

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

In the *Inter Partes* Review of:

U.S. Patent No. 8,527,591

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

Mail Stop Patent Board
Patent Trial and Appeal Board
P.O. Box 1450
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**DECLARATION OF HENRY A. LIEBERMAN
IN SUPPORT OF PETITION FOR *INTER PARTES*
REVIEW OF U.S. PATENT NO. 8,527,591**

I, Henry A. Lieberman, declare as follows:

I. INTRODUCTION

1. I have been asked by the party requesting this review, Intuit, Inc. (“Petitioner”), to provide my expert opinions in support of the above-captioned petition for *inter partes* review of U.S. Patent No. 8,527,591 (the “’591 patent” or the “challenged patent”), challenging the patentability of the claims 1 – 18 of the ’591 patent.

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

3. In summary, the references cited and discussed below render obvious the challenged claim of the ’591 patent. My detailed opinions on the claim are set forth below.

II. BACKGROUND AND QUALIFICATIONS

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

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

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

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

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

III. COMPENSATION AND RELATIONSHIP WITH PARTIES

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

10. I have no financial interest in Petitioner or any related parties. I have been informed that Samesurf, Inc. ("Samesurf") owns the challenged patent. I have no

financial interest in the outcome of this litigation. I similarly have no financial interest in the challenged patent.

IV. MATERIALS CONSIDERED

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

- a. the '591 patent (Ex. 1001), and
- b. the prosecution file history for the U.S. Application Serial No. 12/783,743 (Ex. 1002).

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

- a. International Patent Pub. No. WO 00/48110 to Lebrun et al. (Ex. 1005),
- b. U.S. Patent Pub. No. 2005/0033656 to Wang et al. (Ex. 1006), and
- c. U.S. Patent Pub. No. 2005/0021626 to Prajapat et al. (Ex. 1007).

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

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

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

- a. “NCSA Mosaic, Project Profile,” University of Illinois, National Center for Supercomputing Applications (available at: <https://www.ncsa.illinois.edu/research/project-highlights/ncsa-mosaic/>) (Ex. 1008);
- b. “Netscape Communications Corp.,” Henry R. Norr, August 28, 2017, Encyclopedia Britannica, Inc. (available at: <https://www.britannica.com/topic/Netscape-Communications-Corp>) (Ex. 1009);
- c. “50 Years of Email,” cloudHQ, April 6, 2021 (available at: <https://www.prnewswire.com/news-releases/50-years-of-email-301262676.html>) (Ex. 1010);
- d. “The History of Email: Major Milestones from 50 Years,” Kasey Steinbrinck, January 28, 2021, Email on Acid Ina Fried, (available

- at: <https://www.emailonacid.com/blog/article/email-marketing/history-of-email/>) (Ex. 1011);
- e. “10 Instant Messaging Services that Used to Be Popular,” Elise Moreau, May 3, 2021, Lifewire Tech for Humans (available at: <https://www.lifewire.com/once-popular-old-instant-messaging-services-3486135>) (Ex. 1012);
 - f. “Timeline of Social Media,” Wikipedia (available at: https://en.wikipedia.org/wiki/Timeline_of_social_media) (Ex. 1013);
 - g. “Hyperlink,” Wikipedia (available at: <https://en.wikipedia.org/wiki/Hyperlink>) (Ex. 1014);
 - h. U.S. Patent No. 5,708,780 to Levergood et al. (Ex. 1015);
 - i. “Session Identification URI,” W3C Working Draft WD-session-id-960221, w3 Org (available at: <https://www.w3.org/TR/WD-session-id.html>) (Ex. 1016);
 - j. “Giving Web a Memory Cost Its Users Privacy,” John Schartz, September 4, 2001, New York Times (available at: <https://www.nytimes.com/2001/09/04/business/giving-web-a-memory-cost-its-users-privacy.html>) (Ex. 1017);
 - k. “GroupWeb: A WWW Browser as Real Time Groupware,” Saul Greenberg and Mark Roseman, CHI ’96 ACM Conference on

Human Factors in Computing Systems, April 13-18, 1996

(available at: <https://dl.acm.org/doi/pdf/10.1145/257089.257317>)

(Ex. 1018);

- l. “Let’s Browse: A Collaborative Web Browsing Agent,” IUI ’99:

ACM Proceedings of the 4th International Conference on

Intelligent User Interfaces, December 1998 (available at:

<https://dl.acm.org/doi/10.1145/291080.291092>) (Ex. 1019);

- m. “Letizia: An Agent that Assists Web Browsing,” Henry

Lieberman, *International Joint Conference on Artificial*

Intelligence, 1995 (available at:

<https://web.media.mit.edu/~lieber/Lieberary/Letizia/Letizia->

[AAAI/Letizia.html](https://web.media.mit.edu/~lieber/Lieberary/Letizia/Letizia-AAAI/Letizia.html)) (Ex. 1020);

- n. U.S. Patent No. 6,353,822 to Lieberman (Ex. 1021);

- o. “Google Docs,” Wikipedia (available at:

https://en.wikipedia.org/wiki/Google_Docs) (Ex. 1022);

- p. “Google Announces Google Docs & Spreadsheets,” October 11,

2006, Google Press Release, (available at:

<http://googlepress.blogspot.com/2006/10/google-announces->

[google-docs_11.html](http://googlepress.blogspot.com/2006/10/google-announces-google-docs_11.html)) (Ex. 1023);

- q. “The History of JavaScript: Everything You Need to Know,”

T.J. DeGroat, August 19, 2019, Springboard (available at:

<https://www.springboard.com/blog/data-science/history-of-javascript/>) (Ex. 1024);

- r. “Adobe Flash,” Wikipedia (available at: https://en.wikipedia.org/wiki/Adobe_Flash) (Ex. 1025); and
- s. “What Does AJAX Even Stand For?,” Jay Hoffman, March 4, 2019, The History of The Web (available at: <https://thehistoryoftheweb.com/what-does-ajax-even-stand-for/>) (Ex. 1026).

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

V. BASIS OF OPINIONS FORMED

A. Level of Ordinary Skill in the Art

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

18. I am familiar with the technology at issue and the state of the art at the effective filing date of the challenged patent, May 20, 2010.

19. The level of ordinary skill in the art of the challenged patent at the time of the effective filing date is a person with a bachelor's degree in computer network security, computer science, computer engineering, or a related field, with 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.

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

VI. THE '591 PATENT

21. The '591 patent is entitled "Method and Apparatus for the Implementation of a Real-Time, Sharable Browsing Experience on a Guest Device." The '591 patent includes claims 1 – 18, all of which are challenged in the Petition for *Inter Partes Review*.

A. Purported Invention of the '591 Patent

22. The '591 patent describes "a method for joining a synchronized browsing session administered by a synchronization server, comprising activating a hyperlink associated with the synchronized browsing session, sending a request to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink, and joining the synchronized browsing session." Ex. 1001, Abstract, 2:54-60. The '591 patent also describes "a method for implementing a synchronized browsing session, comprising receiving information related to a shared

web browsing interaction performed by a host device from a synchronization server, and performing the shared web browsing interaction based on the information received from the synchronization server.” *Id.*, Abstract, 3:3-9.

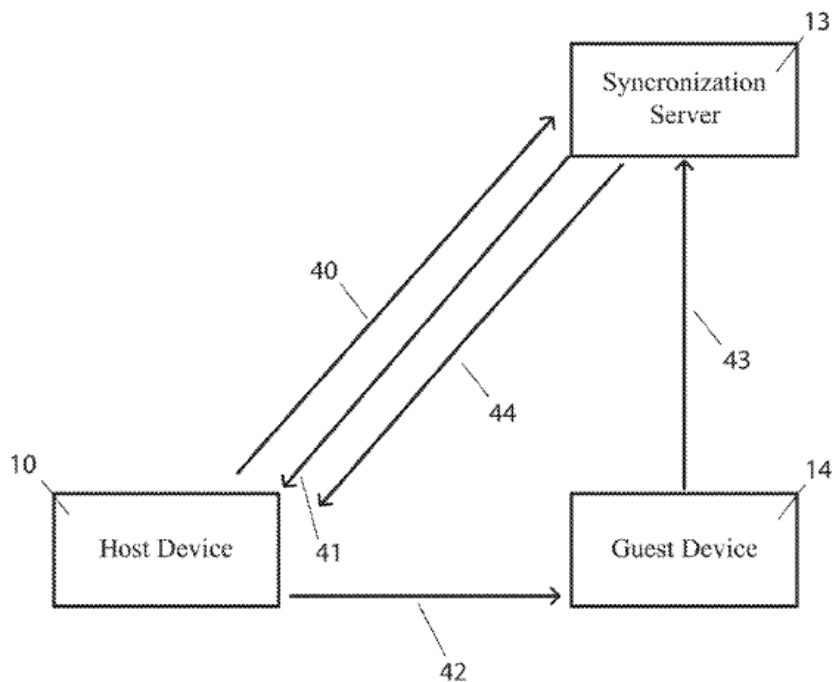
23. According to the ’591 patent specification, the prior art at the time “lack[ed] technology that would simultaneously connect two or more users in a medium that would allow all of them to both interact with one another and with the content itself in real time and in a synchronized or shared fashion.” *Id.*, 1:67-2:4.

24. The specification asserts that prior art “chat software” and “desktop or screen sharing” software allowed users to send and receive messages between users and “view the same internet content” in real-time. *Id.*, 1:49-51, 2:18-23.

25. The ’591 patent specification further asserts that such prior art software did not permit multiple users to “share internet browsing in real time for online activities such as shopping together, booking travel together, watching or listening to media together, and browsing the internet together in a simultaneous fashion from different devices and/or locations.” *Id.*, 2:40-46.

26. The ’591 patent purports to solve the problem of multiple users sharing an internet browsing session together in simultaneous fashion using different devices and locations. *Id.*, 2:40-46. One of the objectives of the ’591 patent is to enable a user to invite and join another user in shopping, booking travel, viewing media, and browsing the internet together in a synchronized online browsing session. *Id.*, 3:18-27.

27. Figure 2(a) of the '591 patent depicts a diagram illustrating the data communication between the components of “the present invention to initialize a synchronized browsing session.” *Id.*, 10:3-6, Fig. 2. The components of the invention include a host device 10, a synchronization server 13, and a guest device 14. *Id.*, 10:6-9, Fig. 2(a).



28. As shown in Figure 2(a) above, the components of the '591 patent include a host device 10, a synchronization server 13, and a guest device 14. *Id.*, 10:6-9, Fig. 2(a).

29. The '591 patent specification describes both the host device 10 and guest device(s) 14 as “a personal computer, mobile phone, Smartphone, IPAD®, or other type of electronic device with a visual user interface and a network connection such that a user may access and view” a website on the internet. *Id.*, 6:5-11, 15-21.

30. The '591 patent specification distinguishes the host and guest device by their function, explaining that the host device “may initialize and conduct a synchronized browsing session with guest device 14 via synchronization server 13,” and the guest device(s) “may join a synchronized browsing session to view internet browsing conducted by host device 10 via relay communication over synchronization server 13.” *Id.*, 6:3-5, 12-15.

31. The '591 patent specification describes the synchronization server 13 as “comprising [a] processor 28, [a] network interface 29, [a] session identification database 30, and [an] affiliate database 31.” *Id.*, 9:20-24, Fig. 1(e). The specification explains the general function of the synchronization server “to establish and facilitate a synchronized browsing session between host device 10 and guest device 14.” *Id.*, 9:24-26.

32. The '591 patent specification describes the process for establishing the synchronized browsing session. First, the host device sends an initialization request to the synchronization server to establish a synchronized browsing session. *Id.*, 10:10-12, 11:25-26.

33. The synchronization server responds to the request with a confirmation message that may include a session identifier for the synchronized browsing session. *Id.*, 10:12-14, 11:26-31. The '591 patent specification explains that the “session identifier 19 may comprise an identification number, passkey, URL, MAC address, or other unique indicator” to identify and initiate the session. *Id.*, 10:14-18.

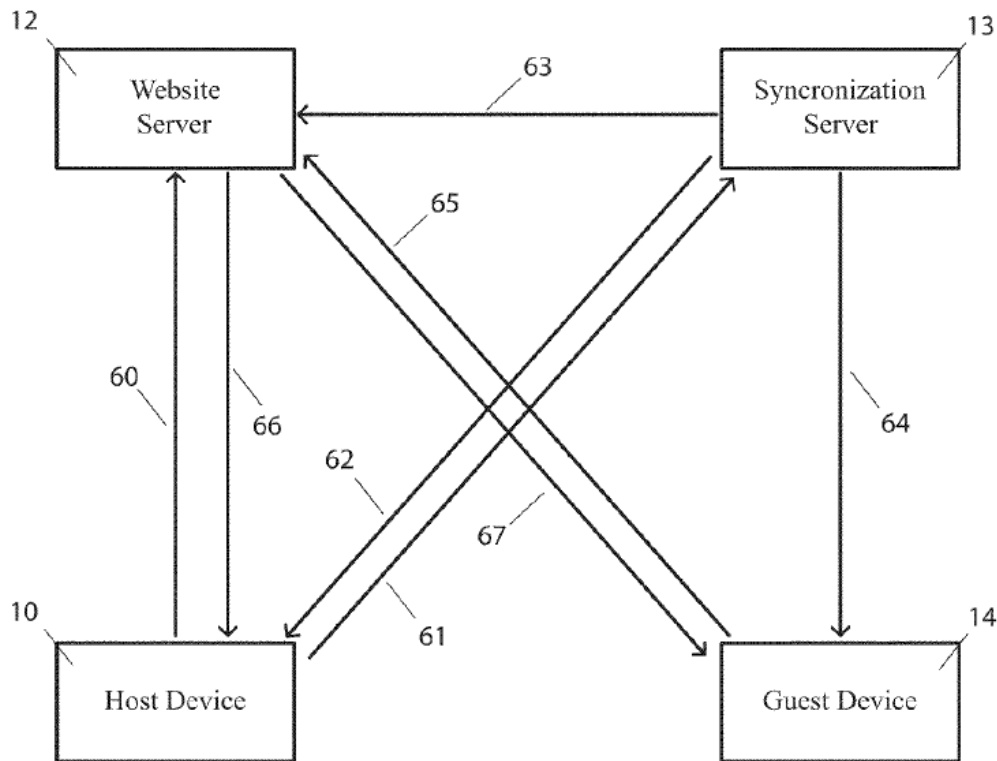
34. Once the confirmation message and session identifier have been received by the host device, the host device then sends a session invitation to prospective guest devices. *Id.*, 10:19-22, 11:32-34. The '591 patent specification explains that the session invitation “may comprise [the] session identifier 19, and [an] invitation hyperlink 52 to join the synchronized browsing session.” *Id.*, 11:35-37.

35. To join the synchronized browsing session, the invitee user of the guest device “need[s] to simply click invitation hyperlink 52 included in session invitation 42[.]” *Id.*, 11:37-39.

36. Once the invitation response has been received by the synchronization server, the synchronization server notifies the host device that a guest device has joined the synchronized browsing session. *Id.*, 12:5-15.

37. The '591 patent specification enumerates various forms that the synchronized browsing session invitation may take, including email, instant message or social network communication. *Id.*, 11:32-53, 11:54-12:4, Figs. 4(b)-4(e).

38. Figure 5(a) of the '591 patent illustrates the data communication between the system components once the synchronized browsing session has been established. *Id.*, 15:42-47, Fig. 5(a).



39. The '591 patent specification explains that during a synchronized browsing session, the host device transmits typical web requests (60) to website servers through the internet, which provide the requested website content (66). *Id.*, 15:50-67, Fig. 5(a).

40. Additionally, following each request to a website server, the host device sends a second communication message (61) to the synchronization server, and includes “webpage interaction information such as a URL address, form data, java script, cookies, or other data communication.” *Id.*, 18:23-27, Fig. 5(a), 16:1-7 (“Communication message 61 may comprise the URL address of website server 12, cookie information, form data, java script, or other user inputted information, or attached files.”).

41. The '591 patent specification explains that the synchronization server forwards the communication message (61) and webpage interaction information to the guest device. *Id.*, 16:31-40, 51-56, Fig. 5(a). The guest device uses the communication message (61) and webpage interaction data to make an identical website request (65) to the same website server as the original request (60) sent by the host device to the website server, which replies with similar or identical content (67) to the requested website content (66) sent to the host device. *Id.*, 8:1-14, 17:27-36, Fig. 5(a).

42. The '591 patent specification explains that the host device may indicate in the communication message to the synchronization server not to relay the webpage interaction information to the guest device with the communication message (61). *Id.*, 16:7-12. In this alternative, the unshared webpage interaction information is rendered and displayed in a separate, unshared browser window at the host device only. *Id.*, 19:59-20:3, 20:15-18.

43. I refer now to the claims of the '591 patent. Claim 1 recites, “A method for a guest device performing a synchronized browsing session administered by a synchronization server.” Ex. 1001, citation. The claims and the reference numerals used for each claim element are reproduced below.

Claims 1-18

[1.pre]	A method for a guest device performing a synchronized browsing session administered by a synchronization server, comprising
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[1.a]	detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device;
[1.b]	sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink;
[1.c]	receiving from the synchronization server a notification that guest device has joined the synchronized browsing session;
[1.d]	receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device; and wherein the data comprises a URL of the website and cookie information associated with the website and the host device; and
[1.e]	operating a browser by the guest device based on the data received from the synchronization server.
[2]	The method of claim 1, further comprising receiving an invitation to join the synchronized browsing session.
[3]	The method of claim 2, wherein the invitation comprises the hyperlink associated with the synchronized browsing session.
[4]	The method of claim 2, wherein the invitation further comprises a session identifier.
[5]	The method of claim 2, wherein the invitation is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.
[6]	The method of claim 1, wherein information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.

[7]	The method of claim 1, wherein the shared user input web browsing interaction is depicted in a first web browser window.
[8]	The method of claim 7, wherein non-shared web browsing interactions are depicted in a second web browser window.
[9]	The method of claim 1, wherein the shared user input web browser action further comprises a log-in into a restricted-access webpage.
[10]	An apparatus for a guest device performing a synchronized browsing session administered by a synchronization server, comprising:
[10.a]	a network interface adapted to communicate with the synchronization server; and
[10.b]	a processor adapted to:
[10.b.i]	detect an activation of a hyperlink associated with the synchronized browsing session by a guest device;
[10.b.ii]	send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink;
[10.b.iii]	receive from the synchronization server a notification that guest device has joined the synchronized browsing session;
[10.b.iv]	receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website and the host device; and
[10.b.v]	operate a browser by the guest device based on the data received from the synchronization server.
[11]	The apparatus of claim 10, further comprising a user interface adapted to initiate the processor to send the request in response to a user input.
[12]	The apparatus of claim 11, wherein the user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.

[13]	The apparatus of claim 10, further comprising a memory adapted to store one or more software modules for controlling the processor.
[14]	The apparatus of claim 10, wherein the hyperlink is received from a host device via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.
[15]	The apparatus of claim 10, further comprising a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.
[16]	The apparatus of claim 10, wherein information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.
[17]	The apparatus of claim 10, wherein the shared user input web browsing interaction is depicted in a first web browser window.
[18]	The apparatus of claim 17, wherein non-shared web browsing interactions are depicted in a non-shared web browser window.

44. The two independent claims '591, claims 1 and 10, recite primarily the same basic elements:

- detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device;
- sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink;

- receiving from the synchronization server a notification that guest device has joined the synchronized browsing session; receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device; and
- wherein the data comprises a URL of the website and cookie information associated with the website and the host device; and
- operating a browser by the guest device based on the data received from the synchronization server.

45. As explained, each of these functions was known before the priority date of the '591 patent. The claims thus add nothing novel and are not combined in any way that would be non-obvious to a POSITA.

B. Prosecution History

46. I reviewed the prosecution history of the '591 patent. I understand that statements made during prosecution of a patent may influence the meaning of terms in the claim of that patent, as well as terms in other claims in the same patent family.

47. The '591 patent was filed on May 20, 2010 as Application Serial No. 12/783,743 ("the '743 application"). Ex. 1001, Title page. Thus, the effective filing date of the '591 patent is no earlier than May 20, 2010. For the purposes of this Petition, Petitioner presumes the claims of the '591 patent are entitled to the earliest possible effective filing date and thus are subject to the pre-AIA provisions of the Patent Statute.¹ All statutory references in this Petition are to the applicable pre-AIA

¹ 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.

provisions. I understand for the purposes of this *Inter Partes* Review proceeding that the challenged patent has an effective filing date no earlier than May 20, 2010.

48. I reviewed the prosecution history of the '591 patent. I understand that statements made during prosecution of a patent may influence the meaning of terms in the claim of that patent, as well as terms in other claims in the same patent family.

49. The '743 application was originally filed with claims 1-20, including independent claims 1 and 6. *See* Prosecution History of U.S. Patent 8,527,591 ("Exhibit 1002") at 205-209. On November 24, 2011, the '743 application was published as U.S. Patent Publication No. 2011/0289157. *Id.* at 136.

50. On June 5, 2012, the Office issued a non-final Office Action in the '743 application, rejecting all claims provisionally on the ground of non-statutory double patenting as being unpatentable over co-pending Application No. 12/783,735 ("the '735 application"), and as being unpatentable over co-pending Application No. 12/783,716 ("the '716 application"), as the conflicting claims of the '735 application and the '716 application were not patented. *Id.* at 113-115. Claims 6-20 were also rejected under 35 U.S.C. §102 as anticipated by Henrick (U.S. 2003/0041108). *Id.* at 116-119. Claims 1-5 were further rejected under 35 U.S.C. §103(a) as obvious in light of Henrick in view of Rosen (U.S. 2008/0028323). *Id.* at 119-122. The Office Action noted that the only limitation that Henrick "does not specifically disclose [is] activating a hyperlink associated with the synchronized browsing session." *Id.* at 120.

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

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

53. Following an applicant-initiated interview on April 25, 2013, the Applicant filed a request for continued examination on May 6, 2013 and amended the claims to include limitations for “detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device”, “sending a request by the guest device to join the synchronized browsing session . . .”, “receiving from the synchronization server a notification that guest device has joined the synchronized browsing session”, “receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website”

and the host device[.]” *Id.* at 40, 50-55 (emphasis in original). The Applicant argued that none of the cited prior art “disclose passing of URL and cookie information from a shared user input web browsing interaction through a synchronization server and onto a guest device” as recited in amended claims 1 and 6. *Id.* at 56-59.

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

VII. CLAIM CONSTRUCTION

A. Legal Standard for Claim Construction

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

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

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

VIII. OBVIOUSNESS STANDARD

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

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

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

61. I understand that if a technique has been used to improve one device or product, and a POSITA would recognize that it would improve similar devices or

products in the same way, using the technique is obvious unless its actual application is beyond his or her skill.

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

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

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

65. It is further my understanding that a proper obviousness analysis focuses on what was known or obvious to a POSITA, not just the patentee. Accordingly, I

understand that any need or problem known in the field of endeavor at the time of invention and addressed by the patent can provide a reason for combining the elements in the manner claimed.

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

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

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

art; (5) taking of licenses under the patent by others; (6) deliberate copying of the invention; (7) failure of others to find a solution to the long felt need; and (8) skepticism by experts.

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

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

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

A. State of the Art

71. As stated in the specification, the '591 patent is in the general field of "a sharable browsing experience, and more specifically, to a method and apparatus for the implementation of a synchronized browsing session on a guest device utilizing the transfer of URL, form data, script, and other information." Ex. 1001, 1:8-12.

72. The '591 patent essentially claims the features of requesting and receiving website data using a browser, clicking a hyperlink invitation sent via email, instant message or social network, identifying browsing sessions using a session identifier, collaborative web browsing using multiple devices and a synchronization server, and operating a browser or an application based on the received data. The claims implement these well-known functions with basic steps performed in common web browsing and collaborative systems. Each of these functions was known before the effective filing date of the '591 patent, and thus, the claims add nothing new to the state of the art at the time of the purported invention.

1. Basic Web Browsing Communication

73. The concept of requesting and receiving website data using a web browser—the basic foundational mechanics of world-wide web browsing—was well-known by the time of the invention of the '591 patent.

74. In 1993, computer scientist Marc Andreessen created Mosaic, the first internet browser at the National Center for Supercomputing Applications (NCSA) at the University of Illinois Urbana-Champaign. Mosaic was available to all students at the College of Engineering at the University of Illinois Urbana-Champaign. Ex. 1008, <https://www.ncsa.illinois.edu/research/project-highlights/ncsa-mosaic/>. In 1994, Marc Andreessen founded Netscape and released Netscape Navigator, as the first publicly available web browser. Ex. 1009, <https://www.britannica.com/topic/Netscape-Communications-Corp>.

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

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

77. The client-server architecture of the Web was also designed to allow the maximum in flexibility of configuration of sources of information and their consumption by users. The responsibility of a server to deliver pages helps a server manage requests emanating from multiple, independent users; the responsibility of a

client to display pages from the user facilitates multiple points of view on the same information. Thus, browsing by a set of coordinated, rather than independent users, can be best managed by a server whose responsibility it is to coordinate the session. That server coordinates the process of invitation to the group, acceptance/decline, and synchronization of actions across multiple users.

78. This foundational concept of web browsing—requesting and receiving website data using a web browser—as well as groupware, and specifically, collaborative browsing, were many years old by the time of the effective filing date of the '591 patent.

2. Hyperlink Invitations

79. Sending a hyperlink invitation via email, instant message or social network, and clicking the hyperlink to initiate a web request was also widely in use prior to the effective filing date of the '591 patent.

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

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

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

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

84. Hyperlinks, which could be clicked to deliver the user to an internet destination via a Universal Resource Locator or URL, were a core feature of Mosaic, Netscape Navigator, and all subsequent web browsers from their earliest introduction in 1993. Ex. 1014, <https://en.wikipedia.org/wiki/Hyperlink>.

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

86. Because HTTP/HTTPS requests containing a URL can also invoke functions on the server (typically, by naming the function after a “?” character in the URL), a URL can be used, not only for simply reading and displaying a page, but also

for additional functions involving that URL. In particular, the functions of joining a group browsing session, or transmitting information to be used by other users, can be requested from the group browsing server by an HTTPS request containing a URL. Invoking server functions via HTTPS request and is a standard technique well known to POSITAs at the time.

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

88. The combination of sending a hyperlink invitation via email, messenger or social network, which can be clicked to initiate a web request, was well-known and in wide use years before the '591 patent's effective filing date.

3. Web Session Identifiers

89. Web session identifiers were also well-known and widely used before the effective filing date of the '591 patent.

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

appending a session identification (SID) to the request and to subsequent service requests from the client to the server within a session of requests.”)

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

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

93. One important characteristic of the HTTP/HTTPS (HyperText Transfer Protocol) software that is used by Web servers to respond to URLs that request Web pages, is that that it is “stateless” – normally, two users request the same page with

identical URLs that do not carry the user's identity or identify the interactive session in which the user made the request. Because of that, if an e-commerce site wishes to have a "cart" to hold potential user purchases, it must have an additional mechanism to identify that user and that session. One such mechanism is the so-called "cookie." The server asks the user for permission to store an identifying cookie on the user's computer, and if granted, future requests from that user to that server carry an identifier that can be used by the server to access the cart unique to that user (and that session).

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

4. Collaborative Web Browsing and Collaborative Systems

95. The concept of collaborative web browsing using multiple devices and a synchronization server was also well-known and widely used before the effective filing date of the '591 patent.

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

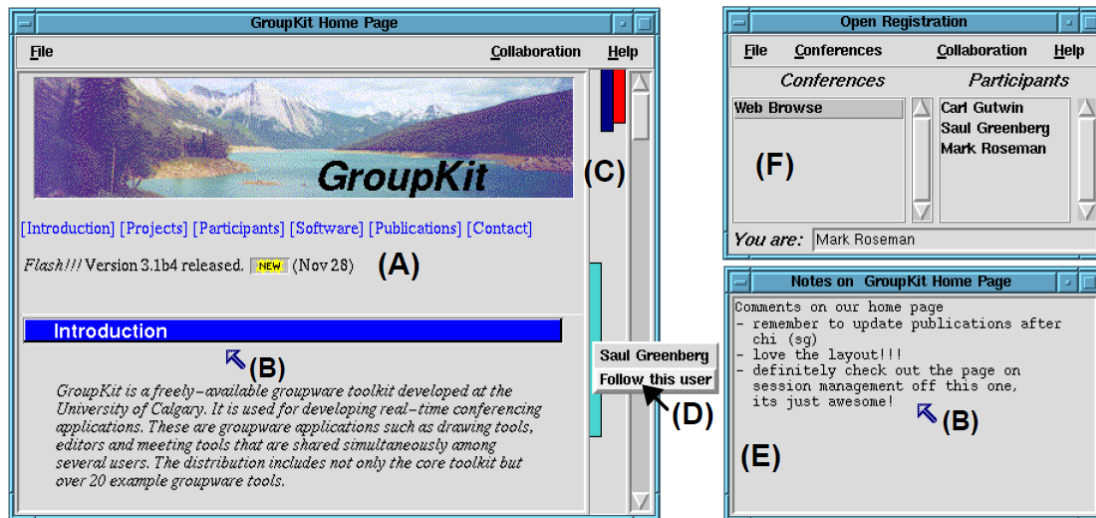


Figure 1. GroupWeb, showing (a) a shared web page, (b) telepointers, (c) multi-user scrollbars, (d) view-slaving controls, (e) a group annotation tool, and (f) a session manager for joining the GroupWeb conference.

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

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

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

99. Collaborative user interfaces and collaborative work systems, or groupware, were also well-known and widely in use before the effective filing date of the '591 patent. For example, in August 2005, the software company Upstartle released Writely, one of the first collaborative cloud-based word processors. Ex. 1022, https://en.wikipedia.org/wiki/Google_Docs.

100. Google acquired Writely in 2006, which was incorporated into Google's widely available collaborative cloud-based word processor, Google Docs and Spreadsheets. Ex. 1023 (Press Release, Google Announces Google Docs & Spreadsheets, 10/11/2006, http://googlepress.blogspot.com/2006/10/google-announces-google-docs_11.html). Google released Google Docs and Spreadsheets on October 11, 2006.

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

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

103. Moreover, all collaborative groupware systems, whether text editors, spreadsheets or Web browser, use the same basic elements to establish a shared user interface that shows a common display (perhaps with minor variations) to multiple users at the same time, and can potentially accept input from any of the users in the

group. First of all, users must receive an invitation that contains information that allows each user to access the shared interface. The user must declare their acceptance of the invitation to join the group in response to the invitation. The software on each user's computer must be able to communicate both input from its own user to other users, typically through a common server, and also display output that is the result of other user's actions. In that sense, the operation of a groupware system is similar to many other kinds of multiple-user interfaces, such as a shared database that can be read or written by multiple users. The principles of synchronization of actions of multiple users were not novel, and well-known to POSITAs at the time of the effective filing date.

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

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

105. The final concept of operating a browser or an application based on web data received by a guest device was similarly well-known and in wide use prior to the effective filing date of the '591 patent.

106. Operating a client-side browser or application based on received web data was decades old by the purported time of invention. For instance, Netscape introduced JavaScript in 1995 as a client-side scripting language to provide dynamic application elements capable of executing within the user's browser. Shortly after its introduction,

JavaScript quickly became a standard programming language for internet websites.

Ex. 1024, <https://www.springboard.com/blog/data-science/history-of-javascript/>.

107. In 1996, Macromedia released Flash as a multimedia software application run within a user's browser to add animation, audio, and video elements to web pages requested by a user device and served by a webserver. Ex. 1025,

https://en.wikipedia.org/wiki/Adobe_Flash.

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

109. Flash, and other extensions to Web protocols, effectively allowed a much richer graphical vocabulary for constructing user interfaces than was previously available. They allowed more dynamic interfaces in response to user interaction. Developers realized that they now had all the elements necessary to implement, with Web technology, user interfaces that had previously required native applications designed for a single computer and user. This paved the way for Web- and cloud-based groupware.

110. In 2005, Asynchronous JavaScript And XML (Ajax) was introduced to enable website developers to create asynchronous web applications, including today's well-known Google's Gmail and Google Maps web applications, all of which operate

based on web data received by a user's computer or handheld device from a webserver or web application server. Ex. 1026, <https://thehistoryoftheweb.com/what-does-ajax-even-stand-for/>.

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

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

113. It was well-known to a POSITA as of the effective filing date of the '591 patent that then-contemporary browser and web applications operated based on web data received by a guest (user) device.

114. The claimed invention of the '591 is the combination of the above known concepts to perform known methods used in collaborative systems and collaborative web browsing. The background provided above shows that each of the individual concepts were well-known and in use by the time of the invention.

B. Specific References that Render the Claims Obvious

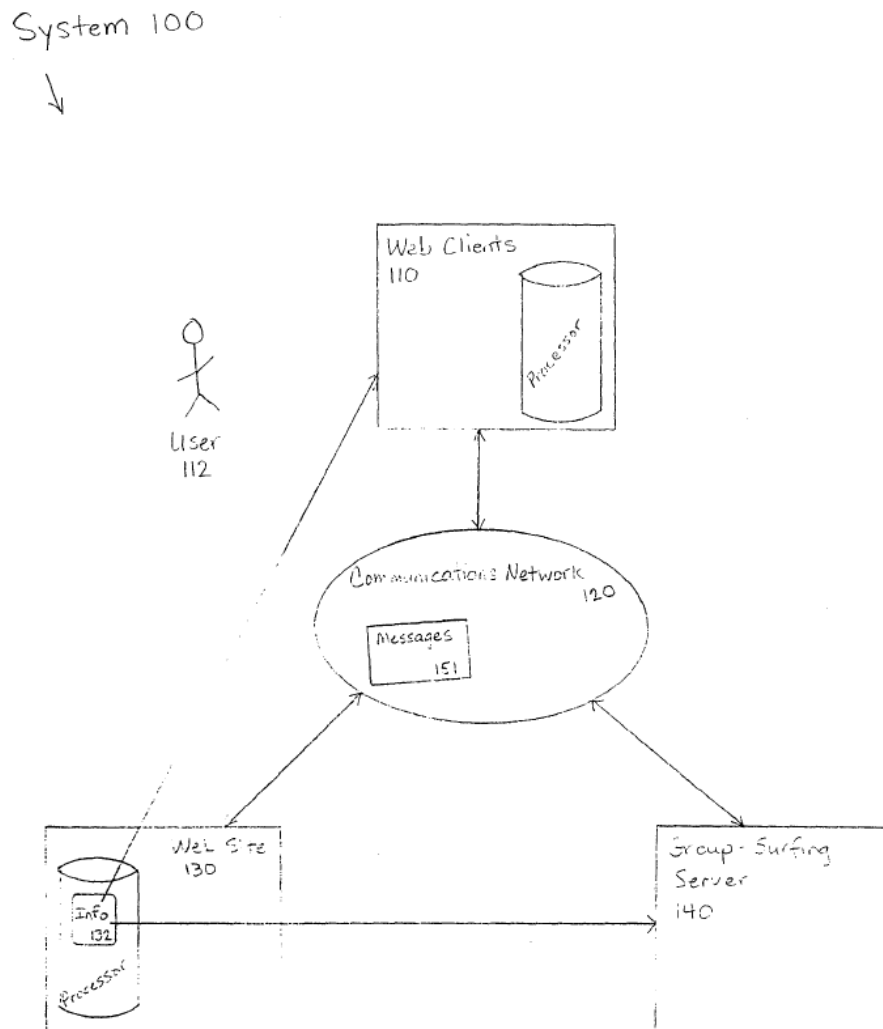
1. International Patent Pub. No. WO 00/48110 to Lebrun et al.

115. International Patent Pub. No. WO 00/48110 (“Lebrun”) filed on February 11, 2000 and published on August 17, 2000. Lebrun is therefore prior art to the ’591 patent under pre-AIA §§ 102(a) and 102(b). Lebrun was not cited by the applicant or examiner during prosecution of the ’591 patent. Ex. 1001, References Cited.

116. Lebrun identified problems in the art, much like the ’591 patent, that “there is no convenient and simple technique in the known art for those users to coordinate following links to other and further web sites. Similarly, there is no convenient and simple technique in the known art for providing, for a group of related users, simultaneous access to a sequence of web sites.” Ex. 1005, 4:1-4.

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

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



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

120. Lebrun discloses a sequence to create and participate within a group surfing session, in which a first web client 110 sends a group session creation request

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

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

122. Lebrun thus describes a system of collaborative web browsing and components in virtually the same manner as that offered by the system of the '591 patent, described below.

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

123. 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 '591 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 '591 patent. Ex. 1001, References Cited.

124. Wang, like the '591 patent and Lebrun, is directed to a collaboration system that includes multiple client devices, a communication network, and a server providing “a group session” to the connected client devices and “means for synchronizing the client devices in the collaboration environment.” Ex. 1006, Abstract.

125. Wang, also like the '591 patent and Lebrun, identifies problems in the art related to collaborative browsing, and in particular, to group virtual shopping sessions which suffer synchronization issues when individual web clients attempt to browse web pages or process online purchase requests. *Id.*, ¶¶[0009-10] (describing synchronization problems using conventional methods for an “on-line shopping system” and explaining that such “problems may be solved if web pages are shared using the collaborative technology” described therein).

126. To resolve such problems, Wang provides a “collaboration system” enabling a plurality of users to initiate a group browsing session via a synchronization server, to communicate with other users and invite them to follow an URL link to the group browsing session, and virtually shop together in a synchronized manner through the server apparatus. *Id.*, ¶¶[0013-17], [0046] (defining “the term ‘group session’ [a]s a session which enables client devices included in a group designated by a fixed

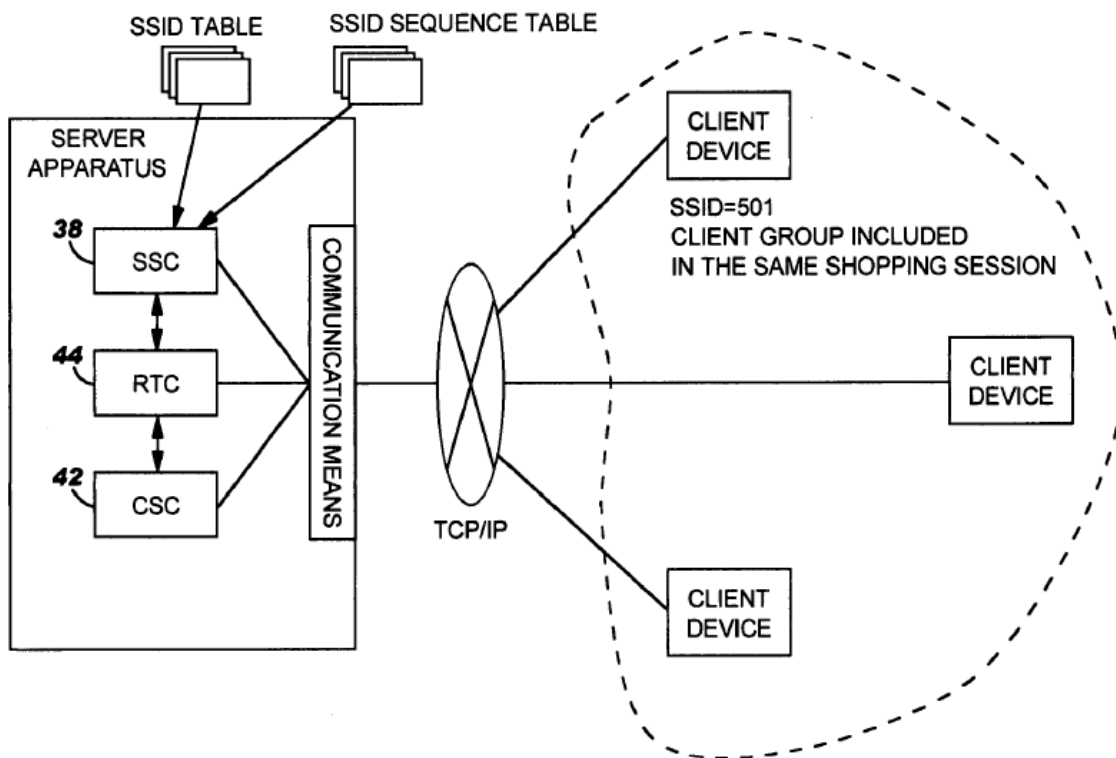
identification value to access a common application service. In a virtual shopping system, this group session may be referred to as a shopping session.”).

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

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

129. Figure 11 is a diagram showing multiple client devices engaged in a group shopping session using the collaboration system of Wang, including multiple client devices engaged in a group shopping session with a session identifier 501, a TCP/IP communication network, and a server apparatus responsible for storing the group session information, for managing the group session, and synchronizing the requested web page data across the client devices within the group session. *Id.*, ¶[0063], Fig. 11.

FIG. 11



130. Wang thus discloses a collaborative browsing system and components, group session initiation sequence, and group session operation in much the same manner and operation as the '591 patent.

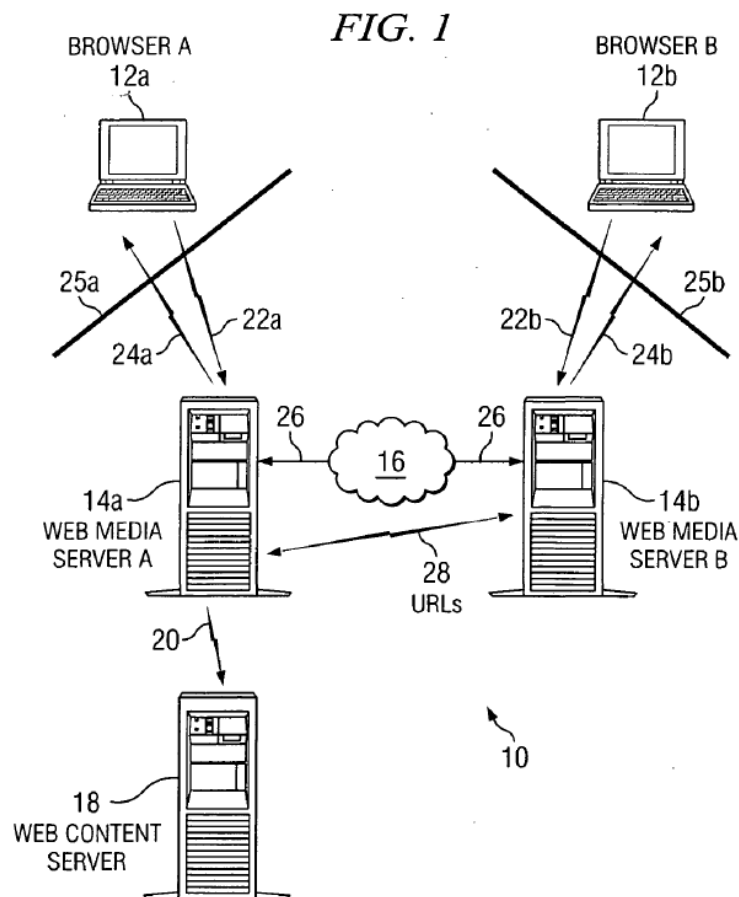
3. U.S. Patent Application Publication No. 2005/0021626 to Prajapat et al.

131. 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 '591 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 '591 patent. Ex. 1001, References Cited.

132. Prajapat, like the '591 patent, Lebrun and Wang, discloses a collaborative browsing system that is directed to solving problems in the art regarding “efficiency in a communication system when sharing web pages.” Ex. 1007, ¶¶[0009-10], [0013].

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



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

135. Prajapat describes the process of initiating a co-browsing session similar to that of the '591 patent, Lebrun and Wang, in which a client browser sends a request to a web media server to co-browse with one or more client browsers identified by email address. *Id.*, ¶¶[0016-17], [0034-35]. In response, the web media server establishes the co-browsing session with the requesting client browser, web media content servers, and invitee client browsers via their associated web media servers. *Id.*, ¶¶[0019-21], [0035].

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

137. Thus, Prajapat also discloses a collaborative browsing system that is formed and operates in the same or similar manner as the '591 patent.

4. Motivation to Combine Lebrun and Wang

138. A POSITA would have been motivated to combine Lebrun with Wang. Both are directed to solving problems in the art regarding collaborative browsing of web pages by multiple users in a synchronized manner. *See* Ex. 1005, 4:1-4 (stating that “there is no convenient and simple technique in the known art for providing, for a group of related users, simultaneous access to a sequence of web sites.”); Ex. 1006, ¶¶[0009-10] (describing synchronization problems using conventional methods and explaining that such “problems may be solved if web pages are shared using the collaborative technology” described therein); *see also*, Ex. 1005, 4:6-10 (describing an “embodiment of the invention in which multiple related users can simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same times”); Ex. 1006, ¶[0013] (“The present invention provides a collaboration environment that enables a plurality of users to access the same web page through their browsers while communicating with each other.”).

139. Furthermore, both Lebrun and Wang describe a process in which a first user initiates a collaborative browsing session by sending a request to a server to create a group browsing session and to send invitations to other users to join the session. Ex. 1005, 32:3-28; Ex. 1006, ¶¶[0047-48]. A POSITA would have recognized that the “identifier” in the group surfing invitation of Lebrun (Ex. 1005, 32:21-24) could incorporate the hyperlink “URL address” disclosed in Wang (Ex. 1006, ¶[0048]) using

conventional web programming techniques. The result would be a combination of prior art elements according to known methods to yield predictable results.

140. A POSITA attempting to solve problems in collaborative web browsing and collaborative systems at the time of the effective filing date of the '591 patent would have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative, synchronized manner, and considered combining the “group surfing” concepts disclosed in Lebrun with the hyperlink invitation concept disclosed in Wang.

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

5. Motivation to Combine Prajapat and Wang

142. 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].

143. Moreover, both Prajapat and Wang disclose synchronizing the retrieval and display of web pages to all client devices participating in a co-browsing session using a synchronization service comprised of a single server (Wang) or multiple web media servers (Prajapat). Ex. 1006, ¶¶[0018-19], [0045-49], [0054-55]; Ex. 1007, ¶¶[0022-26], [0036-39].

144. A POSITA attempting to solve problems in collaborative web browsing and collaborative systems at the time of the effective filing date of the '591 patent would have sought out various available solutions for enabling multiple users to browse web pages together in an efficient, collaborative manner such as Prajapat web page sharing with the hyperlink invitation concept disclosed in Wang.

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

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

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

6. Secondary Considerations

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

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

1. Independent Claim 1

a. Lebrun and Wang Disclose 1[pre] of Claim 1

148. To the extent the preamble of claim 1 is limiting, Lebrun discloses “**a method for a guest device performing a synchronized browsing session administered by a synchronization server.**”

149. Lebrun discloses **a synchronized browsing session**. The ’591 patent describes its invention as “allow[ing] two or more persons browsing the internet to share their internet browsing experience and have all users simultaneously browse and fully interact with web sites, games, virtual worlds, or other online applications in real

time.” Ex. 1001, 5:15-22. A “synchronized browsing session” is described as “two or more people read[ing] the same article, watch the same video, or shop for the same item automatically, without the hassle of coordinating user input.” *Id.* Lebrun describes its invention as “an improved technique for group access to web sites.” Ex. 1005, 7:3-5. This technique allows “[m]ultiple related users” to “simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same times.” *Id.* In Lebrun, this is achieved through “a group-surfing session,” which a POSITA would have understood to correspond to a “synchronized browsing session.”

150. Lebrun also discloses **a guest device that performs the “synchronized browsing session.”** The ’591 patent describes “guest devices” as “components of the present invention that may join a synchronized browsing session to view internet browsing conducted by host device 10 via relay communication over synchronization server 13.” Ex. 1001, 6:12-15. In the ’591 patent, host and guest devices “may comprise a personal computer, mobile phone, Smartphone, IPAD®, or other type of electronic device with a visual user interface and a network connection such that a user may access and view an internet website such as one provided by website server 12 over internet 11.” *Id.*, 6:5-11. Lebrun discloses multiple “web clients 110,” which may include, among others, “a general-purpose computer, such as a laptop or workstation,” “a hand-held calendar (such as a “Palm Pilot” or other hand-held device), a portable computer, a special purpose computer, a cellular telephone or other

telephonic device, a telephone system with interactive voice response, or a web server acting as the agent for an user.” Ex. 1005, 12:30-13:2; 30:19-28. Lebrun describes “[a] first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session.” *Id.*, 32:1-19. Once the group-surfing session is set up, Lebrun discloses “a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140” to add itself to the session. *Id.*, 33:2-4. A POSITA would have understood the “second (or further) web client 110” to correspond to the ’591 patent’s guest device.

151. Lebrun further discloses a **synchronization server**. Lebrun discloses a “group-surfing server 140” which, in response to receiving a “session-creation message 151,” would “(1) creat[e] a group-surfing session, and (2) inform[] the participants in the group-surfing session.” Ex. 1005, 32:26-31. A POSITA would have understood that the group-surfing server 140 described in Lebrun corresponds to a “synchronization server.” A POSITA would have also understood that the “other web clients 110” joining a “group-surfing session” administered by a “group-surfing server” comprises a method for a guest device performing a synchronized browsing session administered by a synchronization server. This is because the group-surfing session is a session where multiple web clients are shown the same progression of web pages as determined by one or more controlling web clients, *id.*, 34:15-232, and the

group-surfing server is configured to “create or set up [the] group surfing session,” *id.*, 7:3; 32:9-11.

b. Lebrun and Wang Disclose 1[a] of Claim 1

152. Lebrun and Wang disclose “**detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.**”

153. Lebrun and Wang disclose “**a hyperlink associated with the synchronized browsing session.**” As mentioned above, Lebrun discloses “[a] first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session.” *See supra* Section IX.C.1.a; Ex. 1005, 32:9-31. The “session-creation message 151” includes “an identifier 152 for an initial page 153 for the group-surfing session.” *Id.* Further, Lebrun discloses that, as an example, “the initial page 153 can include a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130.” *Id.*

154. Lebrun alone disclosed “a hyperlink associated with the synchronized browsing session.” But even if it did not, Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶¶[0047-49]. A POSITA would also have understood that Lebrun’s disclosure of a “message” to the “group-surfing server” could be modified to include the “myURL address” of Wang.

155. Lebrun further discloses “**detecting an activation of the hyperlink by a guest device.**” The “session-creation message 151” Lebrun discloses 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. When “[t]he group-surfing server 140 receives the session-creation message 151,” one of its actions is to “inform[] the participants in the group-surfing session.” *Id.*, 32:9-31. Lebrun also discloses that “the message 151 includes an identifier for the group-surfing session, so that other web clients 110 can add themselves to that session.” *Id.* Then, “[t]o add itself to the session, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140,” and “the [session-join] message 151 includes the identifier for the group-surfing session.” *Id.*, 33:2-4.

156. Because both the “session-creation message” and the “session-join message” are labelled as 151, and both of these messages contain an identifier for the group-surfing session, a POSITA would have understood that the “session-join message 151” is a reply message in response to “the session-creation message 151” and that it includes the same identifier as the one contained in “the session-creation message 151.” *Id.* Based on this understanding, a POSITA would have concluded that the other web clients 110 must have first received the session-join message 151 before they could send the session-join message 151 containing the same hyperlink. Therefore, a POSITA would have understood that a “second (or further) web client 110” receiving the session-creation message necessarily comprises detecting the

activation of the hyperlink within the message. And because the hyperlink is for “an initial page 153 for the group-surfing session,” it is associated with the synchronized browsing session.

157. As explained above, a POSITA would have understood Lebrun’s disclosure of “an identifier 152 for an initial page 153 for the group-surfing session” in the “session-creation message 151” to comprise a URL. *See supra* Section IX.C.1.b. But even if a POSITA would not have found Lebrun to explicitly disclose a hyperlink, he/she would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s disclosure of a “message” from the “first web client 110” containing an “identifier” for the “group-surfing session.” Incorporating standard user interface and web technology, such as accessing a designated URL address, into Lebrun’s invitation would allow Lebrun to perform the functions described in Lebrun’s disclosure. Further, activating an invitation via a designated URL address would further enable the group-surfing server disclosed in Lebrun to coordinate and manage the group-surfing session, which would further Lebrun’s objective of providing an “improved technique for group access to web sites.” Ex. 1005, 7:3-5.

c. Lebrun and Wang Disclose 1[b] of Claim 1

158. Lebrun and Wang disclose “**sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink.**” As mentioned above, Lebrun describes that, in

response to receiving the session-creation message, “a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140” to add itself to the session, and “the [session-join] message 151 includes the identifier for the group-surfing session.” *See supra* Section IX.C.1.a; Ex. 1005, 33:2-4. A POSITA would have understood that the “session-join message 151” is a request sent to the group-surfing server 140 by the other web clients 110 to join the group-surfing session, in response to “the session-creation message 151.” Because a POSITA would also have understood the web clients 110 receiving the session-creation message necessarily comprises detecting the activation of the hyperlink within the message, he/she would similarly have understood that the same web clients sending a request to join the group-surfing session comprises “sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink.”

159. If Lebrun did not disclose “in response to the activation of the hyperlink,” Wang discloses this limitation. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address,” and then sends a “login request” to “the server apparatus,” which “establishes an individual session therewith using an identification value SESSION B.” Ex. 1006, ¶[0049]. Therefore, even if a POSITA would not have found Lebrun to explicitly disclose this limitation, he/she would have found it obvious to modify Lebrun’s disclosure of sending a “session-join message” to the “group-surfing server”

to include accessing the “myURL address” of Wang, and thus comprise “in response to the activation of the hyperlink.”

160. A POSITA would have understood Lebrun’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Lebrun to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s invitation to join a group-surfing session for the reasons explained above for limitation 1[a]. *See supra* Section IX.C.1.a. A POSITA would have also been motivated to combine Wang’s disclosures of accessing a designated URL and sending a “login request” in response to receiving the invitation with Lebrun’s “session-join message.” Wang’s disclosures further ensure that only the intended guest devices are able to access Lebrun’s group surfing session, which furthers Lebrun’s objective of providing an “improved technique for group access to web sites.”

d. Lebrun Discloses 1[c] of Claim 1

161. Lebrun discloses **“receiving from the synchronization server a notification that guest device has joined the synchronized browsing session.”** Lebrun discloses that after “[t]he group-surfing server 140 receives the session-join message 151, and responds by adding the new web client 110 to the group-surfing session,” it “can . . . inform the other participants in the group-surfing session of the newly added web client 110.” Ex. 1005, 33:6-10. A POSITA would have understood that the group-surfing server 140 informing “the other participants in the group-surfing

session of the newly added web client 110” causing other web clients 110 to receive from the synchronization server a notification that the newly added web client 110 has joined the synchronized browsing session.

e. Lebrun Discloses 1[d] of Claim 1

162. Lebrun discloses **“receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device; and wherein the data comprises a URL of the website and cookie information associated with the website and the host device.”**

163. Lebrun discloses **“receiving data from the synchronization server.”** Lebrun describes a process through which “[a] first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session.” Ex. 1005, 32:1-19. Then, “[w]hen the session-creation message 151 includes an identifier 152 for an initial page 153, the group-surfing server 140 proceeds to begin operation of the group-surfing session . . . , causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session.” Ex. 1005, 32:26-31. After the group-surfing server 140 establishes the group-surfing session at the request of the first web client 110, it “directs the target web site 130 to deliver that next page 153 to the group-surfing server 140 itself. The group-surfing server 140 then re-sends that page 153 to those web clients 110 participating in the session.” Ex. 1005, 35:5-28. A POSITA would

have understood the process that Lebrun describes to comprise a synchronization server sending the web page to the guest devices.

164. Lebrun further discloses that “**the data relates to a website being accessed in real-time by a host device.**” The ’591 patent describes a host device as “a component of the present invention that may initialize and conduct a synchronized browsing session with guest device 14 via synchronization server 13.” Ex. 1001, 6:2-5. As discussed for limitation 1[pre], Lebrun discloses multiple web clients 110. *Supra* Section IX.C.1.a. Lebrun discloses a “first web client 110” that “request[s] the group-surfing server 140 to create or set up a group-surfing session,” and instructs the server to deliver web pages 153 to the other web clients 110. Ex. 1005, 32:1-19. Lebrun further discloses that, when a user of the first web client 110 “comes upon a page that the user desires to share, that user can, using its web client 110, send a message to the group-surfing server 140 to add that page to a group-surfing session.” *Id.*, 43:13-22. “If the second web client 110 is already participating in that group-surfing session, the page would be presented to the second web client 110 when it is sent by the first web client 110 to the group-surfing server 140.” *Id.*

165. Lebrun also discloses a “controlling web client 110,” which can be “the web client 110 that contacted the group-surfing server 140 to create the session.” *Id.*, 33:20-24. “The controlling web client 110 “determines the progression of pages 153 viewed during the group-surfing session.” *Id.*, 34:15-21. “As the controlling web client 110 selects a progression of pages 153 for the session, that progression of pages

153 is presented at each of the web clients 110 participating in the session.” *Id.*, 35:5-28.

166. A POSITA would have understood the “first web client 110” or the “controlling web client 110” to correspond to the ’591 patent’s host device. A POSITA would also have understood that the web page selected by the controlling web client and presented at each of the participating web clients comprises data that relates to a website being accessed in real-time by a host device. *Id.*

167. Lebrun discloses that **“the data comprises a URL of the website.”** As noted immediately above, Lebrun discloses the sharing of web pages 153 with the guest device, which a POSITA would have understood to include the URL of web site 130. *See supra* ¶¶157-160; Ex. 1005, 43:13-22. Lebrun also discloses the possibility that, instead of receiving the actual web page from the synchronization server, “the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added.” Ex. 1005, 43:13-22. This further proves to a POSITA that Lebrun discloses that the data being shared between the host device and the guest device comprises a URL of the website.

168. Lebrun also discloses that **“the data comprises cookie information associated with the website and the host device.”** Lebrun discloses that the resending of page 153 from the group-surfing server to the participating web clients 110 “allows usage of a single set of ‘cookies,’ or other data related to identity or

session, sent by the web site 130 and stored by the group-surfing server 140 at each participating web client 110.” Ex. 1005, 35:5-28. A POSITA would have understood Lebrun to disclose that the data being shared between the web clients comprises cookie information associated with the web site 130 and the controlling web client.

f. Lebrun Discloses 1[e] of Claim 1

169. Lebrun discloses “operating a browser by the guest device based on the data received from the synchronization server.”

170. Lebrun discloses “**a guest device operating a browser.**” As discussed for limitation 1[pre], Lebrun discloses multiple web clients 110, some of which correspond to the ’591 patent’s “host device,” and some correspond to the ’591 patent’s “guest device.” Lebrun further discloses that the “web clients 110” can include “a general-purpose computer, such as a laptop or workstation,” which can be used to operate web browsers. Ex. 1005, 30:19-28. As discussed for limitation 1[d], Lebrun describes how “an individual user of a web client 110 using ordinary web surfing techniques” could share a web page with a second web client 110. Ex. 1005, 43:13-22.

171. Lebrun further discloses that “**the guest device operates a browser based on the data received from the synchronization server.**” When a user of a web client 110 “comes upon a page that the user desires to share,” it “send[s] a message to the group-surfing server 140 to add that page to a group-surfing session.” Ex. 1005, 43:13-22. A second web client 110 in the “group-surfing session” then

receives the page or the URLs of the page through the group-surfing server 140, giving it access to the selected page. Ex. 1005, 35:5-28; 43:13-22. A POSITA would have understood the second web client 110 receiving the page or the URLs of the page from the group-surfing server 140 to comprise a guest device operating a browser based on the data received from the synchronization server.

2. Independent Claim 10

a. Lebrun Discloses the Preamble of Claim 10

172. Lebrun discloses **“an apparatus for a guest device performing a synchronized browsing session administered by a synchronization server.”** For the reasons stated above for limitation 1[pre], Lebrun discloses each limitation in this component. *See supra* Section IX.C.1.a.

b. Lebrun Discloses 10[a] of Claim 10

173. Lebrun discloses **“a network interface adapted to communicate with the synchronization server.”** For the reasons stated above for limitation 1[pre], Lebrun discloses a “synchronization server.” *See supra* Section IX.C.1.a.

174. Lebrun discloses a “communication network 120,” which includes “a packet switched network such as the Internet, as well as... an intranet, an enterprise network, an extranet, a virtual private network, a virtual switched network,” or “any other set of communication links that couple the web clients 110, web site 130, and group-surfing server 140 so they can perform the functions described herein.” Ex. 1005, 30:30-31:15. Lebrun further describes this “communication network 120” as

“disposed for transporting messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140.” *Id.* The messages are “formatted in the communication protocol recognized” by the “web clients,” “the web site,” and the “group-surfing server.” *Id.*, 31:6-7. A POSITA would have concluded that Lebrun’s disclosure of a “communication network 120” transporting messages “formatted in the communication protocol recognized” by the “web clients,” “the web site,” and the “group-surfing server,” comprises a network interface adapted to communicate with the synchronization server.

c. Lebrun Discloses 10[b] of Claim 10

175. Lebrun discloses “**a processor.**” Lebrun discloses “web clients” as including “any combination of devices or software taking on the role of a client in a client-server environment in the internet, the world wide web, or an equivalent or extension thereof. There is no particular requirement that the web clients 110 must be individual devices; they can each be a single device, a set of cooperating devices, a portion of a device, or some combination thereof (such as for example a device providing web server services that acts as an agent of the user).” Ex. 1005, 12:11-16; 12:24-28. Lebrun further discloses “the web clients 110” as each including “a processor operating under control of web client software 111, such as a web browser, and disposed for use by an operator or user 112.” *Id.*, 12:24-28; 30:14-17. A POSITA would understand that Lebrun expressly discloses that the web client comprises a processor.

d. Lebrun and Wang Disclose 10[b][i] of Claim 10

176. Lebrun and Wang disclose “**a processor adapted to detect an activation of a hyperlink associated with the synchronized browsing session by a guest device.**” For the reasons stated above for limitation 1[a], Lebrun and Wang disclose each limitation in this component. *See supra* Section IX.C.1.b.

e. Lebrun and Wang Disclose 10[b][ii] of Claim 10

177. Lebrun and Wang disclose “**a processor adapted to send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink.**” For the reasons stated above for limitation 1[b], Lebrun and Wang disclose each limitation in this component. *See supra* Section IX.C.1.c.

f. Lebrun Discloses 10[b][iii] of Claim 10

178. Lebrun discloses “**a processor adapted to receive from the synchronization server a notification that guest device has joined the synchronized browsing session.**” For the reasons stated above for limitation 1[c], Lebrun discloses each limitation in this component. *See supra* Section IX.C.1.d.

g. Lebrun Discloses 10[b][iv] of Claim 10

179. Lebrun discloses “**a processor adapted to receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website and the host device.**” For the

reasons stated above for limitation 1[d], Lebrun discloses each limitation in this component. *See supra* Section IX.C.1.e.

h. Lebrun Discloses 10[b][v] of Claim 10

180. Lebrun discloses **“a processor adapted to operate a browser by the guest device based on the data received from the synchronization server.”** For the reasons stated above for limitation 1[e], Lebrun discloses each limitation in this component. *See supra* Section IX.C.1.f.

3. Dependent Claims 2-9 and 11-18.

a. Lebrun and Wang Disclose Claim 2

181. Lebrun and Wang disclose **“receiving an invitation to join the synchronized browsing session.”** As discussed for limitation 1[pre], Lebrun discloses “[a] first web client 110 send[ing] a session-creation message 151 to the group-surfing server 140,” which in response “create[es] a group-surfing session,” and “inform[s] the participants in the group-surfing session.” *See supra* Section IX.C.1.a; Ex. 1005, 32:1-31. Lebrun further discloses that the “session-creation message 151” “includes an identifier for the group-surfing session” to allow “other web clients 110 [to] add themselves to that session.” *Id.*

182. A POSITA would have understood that “a first web client 110” sending a “session-creation message” containing “an identifier” to the “group-surfing server” to allow “other web clients 110 [to] add themselves to that session” comprises receiving an invitation to join the synchronized browsing session.

183. Wang also discloses that, upon receiving “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0049]. A POSITA would also have understood that Lebrun’s disclosure of a “message” received from the “first web client 110” can include receiving “myURL address” of Wang, which comprises receiving an invitation to join the synchronized browsing session.

184. A POSITA would have understood Lebrun’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Lebrun to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teaching of “Invitation acknowledgment, myURL address,” with Lebrun’s “session-creation message,” because both comprise well-known techniques of inviting users to join a synchronized browsing session.

b. Lebrun and Wang Disclose Claim 3

185. Lebrun in view of Wang discloses **“an invitation comprises a hyperlink associated with the synchronized browsing session.”** As explained for limitation 1[a], Lebrun discloses that “the session-creation message 151” includes “an identifier 152 for an initial page 153 for the group-surfing session.” *See supra* Section IX.C.1.b; Ex. 1005, 32:9-31. This “initial page 153” can include “a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130.” *Id.* A POSITA would have understood that the “identifier 152 for an initial page 153 for the group-surfing session” in the “session-creation message 151”

comprises an invitation comprising a hyperlink associated with the synchronized browsing session.

186. For the reasons stated for claim 2, Wang also discloses “**an invitation comprises a hyperlink associated with the synchronized browsing session.**” *See supra* Section IX.C.3.a. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address.” Ex. 1006, ¶¶[0047-49].

187. A POSITA would have understood Lebrun’s disclosure of “an identifier 152 for an initial page 153 for the group-surfing session” in the “session-creation message 151” to comprise a URL. Even if a POSITA would not have found Lebrun to explicitly disclose a hyperlink, he/she would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s disclosure of a “message” from the “first web client 110” containing an “identifier” for the “group-surfing session” for the reasons stated for limitation 1[a] and claim 2. *See supra* Sections IX.C.1.b; IX.C.3.a.

c. Lebrun and Wang Disclose Claim 4

188. Lebrun in view of Wang discloses “**an invitation further comprises a session identifier.**” As explained for limitation 1[a] and claim 2, Lebrun discloses that “the session-creation message 151” includes “an identifier 152” for the group-surfing session. *See supra* Section Sections IX.C.1.b; IX.C.3.a; Ex. 1005, 32:9-31. A POSITA would have understood that a “session-creation message” containing “an

identifier” to the “group-surfing server” to allow “other web clients 110 [to] add themselves to that session” comprises an invitation further comprising a session identifier.

189. Wang also discloses “**an invitation comprises a session identifier.**” *See supra* Sections IX.C.1.b; IX.C.3.a. A POSITA would have understood Wang’s disclosure of a designated URL address that is included in the invitation message for a “group session” necessarily comprises a session identifier for an invitation.

190. A POSITA would have understood Lebrun’s disclosure of “an identifier 152 for an initial page 153 for the group-surfing session” in the “session-creation message 151” to comprise a session identifier. Even if a POSITA would not have found Lebrun to explicitly disclose a session identifier, he/she would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s disclosure of a “message” from the “first web client 110” containing an “identifier” for the “group-surfing session” for the reasons stated for limitation 1[a] and claim 2. *See supra* Sections IX.C.1.b; IX.C.3.a.

d. Lebrun and Wang Disclose Claim 5

191. Lebrun in view of Wang discloses “**an invitation is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.**” Lebrun explains that the “web clients” in in a group-surfing session can “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.

192. Lebrun discloses a “communication network 120,” which includes “a packet switched network such as the Internet, as well as . . . an intranet, an enterprise network, an extranet, a virtual private network, a virtual switched network,” or “any other set of communication links that couple the web clients 110, web site 130, and group-surfing server 140 so they can perform the functions described herein.” Ex. 1005, 30:30-31:15. Lebrun describes this “communication network 120” to “transport[] messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140.” *Id.* A POSTIA would understand that receiving the “session-creation message 151” via the “communication network 20” comprises an invitation that is received via a suitable communication medium.

193. Wang also discloses **an invitation is received via a suitable communication medium**. Wang discloses a “server apparatus” transmitting an invitation notice and a URL address to be used, such as “Invitation Acknowledgment, myURL address,” to a second client device “as electronic mail.” Ex. 1006, ¶¶[0048], [0066].

194. A POSITA would have understood Lebrun’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Lebrun to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teaching of a “server apparatus” transmitting an invitation notice and a URL

address to a second client device “as electronic mail” with Lebrun’s disclosure of “communication network 120,” which also enables the web clients to communicate via “electronic mail.”

e. Lebrun Discloses Claims 6 and 16

195. Lebrun discloses that **“information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.”** As explained for limitation 1[d], Lebrun discloses information related to the shared user input web browsing interaction to comprise cookie information. *See supra* Section IX.C.1.e. Lebrun discloses that the “group-surfing server 140” receiving page 153 from web site 130 and resending it to the “web clients 110” participating in the group-surfing session allows “‘cookies,’ or other data related to identity or session” to be “stored by the group-surfing server 140 at each participating web client 110.” Ex. 1005, 35:5-28; 46:7-11.

f. Lebrun Discloses Claims 7 and 17

196. Lebrun discloses **“a shared user input web browsing interaction is depicted in a first web browser window.”** As explained for limitation 1[d], Lebrun discloses a “controlling web client 110,” which “determines the progression of pages 153 viewed during the group-surfing session.” *See supra* Section IX.C.1.e; Ex. 1005, 34:15-21. “As the controlling web client 110 selects a progression of pages 153 for the session, that progression of pages 153 is presented at each of the web clients 110 participating in the session.” *See supra* Section IX.C.1.e; Ex. 1005, 35:5-28. A

POSITA would have understood the controlling web client 110's sharing of pages 153 with other participating web clients 110 comprises a shared user input web browsing interaction is depicted in a first web browser window.

g. Lebrun Discloses Claims 8 and 18

197. Lebrun discloses **“non-shared web browsing interactions are depicted in a second web browser window.”** Lebrun discloses that the “controlling web client 110” can also “select web pages 153 for ‘look ahead’ before designating those web pages 153 as next pages 153 in the progression of pages 153 in the session.” Ex. 1005, 37:29-38:27. The “look ahead” function allows the “controlling web client 110” to determine whether “the selected ‘look ahead’ pages 153 require special access (such as password restriction or cost-burdened services)” before presenting the pages to the other web clients. Ex. 1005, 37:29-38:27. If the pages require “special access,” the controlling web client 110 can choose to “exclude such pages 153 from the session” or “accept such special access (such as entering a password or credit card number) without presenting that acceptance to other web clients 110 participating in the session.” *Id.*

198. Lebrun discloses that the “controlling web client 110” may send “a look-ahead-start message 151 to the group-surfing server 140” to prevent the server from “presenting following pages 153 to participants in the session.” Ex. 1005, 47:1-6. The “controlling web client 110” may also send “a special-access-start message 151 to the group-surfing server 140” to prevent the server from “presenting access or

authentication information (such as HTML forms) to participants in the session.” *Id.*, 47:22-27. This allows the “controlling web client 110” to “obtain access to those web sites 130, without having that information presented to participants in the session.” *Id.*, 47:29-31. A POSITA would have understood that the controlling web client 110’s selection and exclusion of certain web pages from being presented to participants in the group-surfing session comprises non-shared web browsing interactions that are depicted in a second web browser window.

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

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

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

h. Lebrun Discloses Claim 9

201. Lebrun discloses **“the shared user input web browser action further comprises a log-in into a restricted-access webpage.”** As discussed for claims 8 and 18, Lebrun’s disclosure of certain web pages subject to special access comprises a restricted-access webpage. *See supra* Section IX.C.3.g. The “controlling web client 110” “can enter information required for special access privately, without presenting that information to other web clients 110 participating in the session” or “enter such information (such as for completing an HTML “form”) using information available from, and supplied by, other web clients 110 participating in the session.” Ex. 1005, 37:29-38:27. Lebrun discloses that the “controlling web client” may allow “information on the HTML form” to be presented “at each participating web client 110.” *Id.*, 39:4-10. A POSITA would have recognized that Lebrun discloses presenting an HTML form to each participating web client 110 in the group-surfing session comprises the shared user input web browser action further comprises a log-in into a restricted-access webpage.

i. Lebrun Discloses Claim 11

202. Lebrun discloses **“a user interface adapted to initiate the processor to send the request in response to a user input.”** As discussed for limitation 10[b], Lebrun discloses “web clients 110” to include “a processor operating under control of

web client software 111, such as a web browser, and disposed for use by an operator or user 112.” *See supra* Section IX.C.2.c; Ex. 1005, 12:24-28; 30:14-17. Lebrun also discloses that “when an individual user of a web client 110 using ordinary web surfing techniques comes upon a page that the user desires to share, that user can, using its web client 110, send a message to the group-surfing server 140 to add that page to a group-surfing session.” Ex. 1005, 43:13-22.

j. **Lebrun and Wang Disclose Claim 12**

203. As discussed for limitations 1[a] and 1[b], Lebrun in view of Wang discloses **“the user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.”** *See supra* Sections IX.C.1.b; IX.C.1.c. Lebrun explains that a “group-surfing session” is initiated when a “first web client” sends a “session-creation message” to a “group-surfing server.” Ex. 1005, 32:9-11. 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.

204. Even if Lebrun did not explicitly disclose “activation of the hyperlink,” Wang discloses this limitation. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶¶[0047-49]. A POSITA would also have understood that Lebrun’s disclosure of a “message” to the “group-surfing server” could be modified to

include the “myURL address” of Wang, which comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.

205. A POSITA would have understood Lebrun’s disclosure of “an identifier 152 for an initial page 153 for the group-surfing session” in the “session-creation message 151” to comprise a URL. Even if a POSITA would not have found Lebrun to explicitly disclose a hyperlink, he/she would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s disclosure of a “message” from the “first web client 110” containing an “identifier” for the “group-surfing session” for the reasons stated above for limitation 1[a]. *See supra* Section IX.C.1.b.

k. Lebrun Discloses Claim 13

206. Lebrun discloses “**a memory adapted to store one or more software modules for controlling the processor.**” According to Lebrun, the invention can be “implemented using one or more general purpose processors or special purpose processors.” Ex. 1005, 11:24-30. As discussed for limitation 10[b], Lebrun further discloses “web clients 110” to include “a processor operating under control of web client software 111.” *See supra* Section IX.C.2.c; Ex. 1005, 12:24-28; 30:14-17. An example Lebrun provides for such a processor is “a general-purpose computer, such as a laptop or workstation.” Ex. 1005, 30:19-28. A POSITA would have understood Lebrun’s disclosure of the “web client 110” as “a general-purpose computer” to

comprise a memory adapted to store one or more software modules for controlling the processor.

I. Lebrun and Wang Disclose Claim 14

207. Lebrun and Wang disclose that **“a hyperlink is received from a host device via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.”** For the reasons stated above for claim 1[a], Lebrun in view of Wang discloses a hyperlink is received from a host device. *See supra* Section IX.C.1.b. Lebrun discloses that a “session-creation message 151” includes “an identifier 152 for an initial page 153 for the group-surfing session.” Ex. 1005, 32:9-31. And “the initial page 153 can include a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130.” *Id.*

208. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶¶[0047-49]. A POSITA would have understood that Lebrun’s disclosure of a “message” to the “group-surfing server” could be modified to include the “myURL address” of Wang.

209. For the reasons stated above for claim 5, Lebrun and Wang also disclose that the hyperlink is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication;

a text message communication; or other communication medium. *See supra* Section IX.C.3.d; *see also* Ex. 1005, 41:16-22; Ex. 1006, ¶[0048], [0066].

210. A POSITA would have understood Lebrun's disclosures alone to comprise this limitation. But even if a POSITA would not have found Lebrun to explicitly disclose a hyperlink, he/she would have been motivated to combine Wang's teachings of including a URL in a session invitation with Lebrun's disclosure of a "message" from the "first web client 110" containing an "identifier" for the "group-surfing session" for the reasons stated above for limitation 1[a]. *See supra* Section IX.C.1.b. Moreover, even if a POSITA would not have found Lebrun to explicitly disclose an appropriate communication medium, he/she would have been motivated to combine Wang's teaching of a "server apparatus" transmitting an invitation notice and a URL address to a second client device "as electronic mail" with Lebrun's disclosure of "communication network 120" for the reasons stated above for claim 5. *See supra* Section IX.C.3.d.

m. Lebrun Discloses Claim 15

211. For the reasons stated above for claim 11, Lebrun discloses "**a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.**" *See supra* Section IX.C.3.i. As discussed for limitation 10[b], Lebrun discloses "web clients 110" to include "a processor" used by "an operator or user 112." *See supra* Section IX.C.2.c; Ex. 1005, 12:24-28; 30:14-17. Lebrun also discloses that "when an individual user of a web client 110 using ordinary

web surfing techniques comes upon a page that the user desires to share, that user can, using its web client 110, send a message to the group-surfing server 140 to add that page to a group-surfing session.” Ex. 1005, 43:13-22.

212. Lebrun further discloses a “group-surfing server 140” making “multiple requests for the web site 130 to send (variants of) the same page, so as to retrieve the most suited version of the page for each separate web client 110,” when there are “more than one type of web client 130[sic].” Ex. 1005, 36:11-17. The “group-surfing server 140” then “forwards to each separate web client 110 the variant of the page that is most suited to that separate web client 110.” *Id.*

213. In addition, as mentioned for claim 9, Lebrun discloses that the “controlling web client” may allow “information on the HTML form” to be presented “at each participating web client 110,” “so that each participating web client 110 can see the HTML form being filled in.” *See supra* IX.C.3.h; Ex. 1005, 39:4-10.

D. Ground 2: Claims 1-18 are Rendered Obvious by Prajapat in View of Wang

1. Independent Claim 1

a. Prajapat Discloses the Preamble Of Claim 1

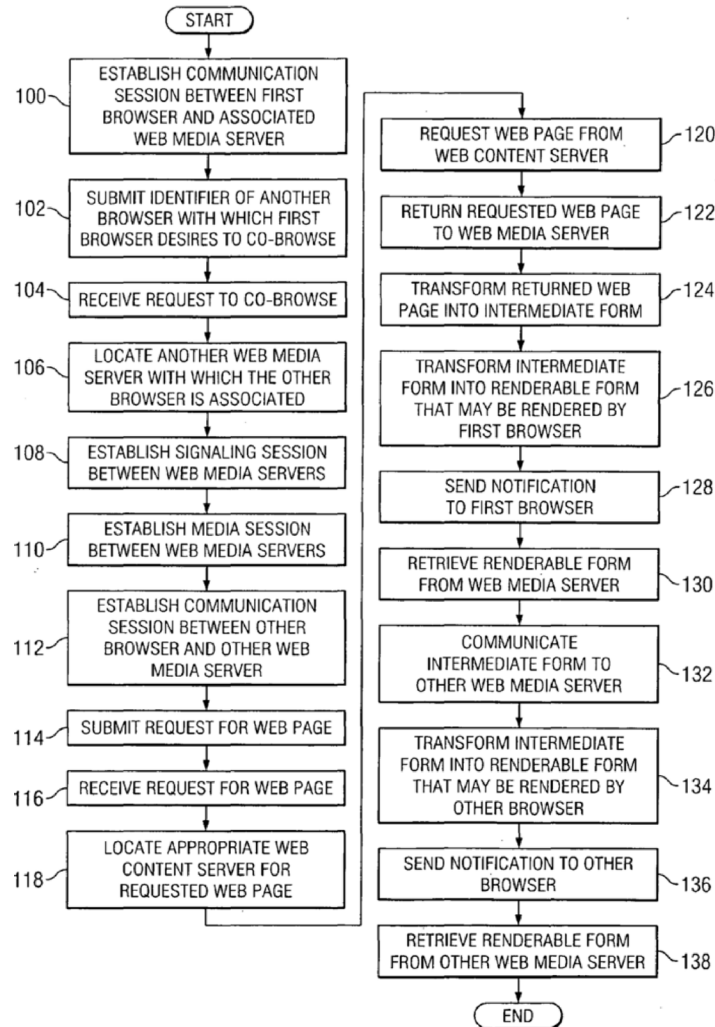
214. To the extent that the preamble of claim 1 is limiting, Prajapat discloses **“a method for a guest device performing a synchronized browsing session administered by a synchronization server.”**

215. Prajapat discloses **a synchronized browsing session**. The ’591 patent describes its invention as “allow[ing] two or more persons browsing the internet to

share their internet browsing experience and have all users simultaneously browse and fully interact with web sites, games, virtual worlds, or other online applications in real time.” Ex. 1001, 5:11-15. A “synchronized browsing session” is described as “two or more people read[ing] the same article, watch the same video, or shop for the same item automatically, without the hassle of coordinating user input.” *Id.*

216. Prajapat discloses a system that provides “peer-to-peer dynamic web page sharing.” Ex. 1007, ¶[0012]. 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.* 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.* Prajapat also refers to the “co-browsing session” as a “a web page sharing session.” *Id.*, ¶[0041]. Figure 2, reproduced below, shows an example flowchart demonstrating the steps taken to initiate a co-browsing, or web page sharing session. *Id.*, Fig. 2.

FIG. 2



217. Prajapat also discloses a **guest device that performs the “synchronized browsing session.”** The '591 patent describes “guest devices” as “components of the present invention that may join a synchronized browsing session to view internet browsing conducted by host device 10 via relay communication over synchronization server 13.” Ex. 1001, 6:12-15. In the '591 patent, host and guest devices “may comprise a personal computer, mobile phone, Smartphone, IPAD®, or other type of electronic device with a visual user interface and a network connection such that a user

may access and view an internet website such as one provided by website server 12 over internet 11.” *Id.*

218. 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 associated browser 12b” co-browsing with a “user associated with browser 12a,” comprises a guest device performing the “synchronized browsing session.”

219. Prajapat further discloses a **synchronization server**. As mentioned above, Prajapat discloses a “web media server 14a,” which “allows a user (e.g., “browser 12a”) to “co-browse one or more web pages with browser 12b.” *See supra* Ex. 1007, ¶[0012]. A POSITA would have understood that the web media server 14a described in Prajapat corresponds to a “synchronization server.” A POSITA would have also understood that the “browser 12b” co-browsing with “browser 12a” through the “web media server 14a” comprises a method for a guest device performing a synchronized browsing session administered by a synchronization server.

b. Prajapat and Wang Disclose 1[a] of Claim 1

220. Prajapat in view of Wang discloses “**detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.**” Prajapat discloses that co-browsing between “browser 12a” and “browser 12b” “may be done in any suitable manner.” Ex. 1007, ¶[0019].

221. Specifically, Prajapat describes that “browser 12a” requests to co-browse with “browser 12b,” by communicating “the URL or other suitable information regarding the requested web page to web media server 14a,” which then passes the information to “browser 12b” through “web media server 14b.” Ex. 1007, ¶¶[0022]; [0026-27]; [0036]; [0039]; [0043]. A POSITA would have understood browser 12b’s receipt of browser 12a’s request to co-browse to comprise detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.

222. Even if Prajapat did not explicitly disclose “detecting an activation of the hyperlink,” Wang discloses this limitation. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047-49]. A POSITA would also have understood Prajapat’s disclosure of browser 12b receiving browser 12a’s request to co-browse to include receiving “myURL address” of Wang, which comprises detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.

223. A POSITA would have understood Prajapat’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Prajapat’s disclosure of browser 12a’s request to co-browse, which includes a URL. Incorporating standard user interface and web technology, such as a hyperlink associated with a designated

URL address, into Prajapat's request to co-browse would allow the guest device in Prajapat to perform the collaborative browsing described in its disclosures as expected. Activating a hyperlink would allow browser 12a to control the time other browsers 12 can join the co-browsing session, which would further Prajapat's objective of providing a particular method of "peer-to-peer dynamic web page sharing." Ex. 1006, ¶[0005].

c. Prajapat and Wang Disclose 1[b] of Claim 1

224. Prajapat in view of Wang discloses **"sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink."** Prajapat discloses that, in response to browser 12a's request to co-browse, "web media server 14a" "may locate the web media server 14b," which then passes the request to "browser 12b" through a "communication session" between "web media server 14b" and "browser 12b." Ex. 1007, ¶[0019]; [0021]. Prajapat further discloses that "the communication session between browser 12b and web media server 14b may include an outgoing channel 30b," through which "browser 14b[sic] may submit requests for web pages and other web content." *Id.*, ¶[0021]. A POSITA would have understood browser 12b submitting requests for web pages may be in response to the receipt of browser 12a's request to co-browse, which comprises sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink.

225. Even if Prajapat did not explicitly disclose “in response to the activation of the hyperlink,” Wang discloses sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address,” and then sends a “login request” to “the server apparatus,” which “establishes an individual session therewith using an identification value SESSION B.” Ex. 1006, ¶[0049]. A POSITA would have understood that Prajapat’s disclosure of browser 12b receiving browser 12a’s request to co-browse to include receiving “myURL address” of Wang to comprise activation of the hyperlink. A POSITA would have further understood Prajapat’s disclosure of browser 12b submitting requests for web pages to include accessing a designated URL address and sending a “login request” of Wang to comprise sending a request by the guest device to join the synchronized browsing session to the synchronization server.

226. A POSITA would have understood Prajapat’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Prajapat’s disclosure of browser 12a’s request to co-browse, which includes a URL. A POSITA would have also been motivated to combine Wang’s disclosures of accessing a designated URL and sending a “login request” in response to receiving the invitation with Lebrun’s

“session-join message.” Wang’s disclosures further ensure that only the intended guest devices are able to access Prajapat’s “peer-to-peer dynamic web page sharing” session.

d. Prajapat Discloses 1[c] of Claim 1

227. Prajapat discloses **“receiving from the synchronization server a notification that guest device has joined the synchronized browsing session.”**

Prajapat discloses a “communication session” between “browser 12b” and “web media server 14b,” which may include “an incoming channel 32b,” through which “web media server 14b may communicate notifications and other information to browser 14b[sic].” Ex. 1007, ¶¶[0021]; [0035]. A POSITA would have understood browser 12b receiving notifications and other information from “web media server 14b” to comprise receiving from the synchronization server a notification that guest device has joined the synchronized browsing session.

e. Prajapat Discloses 1[d] of Claim 1

228. Prajapat discloses **“receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device; and wherein the data comprises a URL of the website and cookie information associated with the website and the host device.”** Prajapat discloses receiving data from the synchronization server. As explained for limitation 1[c], Prajapat discloses “an incoming channel 32b,” through which “web media server 14b may communicate notifications and other information to browser 14b[sic].” Ex. 1007, ¶¶[0021]; [0035].

Prajapat further describes that “browser 12a” requests to co-browse with “browser 12b,” by communicating “the URL or other suitable information regarding the requested web page to web media server 14a,” which then passes the information to “browser 12b” through “web media server 14b.” Ex. 1007, ¶¶[0022]; [0026-27]; [0036]; [0039]; [0043].

229. Prajapat further discloses that **the data relates to a website being accessed in real-time by a host device.** The ’591 patent describes a host device as “a component of the present invention that may initialize and conduct a synchronized browsing session with guest device 14 via synchronization server 13.” Ex. 1001, 6:2-5. As discussed for limitation 1[pre], 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 with browser 12b.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0016]. Prajapat further defines “co-browse” to include browsers that “display the same web pages at substantially the same time,” or “alter web pages” and “view those alterations.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0012]. A POSITA would have understood that a “user associated with browser 12a” co-browsing with “another user associated with browser 12b” comprises sharing data that relates to a website being accessed in real-time by a host device.

230. Prajapat discloses that **the data comprises a URL of the website.** Prajapat specifically discloses browser 12a submitting requests for “one or more web pages” “for a particular web site using the uniform resource locator (URL) of the web

site.” Ex. 1007, ¶¶[0022]; [0036]; [0043]. Therefore, a POSITA would have understood that Prajapat discloses that the data being shared between the host device and the guest device comprises a URL of the website.

231. Prajapat also discloses that the data comprises **cookie information associated with the website and the host device**. Prajapat discloses that browser 12a’s “request for the web page may include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server 18 associated with the requested web page, or any other suitable information.” Ex. 1007, ¶¶[0022]; [0036]; [0043]. “Web media server 14a may [also] derive any suitable information regarding browser 12a during a session with web content server 18.” *Id.* A POSITA would have understood Prajapat to disclose that the data being shared between the browsers comprises cookie information associated with the website and the host device.

f. Prajapat Discloses 1[e] of Claim 1

232. Prajapat discloses **“operating a browser by the guest device based on the data received from the synchronization server.”** Prajapat disclose a guest device operating a browser. As mentioned before, 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 [with] browser 12b.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0016]. Prajapat further defines “co-browse” to include “browser 12a and browser 12b display the same web pages at substantially the

same time,” or “alter web pages” and “view those alterations.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0012]. A POSITA would have understood browser 12b displaying, altering, or viewing web pages and its alterations comprises a guest device operating a browser.

233. Prajapat further discloses that the guest device operates a browser **based on the data received from the synchronization server**. As explained for limitation 1[d], Prajapat describes that “browser 12a” requests to co-browse with “browser 12b,” by communicating “the URL or other suitable information regarding the requested web page to web media server 14a,” which then passes the information to “browser 12b” through “web media server 14b.” *See supra* Section IX.D.1.e; Ex. 1007, ¶¶[0022]; [0026-27]; [0036]; [0039]; [0043]. A POSITA would have understood browser 12b receiving information related to browser 12a’s request to co-browse through web media servers 14a and 14b to comprise a guest device operating a browser based on the data received from the synchronization server.

2. Independent Claim 10

a. Prajapat Discloses the preamble of Claim 10

234. Prajapat discloses **“an apparatus for a guest device performing a synchronized browsing session administered by a synchronization server.”** For the reasons stated above for Limitation 1[pre], Prajapat discloses each limitation in this component. *See supra* Section IX.D.1.a.

b. Prajapat Discloses 10[a] of Claim 10

235. Prajapat discloses **“a network interface adapted to communicate with the synchronization server.”** For the reasons stated above for limitation 1[pre], Prajapat discloses **a synchronization server.** *See supra* Section IX.D.1.a. Prajapat also explains that browsers “may include any suitable interface for submitting requests for and displaying media such as web pages,” such as “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]. Prajapat further discloses “incoming” and “outgoing” channels between browsers and web media servers that the browsers use to transmit information in a co-browsing session. Ex. 1007, ¶¶[0021-22]; [0025-26]; [0034-36]; [0038-39]. A POSITA would have concluded that Prajapat’s description of “browsers” and their communication channels with “web media servers” to comprise a network interface adapted to communicate with the synchronization server.

c. Prajapat Discloses 10[b] of Claim 10

236. Prajapat discloses **“a processor.”** Prajapat explains 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.” Ex. 1007, ¶[0014].

d. Prajapat and Wang Disclose 10[b][i] of Claim 10

237. Prajapat and Wang disclose “**a processor adapted to detect an activation of a hyperlink associated with the synchronized browsing session by a guest device.**” For the reasons stated above for 1[a], Prajapat and Wang disclose each limitation in this component. *See supra* Section IX.D.1.b.

e. Prajapat and Wang Disclose 10[b][ii] of Claim 10

238. Prajapat and Wang disclose “**a processor adapted to send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink.**” For the reasons stated above for 1[b], Prajapat and Wang disclose each limitation in this component. *See supra* Section IX.D.1.c.

f. Prajapat Discloses 10[b][iii] of Claim 10

239. Prajapat discloses “**a processor adapted to receive from the synchronization server a notification that guest device has joined the synchronized browsing session.**” For the reasons stated above for limitation 1[c], Prajapat discloses each limitation in this component. *See supra* Section IX.D.1.d.

g. Prajapat Discloses 10[b][iv] of Claim 10

240. Prajapat discloses “**a processor adapted to receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and**

cookie information associated with the website and the host device.” For the reasons stated above for 1[d], Prajapat discloses each limitation in this component. *See supra* Section IX.D.1.e.

h. Prajapat Discloses 10[b][v] of Claim 10

241. Prajapat discloses **“a processor adapted to operate a browser by the guest device based on the data received from the synchronization server.”** For the reasons stated above for 1[e], Prajapat discloses each limitation in this component. *See supra* Section IX.D.1.f.

3. Dependent Claims 2-9 and 11-18

a. Prajapat and Wang Disclose Claim 2

242. Prajapat and Wang disclose **“receiving an invitation to join the synchronized browsing session.”** As explained for limitation 1[a], Prajapat describes that “browser 12a” requests to co-browse with “browser 12b,” by communicating “the URL or other suitable information regarding the requested web page to web media server 14a,” which then passes the information to “browser 12b” through “web media server 14b.” *See supra* Section IX.D.1.b; Ex. 1007, ¶¶[0022]; [0026-27]; [0036]; [0039]; [0043]. A POSITA would have understood browser 12b receiving the “request to co-browse” comprises receiving an invitation to join the synchronized browsing session.

243. Wang also discloses that, upon receiving “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address.”

Ex. 1006, ¶[0049]. A POSITA would also have understood that Prajapat’s disclosure of browser 12b receiving browser 12a’s request to co-browse can include receiving “myURL address” of Wang, which comprises receiving an invitation to join the synchronized browsing session.

244. A POSITA would have understood Prajapat’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teaching of “Invitation acknowledgment, myURL address,” with Prajapat’s request to co-browse from browser 12a, because the two messages are intended to achieve a similar goal of initiating a communication session with the guest devices.

b. Prajapat and Wang Disclose Claim 3

245. Prajapat in view of Wang discloses **“an invitation comprises a hyperlink associated with the synchronized browsing session.”** As explained for limitation 1[a], Prajapat describes that “browser 12a” requests to co-browse with “browser 12b,” by communicating “the URL or other suitable information regarding the requested web page to web media server 14a,” which then passes the information to “browser 12b” through “web media server 14b.” *See supra* Section IX.D.1.b; Ex. 1007, ¶¶[0022]; [0026-27]; [0036]; [0039]; [0043]. A POSITA would have understood the request to co-browse from browser 12a to browser 12b to comprise an invitation that comprises a hyperlink associated with the synchronized browsing session.

246. For the reasons stated for claim 2, Wang also discloses an invitation comprises a hyperlink associated with the synchronized browsing session. *See supra* Section IX.D.3.a. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address.” Ex. 1006, ¶¶[0047-49]. A POSITA would also have understood that Prajapat’s disclosure of browser 12b receiving browser 12a’s request to co-browse to include receiving “myURL address” of Wang, which comprises an invitation comprising a hyperlink associated with the synchronized browsing session.

247. A POSITA would have understood Prajapat’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teaching of “Invitation acknowledgment, myURL address,” with Prajapat’s request to co-browse from browser 12a, for the reasons stated for limitation 1[a] and claim 2. *See supra* Sections IX.D.1.b; IX.D.3.a.

c. Prajapat and Wang Disclose Claim 4

248. Prajapat in view of Wang discloses **“an invitation further comprises a session identifier.”** 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]. A POSITA would have understood 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 12,” the

invitation necessarily includes an identifier for other browsers to join the co-browsing session, and thus, comprises an invitation further comprising a session identifier.

249. For the reasons stated for claim 3, Wang also discloses an invitation comprises a session identifier. *See supra* Section IX.D.3.b. A POSITA would have understood Wang's disclosure of a designated URL address that is included in the invitation message for a "group session" necessarily comprises a session identifier for an invitation.

250. A POSITA would have understood Prajapat's disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang's teaching of "Invitation acknowledgment, myURL address," with Prajapat's request to co-browse from browser 12a, for the reasons stated for limitation 1[a] and claim 2. *See supra* Sections IX.D.1.b; IX.D.3.a.

d. Prajapat and Wang Disclose Claim 5

251. Prajapat in view of Wang discloses **"an invitation is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium."** As explained for limitation 1[a], Prajapat describes that "browser 12a" requests to co-browse with "browser 12b," by communicating "the URL or other suitable information regarding the requested web page to web media server 14a," which then passes the information to "browser 12b"

through “web media server 14b.” *See supra* Section IX.D.1.b; Ex. 1007, ¶¶[0022]; [0026-27]; [0036]; [0039]; [0043]. For example, the invitation to co-browse could be sent to “chachi@happydaycompany.com who is associated with browser 12b.” Ex. 1007, ¶[0016-17]. A POSTIA would understand that sending a request to co-browse via email comprises an invitation that is received via a suitable communication medium.

252. Wang also discloses an invitation is received via a suitable communication medium. Wang discloses the server apparatus transmitting an invitation notice and a URL address to be used, such as “Invitation Acknowledgment, myURL address,” to a second client device “as electronic mail.” Ex. 1006, ¶¶[0048], [0066].

253. A POSITA would have understood Prajapat’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teaching of a “server apparatus” transmitting an invitation notice and a URL address to a second client device “as electronic mail” with Prajapat’s disclosure of sending a request to co-browse to an email address, because they are likely to be employing the same communication medium, which is also one of the appropriate media.

e. Prajapat Discloses Claims 6 and 16

254. Prajapat discloses that **“information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.”** Prajapat discloses a shared user input web browsing interaction. As discussed above, 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.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0012]. A POSITA would have understood Prajapat’s description of “co-browsing” to comprise a shared user input web browsing interaction.

255. Prajapat further discloses information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data. 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 17

256. Prajapat discloses **“a shared user input web browsing interaction is depicted in a first web browser window.”** As discussed above, 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.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0012]. A POSITA would have understood

Prajapat's description of "co-browsing" to comprise a shared user input web browsing interaction is depicted in a first web browser window.

g. Prajapat Discloses Claims 8 and 18

257. Prajapat discloses **"non-shared web browsing interactions are depicted in a second web browser window."** Prajapat describes that "browser 12a" can register with a "web media server 14a without actually sharing web pages with another browser 12." Ex. 1007, ¶[0034]. A POSITA would have understood that before browser 12a requests to share "one or more web pages" with other browsers, a user associated with browser 12a may view the web pages in a non-shared browser window.

h. Prajapat and Wang Disclose Claim 9

258. Prajapat in view of Wang discloses **"the shared user input web browser action further comprises a log-in into a restricted-access webpage."** Prajapat discloses a "co-browsing" technique that includes browsers that "display the same web pages at substantially the same time," and a POSITA would have understood Prajapat's description of "co-browsing" to comprise a shared user input web browsing interaction. Ex. 1007, ¶[0012].

259. Prajapat also teaches that the interaction data comprises a log-in into a restricted access webpage, and the information related to the shared user input web browsing interaction includes form data; java script data; or other web browsing interaction data. During a co-browsing session, "web page form content, such as fields

in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events.” Ex. 1007, ¶[0031]. When browser 12a submits a request to co-browse, “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.**” *Id.*, ¶[0017]. A POSITA would understand or consider obvious that the parameters include log-in information, which a POSITA would know is needed to access restricted web pages.

260. Wang also discloses this limitation. Wang discloses that to create the group-shopping session, the server “acquires the session identification value and the **user identification value (user ID, password and the like)** from data in the received HTTP request, such as a cookie.” Ex. 1006, ¶[0064]. The customer is then permitted to create a “dedicated URL address” that the customer can invite other authenticated users to join. *Id.*, ¶¶[0067-68]. A POSITA would understand that the creation of a dedicated URL for authenticated users constitutes web browsing interaction data that comprise a log-in into a restricted access webpage.

261. A POSITA would have understood that Prajapat’s disclosure of communicating “parameters” or “any suitable information” needed to properly render the co-browsing web pages could have been modified to include the user identification values of Wang, and could have incorporated that information into its registration and

invitation process because cookies and other registration information is already used for this purpose. Ex. 1006, ¶[0064].

262. A POSITA would have been motivated to combine Wang’s teachings of incorporating user identification values into the HTTP request for the shared virtual shopping into the invitation process disclosed by Prajapat for peer-to-peer web page sharing. Prajapat discloses a process for seeking out the requested invited user through identification of the associated web media server. Incorporating Wang’s disclosure of the server acquiring the user identification values when submitting a joint shopping session into Prajapat’s disclosure of joining the peer-to-peer session, would allow the host device to ensure that the user joining the co-browsing session is the intended recipient. Retrieving user identification information from an HTTP request such as a cookie was a known method, and Prajapat indicates that it could be implemented in a similar way in Prajapat’s process through its use of cookies for retrieving the intended web site to yield predictable results.

i. Prajapat Discloses Claim 11

263. Prajapat discloses “**a user interface adapted to initiate the processor to send the request in response to a user input.**” 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.” Ex. 1007, ¶[0014].

j. Prajapat and Wang Disclose Claim 12

264. As discussed for limitation 1[a] and 1[b], Prajapat in view of Wang discloses **“the user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.”** *See supra* Sections IX.D.1.b; IX.D.1.c. 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 [with] browser 12b.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0016]. Prajapat further defines “co-browse” to include browsers that “display the same web pages at substantially the same time,” or “alter web pages” and “view those alterations.” *See supra* Section IX.D.1.a; Ex. 1007, ¶[0012].

265. Prajapat discloses that, “[i]n a request to co-browse or otherwise,” “browser 12a” may submit “requests for one or more web pages, for example by requesting a particular web site, to web media server 14a.” Ex. 1007, ¶[0017]. In response, browser 12b may then submit requests for “web pages and other web content” to “web media server 14b.” Ex. 1007, ¶[0021]. A POSITA would have understood browser 12b submitting requests for web pages in response to the receipt of browser 12a’s request to co-browse to comprise the user input comprising activation of

the hyperlink for initializing sending of the request to join the synchronized browsing session.

266. In addition, even if Prajapat did not explicitly disclose “activation of the hyperlink,” Wang discloses activation of the hyperlink for initializing sending of the request to join the synchronized browsing session. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶¶[0047-49]. A POSITA would also have understood that Prajapat’s disclosure of browser 12a sending a request to co-browse to browser 12b to include sending “myURL address” of Wang, which comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.

267. A POSITA would have understood Prajapat’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teaching of “Invitation acknowledgment, myURL address,” with Prajapat’s request to co-browse from browser 12a, for the reasons stated for limitation 1[a]. *See supra* Section IX.D.1.b.

k. Prajapat Discloses Claim 13

268. Prajapat discloses “**a memory adapted to store one or more software modules for controlling the processor.**” Prajapat explains 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.” Ex. 1007, ¶[0014].

I. Prajapat and Wang Disclose Claim 14

269. Prajapat and Wang disclose that **“a hyperlink is received from a host device via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.”** For the reasons stated above for limitation 1[a], Prajapat in view of Wang discloses a hyperlink is received from a host device. *See supra* Section IX.D.1.b. Prajapat describes that “browser 12a” requests to co-browse with “browser 12b,” by communicating “the URL or other suitable information regarding the requested web page to web media server 14a,” which then passes the information to “browser 12b” through “web media server 14b.” *See supra* Section IX.D.1.b; Ex. 1007, ¶¶[0022]; [0026-27]; [0036]; [0039]; [0043]. A POSITA would therefore have understood browser 12b receiving browser 12a’s request to co-browse to comprise a hyperlink is received from a host device.

270. Wang also discloses **a hyperlink is received from a host device**. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶¶[0047-49]. A POSITA would also have understood that Prajapat’s disclosure of browser 12a

sending a request to co-browse to browser 12b to include sending “myURL address” of Wang, which comprises a guest device receiving a hyperlink from a host device.

271. For the reasons stated above for claim 5, Prajapat and Wang also disclose that the hyperlink is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium. *See supra* Section IX.D.3.d. Prajapat discloses, as an example, a request to co-browse that is sent from browser 12a to “chachi@happydaycompany.com who is associated with browser 12b.” Ex. 1007, ¶[0016-17]. A POSITA would understand that browser 12b receiving a request to co-browse via email comprises receiving a hyperlink via a suitable communication medium.

272. A POSITA would have understood Prajapat’s disclosures alone to comprise this limitation. But even if a POSITA would not have found Prajapat to explicitly disclose this limitation, he/she would have been motivated to combine Wang’s teaching of “Invitation acknowledgment, myURL address,” with Prajapat’s request to co-browse from browser 12a, for the reasons stated for limitation 1[a]. *See supra* Section IX.D.1.b. A POSITA would also have been motivated to combine Wang’s teaching of a “server apparatus” transmitting an invitation notice and a URL address to a second client device “as electronic mail” with Prajapat’s disclosure of sending the request to co-browse to browser 12b’s email address, for the reasons stated above for claim 5. *See supra* IX.D.3.d.

m. Prajapat Discloses Claim 15

273. For the reasons stated above for claim 11, Prajapat discloses “**a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.**” *See supra* Section IX.D.3.i. 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.” Ex. 1007, ¶[0014].

2. Claim Charts and Summary of Invalidity

274. For the reasons provided above and further analyzed in the claim chart below, the applied references render obvious claims 1-18 of the ’591 patent.

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

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

'591 Patent Claims 1-18 in view of Lebrun and Wang

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

Claim No.	Claim	Prior Art Analysis
1[pre]	A method for a guest device performing a synchronized browsing session administered by a synchronization server, comprising:	<i>Claim 1 is obvious in view of European Patent Application No. WO 2000/048110 (“Lebrun”), in view of U.S. Patent Pub. No. 2005/0033656 (“Wang”).</i> <i>Lebrun discloses a method for a guest device performing a synchronized browsing session administered by a synchronization server.</i> The invention provides an improved technique for group access to web sites. Multiple 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. Ex. 1005, 7:3-5. In a preferred embodiment, the web client 110 includes a general-purpose computer, such as a laptop or workstation. However, the web client 110 can also include (either alone or in conjunction with a laptop or workstation), a hand-held calendar (such as a “Palm Pilot” or other hand-held device), a portable computer, a special purpose computer, a cellular telephone or other telephonic device, a telephone system with interactive voice response, or a web server acting as the agent for an user. Ex. 1005, 12:30-13:2.

Claim No.	Claim	Prior Art Analysis
		In a preferred embodiment, the web clients 110 each include a general-purpose computer, such as a laptop or workstation. However, the web clients 110 can also include (either alone or in conjunction with a laptop or workstation), a hand-held calendar (such as a “Palm Pilot” or other hand-held device), a portable computer, a special purpose computer, a cellular telephone or other telephonic device, a web server acting as the agent for a user, or another device. In alternative embodiments, the web clients 110 may also include any other device disposed for performing the all or some functions described herein. The location, the type of device, and the nature of the connection of the web clients 110 to the web site 130 can each differ between pairs of connection sessions between the web clients 110 and the web site 130. Ex. 1005, 30:19-28. Creating a Group-Surfing Session The web client software 111 is disposed for sending a message 151 to the group-surfing server 140, to request the group-surfing server 140 to respond and perform functions described herein. In a preferred embodiment, the message 151 is responsive to an action by the user of the web client software 111, such as by selecting a web page or a link to a web page. A first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session. In a preferred embodiment, the message 151 includes an identifier for the

Claim No.	Claim	Prior Art Analysis
		group-surfing session, so that other web clients 110 can add themselves to that session. (The group-surfing server 140 can also assign this identifier in a reply to the session-creation message 151.) In a preferred embodiment, the message 151 includes identifiers for a set of web clients 110 participating in, permitted to participate in, or forbidden from participating in, that session. The web client 110 can alternatively specify that the session is open to anyone. The web client 110 can also specify a time schedule for the session (these functions can be combined, so that for example, the session can be open to anyone for a selected time period, after which only certain authorized users may participate). Ex. 1005, 32:1-19. The group-surfing server 140 receives the session-creation message 151, and responds by (1) creating a group-surfing session, and (2) informing the participants in the group-surfing session. When the session-creation message 151 includes an identifier 152 for an initial page 153, the group-surfing server 140 proceeds to begin operation of the group-surfing session, . . . causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session. Ex. 1005, 32:26-31. To add itself to the session, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140. In a preferred embodiment, the [session-join] message 151 includes the identifier for the group-surfing session. Ex. 1005, 33:2-4.

Claim No.	Claim	Prior Art Analysis
		Figure 4 shows a process flow diagram for a method of using a system for group access to web sites. Ex. 1005, Fig. 4. A method 200 is performed by the system 100, including the web client 110, the communication network 120, the web server 130, and the group-surfing server 140. Ex. 1005, 43:27-30. <i>A POSITA would have understood that the group-surfing server 140 described in Lebrun corresponds to a “synchronization server.” A POSITA would also have understood that the “other web clients 110” joining a “group-surfing session” administered by a “group-surfing server” comprises a method for a guest device performing a synchronized browsing session administered by a synchronization server.</i>
1[a]	detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device;	<i>Lebrun and Wang disclose detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.</i> The invention provides an improved technique for group access to web sites. Multiple 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. Ex. 1005, 7:3-5. A first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session. In a preferred embodiment, the message 151 includes an identifier for the group-surfing session, so that other web

Claim No.	Claim	Prior Art Analysis
		clients 110 can add themselves to that session. (The group-surfing server 140 can also assign this identifier in a reply to the session-creation message 151.) In a preferred embodiment, the message 151 includes identifiers for a set of web clients 110 participating in, permitted to participate in, or forbidden from participating in, that session. The web client 110 can alternatively specify that the session is open to anyone. The web client 110 can also specify a time schedule for the session (these functions can be combined, so that for example, the session can be open to anyone for a selected time period, after which only certain authorized users may participate). In a preferred embodiment, the message 151 can also include an identifier 152 for an initial page 153 for the group-surfing session. For example, the initial page 153 can include a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130. The group-surfing server 140 receives the session-creation message 151, and responds by (1) creating a group-surfing session, and (2) informing the participants in the group-surfing session. When the session-creation message 151 includes an identifier 152 for an initial page 153, the group-surfing server 140 proceeds to begin operation of the group-surfing session, . . . causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session. Ex. 1005, 32:9-31. To add itself to the session, a second (or further) web client 110 sends a session-join

Claim No.	Claim	Prior Art Analysis
		message 151 to the group-surfing server 140. In a preferred embodiment, the [session-join] message 151 includes the identifier for the group-surfing session. Ex. 1005, 33:2-4. <i>In addition, even if Lebrun is found not to explicitly disclose “activation of the hyperlink,” Wang discloses detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.</i> As shown in FIG. 3, at T1, a customer connects to the server apparatus from a first client device. The server apparatus sets up an individual session with the first client device with an identification value SESSION A at T2. The server apparatus transmits an HTTP response to the first client at T3, establishes a session therewith (T4), and stores values of the SESSION A as an SSID table (described below) in an appropriate storage device. At T4, the first client device transmits a message inviting the other client devices to the shopping session, for example the message “Add Others” and a message such as “Invitee” including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of “Add Others” and “Invitee.” Ex. 1006, ¶[0047]. At T7, the server apparatus transmits an invitation notice and a URL address to be used, such as “Invitation Acknowledgment, myURL address,” to a second client device by way of, for example. The description that follows assumes that the customer using the second client device has previously received

Claim No.	Claim	Prior Art Analysis
		notice from the customer using the first client device and is on standby for receiving an HTML message including “Invitation acknowledgment, myURL address” or the like as electronic mail. Ex. 1006, ¶[0048]. Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]. FIG. 3 Ex. 1006, Fig. 3. <i>A POSITA would find obvious incorporating standard user interface and web technology, such as accessing a designated URL address, into Lebrun’s invitation, such that it would allow Lebrun to perform the functions described in</i>

Claim No.	Claim	Prior Art Analysis
		<i>Lebrun's disclosure. Further, activating an invitation via a designated URL address would further enable the group-surfing server disclosed in Lebrun to coordinate and manage the group-surfing session, which would further Lebrun's objective of providing an improved technique for group access to web sites.</i>
1[b]	sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink;	<i>Lebrun and Wang disclose sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink.</i> The group-surfing server 140 receives the session-creation message 151, and responds by (1) creating a group-surfing session, and (2) informing the participants in the group-surfing session. When the session-creation message 151 includes an identifier 152 for an initial page 153, the group-surfing server 140 proceeds to begin operation of the group-surfing session, as described below, causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session. Ex. 1005, 32:26-31. To add itself to the session, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140. In a preferred embodiment, the [session-join] message 151 includes the identifier for the group-surfing session. Ex. 1005, 33:2-4. At a step 221, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140 At a step 222, the group-surfing server 140 receives the session-join message 151. The

Claim No.	Claim	Prior Art Analysis
		group-surfing server 140 (1) adds the new web client 110 to the group-surfing session, and (2) inform the other participants in the group-surfing session of the newly added web client 110. Ex. 1005, 44:21-27; Fig. 4. <i>In addition, even if Lebrun is found not to explicitly disclose “in response to the activation of the hyperlink,” Wang discloses sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink.</i> Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]; Fig. 3. When the customer receives an HTTP request desiring invitations through the client device (i.e., yes in Step S510), the processing proceeds to Step S512, where the server apparatus acquires, responsive to the received HTTP request, information such as, for example, an electronic mail address of the customer to be invited, and temporarily stores the information in the memory. Ex. 1006, ¶[0065]; Fig. 12.

Claim No.	Claim	Prior Art Analysis
		Thereafter, in Step S514, the server apparatus notifies the invited customer by transmitting electronic mail or the like to the invited customer. In Step S516, the server apparatus determines whether or not the customer accepts the invitation by monitoring an HTTP response from the invited customer, for example, “?Joinagreement==yes.” When the response indicates that the other customer accepts the invitation, i.e., “yes” in Step S516, the processing proceeds to Step S518, where client identification information is acquired, and a handle is set. Ex. 1006, ¶[0066]. FIG. 12 <pre> graph TD S500[RECEIVE HTTP REQUEST FOR VIRTUAL SHOPPING] --> S502[ACQUIRE SESSION IDENTIFICATION VALUE AND USER IDENTIFICATION VALUE] S502 --> S504{IS USER AUTHENTICATED?} S504 -- No --> S524[USER REGISTRATION PROCESSING] S504 -- Yes --> S506{HAS A SHOPPING SESSION BEEN CREATED?} S506 -- No --> S508[INQUIRE WHETHER ANOTHER CUSTOMER IS TO BE INVITED FOR JOINT SHOPPING] S506 -- Yes --> S510{ADD OTHERS==YES?} S508 --> S510 S510 -- No --> S512[ACQUIRE INFORMATION OF INVITED CUSTOMER] S510 -- Yes --> S514[NOTIFY THE INVITED CUSTOMER] S514 --> S516{JOIN AGREEMENT==YES?} S516 -- No --> S518[ACQUIRE CLIENT IDENTIFICATION VALUE OF THE INVITED CUSTOMER FROM COOKIE, AND SET HANDLE NAME] S516 -- Yes --> S520[TRANSMIT NECESSARY PROGRAM, ASSIGN SSID VALUE, AND REGISTER THE SSID VALUE IN SSID SEQUENCE TABLE] S518 --> S520 S520 --> S522[VIRTUAL SHOPPING] </pre> Ex. 1006, Fig. 12. <i>A POSITA would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s invitation to join a group-surfing session, and to combine Wang’s disclosures of accessing a designated URL and sending a “login request” in response to receiving the invitation with Lebrun’s “session-join message.” Wang’s disclosures further ensure that only the intended guest devices are able to access</i>

Claim No.	Claim	Prior Art Analysis
		<i>Lebrun's group surfing session, which furthers Lebrun's objective of providing an "improved technique for group access to web sites."</i>
1[c]	receiving from the synchronization server a notification that guest device has joined the synchronized browsing session;	<i>Lebrun discloses receiving from the synchronization server a notification that guest device has joined the synchronized browsing session.</i> The group-surfing server 140 receives the session-join message 151, and responds by adding the new web client 110 to the group-surfing session. The group-surfing server 140 can also inform the other participants in the group-surfing session of the newly added web client 110. The group-surfing server 140 causes the newly added web client 110 to participate in the session. Ex. 1005, 33:6-10. <i>A POSITA would have understood that the group-surfing server 140 informing "the other participants in the group-surfing session of the newly added web client 110" causing other web clients 110 to receive from the synchronization server a notification that the newly added web client 110 has joined the synchronized browsing session.</i>
1[d]	receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device; and wherein the data comprises a URL of the website and	<i>Lebrun discloses receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device; and wherein the data comprises a URL of the website and cookie information associated with the website and the host device.</i> A first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session. In a preferred embodiment, the

Claim No.	Claim	Prior Art Analysis
	cookie information associated with the website and the host device; and	message 151 includes an identifier for the group-surfing session, so that other web clients 110 can add themselves to that session. (The group-surfing server 140 can also assign this identifier in a reply to the session-creation message 151.) In a preferred embodiment, the message 151 includes identifiers for a set of web clients 110 participating in, permitted to participate in, or forbidden from participating in, that session. The web client 110 can alternatively specify that the session is open to anyone. The web client 110 can also specify a time schedule for the session (these functions can be combined, so that for example, the session can be open to anyone for a selected time period, after which only certain authorized users may participate). In a preferred embodiment, the message 151 can also include an identifier 152 for an initial page 153 for the group-surfing session. For example, the initial page 153 can include a home page for a selected web site 130 or a welcome page for a selected service available at the selected web site 130. The group-surfing server 140 receives the session-creation message 151, and responds by (1) creating a group-surfing session, and (2) informing the participants in the group-surfing session. When the session-creation message 151 includes an identifier 152 for an initial page 153, the group-surfing server 140 proceeds to begin operation of the group-surfing session, as described below, causing the web site 130 to deliver the initial page 153 to the web clients 110 participating in the session. Ex. 1005, 32:9-31.

Claim No.	Claim	Prior Art Analysis
		If the controlling web client 110 is a single web client 110, that single controlling web client 110 determines the progression of pages 153 viewed during the group-surfing session, as described below. If there is more than one controlling web client 110, those controlling web clients 110 act in concert to determine the progression of pages 153 viewed during the group-surfing session. Ex. 1005, 34:15-21. In any event, the group-surfing server 140 determines a next one in the progression of pages 153 in the session. The group-surfing server 140 contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session. In a preferred embodiment, the group-surfing server 140 directs the target web site 130 to deliver that next page 153 to the group-surfing server 140 itself. The group-surfing server 140 then re-sends that page 153 to those web clients 110 participating in the session. This allows usage of a single set of “cookies,” or other data related to identity or session, sent by the web site 130 and stored by the group-surfing server 140 at each participating web client 110. In alternative embodiments, where no “cookies” or other data related to identity are involved, each web client 110 can receive the next page 153 directly from the web site 130. In some such alternative embodiments, the

Claim No.	Claim	Prior Art Analysis
		group-surfing server 140 may retrieve that next page 153 itself from the target web site 130, and re-send that next page 153 to each web client 110 participating in the session. In other such alternative embodiments, the group-surfing server 140 may use a multicast protocol such as the IGMP protocol (Internet Group Management Protocol), to multicast the next page 153 to those web clients 110 participating in the session. As the controlling web client 110 selects a progression of pages 153 for the session, that progression of pages 153 is presented at each of the web clients 110 participating in the session. Ex. 1005, 35:5-28. In alternative embodiments, [] when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 39:4-10. In a preferred embodiment, when an individual user of a web client 110 using ordinary web surfing techniques comes upon a page that the user desires to share, that user can, using its web client 110, send a message to the group-surfing server 140 to add that page to a group-surfing session. Each such

Claim No.	Claim	Prior Art Analysis
		web client 110 can have its own personalized group-surfing session, which a second web client 110 can view and view the history thereof. If the second web client 110 is already participating in that group-surfing session, the page would be presented to the second web client 110 when it is sent by the first web client 110 to the group-surfing server 140. In alternative embodiments, the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added. Ex. 1005, 43:13-22. <i>A POSITA would have understood Lebrun to disclose that the data being shared between the web clients comprises cookie information associated with the web site 130 and the controlling web client.</i>
1[e]	operating a browser by the guest device based on the data received from the synchronization server.	<i>Lebrun discloses operating a browser by the guest device based on the data received from the synchronization server.</i> In a preferred embodiment, the web clients 110 each include a general-purpose computer, such as a laptop or workstation. However, the web clients 110 can also include (either alone or in conjunction with a laptop or workstation), a hand-held calendar (such as a “Palm Pilot” or other hand-held device), a portable computer, a special purpose computer, a cellular telephone or other telephonic device, a web server acting as the agent for a user, or another device. In alternative embodiments, the web clients 110 may also include any other device disposed for performing the all or some functions

Claim No.	Claim	Prior Art Analysis
		described herein. The location, the type of device, and the nature of the connection of the web clients 110 to the web site 130 can each differ between pairs of connection sessions between the web clients 110 and the web site 130. Ex. 1005, 30:19-28. In any event, the group-surfing server 140 determines a next one in the progression of pages 153 in the session. The group-surfing server 140 contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session. In a preferred embodiment, the group-surfing server 140 directs the target web site 130 to deliver that next page 153 to the group-surfing server 140 itself. The group-surfing server 140 then re-sends that page 153 to those web clients 110 participating in the session. This allows usage of a single set of “cookies,” or other data related to identity or session, sent by the web site 130 and stored by the group-surfing server 140 at each participating web client 110. In alternative embodiments, where no “cookies” or other data related to identity are involved, each web client 110 can receive the next page 153 directly from the web site 130. In some such alternative embodiments, the group-surfing server 140 may retrieve that next page 153 itself from the target web site 130, and re-send that next page 153 to each web client 110 participating in the session. In other such alternative embodiments, the

Claim No.	Claim	Prior Art Analysis
		group-surfing server 140 may use a multicast protocol such as the IGMP protocol (Internet Group Management Protocol), to multicast the next page 153 to those web clients 110 participating in the session. As the controlling web client 110 selects a progression of pages 153 for the session, that progression of pages 153 is presented at each of the web clients 110 participating in the session. Ex. 1005, 35:5-28. In a preferred embodiment, when an individual user of a web client 110 using ordinary web surfing techniques comes upon a page that the user desires to share, that user can, using its web client 110, send a message to the group-surfing server 140 to add that page to a group-surfing session. Each such web client 110 can have its own personalized group-surfing session, which a second web client 110 can view and view the history thereof. If the second web client 110 is already participating in that group-surfing session, the page would be presented to the second web client 110 when it is sent by the first web client 110 to the group-surfing server 140. In alternative embodiments, the second web client 110 can receive only a list of pointers (such as URLs) to those pages presented during the group-surfing session, dynamically updated when a new page is added. Ex. 1005, 43:13-22. <i>A POSITA would have understood the second web client 110 receiving the page or the URLs of the page from the group-surfing server 140 to comprise a guest device operating a browser based on the data received from the synchronization server.</i>

Claim No.	Claim	Prior Art Analysis
2	The method of claim 1, further comprising receiving an invitation to join the synchronized browsing session.	<i>Lebrun and Wang disclose receiving an invitation to join the synchronized browsing session.</i> See Claim 1; Ex. 1005, 7:3-5, 12:30-13:2; 30:19-28; 32:1-31; 33:2-4; 33:6-10; 33:20-24; 34:15-21; 35:5-28; 39:4-10; 43:13-22; 43:27-30; 44:21-27; Fig. 4; Ex. 1006, [0047-49]; [0065-66]; Fig. 3; Fig. 12. At a step 211, a first web client 110 sends a session-creation message 151 to the group-surfing server 140, as described above, to request the group-surfing server 140 to create or set up a group-surfing session. At a step 212, the group-surfing server 140 receives the session-creation message 151. The group-surfing server 140 (1) creates the group-surfing session, and (2) informs the participants in the group-surfing session. Ex. 1005, 44:8-14. <i>A POSITA would have been motivated to combine Wang's teaching of "Invitation acknowledgment, myURL address," with Lebrun's "session-creation message," because both comprise well-known techniques of inviting users to join a synchronized browsing session.</i>
3	The method of claim 2, wherein the invitation comprises the hyperlink associated with the synchronized browsing session.	<i>Lebrun and Wang disclose an invitation comprises a hyperlink associated with the synchronized browsing session.</i> See Claim 2; Ex. 1005, 7:3-5, 32:1-31; 33:2-4; 33:6-10; 34:15-21; 35:5-28; 39:4-10; 43:13-22; 43:27-30; 44:8-14; 44:21-27; Fig. 4; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12.

Claim No.	Claim	Prior Art Analysis
		<i>In addition, even if Lebrun did not explicitly disclose “a hyperlink associated with the synchronized browsing session,” Wang discloses an invitation comprises a hyperlink associated with the synchronized browsing session.</i> Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]; Fig. 3. <i>A POSITA would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s disclosure of a “message” from the “first web client 110” containing an “identifier” for the “group-surfing session.”</i>
4	The method of claim 2, wherein the invitation further comprises a session identifier.	<i>Lebrun and Wang disclose an invitation further comprises a session identifier.</i> See Claim 2; Ex. 1005, 7:3-5, 32:1-31; 33:2-4; 33:6-10; 34:15-21; 35:5-28; 39:4-10; 43:13-22; 43:27-30; 44:8-14; 44:21-27; Fig. 4; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12. <i>A POSITA would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s disclosure of a</i>

Claim No.	Claim	Prior Art Analysis
		<i>“message” from the “first web client 110” containing an “identifier” for the “group-surfing session.”</i>
5	The method of claim 2, wherein the invitation is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.	<i>Lebrun and Wang disclose that an invitation is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.</i> See Claim 2; Ex. 1005, 7:3-5, 32:1-31; 33:2-4; 33:6-10; 34:15-21; 35:5-28; 39:4-10; 43:13-22; 43:27-30; 44:8-14; 44:21-27; Fig. 4; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12. In a preferred embodiment, the communication network 120 includes a packet switched network such as the Internet, as well as (in conjunction with or instead of) an intranet, an enterprise network, an extranet, a virtual private network, a virtual switched network. In alternative embodiments, the communication network 120 may include any other set of communication links that couple the web clients 110, web site 130, and group-surfing server 140 so they can perform the functions described herein. The communication network 120 is disposed for transporting messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140. The messages 151 are formatted in the communication protocol recognized by the web clients 110, the web site 130, and the group-surfing server 140. In a preferred embodiment, the communication protocol includes TCP/IP (transfer control protocol/

Claim No.	Claim	Prior Art Analysis
		Internet protocol), or HTTP (hypertext transfer protocol) a variant thereof, such as HTTPS (secure HTTP). In a preferred embodiment, the communication protocol can include an additional protocol operating over TCP/IP. The communication protocol can also include other protocols for requesting and sending information, including FTP (file transfer protocol), Gopher, and variants thereof. Although the description refers herein primarily to HTTP and TCP/IP, those of ordinary skill in the art will recognize, after perusing this application, that use of the invention with other protocols would not require new invention or undue experimentation. Ex. 1005, 30:30-31:15. Those web clients 110 participating in the session can also communicate between and among groups of users 112 at those web clients 110. The techniques used for communication can include one or more of, or some combination of, the following: telephone communication, voice over IP, Internet chat, electronic mail, “instant messaging,” or other intra-user communication. In a preferred embodiment, the communication technique can be presented to each web client 110 at the initiation of the group-surfing server 140, using either a same or a separate window at the web client 110. Ex. 1005, 41:16-22.

Claim No.	Claim	Prior Art Analysis
		System 100 <pre> graph TD User112[User 112] --> WebClients110[Web Clients 110] WebClients110 --> CommNetwork120((Communications Network 120)) CommNetwork120 --> WebSite130[Web Site 130] CommNetwork120 --> GroupSurfingServer140[Group-Surfing Server 140] WebSite130 --> GroupSurfingServer140 </pre> Ex. 1005, Fig. 3. <i>In addition, even if Lebrun is found to not explicitly disclose “a hyperlink is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium,” Wang discloses a hyperlink is received via an email message or other communication medium.</i> At T7, the server apparatus transmits an invitation notice and a URL address to be used, such as “Invitation Acknowledgment, myURL address,” to a second client device by way of, for example. The description that follows assumes that the customer using the second client device has previously received notice from the customer using the first client device and is on standby for receiving an

Claim No.	Claim	Prior Art Analysis
		HTML message including “Invitation acknowledgment, myURL address” or the like as electronic mail. Ex. 1006, ¶[0048]. When another customer is to be invited, i.e., “yes” in Step S510, the server apparatus transmits, to the client device, a display prompting entry of information about the invitation. In Step S510, the server apparatus is on standby for receiving a message, for example a message including a command of “?add others==yes” from the client device. When the customer receives an HTTP request desiring invitations through the client device (i.e., yes in Step S510), the processing proceeds to Step S512, where the server apparatus acquires, responsive to the received HTTP request, information such as, for example, an electronic mail address of the customer to be invited, and temporarily stores the information in the memory. Ex. 1006, ¶[0065]. Thereafter, in Step S514, the server apparatus notifies the invited customer by transmitting electronic mail or the like to the invited customer. Ex. 1006, ¶[0066]; Fig. 12. <i>A POSITA would have been motivated to combine Wang’s teaching of a “server apparatus” transmitting an invitation notice and a URL address to a second client device “as electronic mail” with Lebrun’s disclosure of “communication network 120,” which also enables the web clients to communicate via “electronic mail.”</i>
6	The method of claim 1, wherein information related to the	<i>Lebrun discloses that information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.</i>

Claim No.	Claim	Prior Art Analysis
	shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.	<i>See</i> Claim 1; Ex. 1005, 7:3-5, 32:1-31; 33:2-4; 33:6-10; 34:15-21; 35:5-28; 39:4-10; 43:13-22; 43:27-30; 44:21-27; Fig. 4; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12. In a preferred embodiment, load is reduced on the group-surfing server 140 using a program fragment loaded at each web client 110. The program fragment can include one or more of, or any combination of, a Java applet, a section of JavaScript code, a web browser plug-in, an active-X element, or another technique for interfacing with the web client 110 and affecting its operation with the web site 130 and the group-surfing server 140. Ex. 1005, 36:21-25. The program fragment can intercept selection of a link 152 at the web client 110 and direct that selection to the group-surfing server 140 for processing. The program fragment can intercept “submit” selections by the web client 110 during posting of HTML forms, and direct the information in those "submit" selections to the group-surfing server 140 for processing. Ex. 1005, 37:5-10. In alternative embodiments, []when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that

Claim No.	Claim	Prior Art Analysis
		information on the HTML form as each field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 39:4-10.
7	The method of claim 1, wherein the shared user input web browsing interaction is depicted in a first web browser window.	<i>Lebrun discusses wherein the shared user input web browsing interaction is depicted in a first web browser window.</i> If the controlling web client 110 is a single web client 110, that single controlling web client 110 determines the progression of pages 153 viewed during the group-surfing session, as described below. If there is more than one controlling web client 110, those controlling web clients 110 act in concert to determine the progression of pages 153 viewed during the group-surfing session. Ex. 1005, 34:15-21. In any event, the group-surfing server 140 determines a next one in the progression of pages 153 in the session. The group-surfing server 140 contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session. In a preferred embodiment, the group-surfing server 140 directs the target web site 130 to deliver that next page 153 to the group-surfing server 140 itself. The group-surfing server 140 then re-sends that page 153 to those web clients 110 participating in the session. This allows usage of a single set of “cookies,” or other data related to identity or session, sent by the web site 130 and stored by the group-surfing server 140 at each participating web client

Claim No.	Claim	Prior Art Analysis
		110. In alternative embodiments, where no “cookies” or other data related to identity are involved, each web client 110 can receive the next page 153 directly from the web site 130. In some such alternative embodiments, the group-surfing server 140 may retrieve that next page 153 itself from the target web site 130, and re-send that next page 153 to each web client 110 participating in the session. In other such alternative embodiments, the group-surfing server 140 may use a multicast protocol such as the IGMP protocol (Internet Group Management Protocol), to multicast the next page 153 to those web clients 110 participating in the session. As the controlling web client 110 selects a progression of pages 153 for the session, that progression of pages 153 is presented at each of the web clients 110 participating in the session. Ex. 1005, 35:5-28. <i>A POSITA would have understood the controlling web client 110’s sharing of pages 153 with other participating web clients 110 comprises a shared user input web browsing interaction is depicted in a first web browser window.</i>
8	The method of claim 7, wherein non-shared web browsing interactions are depicted in a second web browser window.	<i>Lebrun discloses non-shared web browsing interactions are depicted in a second web browser window.</i> If the controlling web client 110 is a single web client 110, that single controlling web client 110 determines the progression of pages 153 viewed during the group-surfing session, as described below. If there is more than one controlling web client 110, those controlling web clients 110 act in concert to determine the progression of pages 153

Claim No.	Claim	Prior Art Analysis
		viewed during the group-surfing session. Ex. 1005, 34:15-21. At a step 251, the controlling web client 110 sends a look-ahead-start message 151 to the group-surfing server 140. At a step 252, the group-surfing server 140 receives the look-ahead-start message 151. The group-surfing server 140 refrains from presenting following pages 153 to participants in the session. Ex. 1005, 47:1-6. At a step 261, the controlling web client 110 sends a special-access-start message 151 to the group-surfing server 40. At a step 262, the group-surfing server 140 receives the special-access-start message 151. The group-surfing server 140 refrains from presenting access or authentication information (such as HTML forms) to participants in the session. Ex. 1005, 47:22-27. At a step 263, the controlling web client 110 sends messages 151 to one or 30 more web sites 130 to obtain access to those web sites 130, without having that information presented to participants in the session. Ex. 1005, 47:29-31. <i>A POSITA would have understood that the controlling web client 110's selection and exclusion of certain web pages from being presented to participants in the group-surfing session comprises non-shared web browsing interactions are depicted in a second web browser window.</i>
9	The method of claim 1, wherein the shared user input web	<i>Lebrun discloses a shared user input web browser action further comprising a log-in into a restricted-access webpage.</i>

Claim No.	Claim	Prior Art Analysis
	browser action further comprises a log-in into a restricted-access webpage.	The controlling web client 110 can select web pages 153 for “look ahead” 30 before designating those web pages 15 3 as next pages 15 3 in the progression of pages 15 3 in the session. This allows the controlling web client 110 to provide for one or more of, or some combination of, the following contingencies: The user 112 at the controlling web client 110 can determine if the selected “look ahead” pages 153 are accessible at the time of the session. For example, some such pages 153 can be subject to restricted access in response to time or usage constraints. • The user 112 at the controlling web client 110 can determine if the selected “look ahead” pages 153 are appropriate for the web clients 110 participating in the session. For a first example, some such pages 153 can include information that is immaterial to the session (such as for a class, a seminar, or a demonstration of a product or service). For a second example, some such pages 153 can include information that is inappropriate for the session 10 (such as so-called "adult-oriented" material for a session including users 112 who are minors). • The user 112 at the controlling web client 110 can determine if the selected “look ahead” pages 153 require special access (such as password restriction or cost-burdened services). For a first example, the controlling web client 110 can choose to exclude such 15 pages 153 from the session. For a second

Claim No.	Claim	Prior Art Analysis
		example, the controlling web client 110 can choose to accept such special access (such as entering a password or credit card number) without presenting that acceptance to other web clients 110 participating in the session. Web Page Special Access The controlling web client 110 can select web pages 153 for special access when designating those web pages 153 as next pages 153 in the progression of pages 153 in the session. For a first example, the controlling web client 110 can enter information required for special access privately, without presenting that information to other web clients 110 25 participating in the session. For a second example, the controlling web client 110 can enter such information (such as for completing an HTML “form”) using information available from, and supplied by, other web clients 110 participating in the session. Ex. 1005, 37:29-38:27. In alternative embodiments, the when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each field of the form is completed, or when the entire

Claim No.	Claim	Prior Art Analysis
		form is completed, or at other times. Ex. 1005, 39:4-10. <i>A POSITA would have recognized that Lebrun discloses presenting an HTML form to each participating web client 110 in the group-surfing session comprises the shared user input web browser action further comprises a log-in into a restricted-access webpage.</i>
10[pre]	An apparatus for a guest device performing a synchronized browsing session administered by a synchronization server, comprising:	<i>Lebrun discloses an apparatus for a guest device performing a synchronized browsing session administered by a synchronization server.</i> See Claim 1[pre]; Ex. 1005, 7:3-5, 32:1-19; 32:26-31; 33:2-4; 43:27-30.
10[a]	a network interface adapted to communicate with the synchronization server; and	<i>Lebrun discloses a network interface adapted to communicate with the synchronization server.</i> The web clients 110 each include a processor operating under control of web client software 111, such as a web browser, and disposed for use by an operator or user 112. In a preferred embodiment, the web client software 111 includes software disposed for communicating with the web site(s) 130 using a communication protocol, as described below. Ex. 1005, 30:14-17. In a preferred embodiment, the communication network 120 includes a packet switched network such as the Internet, as well as (in conjunction with or instead of) an intranet, an enterprise network, an extranet, a virtual private network, a virtual switched network. In alternative embodiments, the communication network

Claim No.	Claim	Prior Art Analysis
		120 may include any other set of communication links that couple the web clients 110, web site 130, and group-surfing server 140 so they can perform the functions described herein. The communication network 120 is disposed for transporting messages 151 between any two of the web clients 110, the web site 130, and the group-surfing server 140. The messages 151 are formatted in the communication protocol recognized by the web clients 110, the web site 130, and the group-surfing server 140. In a preferred embodiment, the communication protocol includes TCP/IP (transfer control protocol/Internet protocol), or HTTP (hypertext transfer protocol) a variant thereof, such as HTTPS (secure HTTP). In a preferred embodiment, the communication protocol can include an additional protocol operating over TCP/IP. The communication protocol can also include other protocols for requesting and sending information, including FTP (file transfer protocol), Gopher, and variants thereof. Although the description refers herein primarily to HTTP and TCP/IP, those of ordinary skill in the art will recognize, after perusing this application, that use of the invention with other protocols would not require new invention or undue experimentation. Ex. 1005, 30:30-31:15. A first web client 110 sends a session-creation message 151 to the group-surfing server 140, to request the group-surfing server 140 to create or set up a group-surfing session. In a preferred embodiment, the

Claim No.	Claim	Prior Art Analysis
		[session-creation] message 151 includes an identifier for the group-surfing session, so that other web clients 110 can add themselves to that session. (The group-surfing server 140 can also assign this identifier in a reply to the session-creation message 151.) In a preferred embodiment, the [session-creation] message 151 includes identifiers for a set of web clients 110 participating in, permitted to participate in, or forbidden from participating in, that session. Ex. 1005, 32:9-16. Figure 4 shows a process flow diagram for a method of using a system for group access to web sites. A method 200 is performed by the system 100, including the web client 110, the communication network 120, the web server 130, and the group-surfing server 140. Ex. 1005, 43:27-30. <i>A POSITA would have concluded that Lebrun's disclosure of a "communication network 120" transporting messages "formatted in the communication protocol recognized" by the "web clients," "the web site," and the "group-surfing server," comprises a network interface adapted to communicate with the synchronization server.</i>
10[b]	a processor adapted to:	<i>Lebrun discloses a processor.</i> As used herein, the phrase "web client" includes any combination of devices or software taking on the role of a client in a client-server environment in the internet, the world wide web, or an equivalent or extension thereof. There is no particular

Claim No.	Claim	Prior Art Analysis
		requirement that the web clients 110 must be individual devices; they can each be a single device, a set of 15 cooperating devices, a portion of a device, or some combination thereof (such as for example a device providing web server services that acts as an agent of the user). Ex. 1005, 12:11-16. The web client 110 includes a processor operating under control of web client 25 software 111, such as a web browser, and disposed for use by an operator or user 112. In a preferred embodiment, the web client software 111 includes software 113 disposed for communicating with the web sites 130 using a communication protocol, possibly including data 114 stored locally at the web client 110 regarding those web sites 130. Ex. 1005, 12:24-28. The web clients 110 each include a processor operating under control of web client software 111, such as a web browser, and disposed for use by an operator or user 112. In a preferred embodiment, the web client software 111 includes software disposed for communicating with the web site(s) 130 using a communication protocol, as described below. Ex. 1005, 30:14-17.
10[b][i]	detect an activation of a hyperlink associated with the synchronized browsing session by a guest device;	<i>Lebrun and Wang disclose a processor adapted to detect an activation of a hyperlink associated with the synchronized browsing session by a guest device.</i> See Claims 10[a]-[b] and 1[a]; Ex. 1005, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:9-31; 33:2-4; 43:27-30; Ex. 1006, [0049]; Fig. 3.

Claim No.	Claim	Prior Art Analysis
10[b][ii]	send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink;	<i>Lebrun and Wang disclose a processor adapted to send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink.</i> See Claims 10[a]-[b] and 1[b]; Ex. 1005, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:9-16; 32:26-31; 33:2-4; 44:21-27; 43:27-30; Fig. 4; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12.
10[b][iii]	receive from the synchronization server a notification that guest device has joined the synchronized browsing session;	<i>Lebrun discloses a processor adapted to receive from the synchronization server a notification that guest device has joined the synchronized browsing session.</i> See Claims 10[a]-[b] and 1[c]; Ex. 1005, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:9-16; 33:6-10; 43:27-30.
10[b][iv]	receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website and the host device; and	<i>Lebrun discloses a processor adapted to receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website and the host device.</i> See Claims 10[a]-[b] and 1[d]; Ex. 1005, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:9-16; 32:28-31; 34:15-21; 35:5-28; 39:4-10; 43:13-22.

Claim No.	Claim	Prior Art Analysis
10[b][v]	operate a browser by the guest device based on the data received from the synchronization server.	<i>Lebrun discloses a processor adapted to operate a browser by the guest device based on the data received from the synchronization server.</i> See Claims 10[a]-[b] and 1[e]; Ex. 1005, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:9-16; 35:5-28; 43:13-22; 43:27-30.
11	The apparatus of claim 10, further comprising a user interface adapted to initiate the processor to send the request in response to a user input.	<i>Lebrun discloses a user interface adapted to initiate the processor to send the request in response to a user input.</i> See Claim 10; Ex. 1005, 7:3-5, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:1-19; 32:26-31; 33:2-4; 43:27-30. As used herein, the phrase “web client” includes any combination of devices or software taking on the role of a client in a client-server environment in the internet, the world wide web, or an equivalent or extension thereof. There is no particular requirement that the web clients 110 must be individual devices; they can each be a single device, a set of 15 cooperating devices, a portion of a device, or some combination thereof (such as for example a device providing web server services that acts as an agent of the user). Ex. 1005, 12:11-16. The web client 110 includes a processor operating under control of web client software 111, such as a web browser, and disposed for use by an operator or user 112. In a preferred embodiment, the web client software 111 includes software 113 disposed for communicating with the web sites 130 using a communication protocol, possibly including data 114 stored locally at the web

Claim No.	Claim	Prior Art Analysis
		client 110 regarding those web sites 130. Ex. 1005, 12:24-28. To add itself to the session, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140. In a preferred embodiment, the message 151 includes the identifier for the group-surfing session. Ex. 1005, 33:2-4. At a step 221, a second (or further) web client 110 sends a session-join message 151 to the group-surfing server 140, as described above. At a step 222, the group-surfing server 140 receives the session-join message 151. The group-surfing server 140 (1) adds the new web client 110 to the group-surfing session, and (2) inform the other participants in the group-surfing session of the newly added web client 110. Ex. 1005, 44:21-27; Fig. 4. Similar to the web client 110, the web site 120 includes a processor, program 15 and data memory, and mass storage, operating under control of web server software (not shown) to perform the functions of a web server or web site. The web site 120 includes a set of web pages 121 for sending to the web client 110 (upon request of the web client 110), including at least one web page 121 having a structured data form 122 for requesting information from the web client 110. Ex. 1005, 66:7-19.
12	The apparatus of claim 11, wherein the user input comprises activation of the	<i>Lebrun and Wang disclose the user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.</i>

Claim No.	Claim	Prior Art Analysis
	hyperlink for initializing sending of the request to join the synchronized browsing session	See Claims 10[a]-[b] and 1[b]-[c]; Ex. 1005, 7:3-5, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:1-19; 32:1-31; 32:26-31; 33:2-4; 43:27-30; 44:21-27; Fig. 4; Ex. 1006, [0049]; [0065]-66]; Fig. 3; Fig. 12. <i>In addition, even if Lebrun is found to not explicitly disclose “activation of the hyperlink,” Wang discloses a user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.</i> Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]. FIG. 3 <pre> sequenceDiagram participant FCD as FIRST CLIENT DEVICE participant SAPP as SERVER APPARATUS participant SCDD as SECOND CLIENT DEVICE Note over FCD: T1 FCD->>SAPP: Login request Note over SAPP: T2 SAPP->>FCD: Establishment of SESSION A Note over FCD: T4 Note over SAPP: T3 Note over SAPP: SSID TABLE SSID SEQUENCE TABLE FCD->>SAPP: Invitation message Note over SAPP: T6 SAPP->>SCDD: Invitation acknowledgement Note over SCDD: T8 SCDD->>SAPP: Access to URL address Note over SCDD: T9 Note over SAPP: T10 SAPP->>SCDD: Login request Note over SCDD: T11 Note over SAPP: T12 Note over SAPP: SSID TABLE SSID SEQUENCE TABLE SCDD->>SAPP: Establishment of SESSION B Note over SAPP: T13 Note over SCDD: T14 </pre>

Claim No.	Claim	Prior Art Analysis
		Ex. 1006, Fig. 3. <i>A POSITA would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Lebrun’s disclosure of a “message” from the “first web client 110” containing an “identifier” for the “group-surfing session.”</i>
13	The apparatus of claim 10, further comprising a memory adapted to store one or more software modules for controlling the processor.	<i>Lebrun discloses a memory adapted to store one or more software modules for controlling the processor.</i> See Claim 10; Ex. 1005, 7:3-5, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:1-19; 32:26-31; 33:2-4; 43:27-30. In the following description, a preferred embodiment of the invention is described with regard to preferred process steps and data structures. Those skilled in the art would recognize after perusal of this application that embodiments of the invention can be implemented using one or more general purpose processors or special purpose processors or other circuits adapted to particular process steps and data structures described herein, and that implementation of the process steps and data structures described herein would not require undue experimentation or further invention. Ex. 1005, 11:24-30. In a preferred embodiment, the web clients 110 each include a general-purpose computer, such as a laptop or workstation. However, the web clients 110 can also include (either alone or in conjunction with a laptop or workstation), a hand-held calendar (such as a “Palm Pilot” or other hand-held

Claim No.	Claim	Prior Art Analysis
		device), a portable computer, a special purpose computer, a cellular telephone or other telephonic device, a web server acting as the agent for a user, or another device. In alternative embodiments, the web clients 110 may also include any other device disposed for performing the all or some functions described herein. The location, the type of device, and the nature of the connection of the web clients 110 to the web site 130 can each differ between pairs of connection sessions between the web clients 110 and the web site 130. Ex. 1005, 30:19-28. <i>A POSITA would have understood Lebrun's disclosure of the "web client 110" as "a general-purpose computer" to comprise a memory adapted to store one or more software modules for controlling the processor.</i>
14	The apparatus of claim 10, wherein the hyperlink is received from a host device via: - a social network communication; - a news feed; - an email message; - an instant message communication; - a micro-blogging communication; - a text message communication; - or	<i>Lebrun and Wang disclose that a hyperlink is received from a host device via:</i> <i>a social network communication;</i> <i>a news feed;</i> <i>an email message;</i> <i>an instant message communication;</i> <i>a micro-blogging communication;</i> <i>a text message communication; or</i> <i>other communication medium.</i> <i>See Claims 5, 10.; Ex. 1005, 7:3-5, 30:30-31:15; 32:1-31; 33:2-4; 33:6-10; 34:15-21; 35:5-28; 39:4-10; 43:13-22; 43:27-30; 44:8-14; 44:21-27; Fig. 3; Fig. 4; Ex. 1006, [0048-49]; [0065-66]; Fig. 3; Fig. 12.</i> <i>In addition, even if Lebrun is found to not explicitly disclose "a hyperlink is received from a host device via: a social network communication; a</i>

Claim No.	Claim	Prior Art Analysis
	other communication medium.	<i>news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium,” Wang discloses a hyperlink is received from a host device via an email message or other communication medium.</i> At T4, the first client device transmits a message inviting the other client devices to the shopping session, for example the message “Add Others” and a message such as “Invitee” including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of “Add Others” and “Invitee.” Ex. 1006, ¶[0047]; Fig. 3. <i>A POSITA would have been motivated to combine Wang’s teaching of a “server apparatus” transmitting an invitation notice and a URL address to a second client device “as electronic mail” with Lebrun’s disclosure of “communication network 120.”</i>
15	The apparatus of claim 10, further comprising a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.	<i>Lebrun discloses a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.</i> See Claim 10[b]; Ex. 1005, 7:3-5, 12:11-16; 12:24-28; 30:14-17; 30:30-31:15; 32:1-19; 32:26-31; 33:2-4; 43:27-30. As used herein, the phrase “web site” includes any combination of devices or software taking on the role of a server in a client-server environment in the internet, the world wide web, or an equivalent or extension thereof. There is no particular requirement that the web sites 130 must be individual devices. Ex. 1005, 28:8-12.

Claim No.	Claim	Prior Art Analysis
		If there is more than one controlling web client 110, those controlling web clients 110 act in concert to determine the progression of pages 153 viewed during the group-surfing session. The group-surfing server 140 can determine the progression of pages 153 in any one of, or some combination of, a variety of techniques: Ex. 1005, 34:19-22. In any event, the group-surfing server 140 determines a next one in the progression of pages 153 in the session. The group-surfing server 140 contacts the web site 130 having that next page 153, and directs that target web site 130 to deliver that next page 153 so it can be presented to those web clients 110 participating in the session. Ex. 1005, 35:5-8. When performing group-surfing for more than one type of web client 130 (such as a first web client 130 including a personal computer and a second web client 130 including a “Palm Pilot” device), the group-surfing server 140 makes multiple requests for the web site 130 to send (variants of) the same page, so as to retrieve the most suited version of the page for each separate web client 110. The group-surfing server 140 forwards to each separate web client 110 the variant of the page that is most suited to that separate web client 110. Ex. 1005, 36:11-17. • The program fragment can intercept HTML instructions in selected pages 153, which instructions would interfere with the screen layout used for the session (such as HTML code

Claim No.	Claim	Prior Art Analysis
		that attempts to force itself into a top-level frame). • The program fragment can detect embedded multimedia objects included in selected pages 153 and request those multimedia objects directly from the web site 130. Ex. 1005, 37:12-17. In a preferred embodiment, the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140. The group-surfing server 140 enters information to complete the HTML form, and sends that information to the web site 130. When the web site 130 replies with a new page, the group-surfing server 140 sends that new page to all participating web clients 130. In alternative embodiments, the when the controlling web client 110 enters information to complete the HTML form, and sends that information to the group-surfing server 140, the group-surfing server 140 may present that information on the HTML form at each participating web client 110, so that each participating web client 110 can see the HTML form being filled in. The group-surfing server 140 may present that information on the HTML form as each field of the form is completed, or when the entire form is completed, or at other times. Ex. 1005, 38:29-39:10.

Claim No.	Claim	Prior Art Analysis
16	The apparatus of claim 10, wherein information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.	<i>Lebrun discloses that information related to the shared user input web browsing interaction comprises:</i> <i>form data;</i> <i>java script data; or</i> <i>other web browsing interaction data.</i> See Claims 6 and 10, Ex. 1005, 7:3-5, 32:1-31; 33:2-4; 33:6-10; 34:15-21; 35:5-28; 36:21-25; 37:5-10; 39:4-10; 43:13-22; 43:27-30; 44:21-27; Fig. 4.
17	The apparatus of claim 10, wherein the shared user input web browsing interaction is depicted in a first web browser window.	<i>Lebrun discloses wherein the shared user input web browsing interaction is depicted in a first web browser window.</i> See Claim 7, Ex. 1005, 34:15-21; 35:5-28.
18	The apparatus of claim 17, wherein non-shared web browsing interactions are depicted in a non-shared web browser window.	<i>Lebrun discloses non-shared web browsing interactions depicted in a non-shared web browser window.</i> See Claim 8, Ex. 1005, 37:29-38:27; 47:1-6; 47:22-27; 47:29-31.

'591 Patent Claim 1-18 in view of Prajapat and Wang

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

Claim No.	Claim	Prior Art Analysis
1[pre]	A method for a guest device performing a synchronized browsing session administered by a synchronization server, comprising:	<i>Claim 1 is obvious in view of U.S. Patent Pub. No. 2005/0021626 ("Prajapat"), in view of U.S. Patent Pub. No. 2005/0033656 ("Wang").</i> <i>Prajapat discloses a method for a guest device performing a synchronized browsing session administered by a synchronization server.</i> According to a particular embodiment of the present invention, a communication system includes a first browser operable to submit requests for one or more web pages and a request to share the one or more requested web pages with another browser, the request to share specifying the other browser. The communication system also includes a web media server operable, in response to the request to share, to: (1) establish a communication session with the first browser; (2) establish a media session and a signaling session with a remote web media server, the remote web media server being associated with the other browser that the first browser specified in the request to share, the signaling session including a standard signaling protocol; (3) receive web page information from the first browser; and (4) communicate shared web page information to the remote web media server using the media session. Ex. 1007, Abstract.

Claim No.	Claim	Prior Art Analysis
		FIG. 1 illustrates an example communication system 10 operable to provide peer-to-peer dynamic web page sharing. Communication system 10 includes browsers 12, web media servers 14a and 14b coupled via network 16, and web content server 18 coupled to web media server 14a via link 20. In general, web media servers 14 allow browser 12a to co-browse one or more web pages with browser 12b. The term "co-browse" may include one or more of the following situations: browser 12a and browser 12b display the same web pages at substantially the same time; browser 12a may alter web pages and browser 12b may view those alterations; browser 12b may alter web pages and browser 12a may view those alterations; or any other suitable situations. In one embodiment, system 10 is implemented to enable co-browsing in a call center environment such as a customer service environment. It should be understood, however, that system 10 may be implemented in any suitable environment where co-browsing may be desired. Ex. 1007, ¶[0012]. A user associated with browser 12a may desire to view one or more web pages. The user associated with browser 12a may also desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b. Although only one browser 12b is illustrated and described, the present invention contemplates browser 12a sharing web pages with any number of other browsers 12 (i.e. browser 12b, browser 12c, browser 12d, and so on). To begin a co-browsing session, the user of browser 12a may need to establish a communication session with

Claim No.	Claim	Prior Art Analysis
		an associated web media server 14a. For example, the user of browser 12a may click on a desktop icon associated with browser 12a to establish a communication session with web media server 14a. In another embodiment, browser 12a may already have an established communication session with web media server 14a. In certain embodiments, the communication session between browser 12a and web media server 14a includes an outgoing channel 30a and an incoming channel 32a. Outgoing channel 30a may include a hypertext transfer protocol (HTTP) channel or any other suitable type of channel. Incoming channel 32a may include a LongPoll event channel such as that described in U.S. patent application Ser. No. 08/352,764 entitled “_____” and filed with the U.S. Patent and Trademark Office, or any other suitable type of channel. For example, browser 14a may submit requests for web pages and other web content using outgoing channel 30a and web media server 14a may communicate notifications and other information to browser 14a using incoming channel 32a. In one embodiment, the communication session between browser 12a and web media server 14a may be established over a firewall or other security measure 25a. Outgoing channels 30 and incoming channels 32 may not necessarily include “always on” links. For example, in certain embodiments, outgoing channels 30 and incoming channels 32 are established for intermittent communications such as packets. Ex. 1007, ¶[0016]. In a request to co-browse or otherwise, browser 12a may specify one or more names or other identifiers of other browsers 12 with which

Claim No.	Claim	Prior Art Analysis
		browser 12a desires to co-browse. For example, a user of browser 12a may submit a request to co-browse with chachi@happydaycompany.com who is associated with browser 12b. Ex. 1007, ¶[0017]. In response to a request to co-browse from browser 12a, web media server 14a may participate in the establishment of the communication session between web media server 14a and browser 12a. For example, web media server 14a may participate in the establishment of outgoing channel 30a and incoming channel 32a with browser 12a. Web media server 14a may be operable to receive one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, browser 12a may request to co-browse one or more web pages with browser 12b. Web media server 14a may locate the web media server 14b associated with browser 12b. This may be done in any suitable manner. Ex. 1007, ¶[0019]. A communication session between web media server 14b and browser 12b may be established in any suitable manner. In one embodiment, web media server 14b contacts browser 12b to establish the communication session. Ex. 1007, ¶[0021]. FIG. 3 illustrates an example communication system 40 operable to provide peer-to-peer simple web page sharing. System 40 includes browsers 12, web media servers 14, and web content server 18. In certain embodiments, system 40 includes firewalls or other security

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

Claim No.	Claim	Prior Art Analysis
		FIG. 2 <pre>graph TD START([START]) --> 100[ESTABLISH COMMUNICATION SESSION BETWEEN FIRST BROWSER AND ASSOCIATED WEB MEDIA SERVER] 100 --> 102[SUBMIT IDENTIFIER OF ANOTHER BROWSER WITH WHICH FIRST BROWSER DESIRES TO CO-BROWSE] 102 --> 104[RECEIVE REQUEST TO CO-BROWSE] 104 --> 106[LOCATE ANOTHER WEB MEDIA SERVER WITH WHICH THE OTHER BROWSER IS ASSOCIATED] 106 --> 108[ESTABLISH SIGNALING SESSION BETWEEN WEB MEDIA SERVERS] 108 --> 110[ESTABLISH MEDIA SESSION BETWEEN WEB MEDIA SERVERS] 110 --> 112[ESTABLISH COMMUNICATION SESSION BETWEEN OTHER BROWSER AND OTHER WEB MEDIA SERVER] 112 --> 114[SUBMIT REQUEST FOR WEB PAGE] 114 --> 116[RECEIVE REQUEST FOR WEB PAGE] 116 --> 118[LOCATE APPROPRIATE WEB CONTENT SERVER FOR REQUESTED WEB PAGE] 118 --> 120[REQUEST WEB PAGE FROM WEB CONTENT SERVER] 120 --> 122[RETURN REQUESTED WEB PAGE TO WEB MEDIA SERVER] 122 --> 124[TRANSFORM RETURNED WEB PAGE INTO INTERMEDIATE FORM] 124 --> 126[TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY FIRST BROWSER] 126 --> 128[SEND NOTIFICATION TO FIRST BROWSER] 128 --> 130[RETRIEVE RENDERABLE FORM FROM WEB MEDIA SERVER] 130 --> 132[COMMUNICATE INTERMEDIATE FORM TO OTHER WEB MEDIA SERVER] 132 --> 134[TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY OTHER BROWSER] 134 --> 136[SEND NOTIFICATION TO OTHER BROWSER] 136 --> 138[RETRIEVE RENDERABLE FORM FROM OTHER WEB MEDIA SERVER] 138 --> END([END])</pre> Ex. 1007, Fig. 2. FIG. 3 <pre>graph TD BA[BROWSER A 12a] --- 25a --- WC[WEB CONTENT SERVER 18] WB[BROWSER B 12b] --- 25b --- WC WC --- 24a --- WMA[WEB MEDIA SERVER A 14a] WC --- 24b --- WMB[WEB MEDIA SERVER B 14b] WMA --- 26 --- C((16)) C --- 26 --- WMB WC -- 42a --> WMA WC -- 42b --> WMB</pre> Ex. 1007, Fig. 3.

Claim No.	Claim	Prior Art Analysis
		<i>A POSITA would have also understood that the “browser 12b” co-browsing with “browser 12a” through the “web media server 14a” comprises a method for a guest device performing a synchronized browsing session administered by a synchronization server.</i>
1[a]	detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device;	<i>Prajapat and Wang disclose detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.</i> In response to a request to co-browse from browser 12a, web media server 14a may participate in the establishment of the communication session between web media server 14a and browser 12a. For example, web media server 14a may participate in the establishment of outgoing channel 30a and incoming channel 32a with browser 12a. Web media server 14a may be operable to receive one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, browser 12a may request to co-browse one or more web pages with browser 12b. Web media server 14a may locate the web media server 14b associated with browser 12b. This may be done in any suitable manner. Ex. 1007, ¶[0019]. A communication session between web media server 14b and browser 12b may be established in any suitable manner. In one embodiment, web media server 14b contacts browser 12b to establish the communication session. Ex. 1007, ¶[0021]. Via outgoing channel 30a or in any other suitable manner, web media server 14a may receive

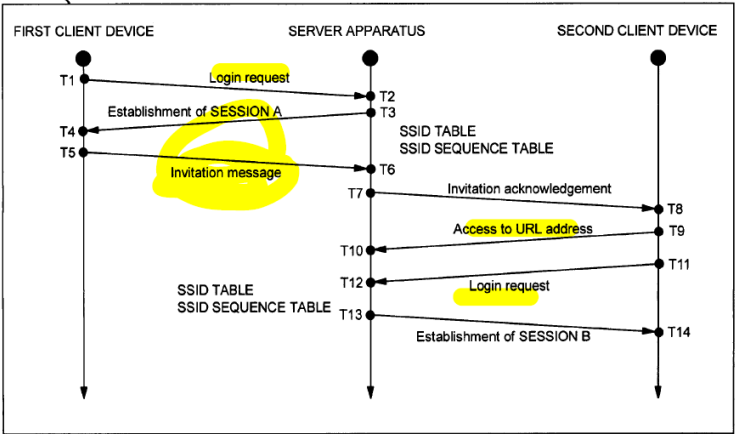
Claim No.	Claim	Prior Art Analysis
		requests from browser 12a for one or more web pages. For example, browser 12a may submit requests for one or more web pages by communicating a request to web media server 14a for a particular web site using the uniform resource locator (URL) of the web site. As discussed above, the request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server 18 associated with the requested web page, or any other suitable information. In one embodiment, web media server 14a may retrieve any suitable information from browser 12a using a signed Applet, plugin, or by other suitable means. Web media server 14a may derive any suitable information regarding browser 12a during a session with web content server 18. Ex. 1007, ¶[0022]. Web media server 14a may communicate the intermediate form to web media server 14b. In one embodiment, web media server 14a communicates the intermediate form to web media server 14b using media session 28. Web media server 14b may transform the intermediate form of the retrieved web page into a renderable form that may be rendered by browser 12b. In one embodiment, the renderable form generated by web media server 14b and the renderable form generated by web media server 14a are different due, in part, to possible differences in browsers 12a and 12b. In one embodiment, each internal link in the renderable form may point back to a

Claim No.	Claim	Prior Art Analysis
		unique location on web media server 14b rather than web content server 18. Web media server 14b may send a notification to browser 12b, using incoming channel 32b for example, indicating that the requested page has been retrieved. In one embodiment, incoming channel 32b includes a LongPoll event channel and web media server 14b sends a notification message using the LongPoll event channel to browser 12b. In one embodiment, browser 12b automatically, and without any input from a user associated with browser 12b, retrieve the renderable form from web media server 14b. However, the present invention contemplates browser 12b retrieving the renderable form from web media server 14b in any suitable manner. Thus, in certain embodiments web media servers 14a and 14b may have the same intermediate form of the web page and browsers 12a and 12b may display the same web page. In one embodiment, web media servers 14a and 14b may communicate information about the status of all transactions between them, and possibly forward the information about the status to browsers 12. For example, browser 12a may receive a message when browser 12b finishes loading a requested web page. Web media servers 14a may also be operable to disable one or more links of the web page such that browser 12b may not be able to display those links. For example, web media server 14a may disable one or more links in the intermediate form of the web page before sending the intermediate form of the web page to web media server 14b. As merely an example, a user of browser 12a may include a caller to a customer service call center, and the user of browser 12b

Claim No.	Claim	Prior Art Analysis
		may include a customer service representative or an automated assistant associated with the call center. The user of browser 12b may be assisting the user of browser 12a with making a purchase on a web site. As the user associated with browser 12a (the caller to the call center) enters credit card information to complete a purchase, web media server 14a may prevent that information from being displayed by browser 12b. In certain embodiments, any web media server 14 associated with system 10 may be operable to disable one or more links of the web page such that other browser 12 (i.e. those not associated with the web browser 14 performing the disabling) may not be able to display those links. Ex. 1007, ¶¶[0026-27]. At step 114, browser 12a may submit a request using outgoing channel 30a for a web page, for example by requesting a particular web site, to web media server 14a. The request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18, and any other suitable information. At step 116, via outgoing channel 30a or in any other suitable manner, web media server 14a may receive the request from browser 12a for the web page. In one embodiment, web media server 14a may retrieve any suitable information from browser 14a using a signed applet, plugin, or by other suitable means. Web media server 14a may derive any suitable information regarding browser 14a

Claim No.	Claim	Prior Art Analysis
		during a session with web content server 18. Ex. 1007, ¶[0036]. At step 132, web media server 14a may communicate the intermediate form to web media server 14b. In one embodiment, web media server 14a communicates the intermediate form to web media server 14b using media session 28. At step 134, web media server 14b may transform the intermediate form of the retrieved web page into a renderable form that may be rendered by browser 12b. In one embodiment, the renderable form generated by web media server 14b and the renderable form generated by web media server 14a are different due, in part, to possible differences in browsers 12a and 12b. In one embodiment, each internal link in the renderable form may point back to a unique location on web media server 14b, not web content server 18. At step 136, web media server 14b may send a notification to browser 12b, using incoming channel 32b for example, indicating that the requested page has been retrieved. In one embodiment, incoming channel 32b includes a LongPoll event channel and web media server 14b sends a notification message using the LongPoll event channel to browser 12b. At step 138, browser 12b retrieves the renderable form of the web page from web media server 14b. In one embodiment, browser 12b automatically, and without any input from a user associated with browser 12b, retrieve the renderable form from web media server 14b. However, the present invention contemplates browser 12b retrieving the renderable form from web media server 14b in any suitable manner. Ex. 1009, [0039].

Claim No.	Claim	Prior Art Analysis
		Browser 12a may submit a request to web content server 18 for one or more web pages using link 42a, for example. Links 42 may include an HTTP link or any other suitable type of link. The request may be submitted in any suitable format such as HTTP. Web content server 18 may return the requested web page to browser 12a. Browser 12a may communicate the URL or other suitable information regarding the requested web page to web media server 14a. Web media server 14a may communicate the URL and any other suitable information to web media server 14b, using media session 28 for example. Web media server 14b may communicate the URL and any other suitable information to browser 12b. Browser 12b may use the URL and any other suitable information to request from web content server 18 the web page that browser 12a requested. Ex. 1007, ¶[0043]. <i>In addition, even if Prajapat is found to not explicitly disclose “activation of the hyperlink,” Wang discloses detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.</i> At T4, the first client device transmits a message inviting the other client devices to the shopping session, for example the message “Add Others” and a message such as “Invitee” including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of “Add Others” and “Invitee.” Ex. 1006, ¶[0047].

Claim No.	Claim	Prior Art Analysis
		Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]; Fig. 3. FIG. 3  Ex. 1006, Fig. 3. <i>A POSITA would have been motivated to combine Wang’s teachings of including a URL in a session invitation with Prajapat’s disclosure of browser 12a’s request to co-browse, which includes a URL.</i>
1[b]	sending a request by the guest device to join the synchronized browsing session to the synchronization	<i>Prajapat discloses sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink.</i>

Claim No.	Claim	Prior Art Analysis
	server in response to the activation of the hyperlink;	In a request to co-browse or otherwise, browser 12a may specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, a user of browser 12a may submit a request to co-browse with chachi@happydaycompany.com who is associated with browser 12b. Browser 12a may also submit requests for one or more web pages, for example by requesting a particular web site, to web media server 14a. The request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18, and any other suitable information. Ex. 1007, ¶[0019]. A communication session between web media server 14b and browser 12b may be established in any suitable manner. In one embodiment, web media server 14b contacts browser 12b to establish the communication session. In another embodiment, a communication session between web media server 14b and browser 12b already exists. In another embodiment (as will be discussed below in more detail), a user of browser 12a and a user of browser 12b are engaged in a telephone conversation. In this example, the user of browser 12a may verbally tell the user of browser 12b to establish a communication session with web media server 14b. In certain embodiments, the communication session between browser 12b and web media server 14b may include an outgoing channel 30b

Claim No.	Claim	Prior Art Analysis
		and an incoming channel 32b. Outgoing channel 30b may include a hypertext transfer protocol (HTTP) channel or any other suitable type of channel, and incoming channel 32b may include a LongPoll event channel or any other suitable type of channel. For example, browser [12b] may submit requests for web pages and other web content using outgoing channel 30b and web media server 14b may communicate notifications and other information to browser [12b] using incoming channel 32b. In one embodiment, the communication session between browser 12b and web media server 14b may be established over a firewall or other security measure 25b. Ex. 1007, ¶[0021]. <i>In addition, even if Prajapat is found to not explicitly disclose “in response to the activation of the hyperlink,” Wang discloses sending a request by the guest device to join the synchronized browsing session to the synchronization server in response to the activation of the hyperlink.</i> Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]; Fig. 3.

Claim No.	Claim	Prior Art Analysis
		When the customer receives an HTTP request desiring invitations through the client device (i.e., yes in Step S510), the processing proceeds to Step S512, where the server apparatus acquires, responsive to the received HTTP request, information such as, for example, an electronic mail address of the customer to be invited, and temporarily stores the information in the memory. Ex. 1006, ¶[0065]; Fig. 12. Thereafter, in Step S514, the server apparatus notifies the invited customer by transmitting electronic mail or the like to the invited customer. In Step S516, the server apparatus determines whether or not the customer accepts the invitation by monitoring an HTTP response from the invited customer, for example, “?Joinagreement==yes.” When the response indicates that the other customer accepts the invitation, i.e., “yes” in Step S516, the processing proceeds to Step S518, where client identification information is acquired, and a handle is set. Ex. 1006, ¶[0066]. FIG. 12 <pre> graph TD S500[S500: RECEIVE HTTP REQUEST FOR VIRTUAL SHOPPING] --> S502[S502: ACQUIRE SESSION IDENTIFICATION VALUE AND USER IDENTIFICATION VALUE] S502 --> S504{S504: IS USER AUTHENTICATED?} S504 -- No --> S524[S524: USER REGISTRATION PROCESSING] S524 --> S504 S504 -- Yes --> S506{S506: HAS A SHOPPING SESSION BEEN CREATED?} S506 -- No --> S526[S526: CALL USUAL EC APPLICATION] S526 --> S506 S506 -- Yes --> S508[S508: INQUIRE WHETHER ANOTHER CUSTOMER IS TO BE INVITED FOR JOINT SHOPPING] S508 --> S510{S510: ADD OTHERS==YES?} S510 -- No --> S512[S512: ACQUIRE INFORMATION OF INVITED CUSTOMER] S510 -- Yes --> S512 S512 --> S514[S514: NOTIFY THE INVITED CUSTOMER] S514 --> S516{S516: JOIN AGREEMENT==YES?} S516 -- No --> S512 S516 -- Yes --> S518[S518: ACQUIRE CLIENT IDENTIFICATION VALUE OF THE INVITED CUSTOMER FROM COOKIE, AND SET HANDLE NAME] S518 --> S520[S520: TRANSMIT NECESSARY PROGRAM, ASSIGN SSD VALUE, AND REGISTER THE SSD VALUE IN SSD SEQUENCE TABLE] S520 --> S522[S522: VIRTUAL SHOPPING] </pre>

Claim No.	Claim	Prior Art Analysis
		Ex. 1006, Fig. 12. <i>A POSITA would have been motivated to combine Wang's disclosures of accessing a designated URL and sending a "login request" in response to receiving the invitation with Lebrun's "session-join message."</i>
1[c]	receiving from the synchronization server a notification that guest device has joined the synchronized browsing session;	<i>Prajapat discloses receiving from the synchronization server a notification that guest device has joined the synchronized browsing session.</i> A communication session between web media server 14b and browser 12b may be established in any suitable manner. In one embodiment, web media server 14b contacts browser 12b to establish the communication session. In another embodiment, a communication session between web media server 14b and browser 12b already exists. In another embodiment (as will be discussed below in more detail), a user of browser 12a and a user of browser 12b are engaged in a telephone conversation. In this example, the user of browser 12a may verbally tell the user of browser 12b to establish a communication session with web media server 14b. In certain embodiments, the communication session between browser 12b and web media server 14b may include an outgoing channel 30b and an incoming channel 32b. Outgoing channel 30b may include a hypertext transfer protocol (HTTP) channel or any other suitable type of channel, and incoming channel 32b may include a LongPoll event channel or any other suitable type of channel. For example, browser [12b] may submit requests for web pages and other web content using outgoing channel 30b and web media server 14b may communicate notifications

Claim No.	Claim	Prior Art Analysis
		and other information to browser [12b] sing incoming channel 32b. In one embodiment, the communication session between browser 12b and web media server 14b may be established over a firewall or other security measure 25b. Ex. 1007, ¶[0021]. At step 112, a communication session is established between web media server 14b and browser 12b. In certain embodiments, the communication session between browser 12b and web media server 14b includes an outgoing channel 30b and an incoming channel 32b. Outgoing channel 30b may include an HTTP channel or any other suitable type of channel, and incoming channel 32b may include a LongPoll event channel or any other suitable type of channel. For example, browser 14b may submit requests for web pages and other web content using outgoing channel 30b and web media server 14b may communicate notifications and other information to browser 14b using incoming channel 32b. Ex. 1007, ¶[0035].

Claim No.	Claim	Prior Art Analysis
		FIG. 2 <pre> graph TD START([START]) --> 100[ESTABLISH COMMUNICATION SESSION BETWEEN FIRST BROWSER AND ASSOCIATED WEB MEDIA SERVER] 100 --> 102[SUBMIT IDENTIFIER OF ANOTHER BROWSER WITH WHICH FIRST BROWSER DESIRES TO CO-BROWSE] 102 --> 104[RECEIVE REQUEST TO CO-BROWSE] 104 --> 106[LOCATE ANOTHER WEB MEDIA SERVER WITH WHICH THE OTHER BROWSER IS ASSOCIATED] 106 --> 108[ESTABLISH SIGNALING SESSION BETWEEN WEB MEDIA SERVERS] 108 --> 110[ESTABLISH MEDIA SESSION BETWEEN WEB MEDIA SERVERS] 110 --> 112[ESTABLISH COMMUNICATION SESSION BETWEEN OTHER BROWSER AND OTHER WEB MEDIA SERVER] 112 --> 114[SUBMIT REQUEST FOR WEB PAGE] 114 --> 116[RECEIVE REQUEST FOR WEB PAGE] 116 --> 118[LOCATE APPROPRIATE WEB CONTENT SERVER FOR REQUESTED WEB PAGE] 118 --> 120[REQUEST WEB PAGE FROM WEB CONTENT SERVER] 120 --> 122[RETURN REQUESTED WEB PAGE TO WEB MEDIA SERVER] 122 --> 124[TRANSFORM RETURNED WEB PAGE INTO INTERMEDIATE FORM] 124 --> 126[TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY FIRST BROWSER] 126 --> 128[SEND NOTIFICATION TO FIRST BROWSER] 128 --> 130[RETRIEVE RENDERABLE FORM FROM WEB MEDIA SERVER] 130 --> 132[COMMUNICATE INTERMEDIATE FORM TO OTHER WEB MEDIA SERVER] 132 --> 134[TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY OTHER BROWSER] 134 --> 136[SEND NOTIFICATION TO OTHER BROWSER] 136 --> 138[RETRIEVE RENDERABLE FORM FROM OTHER WEB MEDIA SERVER] 138 --> END([END]) </pre> Ex. 1007, Fig. 2. <i>A POSITA would have understood browser 12b receiving notifications and other information from “web media server 14b” to comprise receiving from the synchronization server a notification that guest device has joined the synchronized browsing session.</i>
1[d]	receiving data from the synchronization server, where the data relates to a website being accessed in real-	<i>Prajapat discloses receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device; and wherein the data comprises a URL of the website and cookie information associated with the website and the host device.</i>

Claim No.	Claim	Prior Art Analysis
	time by a host device; and wherein the data comprises a URL of the website and cookie information associated with the website and the host device; and	FIG. 1 illustrates an example communication system 10 operable to provide peer-to-peer dynamic web page sharing. Communication system 10 includes browsers 12, web media servers 14a and 14b coupled via network 16, and web content server 18 coupled to web media server 14a via link 20. In general, web media servers 14 allow browser 12a to co-browse one or more web pages with browser 12b. The term “co-browse” may include one or more of the following situations: browser 12a and browser 12b display the same web pages at substantially the same time; browser 12a may alter web pages and browser 12b may view those alterations; browser 12b may alter web pages and browser 12a may view those alterations; or any other suitable situations. In one embodiment, system 10 is implemented to enable co-browsing in a call center environment such as a customer service environment. It should be understood, however, that system 10 may be implemented in any suitable environment where co-browsing may be desired. Ex. 1007, ¶[0012]. A user associated with browser 12a may desire to view one or more web pages. The user associated with browser 12a may also desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b. Although only one browser 12b is illustrated and described, the present invention contemplates browser 12a sharing web pages with any number of other browsers 12 (i.e. browser 12b, browser 12c, browser 12d, and so on). To begin a co-browsing session, the user of browser 12a may need to establish a communication session with

Claim No.	Claim	Prior Art Analysis
		an associated web media server 14a. For example, the user of browser 12a may click on a desktop icon associated with browser 12a to establish a communication session with web media server 14a. In another embodiment, browser 12a may already have an established communication session with web media server 14a. In certain embodiments, the communication session between browser 12a and web media server 14a includes an outgoing channel 30a and an incoming channel 32a. Outgoing channel 30a may include a hypertext transfer protocol (HTTP) channel or any other suitable type of channel. Incoming channel 32a may include a LongPoll event channel such as that described in U.S. patent application Ser. No. 08/352,764 entitled “_____” and filed with the U.S. Patent and Trademark Office, or any other suitable type of channel. For example, browser 14a may submit requests for web pages and other web content using outgoing channel 30a and web media server 14a may communicate notifications and other information to browser 14a using incoming channel 32a. In one embodiment, the communication session between browser 12a and web media server 14a may be established over a firewall or other security measure 25a. Outgoing channels 30 and incoming channels 32 may not necessarily include “always on” links. For example, in certain embodiments, outgoing channels 30 and incoming channels 32 are established for intermittent communications such as packets. Ex. 1007, ¶[0016]. A communication session between web media server 14b and browser 12b may be established in any suitable manner. In one embodiment, web

Claim No.	Claim	Prior Art Analysis
		media server 14b contacts browser 12b to establish the communication session. In another embodiment, a communication session between web media server 14b and browser 12b already exists. In another embodiment (as will be discussed below in more detail), a user of browser 12a and a user of browser 12b are engaged in a telephone conversation. In this example, the user of browser 12a may verbally tell the user of browser 12b to establish a communication session with web media server 14b. In certain embodiments, the communication session between browser 12b and web media server 14b may include an outgoing channel 30b and an incoming channel 32b. Outgoing channel 30b may include a hypertext transfer protocol (HTTP) channel or any other suitable type of channel, and incoming channel 32b may include a LongPoll event channel or any other suitable type of channel. For example, browser 14b may submit requests for web pages and other web content using outgoing channel 30b and web media server 14b may communicate notifications and other information to browser 14b using incoming channel 32b. In one embodiment, the communication session between browser 12b and web media server 14b may be established over a firewall or other security measure 25b. Ex. 1007, ¶[0021]. For example, browser 12a may submit requests for one or more web pages by communicating a request to web media server 14a for a particular web site using the uniform resource locator (URL) of the web site. As discussed above, the request for a web page may specify the web page to retrieve and display, as well as any other

Claim No.	Claim	Prior Art Analysis
		suitable information. For example, the request for the web page may include information that may be required to properly render the web page such as session information, cookies, parameters to send to the web content server 18 associated with the requested web page, or any other suitable information. In one embodiment, web media server 14a may retrieve any suitable information from browser 12a using a signed Applet, plugin, or by other suitable means. Web media server 14a may derive any suitable information regarding browser 12a during a session with web content server 18. Ex. 1007, ¶[0022]. Web media server 14a may communicate the intermediate form to web media server 14b. In one embodiment, web media server 14a communicates the intermediate form to web media server 14b using media session 28. Web media server 14b may transform the intermediate form of the retrieved web page into a renderable form that may be rendered by browser 12b. In one embodiment, the renderable form generated by web media server 14b and the renderable form generated by web media server 14a are different due, in part, to possible differences in browsers 12a and 12b. In one embodiment, each internal link in the renderable form may point back to a unique location on web media server 14b rather than web content server 18. Web media server 14b may send a notification to browser 12b, using incoming channel 32b for example, indicating that the requested page has been retrieved. In one embodiment, incoming channel 32b includes a LongPoll event channel and web media server 14b sends a notification message using the LongPoll event channel to browser 12b. In one

Claim No.	Claim	Prior Art Analysis
		embodiment, browser 12b automatically, and without any input from a user associated with browser 12b, retrieve the renderable form from web media server 14b. However, the present invention contemplates browser 12b retrieving the renderable form from web media server 14b in any suitable manner. Ex. 1007, ¶[0026]. Thus, in certain embodiments web media servers 14a and 14b may have the same intermediate form of the web page and browsers 12a and 12b may display the same web page. Ex. 1007, ¶[0027]. At step 104, web media server 14a receives the request to co-browse with chachi@happydaycompany.com. At step 106, web media server 14a may locate another web media server 14b with which browser 12b is associated, possibly using the email address or other identifier provided by browser 12a. In an embodiment in which web media servers 14 are equipped to establish a communication session with other web media servers 14 using a standard signaling protocol (e.g., SIP), web media server 14a may locate web media server 14b using standard, pre-existing functionality, such as presence functionality or a SIP registrar/location function. At step 108, web media server 14a may establish signaling session 26 with web media server 14b. In one embodiment, signaling session 26 includes a SIP signaling session. At step 110, web media server 14a establishes media session 28 with web media server 14b. At step 112, a communication session is established between web media server 14b and browser 12b. In certain embodiments, the communication session

Claim No.	Claim	Prior Art Analysis
		between browser 12b and web media server 14b includes an outgoing channel 30b and an incoming channel 32b. Outgoing channel 30b may include an HTTP channel or any other suitable type of channel, and incoming channel 32b may include a LongPoll event channel or any other suitable type of channel. For example, browser 14b may submit requests for web pages and other web content using outgoing channel 30b and web media server 14b may communicate notifications and other information to browser 14b using incoming channel 32b. Ex. 1007, ¶[0035]. At step 114, browser 12a may submit a request using outgoing channel 30a for a web page, for example by requesting a particular web site, to web media server 14a. The request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server 18, and any other suitable information. At step 116, via outgoing channel 30a or in any other suitable manner, web media server 14a may receive the request from browser 12a for the web page. In one embodiment, web media server 14a may retrieve any suitable information from browser 14a using a signed applet, plugin, or by other suitable means. Web media server 14a may derive any suitable information regarding browser 14a during a session with web content server 18. Ex. 1007, ¶[0036]; Fig. 2.

Claim No.	Claim	Prior Art Analysis
		At step 132, web media server 14a may communicate the intermediate form to web media server 14b. In one embodiment, web media server 14a communicates the intermediate form to web media server 14b using media session 28. At step 134, web media server 14b may transform the intermediate form of the retrieved web page into a renderable form that may be rendered by browser 12b. In one embodiment, the renderable form generated by web media server 14b and the renderable form generated by web media server 14a are different due, in part, to possible differences in browsers 12a and 12b. In one embodiment, each internal link in the renderable form may point back to a unique location on web media server 14b, not web content server 18. At step 136, web media server 14b may send a notification to browser 12b, using incoming channel 32b for example, indicating that the requested page has been retrieved. In one embodiment, incoming channel 32b includes a LongPoll event channel and web media server 14b sends a notification message using the LongPoll event channel to browser 12b. At step 138, browser 12b retrieves the renderable form of the web page from web media server 14b. In one embodiment, browser 12b automatically, and without any input from a user associated with browser 12b, retrieve the renderable form from web media server 14b. However, the present invention contemplates browser 12b retrieving the renderable form from web media server 14b in any suitable manner. Ex. 1007, ¶[0039].

Claim No.	Claim	Prior Art Analysis
		<i>FIG. 2</i> <pre> graph TD START([START]) --> 100[100 ESTABLISH COMMUNICATION SESSION BETWEEN FIRST BROWSER AND ASSOCIATED WEB MEDIA SERVER] 100 --> 102[102 SUBMIT IDENTIFIER OF ANOTHER BROWSER WITH WHICH FIRST BROWSER DESIRES TO CO-BROWSE] 102 --> 104[104 RECEIVE REQUEST TO CO-BROWSE] 104 --> 106[106 LOCATE ANOTHER WEB MEDIA SERVER WITH WHICH THE OTHER BROWSER IS ASSOCIATED] 106 --> 108[108 ESTABLISH SIGNALING SESSION BETWEEN WEB MEDIA SERVERS] 108 --> 110[110 ESTABLISH MEDIA SESSION BETWEEN WEB MEDIA SERVERS] 110 --> 112[112 ESTABLISH COMMUNICATION SESSION BETWEEN OTHER BROWSER AND OTHER WEB MEDIA SERVER] 112 --> 114[114 SUBMIT REQUEST FOR WEB PAGE] 114 --> 116[116 RECEIVE REQUEST FOR WEB PAGE] 116 --> 118[118 LOCATE APPROPRIATE WEB CONTENT SERVER FOR REQUESTED WEB PAGE] 118 --> 120[120 REQUEST WEB PAGE FROM WEB CONTENT SERVER] 120 --> 122[122 RETURN REQUESTED WEB PAGE TO WEB MEDIA SERVER] 122 --> 124[124 TRANSFORM RETURNED WEB PAGE INTO INTERMEDIATE FORM] 124 --> 126[126 TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY FIRST BROWSER] 126 --> 128[128 SEND NOTIFICATION TO FIRST BROWSER] 128 --> 130[130 RETRIEVE RENDERABLE FORM FROM WEB MEDIA SERVER] 130 --> 132[132 COMMUNICATE INTERMEDIATE FORM TO OTHER WEB MEDIA SERVER] 132 --> 134[134 TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY OTHER BROWSER] 134 --> 136[136 SEND NOTIFICATION TO OTHER BROWSER] 136 --> 138[138 RETRIEVE RENDERABLE FORM FROM OTHER WEB MEDIA SERVER] 138 --> END([END]) </pre> Ex. 1007, Fig. 2. Browser 12a may submit a request to web content server 18 for one or more web pages using link 42a, for example. Links 42 may include an HTTP link or any other suitable type of link. The request may be submitted in any suitable format such as HTTP. Web content server 18 may return the requested web page to browser 12a. Browser 12a may communicate the URL or other suitable information regarding the requested web page to web media server 14a. Web media server 14a may communicate the URL and any other suitable information to web media server 14b, using media session 28 for example. Web media

Claim No.	Claim	Prior Art Analysis
		server 14b may communicate the URL and any other suitable information to browser 12b. Browser 12b may use the URL and any other suitable information to request from web content server 18 the web page that browser 12a requested. Ex. 1007, ¶[0043]. <i>A POSITA would have understood Prajapat to disclose that the data being shared between the browsers comprises cookie information associated with the website and the host device.</i>
1[e]	operating a browser by the guest device based on the data received from the synchronization server.	<i>Prajapat discloses operating a browser by the guest device based on the data received from the synchronization server.</i> See Claims 1[pre], 1[d]; Ex. 1007, Abstract, ¶¶[0012], [0016-17], [0021-22], [0026-27], [0035-36], [0039], [0041], [0043], Figs. 2-3. In general, web media servers 14allow browser 12a to co-browse one or more web pages with browser 12b. The term “co-browse” may include one or more of the following situations: browser 12a and browser 12b display the same web pages at substantially the same time; Ex. 1007, ¶[0012]. Web media server 14a may communicate the intermediate form to web media server 14b. In one embodiment, web media server 14a communicates the intermediate form to web media server 14b using media session 28. Web media server 14b may transform the intermediate form of the retrieved web page into a renderable form that may be rendered by browser 12b. In one embodiment, the renderable form generated by web media server 14b and the renderable form generated by web media server 14a are different due, in part, to possible differences in browsers

Claim No.	Claim	Prior Art Analysis
		12a and 12b. In one embodiment, each internal link in the renderable form may point back to a unique location on web media server 14b rather than web content server 18. Web media server 14b may send a notification to browser 12b, using incoming channel 32b for example, indicating that the requested page has been retrieved. In one embodiment, incoming channel 32b includes a LongPoll event channel and web media server 14b sends a notification message using the LongPoll event channel to browser 12b. In one embodiment, browser 12b automatically, and without any input from a user associated with browser 12b, retrieve the renderable form from web media server 14b. However, the present invention contemplates browser 12b retrieving the renderable form from web media server 14b in any suitable manner. Ex. 1007, ¶[0026]. Thus, in certain embodiments web media servers 14a and 14b may have the same intermediate form of the web page and browsers 12a and 12b may display the same web page. Ex. 1007, ¶[0027]. At step 132, web media server 14a may communicate the intermediate form to web media server 14b. In one embodiment, web media server 14a communicates the intermediate form to web media server 14b using media session 28. At step 134, web media server 14b may transform the intermediate form of the retrieved web page into a renderable form that may be rendered by browser 12b. In one embodiment, the renderable form generated by web media server 14b and the renderable form generated by web media server 14a are different due, in part, to possible

Claim No.	Claim	Prior Art Analysis
		differences in browsers 12a and 12b. In one embodiment, each internal link in the renderable form may point back to a unique location on web media server 14b, not web content server 18. At step 136, web media server 14b may send a notification to browser 12b, using incoming channel 32b for example, indicating that the requested page has been retrieved. In one embodiment, incoming channel 32b includes a LongPoll event channel and web media server 14b sends a notification message using the LongPoll event channel to browser 12b. At step 138, browser 12b retrieves the renderable form of the web page from web media server 14b. In one embodiment, browser 12b automatically, and without any input from a user associated with browser 12b, retrieve the renderable form from web media server 14b. However, the present invention contemplates browser 12b retrieving the renderable form from web media server 14b in any suitable manner. Ex. 1007, ¶[0039].

Claim No.	Claim	Prior Art Analysis
		<i>FIG. 2</i> <pre> graph TD START([START]) --> 100[ESTABLISH COMMUNICATION SESSION BETWEEN FIRST BROWSER AND ASSOCIATED WEB MEDIA SERVER] 100 --> 102[SUBMIT IDENTIFIER OF ANOTHER BROWSER WITH WHICH FIRST BROWSER DESIRES TO CO-BROWSE] 102 --> 104[RECEIVE REQUEST TO CO-BROWSE] 104 --> 106[LOCATE ANOTHER WEB MEDIA SERVER WITH WHICH THE OTHER BROWSER IS ASSOCIATED] 106 --> 108[ESTABLISH SIGNALING SESSION BETWEEN WEB MEDIA SERVERS] 108 --> 110[ESTABLISH MEDIA SESSION BETWEEN WEB MEDIA SERVERS] 110 --> 112[ESTABLISH COMMUNICATION SESSION BETWEEN OTHER BROWSER AND OTHER WEB MEDIA SERVER] 112 --> 114[SUBMIT REQUEST FOR WEB PAGE] 114 --> 116[RECEIVE REQUEST FOR WEB PAGE] 116 --> 118[LOCATE APPROPRIATE WEB CONTENT SERVER FOR REQUESTED WEB PAGE] 118 --> 120[REQUEST WEB PAGE FROM WEB CONTENT SERVER] 120 --> 122[RETURN REQUESTED WEB PAGE TO WEB MEDIA SERVER] 122 --> 124[TRANSFORM RETURNED WEB PAGE INTO INTERMEDIATE FORM] 124 --> 126[TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY FIRST BROWSER] 126 --> 128[SEND NOTIFICATION TO FIRST BROWSER] 128 --> 130[RETRIEVE RENDERABLE FORM FROM WEB MEDIA SERVER] 130 --> 132[COMMUNICATE INTERMEDIATE FORM TO OTHER WEB MEDIA SERVER] 132 --> 134[TRANSFORM INTERMEDIATE FORM INTO RENDERABLE FORM THAT MAY BE RENDERED BY OTHER BROWSER] 134 --> 136[SEND NOTIFICATION TO OTHER BROWSER] 136 --> 138[RETRIEVE RENDERABLE FORM FROM OTHER WEB MEDIA SERVER] 138 --> END([END]) </pre> Ex. 1007, Fig. 2. Browser 12a may submit a request to web content server 18 for one or more web pages using link 42a, for example. Links 42 may include an HTTP link or any other suitable type of link. The request may be submitted in any suitable format such as HTTP. Web content server 18 may return the requested web page to browser 12a. Browser 12a may communicate the URL or other suitable information regarding the requested web page to web media server 14a. Web media server 14a may communicate the URL and any other suitable information to web media server 14b, using media session 28 for example. Web media

Claim No.	Claim	Prior Art Analysis
		server 14b may communicate the URL and any other suitable information to browser 12b. Browser 12b may use the URL and any other suitable information to request from web content server 18 the web page that browser 12a requested. Ex. 1007, ¶[0043]. <i>A POSITA would have understood browser 12b receiving information related to browser 12a's request to co-browse through web media servers 14a and 14b to comprise a guest device operating a browser based on the data received from the synchronization server.</i>
2	The method of claim 1, further comprising receiving an invitation to join the synchronized browsing session.	<i>Prajapat and Wang disclose receiving an invitation to join the synchronized browsing session.</i> See Claim 1; Ex. 1007, Abstract; ¶¶[0012]; [0017]; [0019]; [0021-22]; [0026-27]; [0035-36]; [0039]; [0043]; Fig. 2; Fig. 3; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12. [0049] Upon receiving the electronic mail including the "Invitation acknowledgment, myURL address" at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006 ¶[0049]; Fig. 3. <i>A POSITA would have been motivated to combine Wang's teaching of "Invitation acknowledgment, myURL address," with Prajapat's request to co-browse</i>

Claim No.	Claim	Prior Art Analysis
		<i>from browser 12a, because the two messages are intended to achieve a similar goal of initiating a communication session with the guest devices.</i>
3	The method of claim 2, wherein the invitation comprises the hyperlink associated with the synchronized browsing session.	<i>Prajapat and Wang disclose an invitation comprises a hyperlink associated with the synchronized browsing session.</i> <i>See Claims 1[a], 2; Ex. 1007, Abstract; ¶¶[0012]; [0017]; [0019]; [0021-22]; [0026-27]; [0035-36]; [0039]; [0043]; Fig. 2; Fig. 3; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12.</i> <i>In addition, even if Prajapat is found to not explicitly disclose “a hyperlink associated with the synchronized browsing session,” Wang discloses an invitation comprises a hyperlink associated with the synchronized browsing session.</i> Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]; Fig. 3. <i>A POSITA would have been motivated to combine Wang’s teaching of “Invitation acknowledgment, myURL address,” with Prajapat’s request to co-browse from browser 12a.</i>

Claim No.	Claim	Prior Art Analysis
4	The method of claim 2, wherein the invitation further comprises a session identifier.	<i>Prajapat and Wang disclose an invitation further comprises a session identifier.</i> <i>See Claim 1[a], 2; Ex. 1007, Abstract; ¶¶[0012]; [0017]; [0019]; [0021-22]; [0026-27]; [0035-36]; [0039]; [0043]; Fig. 2; Fig. 3; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12.</i> <i>In addition, even if Prajapat is found to not explicitly disclose “a session identifier,” Wang discloses an invitation further comprises a session identifier.</i> Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049]; Fig. 3. FIG. 12 shows processing to be executed to provide collaboration for the virtual shopping system. First, in Step S500, the server apparatus receives an HTTP request for virtual shopping from the customer through the client device. In Step S502, the server apparatus acquires the session identification value and the user identification value (user ID, password and the like) from data in the received HTTP request such as a cookie. Ex. 1006, ¶[0064]; Fig. 12.

Claim No.	Claim	Prior Art Analysis
		<i>A POSITA would have been motivated to combine Wang's teaching of "Invitation acknowledgment, myURL address," with Prajapat's request to co-browse from browser 12a.</i>
5	The method of claim 2, wherein the invitation is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.	<i>Prajapat and Wang disclose that an invitation is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.</i> <i>See Claim 1[a], 2; Ex. 1007, Abstract; ¶¶[0012]; [0016-17]; [0019]; [0021-22]; [0026-27]; [0035-36]; [0039]; [0043]; Fig. 2; Fig. 3; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12.</i> <i>In addition, even if Prajapat is found to not explicitly disclose "a hyperlink is received via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium," Wang discloses a hyperlink is received via an email message or other communication medium.</i> At T4, the first client device transmits a message inviting the other client devices to the shopping session, for example the message "Add Others" and a message such as "Invitee" including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of "Add Others" and "Invitee." Ex. 1006, ¶[0047]; Fig. 3. At T7, the server apparatus transmits an invitation notice and a URL address to be used, such as

Claim No.	Claim	Prior Art Analysis
		“Invitation Acknowledgment, myURL address,” to a second client device by way of, for example. The description that follows assumes that the customer using the second client device has previously received notice from the customer using the first client device and is on standby for receiving an HTML message including “Invitation acknowledgment, myURL address” or the like as electronic mail. Ex. 1006, ¶[0048]; Fig. 3. When another customer is to be invited, i.e., “yes” in Step S510, the server apparatus transmits, to the client device, a display prompting entry of information about the invitation. In Step S510, the server apparatus is on standby for receiving a message, for example a message including a command of “?add others==yes” from the client device. When the customer receives an HTTP request desiring invitations through the client device (i.e., yes in Step S510), the processing proceeds to Step S512, where the server apparatus acquires, responsive to the received HTTP request, information such as, for example, an electronic mail address of the customer to be invited, and temporarily stores the information in the memory. Ex. 1006, ¶[0065]. Thereafter, in Step S514, the server apparatus notifies the invited customer by transmitting electronic mail or the like to the invited customer. Ex. 1006, ¶[0066]. <i>A POSITA would have been motivated to combine Wang’s teaching of a “server apparatus” transmitting an invitation notice and a URL address to a second</i>

Claim No.	Claim	Prior Art Analysis
		<i>client device “as electronic mail” with Prajapat’s disclosure of sending a request to co-browse to an email address, because they are likely to be employing the same communication medium, which is also one of the appropriate media.</i>
6	The method of claim 1, wherein information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.	<i>Prajapat and Wang disclose that information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.</i> See Claim 1; Ex. 1007, Abstract; ¶¶[0012]; [0017]; [0019]; [0021-22]; [0026-27]; [0035-36]; [0039]; [0043]; Fig. 2; Fig. 3; Ex. 1006, [0049]; [0065-66]; Fig. 3; Fig. 12. Web media server 14a may locate the appropriate web content server 18 that includes the web page requested by browser 12a. For example, browser 12a may submit a web site address to web media server 14a, and web media server 14a may locate web content server 18 using the web site address. Ex. 1007, ¶[0023]. Web content server 18 may include any suitable server or other computer for storing and communicating web pages. Web content server 18 may return a requested web page to web media server 14a. Web media server 14a may transform the returned web page into some intermediate form. In one embodiment, one or more links on the web page may be transformed into references and one or more links to images on the web page may also be transformed. The details of the transformation may depend on the syntax of the content being served. As merely an example, in an embodiment in which the

Claim No.	Claim	Prior Art Analysis
		retrieved web page includes HTML content, one transformation may need to be applied, while in the case of an IP phone display, another transformation may need to be applied. Ex. 1007, ¶[0024]. In certain embodiments, web page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events. As an example, at appropriate times when data in a web page form field changes, a JavaScript or other suitable event may be triggered to send a command to the appropriate web media server 14. If web media server 14b receives the command, for example, it may then be forwarded to web media server 14a. Web media server 14a may then send the updated metadata to web media server 14b, and events may be generated to the browsers 12 to update the web page form content if necessary (i.e. the originating browser 12 may not need the event). Ex. 1007, ¶[0031]. In certain embodiments, JavaScript events, such as onMouseOver events for example, may be kept in sync on the browsers 12 in a substantially similar manner. The JavaScript in the web pages rendered to browsers 12 may be modified so that in addition to performing the regular action, the respective web media server 14 may be notified. This may then be handled similarly to other events received by a web media server 14. Ex. 1007, ¶[0032]. FIG. 12 shows processing to be executed to provide collaboration for the virtual shopping

Claim No.	Claim	Prior Art Analysis
		system. First, in Step S500, the server apparatus receives an HTTP request for virtual shopping from the customer through the client device. In Step S502, the server apparatus acquires the session identification value and the user identification value (user ID, password and the like) from data in the received HTTP request such as a cookie. Ex. 1006, ¶[0064]. When another customer is to be invited, i.e., “yes” in Step S510, the server apparatus transmits, to the client device, a display prompting entry of information about the invitation. In Step S510, the server apparatus is on standby for receiving a message, for example a message including a command of “?add others==yes” from the client device. When the customer receives an HTTP request desiring invitations through the client device (i.e., yes in Step S510), the processing proceeds to Step S512, where the server apparatus acquires, responsive to the received HTTP request, information such as, for example, an electronic mail address of the customer to be invited, and temporarily stores the information in the memory. Ex. 1006, ¶[0065]. Thereafter, in Step S514, the server apparatus notifies the invited customer by transmitting electronic mail or the like to the invited customer. In Step S516, the server apparatus determines whether or not the customer accepts the invitation by monitoring an HTTP response from the invited customer, for example, “?Joinagreement==yes.” When the response indicates that the other customer accepts the invitation, i.e., “yes” in Step S516, the processing

Claim No.	Claim	Prior Art Analysis
		proceeds to Step S518, where client identification information is acquired, and a handle is set. Part of the address of the electronic mail before its domain identification code may be used as the handle name of the invited customer, for example, “Hiro.” Then, the handle name and the client identification value such as an IP address of the other customer are stored in association with each other by use of cookie data or the like. Ex. 1006, ¶[0066]. In Step S520, the server apparatus transmits the necessary programs, assigns a value of the already acquired group session, for example “501,” to the server apparatus itself and the invited customer, creates an SSID table and an SSID sequence table, and creates http://host_path/SSID—501/default.jsp as a dedicated URL address. The server apparatus individually controls the PNC, CSC, and the RTC, and allows them to execute the virtual shopping. Ex. 1006, ¶[0067].
7	The method of claim 1, wherein the shared user input web browsing interaction is depicted in a first web browser window.	<i>Prajapat discloses that a shared user input web browsing interaction is depicted in a first web browser window.</i> See Claim 1[a]; Ex. 1007, ¶¶[0019], [0021-22], [0026-27], [0036], [0039], [0043]. <i>A POSITA would have understood Prajapat’s description of “co-browsing” to comprise a shared user input web browsing interaction is depicted in a first web browser window.</i>
8	The method of claim 7, wherein non-shared web browsing	<i>Prajapat discloses non-shared web browsing interactions are depicted in a second web browser window.</i>

Claim No.	Claim	Prior Art Analysis
	interactions are depicted in a second web browser window.	See Claim 1[pre], 1[a], 1[e]; Ex. 1007, Abstract, ¶¶[0012], [0016-17], [0019], [0021-22], [0026-27], [0035-36], [0039], [0041], [0043], Figs. 2-3. <i>A POSITA would have understood that before browser 12a requests to share “one or more web pages” with other browsers, a user associated with browser 12a may view the web pages in a non-shared browser window.</i>
9	The method of claim 1, wherein the shared user input web browser action further comprises a log-in into a restricted-access webpage.	<i>Prajapat discloses the shared user input web browser action further comprises a log-in into a restricted-access webpage.</i> See Claim 1[pre], 1[a], 1[e]; Ex. 1007, Abstract, ¶¶[0012], [0016-17], [0019], [0021-22], [0026-27], [0035-36], [0039], [0041], [0043], Figs. 2-3. In certain embodiments, web page form content, such as fields in web page forms for example, are kept in sync on web pages in browsers 12 involved in a web page sharing session by using JavaScript or other suitable events. As an example, at appropriate times when data in a web page form field changes, a JavaScript or other suitable event may be triggered to send a command to the appropriate web media server 14. If web media server 14b receives the command, for example, it may then be forwarded to web media server 14a. Web media server 14a may then send the updated metadata to web media server 14b, and events may be generated to the browsers 12 to update the web page form content if necessary (i.e. the originating browser 12 may not need the event). Ex. 1007, ¶[0031]. <i>Wang also discloses this limitation.</i>

Claim No.	Claim	Prior Art Analysis
		FIG. 12 shows processing to be executed to provide collaboration for the virtual shopping system. First, in Step S500, the server apparatus receives an HTTP request for virtual shopping from the customer through the client device. In Step S502, the server apparatus acquires the session identification value and the user identification value (user ID, password and the like) from data in the received HTTP request such as a cookie. Ex. 1006, ¶[0064]. In Step S520, the server apparatus transmits the necessary programs, assigns a value of the already acquired group session, for example “501,” to the server apparatus itself and the invited customer, creates an SSID table and an SSID sequence table, and creates <code>http://host_path/SSIDi501/default.jsp</code> as a dedicated URL address. The server apparatus individually controls the PNC, CSC, and the RTC, and allows them to execute the virtual shopping. A customer group list for the joint session can be formed ahead of time by the customers, and can be registered in the server apparatus. In this case, a predetermined customer designates another customer Who the predetermined customer desires to invite with reference to the list at the point in time when inviting the other customer in step S514, thus initiating the joint shopping. Ex. 1006, ¶¶[0067-68]. <i>A POSITA would have been motivated to combine Wang’s teachings of incorporating user identification values into the HTTP request for the shared virtual shopping into the invitation process disclosed by Prajapat for peer-to-peer web page sharing. A POSITA would understand that incorporating Wang’s disclosure</i>

Claim No.	Claim	Prior Art Analysis
		<i>of the server acquiring the user identification values when submitting a joint shopping session into Prajapat's disclosure of joining the peer-to-peer session, would allow the host device to ensure that the user joining the co-browsing session is the intended recipient.</i>
10	An apparatus for a guest device performing a synchronized browsing session administered by a synchronization server, comprising:	<i>Prajapat discloses an apparatus for a guest device performing a synchronized browsing session administered by a synchronization server.</i> See Claim 1[pre]; Ex. 1007, Abstract; ¶¶[0017]; [0019]; [0021]; Fig. 3.
10[a]	a network interface adapted to communicate with the synchronization server; and	<i>Prajapat discloses a network interface adapted to communicate with a synchronization server.</i> See Claim 1[pre]; Ex. 1007, Abstract, ¶¶[0012], [0016-17], [0019], [0021-22], [0025-26], [0034-36]; [0038-39], [0041], Figs. 2-3. Browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages. For example, browsers 12 may be associated with any device, application, hardware, and/or software for displaying one or more types of media. Browsers 12 may include analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application. Furthermore, browsers 12 may be compatible with any suitable operating system according to particular needs. Reference to a

Claim No.	Claim	Prior Art Analysis
		browser 12 is meant to include reference to a user of browser 12, reference to a device including browser 12, reference to a user interface of browser 12, or any other suitable references as appropriate. A user of browser 12 may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12. Ex. 1007, ¶[0015]. <i>A POSITA would have concluded that Prajapat's description of "browsers" and their communication channels with "web media servers" to comprise a network interface adapted to communicate with the synchronization server.</i>
10[b]	a processor adapted to:	<i>Prajapat discloses a processor.</i> Browsers 12, web media servers 14, and web content server 18 may each comprise an appropriate combination of hardware and software associated with one or more computers at one or more locations. These components of system 10 may share data storage, communications, or other resources according to particular needs. For example, functionality described in connection with browser 12a, web media server 14a, and web content server 18 may be provided using a single computer system or other device, which in a particular embodiment might include a single server system. Furthermore, functionality described in connection with browsers 12, web media servers 14, and web content server 18 may be provided using any suitable software components. Each computer system may include one or more suitable input devices, output devices, mass storage media, processors, memory, or other

Claim No.	Claim	Prior Art Analysis
		components for receiving, processing, storing, and communicating information according to the operation of system 10. In a distributed embodiment of system 10, particular components of system 10 may be communicatively coupled to one another using one or more local area networks (LANs), metropolitan area networks (MANs), wide area networks (WANs), a global computer network such as the Internet, or any other wireline, optical, wireless, or other links. Ex. 1007, ¶[0014].
10[b][i]	detect an activation of a hyperlink associated with the synchronized browsing session by a guest device;	<i>Prajapat discloses a processor adapted to detect an activation of a hyperlink associated with the synchronized browsing session by a guest device.</i> See Claims 1[pre], 1[a] and 10[a]-[b]; Ex. 1007, Abstract, ¶¶[0012], [0014-17], [0019], [0021-22], [0025-27], [0034-36]; [0038-39], [0041], Figs. 2-3; Fig. 12.
10[b][ii]	send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink;	<i>Prajapat and Wang disclose a processor adapted to send a request to join the synchronized browsing session to the synchronization server via the network interface, in response to the activation of the hyperlink.</i> See Claim 1[b] and 10[a]-[b]; Ex. 1007, ¶¶[0014-15]; [0021]; Ex. 1006, ¶¶[0049]; [0065-66]; Fig. 3; Fig. 12.
10[b][iii]	receive from the synchronization server a notification that	<i>Prajapat discloses a processor adapted to receive from the synchronization server a notification that guest device has joined the synchronized browsing session.</i>

Claim No.	Claim	Prior Art Analysis
	guest device has joined the synchronized browsing session;	See Claims 10[a]-[b] and 1[c]; Ex. 1007, ¶¶[0014-15]; [0021]; [0035]; Fig. 2.
10[b][iv]	receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website and the host device; and	<i>Prajapat discloses a processor adapted to receiving data from the synchronization server, where the data relates to a website being accessed in real-time by a host device, and wherein the data comprises a URL of the website and cookie information associated with the website and the host device.</i> See Claims 10[a]-[b] and 1[d]; Ex. 1007, ¶¶[0014-15]; [0022]; [0026-27]; [0036]; [0039]; Fig. 2.
10[b][v]	operate a browser by the guest device based on the data received from the synchronization server.	<i>Prajapat discloses a processor adapted to operate a browser by the guest device based on the data received from the synchronization server.</i> See Claims 10[a]-[b] and 1[e]; Ex. 1007, ¶¶[0012]; [0014-15]; [0026-27]; [0039]; Fig. 2.
11	The apparatus of claim 10, further comprising a user interface adapted to initiate the processor to send the request in	<i>Prajapat and Wang disclose a user interface adapted to initiate the processor to send the request in response to a user input.</i> See Claim 10; Ex. 1007, Abstract; ¶¶[0014-15]; [0017]; [0019]; [0021]; Fig. 3.

Claim No.	Claim	Prior Art Analysis
	response to a user input.	A user associated with browser 12a may desire to view one or more web pages. The user associated with browser 12a may also desire to co-browse or share the one or more web pages or other web content with another user associated browser 12b. Although only one browser 12b is illustrated and described, the present invention contemplates browser 12a sharing web pages with any number of other browsers 12 (i.e. browser 12b, browser 12c, browser 12d, and so on). To begin a co-browsing session, the user of browser 12a may need to establish a communication session with an associated web media server 14a. For example, the user of browser 12a may click on a desktop icon associated with browser 12a to establish a communication session with web media server 14a. Ex. 1007, ¶[0016]. In a request to co-browse or otherwise, browser 12a may specify one or more names or other identifiers of other browsers 12 with which browser 12a desires to co-browse. For example, a user of browser 12a may submit a request to co-browse with chachi@happydaycompany.com who is associated with browser 12b. Browser 12a may also submit requests for one or more web pages, for example by requesting a particular web site, to web media server 14a. The request for a web page may specify the web page to retrieve and display, as well as any other suitable information. For example, the request for the web page may include information that may be required to properly render the web page on browser 12a, such as session information, cookies, parameters to send to web content server

Claim No.	Claim	Prior Art Analysis
		18, and any other suitable information. Ex. 1007, ¶[0017]. Web media servers 14 may include any server, processor, computer, or other suitable component for communicating with browsers 12 and for communicating with each other. Web media servers 14 may communicate with other web media servers using network 16. Ex. 1007, ¶[0018]. <i>Wang also discloses this limitation.</i> The present invention also includes a client device for use in a system that enables computer devices to collaborate with one another through a network. The client device comprises: browser means for allowing the client device to display data received through the network; page navigation means for communicating, through the network, a request for changing ownership of the initiative to operate the web page displayed among a plurality of the client devices; synchronization control means for enabling the plurality of client devices to share the web page; and communication means for enabling the client device to display a message for other client devices. The synchronization control means may issue a request for making an inquiry about an identification value of previously compiled data of the web page through the network in response to ownership of the initiative of the operation of the web page. Ex. 1006, ¶[0020]. The present invention further includes a computer-executable program for enabling a computer device to function as a client device for

Claim No.	Claim	Prior Art Analysis
		use in a network computer collaboration system. The program enables the computer to execute: a step of communicating a request for changing ownership of the initiative of operation of the web page to be displayed among a plurality of the client devices; a step of allowing the plurality of client devices to share the web page; and a step of allowing the client device to display a message for other client devices. Ex. 1006, ¶[0022]. The client device 12a includes browser means 20, page navigation means 22, synchronization control means 24, and mutual communication means 26. The page navigation means 22 includes initiative transfer means 28, and allows the client device 12a to access the server apparatus 14 directly and to acquire a web page when the client device 12a has ownership of the initiative of web page operation. In response to an instruction from a customer, the initiative transfer means 28 transmits, to the server apparatus 14, an HTTP request to transfer ownership of the initiative, and allows the server apparatus 14 to transfer ownership of the initiative of the web page operation to another client device. Ex. 1006, ¶[0041].
12	The apparatus of claim 11, wherein the user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.	<i>Prajapat and Wang disclose a user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.</i> See Claims 11, 1[pre]-[b]; Ex. 1007, Abstract, ¶¶[0012], [0014-17], [0019], [0021-22], [0025-27], [0034-36]; [0038-39], [0041], Figs. 2-3; Fig. 12; Ex. 1006, ¶¶[0049]; [0065-66]; Fig. 3; Fig. 12.

Claim No.	Claim	Prior Art Analysis
		<i>In addition, even if Prajapat is found to not explicitly disclose “activation of the hyperlink,” Wang discloses a user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.</i> At T4, the first client device transmits a message inviting the other client devices to the shopping session, for example the message “Add Others” and a message such as “Invitee” including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of “Add Others” and “Invitee.” Ex. 1006, ¶[0047]; Fig. 3. Upon receiving the electronic mail including the “Invitation acknowledgment, myURL address” at T8, the second client device accesses the designated URL address at T9. Subsequently, the server apparatus receives an access notice at T10, and then receives a login request from the second client at T12. Upon receiving the login request at T12, the server apparatus transmits an HTTP response at T13 to the second client device and establishes an individual session therewith using an identification value SESSION B. Ex. 1006, ¶[0049].

Claim No.	Claim	Prior Art Analysis
		FIG. 3 Ex. 1006, Fig. 3. <i>A POSITA would have been motivated to combine Wang's teaching of "Invitation acknowledgment, myURL address," with Prajapat's request to co-browse from browser 12a.</i>
13	The apparatus of claim 10, further comprising a memory adapted to store one or more software modules for controlling the processor.	<i>Prajapat and Wang disclose a memory adapted to store one or more software modules for controlling the processor.</i> <i>See Claim 10; Ex. 1007, Abstract; ¶¶[0014-15]; [0017]; [0019]; [0021]; Fig. 3.</i> Furthermore, functionality described in connection with browsers 12, web media servers 14, and web content server 18 may be provided using any suitable software components. Each computer system may include one or more suitable input devices, output devices, mass storage media, processors, memory, or other components for receiving, processing, storing, and communicating information according to the operation of system 10. In a distributed embodiment of system 10, particular components of system 10 may be communicatively coupled to one another using one or more local area

Claim No.	Claim	Prior Art Analysis
		networks (LANs), metropolitan area networks (MANs), wide area networks (WANs), a global computer network such as the Internet, or any other wireline, optical, wireless, or other links. Ex. 1007, ¶[0014]. The present invention also includes a client device for use in a system that enables computer devices to collaborate with one another through a network. The client device comprises: browser means for allowing the client device to display data received through the network; page navigation means for communicating, through the network, a request for changing ownership of the initiative to operate the web page displayed among a plurality of the client devices; synchronization control means for enabling the plurality of client devices to share the web page; and communication means for enabling the client device to display a message for other client devices. The synchronization control means may issue a request for making an inquiry about an identification value of previously compiled data of the web page through the network in response to ownership of the initiative of the operation of the web page. Ex. 1006, ¶[0020]. The client device 12a includes browser means 20, page navigation means 22, synchronization control means 24, and mutual communication means 26. The page navigation means 22 includes initiative transfer means 28, and allows the client device 12a to access the server apparatus 14 directly and to acquire a web page when the client device 12a has ownership of the initiative of web page operation. In response to an instruction from a customer, the initiative transfer

Claim No.	Claim	Prior Art Analysis
		means 28 transmits, to the server apparatus 14, an HTTP request to transfer ownership of the initiative, and allows the server apparatus 14 to transfer ownership of the initiative of the web page operation to another client device. Ex. 1006, ¶[0041].
14	The apparatus of claim 10, wherein the hyperlink is received from a host device via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium.	<i>Prajapat and Wang disclose that a hyperlink is received from a host device via:</i> <i>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.</i> <i>See Claims 5, 10, 1[a] Ex. 1007, Abstract; ¶¶[0017]; [0019]; [0021-22]; [0026-27]; [0036]; [0039]; [0043]; Fig. 3; Ex. 1006, [0047-48]; [0065-66]; Fig. 3; Fig. 12.</i> <i>In addition, even if Prajapat is found to not explicitly disclose “a hyperlink is received from a host device via: a social network communication; a news feed; an email message; an instant message communication; a micro-blogging communication; a text message communication; or other communication medium,” Wang discloses a hyperlink is received from a host device via an email message or other communication medium.</i> At T4, the first client device transmits a message inviting the other client devices to the shopping session, for example the message “Add Others” and a message such as “Invitee” including data designating a person to be invited. At T6, the server apparatus receives a request including the messages of “Add Others” and “Invitee.” Ex. 1006, ¶[0047]; Fig. 3.

Claim No.	Claim	Prior Art Analysis
		At T7, the server apparatus transmits an invitation notice and a URL address to be used, such as “Invitation Acknowledgment, myURL address,” to a second client device by way of, for example. The description that follows assumes that the customer using the second client device has previously received notice from the customer using the first client device and is on standby for receiving an HTML message including “Invitation acknowledgment, myURL address” or the like as electronic mail. Ex. 1006, ¶[0048]; Fig. 3. When another customer is to be invited, i.e., “yes” in Step S510, the server apparatus transmits, to the client device, a display prompting entry of information about the invitation. In Step S510, the server apparatus is on standby for receiving a message, for example a message including a command of “?add others==yes” from the client device. When the customer receives an HTTP request desiring invitations through the client device (i.e., yes in Step S510), the processing proceeds to Step S512, where the server apparatus acquires, responsive to the received HTTP request, information such as, for example, an electronic mail address of the customer to be invited, and temporarily stores the information in the memory. Ex. 1006, ¶[0065]. Thereafter, in Step S514, the server apparatus notifies the invited customer by transmitting electronic mail or the like to the invited customer. Ex. 1006, ¶[0066].

Claim No.	Claim	Prior Art Analysis
		<i>A POSITA would have been motivated to combine Wang's teaching of a "server apparatus" transmitting an invitation notice and a URL address to a second client device "as electronic mail" with Prajapat's disclosure of sending the request to co-browse to browser 12b's email address.</i>
15	The apparatus of claim 10, further comprising a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.	<i>Prajapat and Wang disclose a user interface adapted to depict the shared user input web browsing interactions in a shared web browsing window.</i> See Claims 10, 11; Ex. 1007, Abstract; ¶¶[0014], [0015-17]; [0019]; [0021]; Fig. 3; Ex. 1006, ¶¶[0020], [0022], [0041]. Browsers 12 may include any suitable interface for submitting requests for and displaying media such as web pages. For example, browsers 12 may be associated with any device, application, hardware, and/or software for displaying one or more types of media. Browsers 12 may include analog, digital, or Internet protocol (IP) telephones, personal computers, video-conferencing equipment, wireless communication devices, personal digital assistants (PDAs), software applications, or any other suitable device or application. Furthermore, browsers 12 may be compatible with any suitable operating system according to particular needs. Reference to a browser 12 is meant to include reference to a user of browser 12, reference to a device including browser 12, reference to a user interface of browser 12, or any other suitable references as appropriate. A user of browser 12 may include a computer program or other suitable software for automatically communicating with one or more other users of other browsers 12. Ex. 1007, ¶[0015].

Claim No.	Claim	Prior Art Analysis
		FIG. 1 is a block diagram that illustrates a virtual shopping system with collaboration among a plurality of client devices. The virtual shopping system 10 includes a plurality of client devices 12a and 12b, a server apparatus 14, and a network 16 such as the Internet, which interconnects the server apparatus 14 and the client devices 12a and 12b. Each of the client devices 12a and 12b may include browser means such as Internet Explorer (registered trademark) or Netscape Navigator (registered trademark). Each of the client devices 12a and 12b acquires a web page stored by the server apparatus 14 in a database 18. The acquired web page is displayed on a display unit included in each client device. Ex. 1006, ¶¶[0039].
16	The apparatus of claim 10, wherein information related to the shared user input web browsing interaction comprises: form data; java script data; or other web browsing interaction data.	<i>Prajapat and Wang disclose that information related to the shared user input web browsing interaction comprises:</i> <i>form data;</i> <i>java script data; or</i> <i>other web browsing interaction data.</i> See Claims 6, and 10; Ex. 1007, Abstract; ¶¶[0014], [0015]; [0017]; [0019]; [0021]; [0023-24]; [0031-32]; Fig. 3; Ex. 1006, ¶¶[0064-65]; [0066-67].
17		See Claims 1[a], 7; Ex. 1007, ¶¶[0019], [0021-22], [0026-27], [0036], [0039], [0043].

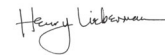
Claim No.	Claim	Prior Art Analysis
18		See Claim 1[pre], 1[a], 1[e]; Ex. 1007, Abstract, ¶¶[0012], [0016-17], [0019], [0021-22], [0026-27], [0035-36], [0039], [0041], [0043], Figs. 2-3.

X. CONCLUSION

279. For the reasons presented above, the applied references render obvious claims 1-18 of the '591 patent.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: December 16, 2022



Henry A. Lieberman