

Patent No. 8,527,591 – Petition for *Inter Partes* Review

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTUIT INC.,
Petitioner

v.

SAMESURF, INC.,
Patent Owner.

Inter Partes Review No. IPR2023-00342
Patent 8,527,591 B2

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT 8,527,591**

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1001	U.S. Patent No. 8,527,591
1002	File History of U.S. Patent No. 8,527,591
1003	Declaration of Henry Lieberman
1004	Curriculum Vitae of Henry Lieberman
1005	International Patent Pub. No. WO 00/48110 to Lebrun et al. (“Lebrun”)
1006	U.S. Patent Pub. No. 2005/0033656 to Wang et al. (“Wang”)
1007	U.S. Patent Pub. No. 2005/0021626 to Prajapat et al. (“Prajapat”)
1008	“NCSA Mosaic, Project Profile,” University of Illinois, National Center for Supercomputing Applications (available at: https://www.ncsa.illinois.edu/research/project-highlights/ncsa-mosaic/)
1009	“Netscape Communications Corp.,” Henry R. Norr, August 28, 2017, Encyclopedia Britannica, Inc. (available at: https://www.britannica.com/topic/Netscape-Communications-Corp)
1010	“50 Years of Email,” cloudHQ, April 6, 2021 (available at: https://www.prnewswire.com/news-releases/50-years-of-email-301262676.html)
1011	“The History of Email: Major Milestones from 50 Years,” Kasey Steinbrinck, January 28, 2021, Email on Acid Ina Fried, (available at: https://www.emailonacid.com/blog/article/email-marketing/history-of-email/)
1012	“10 Instant Messaging Services that Used to Be Popular,” Elise Moreau, May 3, 2021, Lifewire Tech for Humans (available at: https://www.lifewire.com/once-popular-old-instant-messaging-services-3486135)

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1014	“Hyperlink,” Wikipedia (available at: https://en.wikipedia.org/wiki/Hyperlink)
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1018	“GroupWeb: A WWW Browser as Real Time Groupware,” Saul Greenberg and Mark Roseman, CHI ’96 ACM Conference on Human Factors in Computing Systems, April 13-18, 1996 (available at: https://dl.acm.org/doi/pdf/10.1145/257089.257317)
1019	“Let’s Browse: A Collaborative Web Browsing Agent,” IUI ’99: ACM Proceedings of the 4th International Conference on Intelligent User Interfaces, December 1998 (available at: https://dl.acm.org/doi/10.1145/291080.291092)
1020	“Letizia: An Agent that Assists Web Browsing,” Henry Lieberman, <i>International Joint Conference on Artificial Intelligence</i> , 1995 (available at: https://web.media.mit.edu/~lieber/Lieberary/Letizia/Letizia-AAAI/Letizia.html)
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1024	“The History of JavaScript: Everything You Need to Know,” T.J. DeGroat, August 19, 2019, Springboard (available at: https://www.springboard.com/blog/data-science/history-of-javascript/)
1025	“Adobe Flash,” Wikipedia (available at: https://en.wikipedia.org/wiki/Adobe_Flash)
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I. INTRODUCTION

In accordance with 35 U.S.C. §§ 311-319 and 37 C.F.R. §§ 42.100 *et seq.*, Petitioner Intuit Inc. (“Intuit” or “Petitioner”) requests *inter partes* review of claims 1-6 and 10-16 of United States Patent No. 8,527,591 to Pirnazar, titled “Method and Apparatus for the Implementation of a Real-Time, Sharable Browsing Experience on a Guest Device” (the “’591 patent”; “Ex. 1001”). The ’591 patent is assigned to Samesurf, Inc. (“Samesurf” or “Patent Owner”) according to the assignment records at the United States Patent and Trademark Office.¹

The ’591 patent adds nothing novel or non-obvious to the technology that existed in the prior art at the time of the earliest possible priority date. While the ’591 specification leaves the reader with the impression that Samesurf believed that no one had previously conceived of the concept, that was not the case. The concept of collaborative web browsing/co-browsing was already well-known and in use by the priority date of the ’5918 patent, including in web-based collaborative systems. The prior art provides unmistakable evidence that co-browsing’s history reaches as far back as the founding of the World Wide Web and the first web

¹ Petitioner reserves the right to challenge in any litigation Samesurf’s standing to assert the ’591 patent and any related patents.

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

Each of the concepts of the '591 patent—requesting and receiving website data using a browser, sending and clicking a hyperlink invitation, identifying browsing sessions using a session identifier, collaborative web browsing, and operating a browser or an application based on received data—were already well-known in collaborative systems and web browsing before the earliest effective priority date of the '591 patent, as shown in the asserted prior art and background references. For example, Lebrun is directed to resolving the same problem as the '591 patent, “providing, for a group of related users, simultaneous access to a sequence of web sites,” and discloses a collaborative web browsing system “in which multiple related users can simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same time.” Ex. 1005, 4:1-4, 6-11. Wang, titled “Collaboration System Suitable for On-Line Shopping,” also discloses a collaborative browsing system, group session initiation sequence, and group session operation in much the same manner and operation as the '591 patent. Ex. 1005, Abstract. Prajapat, titled “Peer-to-Peer Dynamic Web Page Sharing,” discloses a collaborative browsing system that operates in a similar manner to the '591 patent, allowing multiple

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

II. MANDATORY NOTICES

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

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

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

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

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

Petitioner designates Jennifer R. Bush (Reg. No. 50,784) as lead counsel and Michael J. Sacksteder (*pro hac vice*), Geoffrey R. Miller (*pro hac vice*), Daniel Ledesma (*pro hac vice*), and Christopher L. Larson (Reg. No. 68,243) as back-up counsel.

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

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

III. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to 37 C.F.R. § 42.104(a) that the '591 patent is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

IV. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to 37 C.F.R. §§ 42.22(a)(1) and 42.104(1)-(2), Intuit challenges claims 1-18 of the '591 patent.

A. Prior Art Patents and Printed Publications

The '591 patent issued from U.S. Patent Application No. 12/783,743 (the "'743 application"), filed on May 20, 2010 ("effective filing date"). Ex. 1001.

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

The following references are pertinent to the ground of unpatentability:

1. International Patent Pub. No. WO 00/48110 (“Lebrun”) filed on February 11, 2000 and published on August 17, 2000. Lebrun is prior art under at least 35 U.S.C. §§ 102(a) and 102(b). Ex. 1005.
2. U.S. Patent Appl. Pub. No. 2005/0021626 (“Prajapat”), filed on May 22, 2003 and published on January 27, 2005. Prajapat is prior art under at least 35 U.S.C. §§ 102(b) and 102(e). Ex. 1007.
3. U.S. Patent Appl. Pub. No. 2005/0033656 (“Wang”), filed on April 21, 2004 and published on February 10, 2005. Wang is prior art under at least 35 U.S.C. §§ 102(b) and 102(e). Ex. 1006.

B. Grounds for Challenge

This petition, supported by the Declaration of Henry Lieberman (“Lieberman Decl.”) (Ex. 1003), requests cancellation of claims 1-18 as unpatentable under 35 U.S.C. § 103. *See* 35 U.S.C. § 314(a); Ex. 1003, ¶¶58-70. The grounds include the following:

Ground 1	Claims 1-18	35 U.S.C. § 103 ² over Lebrun in view of Wang
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² References in this Petition to 35 U.S.C. are to the pre-AIA version of the statute.

Ground 2	Claims 1-18	35 U.S.C. § 103 over Prajapat in view of Wang
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V. OVERVIEW OF THE '591 PATENT

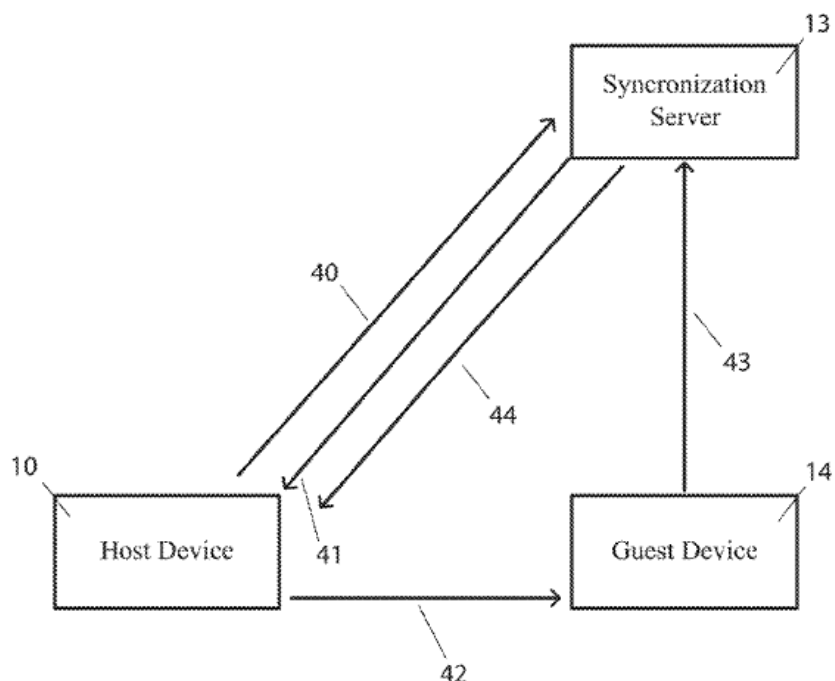
A. Background

The '591 patent adds nothing novel or non-obvious to the technology that existed in the prior art at the time of the earliest possible priority date. The '591 patent essentially claims the features of requesting and receiving website data using a browser, sending and clicking a hyperlink invitation by email text, or social network, identifying browsing sessions using a session identifier, collaborative web browsing using multiple devices and a server, and operating a browser or an application based on received data. Each of these basic functions was already well-known in collaborative systems and web browsing before the earliest effective priority date of the '591 patent. *See* Ex. 1003, ¶¶11-16, 71-114 (State of the Art).

B. '591 Patent Specification

The '591 patent purports to solve the problem of enabling multiple users to share an Internet browsing session simultaneously using different devices and from different locations. Ex. 1001, 2:40-46; Ex. 1003, ¶¶21-45. The '591 patent purports 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. Ex. 1001, 3:18-27; Ex. 1003, ¶26.

Figure 2(a) of the '591 patent illustrates the data communication between the components of “the present invention to initialize a synchronized browsing session.” Ex. 1001, 10:3-6, Fig. 2; Ex. 1003, ¶27. The components include a host device 10, a synchronization server 13, and a guest device 14. Ex. 1001, 10:6-9, Fig. 2; Ex. 1003, ¶28.

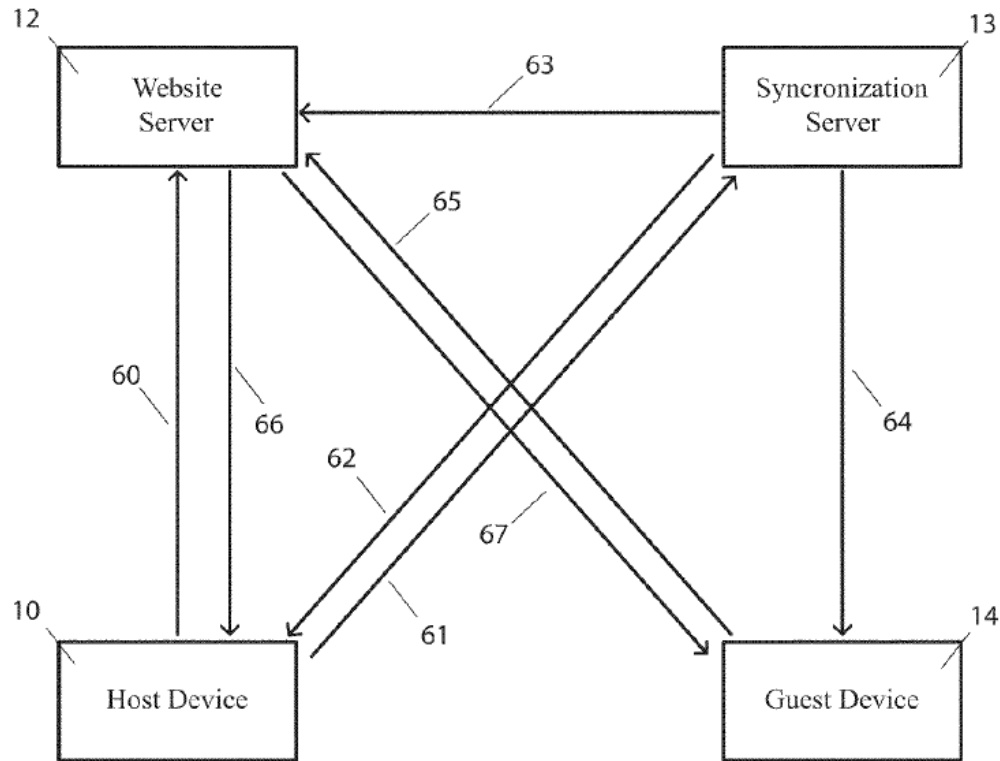


Host and guest devices may be any personal computer, smartphone, or other personal computing device with a visual user interface and a network connection. Ex. 1001, 6:3-21; Ex. 1003, ¶29. The host device initiates the synchronized browsing session and invites the guest device to join the session. Ex. 1001, 10:10-24; Ex. 1003, ¶30. The synchronization server facilitates the synchronized browsing session between the devices, and consists of generic components

including a processor, a network interface, a session identification database, and an affiliate database. Ex. 1001, 9:20-25; Ex. 1003, ¶31.

The '591 patent describes the sequence for synchronized browsing: The host device first sends an initialization request to the synchronization server, which confirms the request and creates and includes a session identifier to identify the new session. Ex. 1001, 9:42-49, 10:10-14, 11:25-31; Ex. 1003, ¶32. The “session identifier may comprise an identification number, passkey, URL, MAC address, or other unique indicator” to identify and initiate the session. Ex. 1001, 10:14-18; Ex. 1003, ¶33. Upon confirmation, the host device sends a session invitation to prospective guest devices. *Id.*, 10:19-22. The session invitation may be sent via email, instant message or social network, and includes the session identifier and an invitation hyperlink. *Id.*, 11:32-53, Figs. 4(b)-4(e). The guest device may then join the synchronized browsing session simply by clicking the hyperlink within the invitation. *Id.*, 11:37-39. Once joined, the synchronization server notifies the host device that a guest device has joined the synchronized browsing session. *Id.*, 12:5-15; Ex. 1003, ¶¶34-37.

Figure 5(a) illustrates the data communication between the system components once the synchronized browsing session has been established. Ex. 1001, 15:42-47, Fig. 5(a).



During a synchronized browsing session, the host device transmits typical web requests (60) to website servers through the Internet, which reply in turn with the requested website content (66). *Id.*, 15:50-67, Fig. 5(a). Additionally, following each request to a website server, the host device sends a second communication message (61) to the synchronization server, which the specification refers to as “webpage interaction data” that may include “the URL address of website server 12, cookie information, form data, java script, or other user inputted information or attached files.” *Id.*, 16:1-7, Fig. 5(a). The synchronization server then forwards the communication message (61), which may include the URL address, cookie information, form data and other included information to the guest

device. *Id.*, 16:31-40, 51-56, Fig. 5(a). The guest device uses the message to make an identical website request (65) to the same website server, which replies in turn with similar or identical content (67) to that sent to the host device. *Id.*, 8:1-14, 17:27-36, Fig. 5(a); Ex. 1003, ¶¶38-41.

Alternatively, the host device may indicate in the second communication message that the synchronization server should not relay the webpage interaction data to the guest device. Ex. 1001, 16:7-12. In this instance, the unshared webpage interaction data is rendered and displayed in a separate, unshared browser window at the host device only. *Id.*, 19:59-20:3, 20:15-18; Ex. 1003, ¶42.

Thus, the '591 patent describes a system in which host and guest devices may initiate, join, and browse together on a particular website or application in a synchronized session, with the synchronization server acting as a facilitator. Ex. 1001, 7:62-67, 8:1-9, 9:24-26; Ex. 1003, ¶¶21-45.

C. Prosecution History

The '591 patent was filed on May 20, 2010 as the '743 application. Ex. 1001. Thus, the effective filing date of the '591 patent is no earlier than May 20, 2010. For the purposes of this Petition, the claims of the '591 patent are presumed entitled to the earliest possible effective filing date and subject to the pre-AIA provisions of the

Patent Statute,³ With all statutory references in this Petition to the applicable pre-AIA provisions. The prosecution history is detailed further in the accompanying declaration. Ex. 1003, ¶¶46-54.

VI. LEVEL OF ORDINARY SKILL IN THE ART

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

Ex. 1003, ¶¶1-10, 17-20.

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

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

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

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

37 C.F.R. § 42.100(b).⁴

For purposes of this Petition, the challenged claims are interpreted according to their plain and ordinary meaning.⁵ Ex. 1003, ¶¶55-57.

VIII. OVERVIEW OF THE ASSERTED PRIOR ART

A. Lebrun

International Application Publication WO 00/48110, titled “Personalized Access to Web Sites” to Lebrun et al. (“Lebrun”) has an international filing date of February 11, 2000, and a publication date of August 17, 2000. Ex. 1005, Title. Lebrun is therefore prior art to the ’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. 1003, ¶¶115-22.

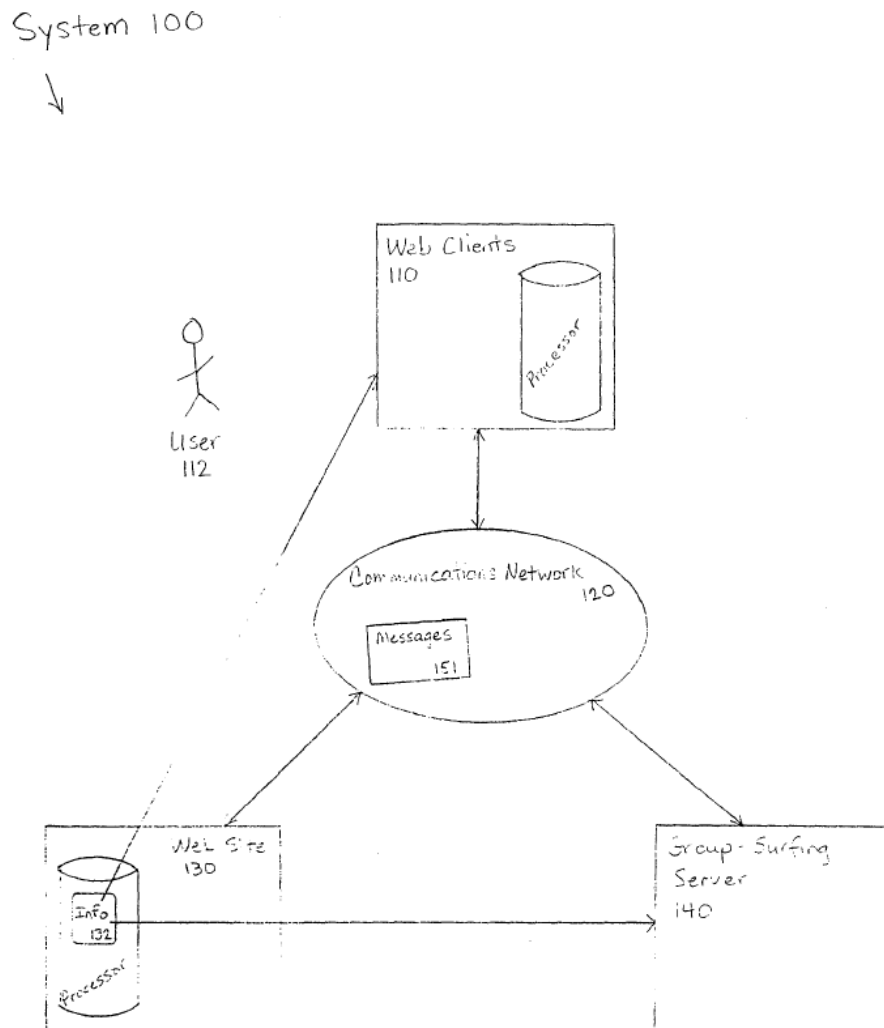
Lebrun is directed to resolving the same problem as the ’591 patent, “providing, for a group of related users, simultaneous access to a sequence of web

⁴ Petitioner expressly reserves and does not waive the right to challenge one or more claims (and claim terms) of the ’591 patent for failure to satisfy the requirements of 35 U.S.C. §§ 101 or 112, which cannot be raised in these proceedings. *See* 35 U.S.C. § 311(b).

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

sites,” and discloses a collaborative web browsing system “in which multiple related users can simultaneously access a sequence of web sites (web surfing), such that each of the related users has substantially the same content presented at the same time.” Ex. 1003, ¶¶116-17; Ex. 1005, 4:1-4, 6-11; *see also id.*, 4:14-20.

Figure 3 of Lebrun depicts the collaborative web browsing system, including “a set of web client 110, a communication network 120, at least one web site 130, and a group surfing server 140.” Ex. 1003, ¶118; Ex. 1005, 29:25-28, Fig. 3.



Lebrun discloses a sequence to create and participate within a group surfing session in similar manner as the '591 patent. Ex. 1003, ¶120; Ex. 1005, 32:1-27. The server invites the other web clients to the group session and delivers the group to a destination web site. Ex. 1005, 32:26-31; *see also id.*, 44:5-13, Fig. 4. Other web clients may join the group surfing session by sending “a session-join message” with the session identifier, to which the server responds by adding the client and notifying the group of the new participant. *Id.*, 33:1-10; *see also id.*, 44:16-45:7, Fig. 4; Ex. 1003, ¶121.

B. Wang

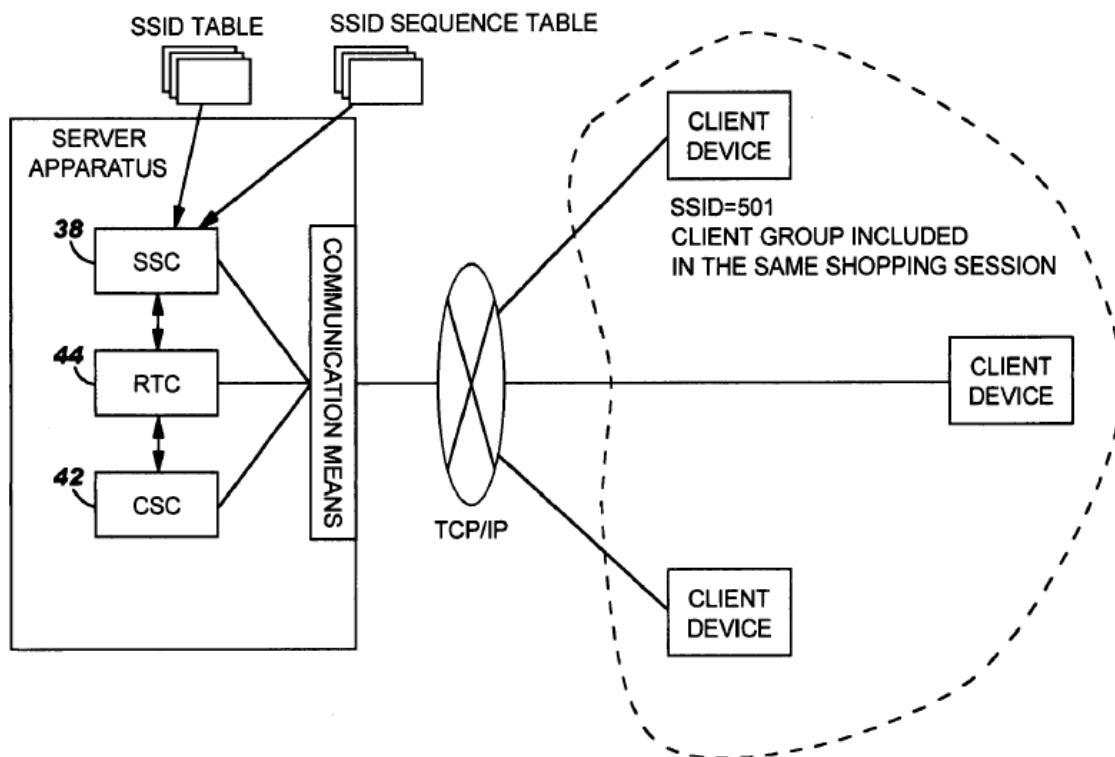
U.S. Patent Application Publication No. 2005/0033656, titled “Collaboration System Suitable for On-Line Shopping” to Wang et al. (“Wang”) has a filing date of April 21, 2004, and a publication date of February 10, 2005. Ex. 1006, Title. Wang is therefore prior art to the '591 patent under pre-AIA 35 U.S.C. §§ 102(b) and 102(e). Wang was not cited by the applicant or examiner during prosecution of the '591 patent. Ex. 1003, ¶¶123-30.

Wang also discloses a collaborative browsing system, group session initiation sequence, and group session operation in much the same manner and operation as the '591 patent. Ex. 1003, ¶124. Wang's system includes the same system components. *Id.*; Ex. 1006, Abstract.

Wang, like Lebrun, is directed to the problem of synchronizing a group browsing session involving multiple users. Ex. 1006, ¶¶[0009-10]. Wang resolves the problem by allowing a user to send a group session request to the synchronization server, which creates the group browsing session, assigns it a session identifier, and sends an invitation containing “a dedicated URL address” that an invited user may click to join the session. Ex. 1003, ¶¶125-27; Ex. 1006, ¶¶[0015], [0046-48]. The synchronization server then synchronizes the presentation of selected web pages to all client devices participating in the group session. Ex. 1003, ¶128; Ex. 1006, ¶¶[0018-19], [0045-49], [0054-55].

Figure 11 depicts Wang’s collaborative browsing system, including multiple client devices engaged in a group shopping session with session identifier (501), a TCP/IP communication network, and a synchronization server storing the group session information, managing the group session, and synchronizing the requested web page data across the client devices within the group session. Ex. 1003, ¶¶129-30; Ex. 1006, [0063], Fig. 11.

FIG. 11



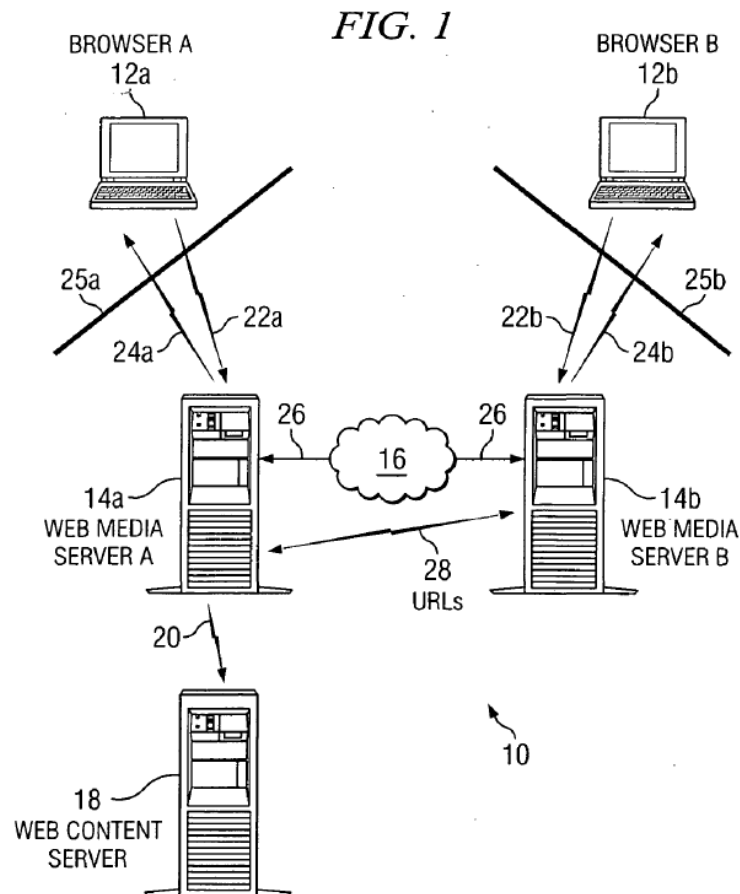
C. Prajapat

U.S. Patent Application Publication No. 2005/0021626, titled “Peer-to-Peer Dynamic Web Page Sharing” to Prajapat et al. (“Prajapat”) has a filing date of May 22, 2003, and a publication date of January 27, 2005. Ex. 1007, Title. Prajapat is therefore prior art to the ’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. 1003, ¶¶131-37.

Prajapat also discloses a collaborative browsing system that operates in a similar manner as the ’591 patent. Prajapat’s system allows multiple client

browsers to “co-browse one or more webpages” together using web media servers as the synchronizing service, and defines “co-brows[ing]” broadly. Ex. 1003, ¶132; Ex. 1007, ¶¶[0009-10], [0012-13].

Figure 1 depicts Prajapat’s collaborative browsing system. Ex. 1003, ¶¶133-34; Ex. 1007, ¶[0012], Fig. 1.



A client browser initiates a co-browsing session by identifying one or more client browsers identified by email address and requesting its web media server establish a co-browsing session with the identified browsers. Ex. 1003, ¶135; Ex. 1007, ¶¶[0016-17], [0034-35]. The web media server responds by locating the

web media servers associated with each identified browser and establishing a co-browsing session with both the browsers and associated web media servers.

Ex. 1003, ¶135; Ex. 1007, ¶¶[0019-21], [0035]. Once established, any of the participating client browsers may submit web page requests to their respective web media servers, which collectively synchronize the retrieval and display of the requested web content on each client browser in the session. Ex. 1003, ¶¶136-37; Ex. 1007, ¶¶[0022-26], [0036-39].

D. Motivation to Combine Lebrun with Wang

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 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.”). A POSITA would therefore have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative, synchronized manner. *See KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 421 (2007) (identifying “a finite number of identified, predictable solutions”); Ex. 1003, ¶¶138-40.

Furthermore, both Lebrun and Wang describe a process in which a first user initiates a collaborative browsing session by sending a request to a server to create a group browsing session and to send invitations to other users to join the session. Ex. 1005, 32:3-28; Ex. 1006, ¶¶[0047-48]; Ex. 1003, Ex. 1003, ¶¶139-41. A POSITA would have recognized that the “identifier” in the invitation of Lebrun (Ex. 1005, 32:21-24) could incorporate the hyperlink “URL address” disclosed in Wang (Ex. 1006, ¶[0048]) using conventional web programming techniques. The result would be a combination of prior art elements according to known methods to yield predictable results. *See KSR*, 550 U.S. at 417 (“[A] court must ask whether the improvement is more than the predictable use of prior art elements according to their established functions”); Ex. 1003, ¶¶139-41. Further motivation to combine these references for specific claim limitations are discussed below in conjunction with those limitations.

E. Motivation to Combine Prajapat with Wang

A POSITA would also have been motivated to combine Prajapat with Wang. Prajapat, like Wang, is directed to solving problems related to collaborative browsing via multiple web media servers and user devices to “improve efficiency in a communication system when sharing web pages.” Ex. 1007, ¶[0005], Fig. 2; Ex. 1006, ¶¶[0009-10], [0013]; Ex. 1003, ¶142. 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 Wang’s single server or Prajapat’s multiple web media servers. Ex. 1003, ¶143; Ex. 1006, ¶¶[0018-19], [0045-49], [0054-55]; Ex. 1007, ¶¶[0022-26], [0036-39]. A POSITA would therefore have sought out various available solutions for enabling multiple users to browse web pages together in a collaborative, synchronized manner. *KSR*, 550 U.S. at 421; Ex. 1003, ¶¶144-146. Further motivation to combine these references for specific claim limitations are discussed below in conjunction with those limitations.

IX. GROUNDS FOR INVALIDITY

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

It is Samesurf’s burden to present a *prima facie* case for such considerations, to which Intuit should have a chance to rebut. *Sega of Am., Inc. v. Uniloc USA*,

Inc., IPR2014-01453, Paper No. 11, at *20 (P.T.A.B. Mar. 10, 2015). Thus, the Board typically rejects arguments against institution based on objective indicia and provides petitioner a fair opportunity to address any secondary indicia evidence on reply. *See Petroleum Geo-Services Inc. v. WesternGeco LLC*, IPR2014-01478, Paper No. 18, at *36 (P.T.A.B. Mar. 17, 2015). Samesurf has neither produced nor is Intuit aware of any evidence of secondary considerations.

A. Ground 1: Claims 1-18 Are Rendered Obvious By Lebrun And Wang

1. Independent Claim 1

a. Lebrun discloses 1[pre]

Lebrun discloses **a method for a guest device performing a synchronized browsing session administered by a synchronization server.** Ex. 1003, ¶148.

Lebrun discloses **a synchronized browsing session.** *See* Ex. 1001, 5:15-22 (definition of term); Ex. 1003, ¶149. Lebrun describes its invention as “an improved technique for group access to web sites” that allows “[m]ultiple related users” to “simultaneously access a sequence of web sites, such that each of the related users has substantially the same content presented at the same times,” via “a group-surfing session,” which a POSITA would have understood to correspond to a “synchronized browsing session.” Ex. 1005, 7:3-5; Ex. 1003, ¶149.

Lebrun also discloses **a guest device that performs the “synchronized browsing session.”** *See* Ex. 1001, 6:5-15 (definition of term); *see also* Ex. 1003, ¶150.

Lebrun discloses multiple “web clients 110,” which may include “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 a user.” Ex. 1005, 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, “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 claimed guest device. Ex. 1003, ¶150.

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 Lebrun’s group-surfing server 140 corresponds to a “synchronization server.” Ex. 1003, ¶151. 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. *Id.*

b. Lebrun and Wang disclose 1[a]

Lebrun and Wang disclose **a hyperlink associated with the synchronized browsing session.** Ex. 1003, ¶153. 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.” 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.* Lebrun discloses 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.*

Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047]. A POSITA would also have understood that Lebrun’s “message” to the “group-surfing server” could be modified to include Wang’s “myURL address.” Ex. 1003, ¶154.

Lebrun further discloses **detecting an activation of the hyperlink by a guest device**. Lebrun’s “session-creation message 151” 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; Ex. 1003, ¶155.

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 to “the session-creation message 151” that they include the same identifier. *Id.* Thus, a POSITA would have concluded that the other web clients 110 must first receive the session-join message 151 to send the session-join message 151 containing the same hyperlink. 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 that the group-surfing session is a synchronized browsing session. Ex. 1003, ¶156.

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. Ex. 1003, ¶157. A POSITA also 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.” *Id.* Incorporating standard user interface and web technology, such as accessing a designated URL address, into Lebrun’s invitation would allow Lebrun to perform the Lebrun’s disclosed functions. Further, activating an invitation via a designated URL address would further enable Lebrun’s group-surfing server 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; Ex. 1003, ¶157; *see also supra* Section VII.D.

c. Lebrun and Wang disclose 1[b]

Lebrun 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.**” 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.” 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, Lebrun discloses this limitation. Ex. 1003, ¶158.

To the extent that Lebrun is found not to explicitly disclose “in response to the activation of the hyperlink,” Wang also discloses limitation 1[b]. Ex. 1003, ¶159. 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 Lebrun’s “session-creation message” to the “group-surfing server” could be modified to include Wang’s “myURL address,” comprising in response to the activation of the hyperlink. Ex. 1003, ¶159.

A POSITA also would have been motivated to combine Wang’s URL in a session invitation with Lebrun’s invitation to join a group-surfing session for the same reasons as limitation 1[a]. *See supra* Section IX.A.1.b; Ex. 1003, ¶160. A POSITA also would have been motivated to combine Wang’s 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.” Ex. 1003, ¶160; *see also supra* Section VII.D.

d. Lebrun discloses 1[c]

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 of the newly added web client causing other web clients to receive a notification discloses this limitation. Ex. 1003, ¶161.

e. Lebrun discloses 1[d]

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.”** Ex. 1003, ¶162. Lebrun discloses **receiving data from the synchronization server**, in a process in 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, 32:9-19. 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.” *Id.*, 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.” *Id.*, 35:5-28. A POSITA would have understood Lebrun’s process as disclosing a synchronization server sending the web page to the guest devices. Ex. 1003, ¶163.

Lebrun further discloses that **the data relates to a website being accessed in real-time by a host device.** *See* Ex. 1001, 6:2-5 (definition of term). As discussed for 1[pre], Lebrun discloses multiple web clients 110. *See supra* Section IX.A.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 web clients 110 participating in the session. Ex. 1005, 32:9-19. 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.*; Ex. 1003, ¶164.

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.*, 34:1-10. 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; Ex. 1003, ¶165.

A POSITA would have understood the first/controlling web client 110 to correspond to the '591 patent's host device. Ex. 1003, ¶166. 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.*; Ex. 1005, 35:5-28.

Lebrun discloses that **the data comprises a URL of the website**. Ex. 1003, ¶167. As noted above, a POSITA would have understood sharing web pages to include the URL of web site 130. *See supra* Section IX.A.1.b; Ex. 1005, 43:13-22. Lebrun discloses 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.” *Id.*, 43:13-22. A POSITA would understand that the data being shared between LeBrun's host device and guest device comprises a URL of the website. Ex. 1003, ¶167.

Lebrun also discloses that the data comprises **cookie information associated with the website and the host device**. Ex. 1003, ¶168. 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. Ex. 1003, ¶168.

f. Lebrun discloses 1[e]

Lebrun discloses “**operating a browser by the guest device based on the data received from the synchronization server.**” Ex. 1003, ¶169. Lebrun discloses **a guest device operating a browser.** 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.” *See supra* Section IX.A.1.a. 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. Lebrun also 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. *Id.*, 43:13-22; Ex. 1003, ¶170.

Lebrun discloses that the guest device operates a browser **based on the data received from the synchronization server.** Ex. 1003, ¶171. 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.” *Id.*, 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. *Id.*, 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. Ex. 1003, ¶171.

Thus, Lebrun and Wang disclose claim 1. *See* Ex. 1003, ¶¶148-71, 274-77.

2. Independent Claim 10

a. Lebrun discloses 10[pre]

Lebrun discloses **“an apparatus for a guest device performing a synchronized browsing session administered by a synchronization server,”** for the reasons stated above for Ground I limitation 1[pre]. *See supra* Section IX.A.1.a; Ex. 1003, ¶172.

b. Lebrun discloses 10[a]

Lebrun discloses **“a network interface adapted to communicate with the synchronization server.”** For the reasons stated above for 1[pre], Lebrun discloses a “synchronization server.” *See supra* Section IX.A.1.a; Ex. 1003, ¶173.

Lebrun discloses a “communication network 120” that can be “any [] 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” between the web clients 110, the web site

130, and the group-surfing server 140, “formatted in the communication protocol recognized” by the devices. *Id.*, 31:6-7. A POSITA would have concluded that Lebrun’s disclosure of a communication network 120 thus discloses a network interface adapted to communicate with the synchronization server. Ex. 1003, ¶174.

c. Lebrun discloses 10[b]

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” and which “can each be a single device ... a portion of a device, or some combination thereof” Ex. 1005, 12:11-16; 12:24-28. Lebrun further discloses that the web clients 110 “each include a processor operating under control of web client software 111, such as a web browser, and disposed for use by an operator or user 112.” *Id.*, 30:14-15. A POSITA would understand that Lebrun expressly discloses that the web client comprises a processor. Ex. 1003, ¶175.

d. Lebrun and Wang disclose 10[b][i]

For the reasons stated above for limitation 1[a], Lebrun and Wang disclose limitation 10[b][i]. *See supra* Section IX.A.1.b; Ex. 1003, ¶176.

e. Lebrun and Wang disclose 10[b][ii]

For the reasons stated above for limitation 1[b], Lebrun and Wang disclose limitation 10[b][ii]. *See supra* Section IX.A.1.c; Ex. 1003, ¶177.

f. Lebrun discloses 10[b][iii]

For the reasons stated above for limitation 1[c], Lebrun discloses limitation 10[b][iii]. *See supra* Section IX.A.1.d; Ex. 1003, ¶178.

g. Lebrun discloses 10[b][iv]

For the reasons stated above for limitation 1[d], Lebrun discloses limitation 10[b][iv]. *See supra* Section IX.A.1.e; Ex. 1003, ¶179.

h. Lebrun discloses 10[b][v]

For the reasons stated above for limitation 1[e], Lebrun discloses limitation 10[b][v]. *See supra* Section IX.A.1.f; Ex. 1003, ¶180.

Thus, Lebrun and Wang disclose claim 10. *See* Ex. 1003, ¶¶172-80, 274-77.

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

a. Lebrun and Wang disclose claim 2

Lebrun and Wang disclose “**receiving an invitation to join the synchronized browsing session.**” As discussed above, Lebrun discloses “[a] first web client 110 send[ing] a session-creation message 151 to the group-surfing server 140,” which in response “create[s] a group-surfing session,” and “inform[s] the participants in the group-surfing session.” *See supra* Section IX.A.1.a; Ex. 1005, 32:1-31; Ex. 1003, ¶181.

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. Ex. 1003, ¶182.

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 have understood that Lebrun’s “message” received from the “first web client 110” can include receiving Wang’s “myURL address,” comprising receiving an invitation to join the synchronized browsing session. Ex. 1003, ¶183.

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. Ex. 1003, ¶184, 274-277; *see also supra* Section VII.D.

b. Lebrun and Wang disclose claim 3

Lebrun in view of Wang discloses **“an invitation comprises a hyperlink associated with the synchronized browsing session.”** As explained above, 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.A.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.” Ex. 1005, 32:9-31. 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. Ex. 1003, ¶185.

For the reasons stated for claim 2, Wang also discloses this limitation. *See supra* Section IX.A.3.a; Ex. 1003, ¶186. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047].

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. Ex. 1003, ¶187. Further, a POSITA would have been motivated to combine Wang’s teachings 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.A.1.b, IX.A.3.a; Ex. 1003, ¶187, 274-277; *see also supra* Section VII.D.

c. Lebrun and Wang disclose claim 4

Lebrun in view of Wang discloses that “**an invitation further compris[ing] a session identifier.**” Ex. 1003, ¶188. 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* Sections IX.A.1.b, IX.A.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. Ex. 1003, ¶188.

Wang also discloses an invitation comprising a session identifier. *See supra* Sections IX.A.1.b, IX.A.3.a; Ex. 1003, ¶189. A POSITA would have understood Wang’s designated URL address that is included in the invitation message for a “group session” would necessarily comprise a session identifier for an invitation. Ex. 1003, ¶189.

A POSITA also would have been motivated to combine Wang’s URL in a session invitation with Lebrun’s “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* Section Sections IX.A.1.b, IX.A.3.a; Ex. 1003, ¶190, 274-277; *see also supra* Section VII.D.

d. Lebrun and Wang disclose claim 5

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.**” Ex. 1003, ¶191. 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.

Lebrun also discloses a “communication network 120” as previously described. *See supra* Section IX.A.2.b; Ex. 1005, 30:30-31:15. 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. Ex. 1003, ¶192.

Wang also discloses this limitation. Ex. 1003, ¶193. 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].

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.” Ex. 1003, ¶194, 274-277; *see also supra* Section VII.D.

e. Lebrun discloses claims 6 and 16

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.”** Ex. 1003, ¶195. As explained above, Lebrun discloses information related to the shared user input web browsing interaction to comprise cookie information. *See supra* Section IX.A.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; Ex. 1003, ¶195, 274-277.

f. Lebrun discloses claims 7 and 17

Lebrun discloses **“a shared user input web browsing interaction is depicted in a first web browser window.”** Ex. 1003, ¶196. As explained above, Lebrun discloses a “controlling web client 110,” which “determines the progression of pages 153 viewed during the group-surfing session,” and “[a]s 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.A.1.e; Ex. 1005, 34:15-21, 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. Ex. 1003, ¶196, 274-277.

g. Lebrun discloses claims 8 and 18

Lebrun discloses “**non-shared web browsing interactions are depicted in a second web browser window.**” Ex. 1003, ¶197. 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. *Id.*, 37:29-38:27; Ex. 1003, ¶197. 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.*

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 depicted in a second web browser window. Ex. 1003, ¶¶197-200, 274-277.

h. Lebrun discloses claim 9

Lebrun discloses “**the shared user input web browser action further comprises a log-in into a restricted-access webpage.**” Ex. 1003, ¶201. As explained above, Lebrun’s disclosure of certain web pages subject to special access comprises a restricted-access webpage. *See supra* Section IX.A.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 presenting an HTML form to each participating web client 110 in LeBrun’s group-surfing session comprises the shared user input web browser action further comprises a log-in into a restricted-access webpage. Ex. 1003, ¶201, 274-277.

i. Lebrun discloses claim 11

Lebrun discloses “**a user interface adapted to initiate the processor to send the request in response to a user input.**” Ex. 1003, ¶202. As discussed above, 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.A.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; Ex. 1003, ¶202, 274-277.

j. Lebrun and Wang disclose claim 12

As discussed above, Lebrun in view of Wang discloses that “**the user input comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session.**” *See supra* Sections IX.A.1.b, IX.A.1.c; Ex. 1003, ¶203. 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.

Wang also discloses this limitation. Ex. 1003, ¶204. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047]. A POSITA would also have understood that Lebrun’s “message” to the “group-surfing server” could be modified to include Wang’s “myURL address,” which comprises activation of the hyperlink for initializing sending of the request to join the synchronized browsing session. Ex. 1003, ¶204.

A POSITA would have understood Lebrun’s “an identifier 152 for an initial page 153 for the group-surfing session” in the “session-creation message 151” to comprise a URL. *Id.*, ¶205. 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,” for the reasons stated above for limitation 1[a]. *See supra* Section IX.A.1.b; Ex. 1003, ¶205, 274-277; *see also supra* Section VII.D.

k. Lebrun discloses claim 13

Lebrun discloses **“a memory adapted to store one or more software modules for controlling the processor.”** Ex. 1003, ¶206. 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 above, Lebrun further discloses “web clients 110” to include “a processor operating under control of web client software 111.” *See supra* Section IX.A.2.c; Ex. 1005, 12:24-28, 30:14-17. Lebrun explains such a processor may be “a general-purpose computer, such as a laptop or workstation.” *Id.*, 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. Ex. 1003, ¶206, 274-277.

l. Lebrun and Wang disclose claim 14

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.”** As stated above, Lebrun in view of Wang discloses **a hyperlink is received from a host device.** *See supra* Section IX.A.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.*; Ex. 1003, ¶207.

Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047]. A POSITA would have understood that Lebrun’s “message” to the “group-surfing server” could be modified to include Wang’s “myURL address.” Ex. 1003, ¶208.

For the reasons stated above, 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.A.3.d; Ex. 1003, ¶209; *see also* Ex. 1005, 41:16-22; Ex. 1006, ¶¶[0048], [0066].

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,” for the reasons stated above. *See supra* Section IX.A.1.b; Ex. 1003, ¶210. Moreover, a POSITA also 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.A.3.d; Ex. 1003, ¶210, 274-277; *see also supra* Section VII.D.

m. Lebrun discloses claim 15

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.A.3.i; Ex. 1003, ¶211.

Also explained above, Lebrun discloses “web clients 110” to include “a processor” used by “an operator or user 112.” *See supra* Section IX.A.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; Ex. 1003, ¶211.

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].” *Id.*, 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.*; Ex. 1003, ¶212.

As explained 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* Section IX.A.3.h; Ex. 1005, 39:4-10; Ex. 1003, ¶213, 274-277.

B. Ground 2: Claims 1-18 Are Rendered Obvious By Prajapat And Wang

1. Independent Claim 1

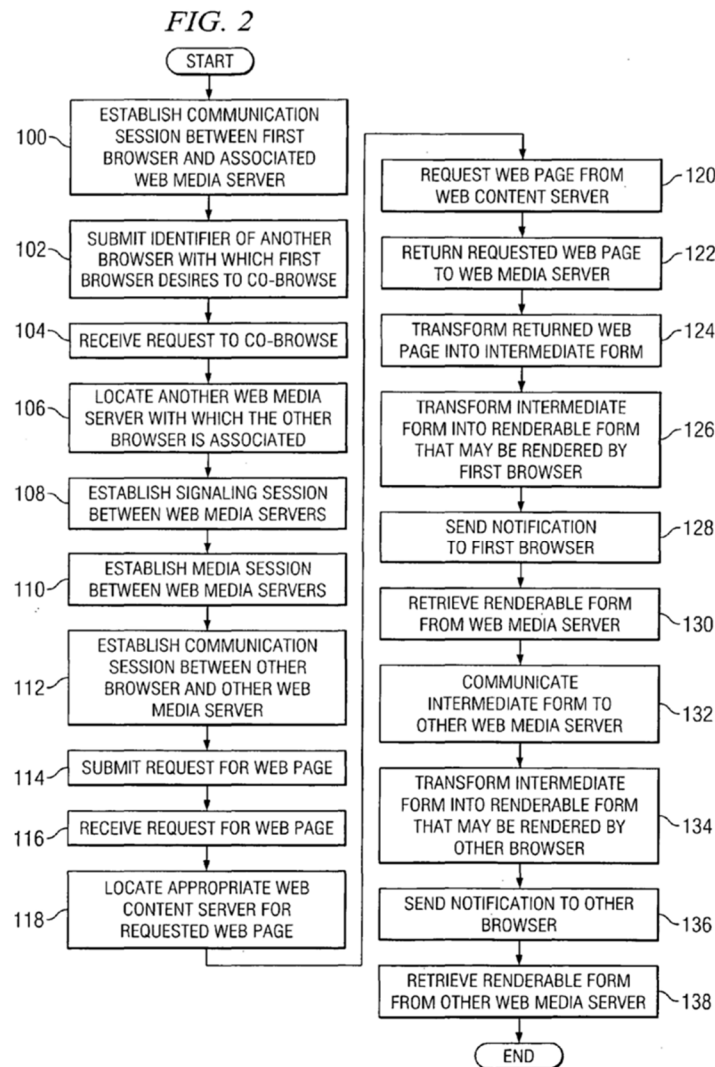
a. 1[pre] Prajapat discloses the preamble of claim 1

Prajapat discloses “**a method for a guest device performing a synchronized browsing session administered by a synchronization server.**” Ex. 1003, ¶214.

Prajapat discloses **a synchronized browsing session.** *See* Ex. 1001, 5:11-15 (describing the term as “two or more people read the same article, watch the same video, or shop for the same item automatically, without the hassle of coordinating user input”). Ex. 1003, ¶215.

Prajapat discloses a system that provides “peer-to-peer dynamic web page sharing,” involving a “web media server” that allows a user (e.g., “browser 12a”) to “co-browse one or more web pages with browser 12b.” Ex. 1007, ¶[0012]. Prajapat explains that the term “co-browse” may include browsers that “display the same web pages at substantially the same time.” *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; Ex. 1003, ¶216.



Prajapat also discloses a guest device that performs the “synchronized browsing session.” See Ex. 1001, 6:12-21 (describing “guest devices”); Ex. 1003, ¶217.

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 this disclosure to comprise a guest device performing the “synchronized browsing session.” Ex. 1003, ¶218.

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.” Ex. 1007, ¶[0012]. A POSITA would have understood that Prajapat’s web media server 14a corresponds to a “synchronization server.” Ex. 1003, ¶219. 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. *Id.*

b. Prajapat and Wang disclose 1[a]

Prajapat in view of Wang discloses “**detecting an activation of a hyperlink associated with the synchronized browsing session by a guest device.**” 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, ¶¶[0019], [0022], [0026-27], [0036], [0039], [0043]; Ex. 1003, ¶¶220-21. 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. Ex. 1003, ¶¶220-21.

Wang also discloses this limitation. Ex. 1003, ¶222. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address,” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047]. 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. Ex. 1003, ¶222.

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. Ex. 1003, ¶223. Incorporating standard technology, such as a hyperlink associated with a designated URL address, into Prajapat’s request to co-browse functionality would allow the guest device in Prajapat to perform the collaborative browsing described in its disclosures as expected. Ex. 1003, ¶223. 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]; Ex. 1003, ¶223; *see also supra* Section VII.E.

c. Prajapat and Wang disclose 1[b]

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 [12b] 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 the request to co-browse, which discloses this limitation. Ex. 1003, ¶224.

Wang also discloses this limitation. Ex. 1003, ¶225. 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]. As explained above, a POSITA would have understood that Prajapat’s browser 12a request and Wang’s “myURL address” to be in response to the activation of the hyperlink. *See supra* Section IX.B.1.b; Ex. 1003, ¶225. 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 the sending a “login request” of Wang to comprise sending a request by the guest device to join the synchronized browsing session. *Id.*, ¶225.

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 Prajapat’s “session-join message” because 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. Ex. 1003, ¶226; *see also supra* Section VII.E.

d. Prajapat discloses 1[c]

Prajapat discloses **“receiving from the synchronization server a notification that the 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 [12b].” Ex. 1007, ¶[0021], [0035]. A POSITA would have understood this disclosure to show receiving from the synchronization server a notification that the guest device has joined the synchronized browsing session. Ex. 1003, ¶227.

e. Prajapat discloses 1[d]

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.”** Ex. 1003, ¶228. Prajapat discloses **receiving data from the synchronization server**. As explained above, Prajapat discloses an incoming channel for web media server 14b to communicate with browser 12b. *See supra* Section IX.B.1.d; Ex. 1007, ¶¶[0021], [0035]. 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]; Ex. 1003, ¶228.

Prajapat discloses that **the data relates to a website being accessed in real-time by a host device**. *See* Ex. 1001, 6:3-5 (describing a host device). As discussed above, 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.B.1.a; Ex. 1007, ¶¶[0012], [0016]. 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. Ex. 1003, ¶229.

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 the shared data comprises a URL of the website. Ex. 1003, ¶230.

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 derive any suitable information regarding browser 12a during a session with web content server 18.” *Id.* A POSITA would have understood Prajapat to disclose this limitation. Ex. 1003, ¶231.

f. Prajapat discloses 1[e]

Prajapat discloses **“operating a browser by the guest device based on the data received from the synchronization server.”** Prajapat discloses **a guest device operating a browser.** As discussed above, 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,” and that Prajapat defines “co-browse” to include “browser 12a and browser 12b display the same web pages at substantially the same time.” *See supra* Section IX.B.1.a; Ex. 1007, ¶¶[0012], [0016]. A POSITA would have understood browser 12b displaying, altering, or viewing web pages and its alterations comprises a guest device operating a browser. Ex. 1003, ¶232.

Prajapat discloses that the guest device operates a browser **based on the data received from the synchronization server.** As explained above, 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.B.1.e; Ex. 1007, ¶¶[0022], [0026-27], [0036], [0039], [0043]. A POSITA would have understood this disclosure to comprise a guest device operating a browser based on the data received from the synchronization server. Ex. 1003, ¶233.

Thus, Prajapat and Wang disclose claim 1. *See* Ex. 1003, ¶¶214-33, 274-76, 278.

2. Independent Claim 10

a. Prajapat discloses 10[pre]

For the reasons stated above for limitation 1[pre],⁶ Prajapat discloses limitation 10[pre]. *See supra* Section IX.B.1.a; Ex. 1003, ¶234.

b. Prajapat discloses 10[a]

Prajapat discloses **“a network interface adapted to communicate with the synchronization server.”** For the reasons stated above, Prajapat discloses **a synchronization server**. *See supra* Section IX.B.1.a. Prajapat 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,” etc., 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 discloses “incoming” and “outgoing” channels between browsers and web media servers used to transmit information in a co-browsing session. Ex. 1007, ¶¶[0021-22], [0025-26], [0034-36], [0038-39].

⁶ All cross-references to limitations in Ground 2 refer to limitations discussed elsewhere in Ground 2.

A POSITA would have concluded that this disclosure comprises a network interface adapted to communicate with the synchronization server. Ex. 1003, ¶235.

c. Prajapat discloses 10[b]

Prajapat discloses “**a processor.**” Ex. 1003, ¶236. Prajapat explains that the functionality described in connection with its devices “may be provided using a single computer system” that “may include one or more . . . processors, memory, or other components for receiving, processing, storing, and communicating information.” Ex. 1007, ¶[0014]; Ex. 1003, ¶236.

d. Prajapat and Wang disclose 10[b][i]

For the reasons stated above for limitation 1[a], Prajapat and Wang disclose limitation 10[b][i]. *See supra* Section IX.B.1.b; Ex. 1003, ¶237.

e. Prajapat and Wang disclose 10[b][ii]

For the reasons stated above for limitation 1[b], Prajapat and Wang disclose limitation 10[b][ii]. *See supra* Section IX.B.1.c; Ex. 1003, ¶238.

f. Prajapat discloses 10[b][iii]

For the reasons stated above for limitation 1[c], Prajapat discloses limitation 10[b][iii]. *See supra* Section IX.B.1.d; Ex. 1003, ¶239.

g. Prajapat discloses 10[b][iv]

For the reasons stated above for 1[d], Prajapat discloses limitation 10[b][iv]. *See supra* Section IX.B.1.e; Ex. 1003, ¶240.

h. Prajapat discloses 10[b][v]

For the reasons stated above for 1[e], Prajapat discloses limitation 10[b][v].

See supra Section IX.B.1.f; Ex. 1003, ¶241.

Thus, Prajapat and Wang disclose claim 10. *See* Ex. 1003, ¶¶234-41, 274-76, 278.

3. Dependent Claims

a. Prajapat and Wang disclose claim 2

Prajapat and Wang disclose “**receiving an invitation to join the synchronized browsing session.**” Ex. 1003, ¶242. As explained above, 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.B.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. Ex. 1003, ¶242.

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 have understood that Prajapat’s disclosure of browser 12b receiving browser 12a’s request to co-browse can include receiving Wang’s “myURL address,” which comprises receiving an invitation to join the

synchronized browsing session. Ex. 1003, ¶243. A POSITA would have been motivated to combine these features because the two messages are intended to achieve a similar goal of initiating a communication session with the guest devices. Ex. 1003, ¶244, 274-276, 278; *see also supra* Section VII.E.

b. Prajapat and Wang disclose claim 3

Prajapat in view of Wang discloses “**an invitation comprises a hyperlink associated with the synchronized browsing session.**” Ex. 1003, ¶245. As explained above, 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.B.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. Ex. 1003, ¶245.

For the reasons stated for claim 2, Wang also discloses this limitation. *See supra* Section IX.B.3.a; Ex. 1006, ¶[0047]; Ex. 1003, ¶246. A POSITA would have understood these combined disclosures to disclose this limitation, and a POSITA would have been motivated to make the combination of references for the

reasons stated for claims 1[a] and 2. *See supra* Section X.A.1.b; X.A.3.a;

Ex. 1003, ¶¶246-47, 274-276, 278; *see also supra* Section VII.D.

c. Prajapat and Wang disclose claim 4

Prajapat in view of Wang discloses that “**an invitation further comprises a session identifier.**” Ex. 1003, ¶248. 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. Ex. 1003, ¶248.

For the reasons stated for claim 3, Wang also discloses that an invitation comprises a session identifier. *See supra* Section IX.B.3.b; Ex. 1003, ¶249. 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. Ex. 1003, ¶249.

A POSITA would have been motivated to make the combination of references for the reasons stated for claims 1[a] and 2. *See supra* Sections IX.B.1.b, IX.B.3.a; Ex. 1003, ¶250, 274-276, 278; *see also supra* Section VII.E.

d. Prajapat and Wang disclose claim 5

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.”** Ex. 1003, ¶251. As explained above, 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.A.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]. A POSTIA would understand that sending a request to co-browse via email comprises an invitation that is received via a suitable communication medium. Ex. 1003, ¶251.

Wang also discloses an invitation is received via a suitable communication medium. Ex. 1003, ¶252. 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]; Ex. 1003, ¶252.

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 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. Ex. 1003, ¶253, 274-276, 278; *see also supra* Section VII.E.

e. Prajapat discloses claims 6 and 16

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.”** Ex. 1003, ¶254. 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.” *See supra* Section IX.B.1.a; Ex. 1007, ¶[0012]. A POSITA would have understood Prajapat’s description of “co-browsing” to disclose this limitation. Ex. 1003, ¶254.

Prajapat further discloses the information comprises: form data; java script data; or other web browsing interaction data. Ex. 1003, ¶255. 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]; Ex. 1003, ¶255, 274-276, 278; *see also supra* Section VII.E.

f. Prajapat discloses claims 7 and 17

Prajapat discloses that **“a shared user input web browsing interaction is depicted in a first web browser window.”** Ex. 1003, ¶256. 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.B.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. Ex. 1003, ¶256, 274-276, 278.

g. Prajapat discloses claims 8 and 18

Prajapat discloses **“non-shared web browsing interactions are depicted in a second web browser window.”** Ex. 1003, ¶257. 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. Ex. 1003, ¶¶257, 274-276, 278.

h. Prajapat and Wang disclose claim 9

Prajapat discloses **“the shared user input web browser action further comprises a log-in into a restricted-access webpage.”** As mentioned before, Prajapat discloses a “co-browsing” technique, which a POSITA would have understood to comprise a shared user input web browsing action. *See supra* Sections IX.B.1.a; IX.B.3.f; Ex. 1007, [¶0012]; Ex. 1003, ¶258.

Prajapat also teaches that the interaction data comprises “a log-in into a restricted access webpage.” Ex. 1003, ¶259. 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 have understood or considered obvious that the parameters include log-in information, which a POSITA would know is needed to access restricted web pages. Ex. 1003, ¶259.

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 have understood 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. Ex. 1003, ¶260.

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. 1003, ¶261.

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. Ex. 1003, ¶262. 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.

Ex. 1003, ¶262. 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. *Id.*, ¶¶262, 274-276, 278.

i. Prajapat discloses claim 11

Prajapat discloses **“a user interface adapted to initiate the processor to send the request in response to a user input.”** Ex. 1003, ¶263. 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 ... processors, memory, or other components for receiving, processing, storing, and communicating information.” Ex. 1007, ¶[0014]; Ex. 1003, ¶¶263, 274-276, 278.

j. Prajapat and Wang disclose claim 12

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.B.1.b; IX.B.1.c; Ex. 1003, ¶264. 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.B.1.a; Ex. 1007, ¶[0016]. Prajapat further defines “co-browse” to include browsers that “display the same web pages at substantially the same time.” *See supra* Section IX.B.1.a; Ex. 1007, ¶[0012]; Ex. 1003, ¶264.

“In 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 14 a.” 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 this disclosure to comprise the user input comprising activation of the hyperlink for initializing sending of the request to join the synchronized browsing session. Ex. 1003, ¶265.

Wang also discloses activation of the hyperlink for initializing sending of the request to join the synchronized browsing session. Ex. 1003, ¶266. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047]. A POSITA would also have understood that Prajapat’s browser 12a sending a request to co-browse to browser 12b to include sending Wang’s “myURL address,” which comprises activation of the hyperlink for initializing

sending of the request to join the synchronized browsing session. Ex. 1003, ¶¶266-67.

A POSITA would have been motivated to make this combination for the reasons stated for limitation 1[a]. *See supra* Section IX.B.1.b; Ex. 1003, ¶¶267, 274-276, 278; *see also supra* Section VII.E.

k. Prajapat discloses claim 13

Prajapat discloses **“a memory adapted to store one or more software modules for controlling the processor.”** Ex. 1003, ¶268. Prajapat explains that the functionality described in connection with the various devices “may be provided using a single computer system,” that “may include ... memory, or other components for receiving, processing, storing, and communicating information.” Ex. 1007, ¶[0014]; Ex. 1003, ¶¶268, 274-276, 278.

l. Prajapat and Wang disclose claim 14

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.”** Ex. 1003, ¶269. For the reasons stated above, Prajapat in view of Wang discloses **a hyperlink is received from a host device.** *See supra* Section IX.B.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.B.1.b; Ex. 1007, ¶¶[0022], [0026-27], [0036], [0039], [0043]. A POSITA would have understood browser 12b receiving browser 12a’s request to co-browse to comprise a hyperlink received from a host device. Ex. 1003, ¶269.

Wang also discloses **a hyperlink received from a host device**. Ex. 1003, ¶270. Wang discloses that upon receiving the “Invitation acknowledgment, myURL address” the “second client device accesses the designated URL address.” Ex. 1006, ¶[0047]. 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. Ex. 1003, ¶270.

For the reasons stated for claim 5, Prajapat and Wang also disclose that **the hyperlink is received via the recited means**. *See supra* Section IX.B.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]. A POSTIA would understand that browser 12b receiving a request to co-browse via email comprises receiving a hyperlink via a suitable communication medium. Ex. 1003, ¶271.

A POSITA would have been motivated to make the combination for the reasons stated for limitation 1[a]. *See supra* Section IX.B.1.b; Ex. 1003, ¶272. 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 for claim 5. *See supra* IX.B.3.d; Ex. 1003, ¶272, 274-276, 278; *see also supra* Section VII.E.

m. Prajapat discloses claim 15

For the reasons stated 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.B.3.i; Ex. 1007, ¶¶[0014- 15]; Ex. 1003, ¶273, 274-276, 278.

X. CONCLUSION

For the reasons given above, Petitioner hereby requests *inter partes* review under 35 U.S.C. § 311 and 37 C.F.R. § 42.101 of United States Patent No. 8,527,591.

Dated: December 16, 2022

Respectfully submitted,

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

Pursuant to 37 C.F.R. § 42.24 *et seq.*, the undersigned certifies that this Petition complies with the 14,000 word type-volume limitation. The Petition contains 13,926 words, excluding the parts of the Petition exempted from the type-volume limitation.

Dated: December 16, 2022

Respectfully submitted,

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

The undersigned hereby certifies that the foregoing Petition for *Inter Partes* Review of U.S. Patent No. 8,527,591 and accompanying Exhibits 1001-1026 were served on December 16, 2022 in their entirety by Federal Express – Priority Delivery upon the following:

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