *See Petroleum Geo-Services Inc. v. WesternGeco LLC*, IPR2014-01478, Paper No. 18, at *36 (P.T.A.B. Mar. 17, 2015). Regardless, Samesurf has not produced, and Intuit is not aware of, any evidence of secondary considerations.

A. Ground I: Claims 1-16 are Rendered Obvious by Lebrun in View of Wang

1. Independent Claim 1

a. Lebrun in View of Wang Discloses 1[pre]

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

Ex. 1003, ¶¶145-48.

Lebrun discloses **a synchronized browsing session**. Ex. 1003, ¶146.

Lebrun describes a “group-surfing session,” which is “an improved technique for group access to websites.” Ex. 1005, 4:6-7. Lebrun explains that in a group-surfing session, “[m]ultiple related users can simultaneously access a sequence of web sites, such that each of the related users has substantially the same content presented at the same times.” *Id.*, 7:7-9. A POSITA would have understood that the group-surfing session corresponds to a “synchronized browsing session.” Ex. 1003, ¶146.

Lebrun discloses **a host device that establishes a synchronized browsing session between a host device and an invitee device**. Ex. 1003, ¶147. Lebrun discloses a “group-surfing session” initiated when a “first web client” sends a “session-creation message” to a “group-surfing server.” Ex. 1005, 32:9-12. The “session-creation message” can include information to invite “web clients” that are “participating in” or “permitted to participate in” the session. Ex. 1005, 32:14-16. A POSITA would have understood that a “first web client” establishing a “group-surfing session” administered by a “group-surfing server,” and inviting “other web clients,” discloses this limitation. Ex. 1003, ¶147.

Wang also discloses this limitation. Ex. 1006, ¶[0020]. The “client device” comprises “browser means for allowing the client device to display data received through the network,” and “synchronization control means for enabling the

plurality of client devices to share the web page.” *Id.*, ¶[0020]. Wang discloses a “first client device” sending a login request to the “server apparatus, followed by the establishment of “SESSION A.” *Id.*, Fig. 3; *see also id.*, ¶[0047]. A POSITA would have been motivated to combine Wang’s “synchronization control means” with Lebrun’s “first web client” because both references are directed to solving problems in the art regarding collaborative send synchronized browsing of web pages by multiple users. Ex. 1003, ¶148; *see also* Section VII.D., *supra*.

b. Lebrun in View of Wang Discloses 1[a]

Lebrun discloses **sending a request to establish the synchronized browsing session to a synchronization server**. Ex. 1003, ¶¶149-53. As discussed above, Lebrun discloses a “group-surfing session.” *See supra* Section IX.A.1.a; *see also* Ex. 1005, 32:9-12; Ex. 1006, ¶[0020]. A POSITA would have understood that this disclosure satisfies this limitation. Ex. 1003, ¶149.

Wang also discloses this limitation. Ex. 1006, ¶¶[0018-19]. The “synchronization control unit” would receive the request to establish a session. Ex. 1003, ¶150. A POSITA would have been motivated to combine Wang’s “server apparatus” with a “synchronization control unit” with Lebrun’s “group-surfing server,” because it is a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶¶151-53; *see also* Section VII.D., *supra*.

c. Lebrun Discloses 1[b]

Lebrun discloses **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.** Ex. 1003, ¶¶154-56.

Lebrun discloses **receiving a confirmation message from a synchronization server.** Ex. 1003, ¶155. As discussed above, Lebrun discloses a “group-surfing session.” *See supra* Section IX.A.1.a; *see also* Ex. 1005, 32:9-12. After the “group-surfing server” receives the message “it informs the participants in the group-surfing session.” *Id.*, 44:12-14.

Lebrun discloses **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.** Ex. 1003, ¶156. This “session-creation message” sent by the “first web client” includes an “identifier for the group-surfing session.” Ex. 1005, 32:9-12. A POSITA would have understood this disclosure to meet this limitation. Ex. 1003, ¶156.

d. Lebrun in View of Wang Discloses 1[c]

Lebrun discloses **sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier.** Ex. 1003, ¶¶157-60.

Lebrun discloses **sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation that includes the session identifier.** Ex. 1003, ¶¶157-158. As discussed above, Lebrun explains that the “session-creation message” includes an “identifier for the group-session session.” *See supra* Sections IX.A.1.a-c; *see also* Ex. 1005, 32:9-12.

Wang also discloses this limitation. Ex. 1006, ¶[0020]. The “client device” could send an invitation via the “communication means” to join the session. Ex. 1003, ¶160. A POSITA would have been motivated to combine Wang’s “communications means” with Lebrun’s “first web client,” because it is a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶160; *see also* Section VII.D., *supra*.

e. Lebrun Discloses 1[d]

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.** Ex. 1003, ¶¶155-58.

Lebrun discloses **recording a shared web browsing interaction.** Ex. 1003, ¶¶161-64. Lebrun discloses a “program fragment” loaded at each “web client” that allows 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 Lebrun’s

“program fragment” relates to the “synchronized browsing software.” Ex. 1003, ¶¶162-63. 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 information and transmits it to the “group-surfing server.” *Id.*, 45:15-16. The user sends a “next-page message” to the “group-surfing server,” indicating the next page in the progression shared to other web clients. *Id.*, 45:21-29.

Lebrun discloses **determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction.** Ex. 1003, ¶164. Before selecting the next page, web pages can be designated for “look ahead” or “special access.” Ex. 1005, 6:19-32, 37:27-38:17. This allows the user to first determine if a web page is accessible or appropriate, and therefore whether to present it. *Id.*, 6:19-32, 37:27-38:27. For example, designating web pages as “special access” allows the “controlling web client” to “enter information required for special access privately, without presenting that information to other web clients.” A POSITA would have understood that when a “controlling web client” chooses the next page, as opposed to designating a web page for “look ahead” or “special access,” the user is determining to share a web page to others participating in the session. Ex. 1003, ¶164; *see also* Ex. 1005 37:27-38:27.

f. Lebrun in View of Wang Discloses 1[e]

Lebrun discloses **sending a request for webpage content to a website server independent of the synchronization server**. Ex. 1003, ¶¶165-66. As discussed above, Lebrun explains that the “session-creation message” includes an “identifier” for an “initial page.” *See supra* Section IX.A.1.c; *see also* Ex. 1005, 32:9-12, 32:21-24. Thus, before sending a request to initiate a session, the user must independently enter the web page URL into the web client, before adding this information into the “session-creation message.” Ex. 1003, ¶165. Furthermore, Lebrun explains that “each web client” is able to retrieve the next web page “directly from the web site.” Ex. 1005, 35:17-19. A POSITA would have understood that entering a URL into a web client and retrieving the corresponding web page from the web site’s server discloses this limitation. Ex. 1003, ¶165.

Wang also discloses this limitation. Ex. 1006, ¶[0021]. The page navigation means “allows the client device 12a to access the server apparatus 14 directly and to acquire a web page when the client device 12a has ownership of the initiative of web page operation.” *Id.*, ¶[0041]. A client device with ownership of the initiative of the web page operation is synonymous with the “controlling web client” disclosed in Lebrun. Ex. 1003, ¶166. Thus, this client device can request web pages independently (and share them), rather than only viewing shared web pages. Ex. 1003, ¶166. A POSITA would have been motivated to combine Wang’s “page

navigation control” software functionality with Lebrun’s “web client” to gain control of the “group-surfing session” and request web pages independent of the “group-surfing server.” Ex. 1003, ¶166; *see also* Section VII.D., *supra*.

g. Lebrun in View of Wang Discloses 1[f]

Lebrun discloses that **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.** Ex. 1003, ¶¶167-70.

As discussed above for Ground I, element 1[e], Lebrun in view of Wang discloses sending the request for webpage content to the website server. *See supra* Section IX.A.1.f; *see also* Ex. 1003, ¶168; Ex. 1005, 32:9-12, 32:21-24, 35:17-19; Ex. 1006, ¶¶[0021], [0041].

Lebrun discloses **transmitting information related to the shared web browsing interaction to the synchronization server.** Ex. 1003, ¶169. As discussed above, each web client has a “program fragment” that affects the operations of a web client. *See supra* Section IX.A.1.e; Ex. 1005, 36:21-25. Once other users have joined the session, the “controlling web client” selects “a progression of pages,” which is “presented at each of the web clients” participating in the session via the “program fragment.” *See supra* Section IX.A.1.e; Ex. 1005, 35:26-28. The user sends a “next-page message” to the “group-surfing server,” which indicates the next page can be shared. Ex. 1005, 45:21-29. A POSITA

would have understood that a “group-surfing server” receiving a “next-page message” from the “controlling web client,” meets this limitation. Ex. 1003, ¶169.

Wang also discloses this limitation. Ex. 1006, ¶[0021]. Each client device sharing the web page “access the server through its own individual session,” so that the client devices “can access an application execution unit through a dedicated URL address to engage in a group session.” *Id.*, ¶[0015]. A POSITA would have been motivated to combine Wang’s notification to “individual session destinations” with Lebrun’s “web client,” because it is a combination of prior art elements according to known methods yielding predictable results Ex. 1003, ¶170; *see also* Section VII.D., *supra*.

h. Lebrun in View of Wang Discloses 1[g]

Lebrun discloses **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.** Ex. 1003, ¶¶171-74.

Lebrun discloses **information related to the shared web browsing interaction is to be processed by a browser of the invitee device.** Ex. 1003, ¶172. As discussed above, the “controlling web client” selects the “next page” in a “progression of pages,” which is “presented at each of the web clients”

participating in the session. *See supra* Section IX.A.1.e; Ex. 1005, 35:26-28.

Specifically, a “next-page message” is sent to the “group-surfing server,” which then causes the “next page” to be presented to the other web clients in the session. Ex. 1005, 45:21-46:5.

Lebrun discloses **an invitee device enabled to generate a request to retrieve substantially the same webpage content as the request for the webpage content from the host device.** Ex. 1003, ¶173. As discussed above, each web client has a “program fragment” that affects the operations of a web client. *See supra* Section IX.A.1.e; Ex. 1005, 36:21-25. Lebrun discloses that “each web client” can retrieve the next web page “directly from the web site.” Ex. 1005, 35:17-19. When the “controlling web client” chooses the “next page,” the “program fragment” on the other web clients uses this information to request the web page. Ex. 1003, ¶173; *see also* Ex. 1005, 36:21-25, 45:21-46:5.

Wang also discloses this limitation. Ex. 1006, ¶[0023]. The “server apparatus” may include a “client synchronization control unit (CSC) 42 for enabling synchronization between the client devices,” wherein the CSC “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, ¶[0043]. For example, “when one customer changes the web page, this causes the other customers’ browsers to follow suit.”

Ex. 1006, ¶[0014]. A POSITA would have been motivated to combine Wang’s teachings of a “server apparatus” with integration and synchronization functionality to Lebrun’s “group-surfing server” to allow a “controlling web client” to share web pages with other users participating in the session. Ex. 1003, ¶174; *see also* Section VII.D., *supra*.

i. Lebrun in View of Wang Discloses 1[h]

Lebrun discloses **wherein a 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.** Ex. 1003, ¶¶175-78.

Lebrun discloses **wherein the synchronization server transmits the information related to the shared web browsing interaction to the invitee device.** Ex. 1003, ¶176. As discussed above, the “program fragment” is controlled by the “group-surfing server,” and affects the operations of a “web client.” *See supra* Section IX.A.1.e; *see also* Ex. 1005, 36:21-25. When the “controlling web client” chooses the “next page,” this information is captured by the “program fragment” and sent to the “group-surfing server,” which causes the “next page” to be presented to the other web clients. *See supra* Section IX.A.1.e; *see also* Ex. 1005, 45:15-16; 45:21-46:5.

Lebrun discloses transmitting the information **in response to receiving the information related to the shared web browsing interaction from the host device**. Ex. 1003, ¶177. As discussed above, the user sends a “next-page message” to the “group-surfing server,” which indicates the next page shared to other web clients. *See supra* Section IX.A.1.g; Ex. 1005, 45:21-29.

Wang also discloses this limitation. Ex. 1006, ¶[0023]. As discussed above, Wang discloses a “page navigation means,” which allows for a user to take control of sharing web pages. *See supra* Section IX.A.1.f; Ex. 1006, ¶[0041]. Once control is transferred, a “snapshot data of the web page changed by the other client device is transmitted from the server apparatus 14 to the client device which has lost the initiative, thus making it possible to share the web page.” Ex. 1006, ¶[0041]. A POSITA would have been motivated to combine Wang’s teachings of a “server apparatus” with integration and synchronization functionality to Lebrun’s “group-surfing server” to receive information from a user about which web pages are shared to other users in a session. Ex. 1003, ¶178; *see also* Section VII.D., *supra*.

j. Lebrun in View of Wang Discloses 1[i]

Lebrun discloses **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. Ex. 1003, ¶¶179-82.

Lebrun discloses **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.** Ex. 1003, ¶180. As discussed above, the “program fragment” is controlled by the “group-surfing server,” interfaces and affects the operations of a “web client” (*see supra* Section IX.A.1.e; *see also* Ex. 1005, 36:21-25), which includes determining which “web page” to retrieve. *See supra* Sections IX.A.1.g-h; *see also* Ex. 1005, 32:21-24, 36:21-25. Also discussed above, the information received by the other web clients from the “group-sharing server” is related to the “controlling web client” determining the “next page” to present. *See supra* Sections IX.A.1.g-h; *see also* Ex. 1005, 35:26-28; 45:21-29.

Lebrun discloses **data associated with the webpage content requested by the host device and the information related to the shared web browsing interaction.** Ex. 1003, ¶181. As discussed above, once other users have joined, the “controlling web client” selects “a progression of pages,” which is “presented at each of the web clients” via the “program fragment” *See supra* Section IX.A.1.e; Ex. 1005, 35:26-28. A POSITA would have understood that when a “controlling web client” presents a web page, via a “group-surfing server,” that is independently

retrieved from “other web clients” participating in the “session,” and displays that page to “other web clients” in response, meets this limitation. Ex. 1003, ¶181.

Wang also discloses this limitation. Ex. 1006, ¶[0023]. As discussed above, the “server apparatus” may include a “CSC” that “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.” *See supra* Section IX.A.1.h; Ex. 1006, ¶[0043]. A POSITA would have been motivated to combine Wang’s “server apparatus” with integration and synchronization functionality with Lebrun’s “group-surfing server,” because it is a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶182; *see also* Section VII.D., *supra*.

k. Lebrun in View of Wang Discloses 1[j]

Lebrun discloses **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.** Ex. 1003, ¶¶183-84.

As discussed above, the “program fragment” is controlled by the “group-surfing server,” affects the operations of a “web client” (*see supra* Section IX.A.1.e; *see also* Ex. 1005, 36:21-25), which includes determining which “web page” to retrieve. *See supra* Sections IX.A.1.g-h; *see also* Ex. 1005, 32:21-24, 36:21-25. A

POSITA would have understood that when “other web clients” join a “group-surfing” session and are presented “web pages,” this limitation is satisfied.

Ex. 1003, ¶183.

Wang also discloses this limitation. Ex. 1006, ¶[0054]. As discussed above, the “server apparatus” may include a “CSC” that “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.” *See supra* Section IX.A.1.h; Ex. 1006, ¶[0043]. Wang discloses that the “page navigation means 22, synchronization control means 24, and mutual communication means 26” each “individually receive information from the respective control units” of the “server apparatus 14, extract an applicable URL address and a command from the received HTTP response, and allow the address and the command to be displayed on the client devices by use of the browser means 20.” *Id.*, ¶[0044]. A POSITA would have been motivated to combine Wang’s “server apparatus” with synchronization functionality with Lebrun’s “group-surfing server,” because it is a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶184; *see also* Section VII.D., *supra*.

Lebrun in view of Wang discloses claim 1. *Id.*, ¶¶289-292.

2. Independent Claim 11

a. Lebrun in View of Wang Discloses 11[pre]

Lebrun in view of Wang discloses **apparatus for establishing a synchronized browsing session between a host device and an invitee device.**

See supra Section IX.A.1.a; *see also* Ex. 1003, ¶185; Ex. 1005, 4:6-7, 7:7-9, 32:9-16.

Lebrun discloses **an apparatus.** Ex. 1003, ¶186. Lebrun discloses that a “web client” can include “any combination of devices or software taking on the role of a client in a client-server environment in the internet, the World Wide Web, or an equivalent or extension thereof.” Ex. 1005, 30:1-3.

Wang also discloses **an apparatus.** Ex. 1003, ¶187. Wang discloses that “a system enabling computer devices to collaborate with one another through a network.” Ex. 1006, ¶[0018]. A POSITA would have understood that the “computer devices” disclosed in Wang comprise an apparatus.

b. Lebrun Discloses 11[a]

Lebrun discloses **a network interface adapted to communicate with a synchronization server.** *See supra* Section IX.A.1.a; *see also* Ex. 1003, ¶188; Ex. 1005, 4:6-7, 7:7-9, 32:9-16; Ex. 1006, ¶¶[0020], [0047], Fig. 3. Lebrun discloses a “communication network” for “transporting messages” between the “web clients,” “the web site,” “and the group-surfing server.” Ex. 1005, 31:4-5.

c. Lebrun Discloses 11[b]

Lebrun discloses **a processor**. Ex. 1003, ¶¶189-90. Lebrun discloses that the “web clients” will “each include a processor operating under control of the web client software,” such as a “web browser,” which is under control by “an operator or user.” Ex. 1005, 30:14-15.

d. Lebrun in View of Wang Discloses 11[c]

Lebrun in view of Wang discloses 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**. *See supra* Sections IX.A.1.a-b; *see also* Ex. 1003, ¶191; Ex. 1005, 4:6-7, 7:7-9, 32:9-16; Ex. 1006, ¶¶[0018-20], [0047], Fig. 3.

e. Lebrun Discloses 11[d]

Lebrun discloses a processor adapted to **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**. *See supra* Sections IX.A.1.a, c; *see also* Ex. 1003, ¶192; Ex. 1005, 4:6-7, 7:7-9, 32:9-16; 44:12-14.

f. Lebrun in View of Wang Discloses 11[e]

Lebrun in view of Wang discloses a processor adapted to **send an invitation from the host device to the invitee device to join the synchronized browsing**

session, wherein the invitation includes the session identifier. *See supra* Sections IX.A.1.a, d; *see also* Ex. 1003, ¶193; Ex. 1005, 4:6-7, 7:7-9, 32:9-16, 44:12-14; Ex. 1006, ¶[0020], [0047], Fig. 3.

g. Lebrun Discloses 11[f]

Lebrun discloses a processor adapted to **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.** *See supra* Section IX.A.1.e; *see also* Ex. 1003, ¶194; Ex. 1005, 6:19-32, 34:15-17, 35:26-28, 36:21-25, 37:27-38:27, 45:15-16; 45:21-29.

h. Lebrun in View of Wang Discloses 11[g]

Lebrun in view of Wang discloses a processor adapted to **send a request for webpage content to a website server independent of the synchronization server.** *See supra* Section IX.A.1.f; *see also* Ex. 1003, ¶195; Ex. 1005, 4:6-7, 7:7-9, 32:9-16, 44:12-14; Ex. 1006, ¶¶[0021], [0041], [0047], Fig. 3.

i. Lebrun in View of Wang Discloses 11[h]

Lebrun in view of Wang discloses a processor adapted to **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.** *See supra* Sections IX.A.1.e-g; *see also* Ex. 1003, ¶196; Ex. 1005, 6:19-32, 34:15-17, 35:17-19, 35:26-28, 36:21-25, 37:27-38:27, 45:15-16; 45:21-29; Ex. 1006, ¶¶[0015], [0021], [0041].

j. Lebrun in View of Wang Discloses 11[i]

Lebrun in view of Wang discloses **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.** *See supra* Sections IX.A.1.e, h; *see also* Ex. 1003, ¶197; Ex. 1005, 6:19-32, 34:15-17, 35:17-19, 35:26-28, 36:21-25, 37:27-38:27, 45:15-16; 45:21-46:5; Ex. 1006, ¶¶[0015], [0021], [0041].

k. Lebrun in View of Wang Discloses 11[j]

Lebrun in view of Wang discloses **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.** *See supra* Sections IX.A.1.e-g, i; *see also* Ex. 1003, ¶198; Ex. 1005, 6:19-32, 34:15-17, 35:26-28, 36:21-25, 37:27-38:27, 45:15-16; 45:21-29; Ex. 1006, ¶¶[0015], [0021], [0023], [0041].

l. Lebrun in View of Wang Discloses 11[k]

Lebrun in view of Wang discloses **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. *See supra*

Sections IX.A.1.e, g-h, j; *see also* Ex. 1003, ¶199; Ex. 1005, 6:19-32, 34:15-17, 35:26-28, 36:21-25, 37:27-38:27, 45:15-16; 45:21-46:5; Ex. 1006, ¶¶[0014], [0023], [0041], [0043-44], [0054].

m. Lebrun in View of Wang Discloses 11[l]

Lebrun in view of Wang discloses a processor adapted to **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.** *See supra* Sections IX.A.1.e, g-h, k; *see also* Ex. 1003, ¶200; Ex. 1005, 6:19-32, 32:9-12, 32:21-24, 35:17-19, 35:26-28, 36:21-25, 37:27-38:17, 45:1-2, 45:21-23; Ex. 1006, ¶¶[0043-44], [0054].

Lebrun in view of Wang discloses claim 11. Ex. 1003, ¶¶289-292.

3. Dependent Claims

a. Lebrun Discloses Claim 2

Lebrun discloses **receiving a notification message indicative of the invitee device joining the synchronized browsing session.** Ex. 1003, ¶201. Lebrun explains that the “group-surfing server” can inform other participants to a “group-surfing session” of “newly added” web clients. Ex. 1005, 33:6-10.

b. Lebrun in View of Wang Discloses Claim 3

Lebrun discloses **activating a hyperlink on a website to initialize the sending of the request to establish the synchronized browsing session.**

Ex. 1003, ¶202. Lebrun discloses a “group-surfing session” initiated when a “first web client” sends a “session-creation message” to a “group-surfing server.”

Ex. 1005, 32:9-12. The “session-creation message” is “responsive to an action by the user of the web client software,” which includes “selecting a web page or a link to a web page.” Ex. 1005, 32:5-7.

Wang also discloses this limitation. Ex. 1006, ¶[0047]. A POSITA would have found it obvious to modify Lebrun’s “message” to the “group-surfing server” to include the “myURL address” of Wang, because it is a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶203; *see also* Section VII.D., *supra*.

c. Lebrun in View of Wang Discloses Claim 4

Lebrun in view of Wang discloses **wherein the invitation comprises a hyperlink for joining the synchronized browsing session.** *See supra* Section IX.A.2.b; *see also* Ex. 1003, ¶¶204-05; Ex. 1005, 32:5-7, 32:9-12; Ex. 1006, ¶[0047].

Wang also discloses this limitation. Ex. 1006, ¶[0049]. A POSITA would have understood that a URL relates to a hyperlink. A POSITA would also have found it obvious to modify Lebrun’s “message” to the “group-surfing server” to

include the “myURL address” of Wang, for the same reasons as for claim 3.

Ex. 1003, ¶205; *see also* Section VII.D., *supra*.

d. Lebrun Discloses Claim 5

Lebrun discloses **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.** Ex. 1003, ¶206. Lebrun explains that the “web clients” in a “session can also communicate between and among groups of users” via “telephone communication, voice over IP, Internet chat, electronic mail, ‘instant messaging,’ or other intra-user communication.” Ex. 1005, 41:16-22.

e. Lebrun Discloses Claim 6

Lebrun discloses **wherein information related to the shared web browsing interactions comprises a URL, form data, cookie information, or script data.** Ex. 1003, ¶207. Lebrun explains that the “controlling web client” is able to exchange “cookies.” Ex. 1005, 41:9-10. The “group-surfing server” can also receive a “cookie” that relates to “identify or session from the “group-surfing server” and the “session.” *Id.*, 46:7-11.

f. Lebrun Discloses Claims 7 and 13

Lebrun discloses **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. Ex. 1003, ¶¶208, 216. Lebrun explains that the “message” includes “the identifier for the group-surfing session.” Ex. 1005, 33:2-5.

g. Lebrun Discloses Claims 8 and 14

Lebrun discloses **wherein web browsing window is capable of accepting both shared and non-shared web browsing interactions.** Ex. 1003, ¶¶209, 217. Lebrun explains that 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, 38:21-27.

h. Lebrun Discloses Claims 9 and 15

Lebrun discloses **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.** Ex. 1003, ¶¶210, 218. A “controlling web client” can decide whether to share a web page using “look ahead” or “special access” functionality. *See supra* Sections IX.A.1.e; *see also* Ex. 1005, 6:19-32, 37:27-38:27, 38:21-27. A POSITA would understand that when a “controlling web client” determines if a “look ahead” or “special access” page is displayed to “other web clients,” a user must necessarily first view that page in a non-shared browser in the “web client” prior to deciding to share that web page. Ex. 1003, ¶¶210, 218; *see also* Ex. 1005 37:27-38:17.

i. Lebrun Discloses Claims 10 and 16

Lebrun discloses **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.** Ex. 1003, ¶¶211, 219. Lebrun discloses “Web page Automatic Form Completion” where a “controlling web client” enters information into an HTML form, which is then sent to the “group-surfing server.” Ex. 1005, 38:31-39:2. After the information is sent, the web site “replies with a new page” forwarded by the “group-surfing server.” Ex. 1005, 38:32-39:2. A POSITA would understand that the web page retrieved after form information is sent represents a reply message, wherein the reply message includes form data. Ex. 1003, ¶¶211, 219.

j. Lebrun in View of Wang Discloses Claim 12

Lebrun discloses **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.** Ex. 1003, ¶¶212-15.

Lebrun discloses **a user interface adapted to initiate the processor to send the request in response to a user input.** Ex. 1003, ¶213. Lebrun explains that

“the group surfing process can be used in [] conjunction with functions that could otherwise occur on display before an in-person audience.” Ex. 1005, 7:14-16.

Lebrun in view of Wang discloses **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.** *See supra* Section IX.A.1.b; *see also* Ex. 1003, ¶214; Ex. 1005, 32:5-7, 32:9-12; Ex. 1006, ¶¶[0018-19], [0047]. Lebrun discloses a “group-surfing session” initiated when a “first web client” sends a “session-creation message” to a “group-surfing server.” Ex. 1005, 32:9-12. The “session-creation message” is “responsive to an action by the user of the web client software,” which includes “selecting a web page or a link to a web page.” *Id.*, 32:5-7.

Wang also discloses this limitation. Ex. 1006, ¶[47]. A POSITA would have found it obvious to modify Lebrun’s “message” to the “group-surfing server” to include the “myURL address” of Wang, to meet this limitation. Ex. 1003, ¶215.

Lebrun in view of Wang discloses the dependent claims. *Id.*, ¶¶289-292.

B. Ground II: Claims 1-16 are Rendered Obvious by Prajapat in View of Wang

1. Independent Claim 1

a. Prajapat in View of Wang Discloses 1[pre]

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

Ex. 1003, ¶¶220-223.

Prajapat discloses **a synchronized browsing session** via a system that provides “peer-to-peer dynamic web page sharing.” Ex. 1007, ¶[0012], *see also* Ex. 1003, ¶221. This system involves a “web media server” that allows a user (e.g., “browser 12a”) to “co-browse one or more web pages with browser 12b.” *Id.*, ¶[0012]. Prajapat explains that the term “co-browse” may include browsers that “display the same web pages at substantially the same time,” or “alter web pages” and “view those alterations.” *Id.*, ¶[0012].

Prajapat discloses **a host device that establishes a synchronized browsing session between a host device and an invitee device.** Ex. 1003, ¶222. Prajapat describes a “user associated with browser 12a may also desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b.” Ex. 1007, ¶[0016]. A POSITA would have understood that a “user with browser 12a” co-browsing with “browser 12b,” meets this limitation. Ex. 1003, ¶222.

Wang also discloses this limitation. Ex. 1006, ¶[0020]. The “client device” comprises “browser means for allowing the client device to display data received through the network,” and “synchronization control means for enabling the plurality of client devices to share the web page.” *Id.*, ¶[0020]. Wang discloses that the “first client device” sends a login request to the “server apparatus, followed by the establishment of “SESSION A.” *Id.*, Fig. 3; *see also id.*, ¶[0047]. A POSITA would have been motivated to combine Wang’s teachings of including “synchronization control means” to Prajapat’s “browser,” because it would be a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶223; *see also* Section VII.E., *supra*.

b. Prajapat in View of Wang Discloses 1[a]

Prajapat discloses **sending a request to establish the synchronized browsing session to a synchronization server**. Ex. 1003, ¶¶224-25. Prajapat discloses “peer-to-peer dynamic web page sharing.” *See supra* Section IX.B.1.a; *see also* Ex. 1007, ¶[0012]. Prajapat explains that to begin a “co-browsing session,” the “user of browser 12a” can “click on a desktop icon” to “establish a communication session with web media server 14a.” *Id.*, ¶[0016].

Wang also discloses this limitation. Ex. 1006, ¶¶[0018-19]. The “synchronization control unit” would receive the request to establish a session. Ex. 1003, ¶225. A POSITA would have been motivated to combine Wang’s

teachings of a “server apparatus” with a “synchronization control unit” to Prajapat’s “web media server,” because it would be a combination of prior art elements according to known methods yielding predictable results Ex. 1003, ¶225; *see also* Section VII.E., *supra*.

c. Prajapat Discloses 1[b]

Prajapat discloses **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.** Ex. 1003, ¶¶226-228.

Prajapat discloses **receiving a confirmation message from a synchronization server.** Ex. 1003, ¶227. Prajapat discloses “peer-to-peer dynamic web page sharing.” *See supra* Section IX.B.1.a; *see also* Ex. 1007, ¶[0012]. Prajapat explains that a browser “may submit requests for one or more web pages by communicating a request to web media server,” where the request may “may specify the web page to retrieve and display,” and “include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server.” *Id.*, ¶[0022].

Prajapat discloses **including a session identifier generated by the synchronization server, a session identifier associated with the host device and**

the established synchronized browsing session. Ex. 1003, ¶228. A POSITA would have understood that a upon creating a “co-browsing session,” the “web media server” would necessarily send a confirmation message containing “session information” to a “browser” as part of inherent communication between the browser and the server, and thus would meet this limitation. *Id.*, ¶228; *see also* Section VII.E., *supra*.

d. Prajapat in View of Wang Discloses 1[c]

Prajapat discloses **sending an invitation to an invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier.** Ex. 1003, ¶¶229-32.

Prajapat discloses **sending an invitation to an invitee device to join the synchronized browsing session.** Ex. 1003, ¶230. Prajapat explains that a “request to co-browse” may “specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse.” Ex. 1007, ¶[0017].

Prajapat discloses **an invitation that includes the session identifier.** Ex. 1003, ¶231. A POSITA would have found it obvious that when “browser 12a” communicates “the URL or other suitable information” to the “web media server” in a “request to co-browse” with “other browsers,” the information communicated

in the invitation necessarily includes an identifier for other browsers to join the co-browsing session. *Id.*, ¶231.

Wang also discloses this limitation. Ex. 1006, ¶[0020]. The “client device” could send an invitation via the “communication means” to join the session. Ex. 1003, ¶232. A POSITA would have been motivated to combine Wang’s “communications means” with Prajapat’s “browser,” because it would be a combination of prior art elements according to known methods yielding predictable results. *Id.*, ¶232; *see also* Section VII.E., *supra*.

e. Prajapat Discloses 1[d]

Prajapat 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.**

Ex. 1003, ¶¶233-35.

Prajapat discloses **recording a shared web browsing interaction.** Ex. 1003, ¶234. Prajapat explains that a user may “desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b.” Ex. 1007, ¶[0016]. Alternatively, “browser 12a” can register with a “web media server,” but “without actually sharing web pages with another browser.” *Id.*, ¶[0034]. Thus, when a user determines to not share a web page, “browser 12a” will have this setting recorded. Ex. 1003, ¶234. When a user

desires to “co-browse or share” the web content, they are sharing their web browsing interactions. Specifically, the user’s browser records these interactions, which are transmitted to a “web media server 14a” to present to other users. Ex. 1007, ¶[0016].

Prajapat discloses **determining that a web browsing interaction of the host device within a web browsing window is a sharable web browsing interaction.** Ex. 1003, ¶235. A POSITA would have understood that when “browser 12a” registers with a “web media server,” and decides to share a web page, Prajapat discloses a determination that a web browsing interaction within a web browsing window is a sharable web browsing interaction. Ex. 1003, ¶235; *see also* Section VII.E., *supra*.

f. Prajapat in View of Wang Discloses 1[e]

Prajapat discloses **sending a request for webpage content to a website server independent of the synchronization server.** Ex. 1003, ¶¶236-37. Prajapat explains that a user “may submit a request” for web pages directly from a “web content server,” where the request “may be submitted in any suitable format such as HTTP.” Ex. 1007, ¶[0043]. After the request, the “web content server” may “return the requested web page to browser 12a.” *Id.*, ¶[0043]. A POSITA would have understood that a requesting “a web page” from a “web content server,” as opposed to a “web media server,” meets this limitation. Ex. 1003, ¶236.

Wang also discloses this limitation. Ex. 1006, ¶[0021]. The page navigation means “allows the client device 12a to access the server apparatus 14 directly and to acquire a web page when the client device 12a has ownership of the initiative of web page operation.” *Id.*, ¶[0041]. A client device with ownership of the initiative of the web page operation is synonymous with the “controlling web client” disclosed in Lebrun. Ex. 1003, ¶237. Thus, this client device can request web pages independently (and share them with others), rather than only viewing web pages that have been shared. Ex. 1003, ¶237. A POSITA would have been motivated to combine Wang’s “page navigation control” software functionality with Prajapat’s “browser” to gain control of the session and request web pages independent of the “web media server,” because a POSITA would have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative, synchronized manner. Ex. 1003, ¶237; *see also* Section VII.E., *supra*.

g. Prajapat in View of Wang Discloses 1[f]

Prajapat discloses that **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.** Ex. 1003, ¶¶238-41.

Prajapat in view of Wang discloses **subsequent to sending the request for webpage content to the website server**. *See supra* Section IX.B.1.f; *see also* Ex. 1003, ¶239; Ex. 1007, ¶[0041]; Ex. 1006, ¶¶[0021], [0041].

Prajapat discloses **transmitting information related to the shared web browsing interaction to the synchronization server**. Ex. 1003, ¶240. Prajapat explains that a browser “may submit requests for one or more web pages by communicating a request to web media server,” where the request may “may specify the web page to retrieve and display,” and “include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server,” (*see supra* Section IX.B.1.c; *see also* Ex. 1007, ¶[0022]) and that request may “return the requested web page to browser 12a.” *See supra* Section IX.B.1.f; *see also* Ex. 1007, ¶[0041]. A POSITA would have understood that a “web media server” receiving a “request for a web page,” meets this limitation. Ex. 1003, ¶240.

Wang also discloses this limitation. Ex. 1006, ¶[0021]. Each client device sharing the web page “access the server through its own individual session,” so that the client devices “can access an application execution unit through a dedicated URL address to engage in a group session.” *Id.*, ¶[0015]. A POSITA would have been motivated to combine Wang’s notification to “individual session destinations” with Prajapat’s “browser,” because it would be a combination of

prior art elements according to known methods yielding predictable results.

Ex. 1003, ¶241; *see also* Section VII.E., *supra*.

h. Prajapat in View of Wang Discloses 1[g]

Prajapat discloses **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.** Ex. 1003, ¶¶242-45.

Prajapat discloses **information related to the shared web browsing interaction is to be processed by a browser of the invitee device.** Ex. 1003, ¶243. Prajapat explains that browsers may “display the same web pages at substantially the same time,” or “alter web pages” and “view those alterations.” Ex. 1007, ¶[0012]. *See supra* Section IX.B.1.a; *see also* Ex. 1007, ¶[0012]. A POSITA would understand that altering web pages is a web browsing interaction, and another browser viewing those alterations, requires the viewing browser to process information concerning that shared interaction. A POSITA therefore would have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative, synchronized manner. Ex. 1003, ¶243.

Prajapat discloses **an invitee device enabled to generate a request to retrieve a substantially the same webpage content as the request for the webpage content from the host device.** Ex. 1003, ¶244. Prajapat explains that “browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages,” where the browser may include a “computer program or other suitable software for automatically communicating with one or more other users of other browsers 12.” Ex. 1007, ¶[0015]. Specifically, “browser 12a submits to web media server 14a one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse.” *Id.*, ¶[0034]. A POSITA would have understood that when “browser 12a” registers with a “web media server,” and shares a web page to “other browsers,” this meets this limitation. Ex. 1003, ¶244.

Wang also discloses this limitation. Ex. 1006, ¶[0023]. The “server apparatus” may include a “client synchronization control unit (CSC) 42 for enabling synchronization between the client devices,” wherein the CSC “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.” *Id.*, ¶[0043]. For example, “when one customer changes the web page, this causes the other customers’ browsers to follow suit.” *Id.*, ¶[0014]. A POSITA would have been motivated to combine Wang’s “server

apparatus” with integration and synchronization functionality with Prajapat’s “web media server” to allow a “browser 12a” to share web pages with other users participating in the session, because it would be a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶245; *see also* Section VII.E., *supra*.

i. Prajapat in View of Wang Discloses 1[h]

Prajapat discloses **wherein a 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.** Ex. 1003, ¶¶246-49.

Prajapat discloses **wherein the synchronization server transmits the information related to the shared web browsing interaction to the invitee device.** *Id.*, ¶247. The browser may include a “computer program or other suitable software for automatically communicating with one or more other users of other browsers 12.” *See supra* Section IX.B.1.h; *see also* Ex. 1007, ¶[0015]. Specifically, “browser 12a” may communicate “suitable information regarding the requested web page to web media server 14a,” which in turn may communicate to “browser 12b.” Ex. 1007, ¶[0043].

Prajapat discloses **transmitting the information in response to receiving the information related to the shared web browsing interaction from the host**

device. Ex. 1003, ¶248. Once “web content server 18” transmits the information, “browser 12b” may then use this “suitable information to request from web content server 18 the web page that browser 12a requested.” Ex. 1007, ¶[0043]. A POSITA would have understood that a “communication session between web media server 14b and browser 12b” includes transmission of “suitable information regarding the requested web page,” and thus, Prajapat discloses this limitation. Ex. 1003, ¶248.

Wang also discloses this limitation. Ex. 1006, ¶[0023]. As discussed above, Wang discloses a “page navigation means,” which allows for a user to take control of what web pages are shared. *See supra* Section IX.B.1.f; Ex. 1006, ¶[0041]. Once control is transferred, a “snapshot data of the web page changed by the other client device is transmitted from the server apparatus 14 to the client device which has lost the initiative, thus making it possible to share the web page.” *Id.*, ¶[0041]. A POSITA would have been motivated to combine Wang’s “page navigation control unit” with Prajapat’s “web media server” to receive information from a user about which web pages are shared to other users in a session. Ex. 1003, ¶249; *see also* Section VII.E., *supra*.

j. Prajapat in View of Wang Discloses 1[i]

Prajapat discloses **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. Ex. 1003, ¶¶250-53.

Prajapat discloses **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.** Ex. 1003, ¶251.

“[B]rowser 12a” may communicate “suitable information regarding the requested web page to web media server 14a,” which in turn may communicate to “browser 12b.” *See supra* Section IX.B.1.h; *see also* Ex. 1007, ¶[0043].

Prajapat discloses **that the data associated with the webpage content requested by the host device and the information related to the shared web browsing interaction.** Ex. 1003, ¶252. “[B]rowser 12a submits to web media server 14a one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse,” thus establishing a co-browsing session. *See supra* Section IX.B.1.h; *see also* Ex. 1007, ¶[0034]. Once the session has been initiated, the user “may submit requests for one or more web pages by communicating a request to web media server,” where the request may “may specify the web page to retrieve and display,” and “include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server,” (*see supra* Section IX.B.1.c; *see*

also Ex. 1007, ¶[0022]) and that request may “return the requested web page to browser 12a.” *See supra* Section IX.B.1.f; *see also* Ex. 1007, ¶[0041]. A POSITA would have understood that when a “browser 12a” enters information into a presented web page, via a “web media server” that is retrieved from “other browsers,” meets this limitation. Ex. 1003, ¶252.

Wang also discloses this limitation. Ex. 1006, ¶[0023]. The “server apparatus” may include a CSC that “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.” *See supra* Section IX.B.1.h; *see also* Ex. 1006, ¶[0043]. A POSITA would have been motivated to combine Wang’s “server apparatus” with integration and synchronization functionality with Prajapat’s “web media server,” because it would be a combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶253; *see also* Section VII.E., *supra*.

k. Prajapat in View of Wang Discloses 1[j]

Prajapat discloses **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.** Ex. 1003, ¶¶254-55. “[B]rowser 12a” may communicate “suitable information regarding the requested

web page to web media server 14a,” which in turn may communicate to “browser 12b.” Ex. 1007, ¶[0043]. Browser 12b may then use this “suitable information to request from web content server 18 the web page that browser 12a requested.” *See supra* Section IX.B.1.i; *see also* Ex. 1007, ¶[0043]. A POSITA would have understood that when “browser 12a” presents web pages to “browser 12b,” via the “web media server” this meets this limitation. Ex. 1003, ¶254.

Wang also discloses this limitation. Ex. 1006, ¶[0054]. The “server apparatus” may include a “CSC” that “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.” *See supra* Section IX.B.1.h; **Error! Reference source not found.**Ex. 1006, ¶[0043]. Wang discloses that the “page navigation means 22, synchronization control means 24, and mutual communication means 26” that each “individually receive information from the respective control units” of the “server apparatus 14, extract an applicable URL address and a command from the received HTTP response, and allow the address and the command to be displayed on the client devices by use of the browser means 20.” Ex. 1006, ¶[0044]. A POSITA would have been motivated to combine Wang’s “server apparatus” with synchronization functionality with Prajapat’s “web media server,” because it would be a

combination of prior art elements according to known methods yielding predictable results. Ex. 1003, ¶255; *see also* Section VII.E., *supra*.

Prajapat in view of Wang discloses claim 1. *Id.*, ¶¶289-291, 293.

2. Independent Claim 11

a. Prajapat in View of Wang Discloses 11[pre]

Prajapat in view of Wang discloses **apparatus for establishing a synchronized browsing session between a host device and an invitee device**. *See supra* Section IX.B.1.a; *see also* Ex. 1003, ¶¶256-58; Ex. 1007, ¶¶[0012], [0016], Fig. 2; Ex. 1006, ¶[0020].

Prajapat discloses **an apparatus**. Ex. 1003, ¶257. Prajapat discloses that the “[b]rowsers 12, web media servers 14, and web content server 18 may each comprise an appropriate combination of hardware and software associated with one or more computers at one or more locations.” Ex. 1007, ¶[0014].

Wang also discloses **an apparatus**. Ex. 1003, ¶258. Wang discloses that “a system enabling computer devices to collaborate with one another through a network.” Ex. 1006, ¶[0018]. A POSITA would have understood that the “computer devices” disclosed in Wang as an apparatus. Ex. 1003, ¶258.

b. Prajapat Discloses 11[a]

Prajapat discloses **a network interface adapted to communicate with a synchronization server**. *See supra* Section IX.B.1.a; *see also* Ex. 1003, ¶259; Ex. 1007, ¶¶[0012], [0016], Fig. 2. Prajapat explains that browsers “may include

analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application,” which “may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12.” Ex. 1007, ¶[0015].

c. Prajapat Discloses 11[b]

Prajapat discloses **a processor**. Ex. 1003, ¶260. Prajapat discloses functionality described in connection with “browser 12a, web media server 14a, and web content server 18 may be provided using a single computer system,” that “may include one or more ... processors, memory, or other components for receiving, processing, storing, and communicating information.” Ex. 1007, ¶[0014].

d. Prajapat in View of Wang Discloses 11[c]

Prajapat in view of Wang discloses 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**. *See supra* Sections IX.B.1.a-b; *see also* Ex. 1003, ¶261; Ex. 1007, ¶¶[0012], [0016], Fig. 2; Ex. 1006, ¶¶[0018-20].

e. Prajapat View of Wang Discloses 11[d]

Prajapat discloses a processor adapted to **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.** *See supra* Section IX.B.1.a, c; *see also* Ex. 1003, ¶262; Ex. 1007, ¶¶[0012], [0016], [0022], Fig. 2.

f. Prajapat in View of Wang Discloses 11[e]

Prajapat in view of Wang discloses a processor adapted to **send an invitation from the host device to the invitee device to join the synchronized browsing session, wherein the invitation includes the session identifier.** *See supra* Section IX.B.1.d; *see also* Ex. 1003, ¶263; Ex. 1007, ¶[0017]; Ex. 1006, ¶[0020].

g. Prajapat Discloses 11[f]

Prajapat discloses a processor adapted to **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.** *See supra* Section IX.B.1.e; *see also* Ex. 1003, ¶264; Ex. 1007, ¶¶[0016], [0034].

h. Prajapat in View of Wang Discloses 11[g]

Prajapat in view of Wang discloses a processor adapted to **send a request for webpage content to a website server independent of the synchronization server**. *See supra* Section IX.B.1.f; *see also* Ex. 1003, ¶265; Ex. 1007, ¶¶[0024], [0041]; Ex. 1006, ¶¶[0021], [0041].

i. Prajapat in View of Wang Discloses 11[h]

Prajapat in view of Wang discloses a processor adapted to **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**. *See supra* Section IX.B.1.c, f-g; *see also* Ex. 1003, ¶266; Ex. 1007, ¶¶[0012], [0022], [0024], [0041]; Ex. 1006, ¶¶[0021], [0041].

j. Prajapat in View of Wang Discloses 11[i]

Prajapat in view of Wang discloses **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**. *See supra* Section IX.B.1.a, h; *see also* Ex. 1003, ¶267; Ex. 1007, ¶¶[0012], [0015], [0034]; Ex. 1006, ¶¶[0018], [0021], [0041].

k. Prajapat in View of Wang Discloses 11[j]

Prajapat in view of Wang discloses **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. *See supra* Section IX.B.1.h-i; *see also* Ex. 1003, ¶268; Ex. 1007, ¶¶[0012], [0015], [0034]; Ex. 1006, ¶¶[0018], [0023].

l. Prajapat in View of Wang Discloses 11[k]

Prajapat in view of Wang discloses **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.** *See supra* Section IX.B.1.a, c, f, h, j; *see also* Ex. 1003, ¶269; Ex. 1007, ¶¶[0012], [0016], [0022], [0024], [0034], [0041], Fig. 2; Ex. 1006, ¶¶[0018], [0021], [0023].

m. Prajapat in View of Wang Discloses 11[l]

Prajapat in view of Wang discloses a processor adapted to **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.** *See supra* Section IX.B.1.i, k; *see also* Ex. 1003, ¶270; Ex. 1007, ¶¶[0015], [0043]; Ex. 1006, ¶¶[0018], [0021], [0023], [0054].

Prajapat in view of Wang discloses claim 11. Ex. 1003, ¶289-291, 293.

3. Dependent Claims

a. Prajapat Discloses Claim 2

Prajapat discloses **receiving a notification message indicative of the invitee device joining the synchronized browsing session.** Ex. 1003, ¶271.

“[B]rowser 12a submits to web media server 14a one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse,” thus establishing a co-browsing session. *See supra* Section IX.B.1.h; *see also* Ex. 1007, ¶[0034]. A POSITA would have understood that an “other browser” joining a co-browsing session in response to “a request to co-browse” meets this limitation. Ex. 1003, ¶271.

b. Prajapat in View of Wang Discloses Claim 3

Prajapat discloses **activating a hyperlink on a website to initialize the sending of the request to establish the synchronized browsing session.**

Ex. 1003, ¶¶272-73. Prajapat explains that “browser 12a” can start a communication session with its associated web media server 14a” via “clicking on an icon on a desktop of browser 12a.” Ex. 1007, ¶[0034].

Wang also discloses this limitation. Ex. 1006, ¶[47]. A POSITA would have found it obvious to modify Prajapat’s desktop “icon” that initiates a “communication session” to include the “myURL address” of Wang, which meets this limitation. Ex. 1003, ¶273; *see also* Section VII.E., *supra*.

c. Prajapat in View of Wang Discloses Claim 4

Prajapat in view of Wang discloses **wherein the invitation comprises a hyperlink for joining the synchronized browsing session.** *See supra* Section IX.B.1.d; *see also* Ex. 1007, ¶¶[0016], [0034]. A POSITA would have found it obvious to modify Prajapat’s “request to co-browse,” which may “specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse” to include the “Invitation acknowledgment, myURL address” of Wang, which meets this limitation. Ex. 1003, ¶274; *see also* Section VII.E., *supra*.

d. Prajapat Discloses Claim 5

Prajapat discloses **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.** Ex. 1003, ¶275. Prajapat describes a user that “may also desire to co-browse or share the one or more web pages or other web content with another user associated.” *See supra* Section IX.B.1.a; *see also* Ex. 1007, ¶[0017]. A POSTIA would understand that sending a request to co-browse via email is a “communication medium that would be suitable for transmitting” the invitation to an invitee device. Ex. 1003, ¶275; *see also* Section VII.E., *supra*.

e. Prajapat Discloses Claim 6

Prajapat discloses **wherein information related to the shared web browsing interactions comprises a URL, form data, cookie information, or script data.** Ex. 1003, ¶276. Prajapat explains that “the request for a web page” may require information “to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18, and any other suitable information.” Ex. 1007, ¶[0017].

f. Prajapat Discloses Claims 7 and 13

Prajapat discloses **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.** Ex. 1003, ¶¶277, 284. Prajapat explains that a browser “may submit requests for one or more web pages by communicating a request to web media server,” where the request may “may specify the web page to retrieve and display,” and “include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server.” Ex. 1007, ¶[0022]. A POSITA would have understood that “browser 12” sending a “request for one or more web pages” containing “session information” meets this limitation.

g. Prajapat Discloses Claims 8 and 14

Prajapat discloses **wherein web browsing window is capable of accepting both shared and non-shared web browsing interactions.** Ex. 1003, ¶¶278, 285. Prajapat describes a user that “may also desire to co-browse or share the one or more web pages or other web content with another user associated.” *See supra* Section IX.B.1.a; *see also* Ex. 1007, ¶[0016]. A POSITA would have understood that when a “browser 12a” desires to “share” web pages to “another user associated browser 12b,” this meets this limitation.

h. Prajapat Discloses Claims 9 and 15

Prajapat discloses **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.** Ex. 1003, ¶¶279, 286. Prajapat describes a user that “may also desire to co-browse or share the one or more web pages or other web content with another user associated,” (*see supra* Section IX.B.1.a; *see also* Ex. 1007, ¶[0016]), or “browser 12a” can register with a “web media server 14a,” but “without actually sharing web pages with another browser 12.” *See supra* Section IX.B.1.e; *see also* Ex. 1007, ¶[0034]. A POSITA would understand that when a “user” desires to “share the or more web pages” to another, the user must necessarily first view the web pages in a non-shared browser window prior to deciding whether to share that web page. Ex. 1003, ¶¶279, 286.

i. Prajapat Discloses Claims 10 and 16

Prajapat discloses **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.** Ex. 1003, ¶¶280, 287. Prajapat explains that “the request for a web page” may require information “to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18.” Ex. 1007, ¶[0017].

j. Prajapat in View of Wang Discloses Claim 12

Prajapat discloses **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.** Ex. 1003, ¶¶281-83.

Prajapat discloses **a user interface adapted to initiate the processor to send the request in response to a user input.** *Id.*, ¶282. Prajapat explains that the “browser” may include “any suitable interface for submitting requests for and displaying media such as web pages” (Ex. 1007, ¶[0015]) and that the “functionality described in connection with “browser 12a, web media server 14a, and web content server 18 may be provided using a single computer system,” wherein that computer system “may include one or more suitable input devices,

output devices, mass storage media, processors, memory, or other components for receiving, processing, storing, and communicating information.” *Id.*, ¶[0014].

Prajapat in view of Wang discloses **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.** *See supra* Section IX.B.2.b; *see also* Ex. 1003, ¶283. Prajapat explains that “browser 12a” can start a communication session with its associated web media server 14a” via “clicking on an icon on a desktop of browser 12a.” Ex. 1007, ¶[0034]. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶[47]. A POSITA would have found it obvious to modify Prajapat’s desktop “icon” that initiates a “communication session” to include the “myURL address” of Wang, which meets this limitation. Ex. 1003, ¶283; *see also* Section VII.E., *supra*.

Prajapat in view of Wang discloses the dependent claims. *Id.*, ¶¶289-291, 293.

X. CONCLUSION

For the reasons herein, Petitioner hereby requests *inter partes* review under 35 U.S.C. § 311 and 37 C.F.R. § 42.101 of United States Patent No. 9,483,448.

Dated: December 16, 2022

Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE
WITH TYPE-VOLUME LIMITATION**

Pursuant to 37 C.F.R. § 42.24 *et seq.*, the undersigned certifies that this Petition complies with the 14,000 word type-volume limitation. The Petition contains 13,990 words, excluding the parts of the Petition exempted from the type-volume limitation.

Dated: December 16, 2022

Respectfully submitted,

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CERTIFICATION OF SERVICE ON PATENT OWNER
(37 C.F.R. § 42.110(a))

The undersigned hereby certifies that the foregoing Petition for *Inter Partes* Review of U.S. Patent No. 9,483,448 and accompanying Exhibits 1001-1026 were served on December 16, 2022 in their entirety by Federal Express – Priority Delivery upon the following:

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