

Summary of verbatim (or nearly verbatim) matches between the 00538 petition to the Houh Declaration Ex.1003

	‘538 Petition	Houh Decl. (Ex. 1003)
1.	The ’801 patent, filed February 7, 2014, claims priority through 3 continuations to U.S. Patent 7,599,9831, filed June 18, 2003, which claims priority to Provisional 60/389,430 filed June 18, 2002. Petitioners do not acquiesce the ’801 patent is entitled to priority of the provisional or any listed priority patent. Regardless, each applied reference was filed or published before June 18, 2002. 538 Petition, p. 1	The ’801 patent, filed February 7, 2014, claims priority through three continuations to U.S. Patent 7,599,983, filed June 18, 2003, which claims priority to Provisional 60/389,430 filed June 18, 2002. Petitioners do not acquiesce the ’801 patent is entitled to priority of the provisional or any listed priority patent. Regardless, each applied reference was filed or published before June 18, 2002. Ex. 1003, ¶ 24
2.	The ’801 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:24-26.) 538 Petition, p. 2	The ’801 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:18-20.) Ex. 1003, ¶ 25
3.	The ’801 patent identifies “accessing of information content over wireless networks via web-enabled mobile devices” as among “the most rapidly expanding aspects of wireless networking.” (EX-1001, 1:30-32.) 538 Petition, p. 2	The ’801 patent identifies “accessing of information content over wireless networks via web-enabled mobile devices” as among “the most rapidly expanding aspects of wireless networking.” (EX-1001, 1:30-32.) Ex. 1003, ¶ 26
4.	Figure 1A (below) “shows an example network-based communication system 10” including “wireless network 12 coupled to the Internet 14, a set of mobile devices 15, a set of servers 16	Figure 1A of the ’801 patent, (reproduced below) “shows an example network-based communication system 10” including “wireless network 12 coupled to the Internet 14, a set of mobile devices 15,

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	and a set of user terminals 18.” (EX-1001, 3:54-58.) [image omitted] ’801 Patent, Figure 1A 538 Petition, p. 3	a set of servers 16 and a set of user terminals 18.” (EX-1001, 3:54-58.) [image omitted] ’801 Patent, Figure 1A Ex. 1003, ¶ 26
5.	Such mobile sites may be associated with “a group comprising multiple members having a common interest” (EX-1001, 6:30-32), “an event” (EX-1001, 6: 50-51), “a game,” (EX-1001, 7:30-31), or “a user of IM, SMS, MMS, email or other type of messaging service” (EX-1001, 7:42-44), among other associations. (EX-1001, 6:30-8:12.) 538 Petition, p. 4	Such mobile sites may be associated with “a group comprising multiple members having a common interest,” (EX-1001, 6:30-32), “an event,” (EX-1001, 6:50-51), “a game,” (EX-1001, 7:30-31), or “a user of IM, SMS, MMS, email or other type of messaging service,” (EX-1001, 7:42-44), among other associations. (EX-1001, 6:30-8:12.) Ex. 1003, ¶ 28
6.	A person of ordinary skill in the art (“POSITA”) would have had a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. 538 Petition, p. 4	In my opinion, a POSITA would have a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. Ex. 1003, ¶ 33
7.	In response, Applicant argued the pending claims were patentably distinct because they included the limitation “integrating into the mobile	In response, Applicant argued that the pending claims and patent’s claims were distinct because the pending claims included the limitation

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	information channel information associated with at least one networking functionality of said at least one network,” which did not appear in earlier filed patent. (EX-1002, 300.) 538 Petition, p. 5	“integrating into the mobile information channel information associated with at least one networking functionality of said at least one network,” whereas U.S. Patent claims 8,135,801 did not. Ex. 1003, ¶ 34
8.	Petitioners dispute PO’s narrow Meta-MDT-IPR construction which is contrary to the express definition in the specification. (See, e.g., EX-1001, 4:38-41.) Petitioners apply the plain meaning which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions. (EX-1003, ¶39.) 538 Petition, p. 5	I dispute PO’s narrow Meta-MDT-IPR construction because it is contrary to the express definition in the specification. (See, e.g., EX-1001, 4:38-41.) I apply the plain meaning for the term which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions. Ex. 1003, ¶ 39
9.	In the Meta-MDT-IPR, the parties dispute the construction of “wireless network” primarily based on the inclusion of language that the wireless network is “separate from the internet” and “facilitates connection to the internet.” 538 Petition, p. 7	In the Meta-MDT-IPR, the parties dispute the construction primarily based on the inclusion of language that the wireless network is “separate from the internet” and “facilitates connection to the internet.” Ex. 1003, ¶ 41
10.	Randall introduces into this network “an open, universal data infrastructure for wireless information devices which can be used by application developers to write new applications by extending the attributes of the database using a <i>standard protocol</i>.” (EX-1005, 3:10-13 (<i>italics in original</i>).) 538 Petition, p. 9	Randall therefore presents “an open, universal data infrastructure for wireless information devices which can be used by application developers to write new applications by extending the attributes of the database using a <i>standard protocol</i>, as opposed to a closed and proprietary protocol.” (Randall, 3:10-13 (<i>emphasis by italics in original</i>).)

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		Ex. 1003, ¶ 48
11.	Randall's extensible database "contains information from or relating to many different entities" and "is organised into information fields which an entity can complete or have completed." (EX-1005, 8:26-28.) 538 Petition, p. 10	The "database contains information from or relating to many different entities" and "is organised into information fields which an entity can complete or have completed." (Randall, 8:26-28.) Ex. 1003, ¶ 64
12.	Forsyth describes several Scenarios that illustrate the operation of group-object enhanced Forums: Group Based Text Messaging, (5:35-7:13), Discussion of Photos (7:18-57), Social Scheduling (7:58-9:4) and Digital Memento from a User's Birthday (9:5-35) as well as numerous features and functions which that can be used within Forums to further enhance the user experience 538 Petition, p. 12	Forsyth describes several Scenarios that illustrate the operation of group-object enhanced Forums: Group Based Text Messaging (Scenario 1), (see Forsyth, 5:35-7:13), Discussion of Photos (Scenario 2), (see Forsyth, 7:18-57), Social Scheduling (Scenario 3), (see Forsyth, 7:58-9:4), and Digital Memento from a User's Birthday (Scenario 4), (see Forsyth, 9:5-35). Forsyth also describes numerous services, features, and functions which that can be used within each individual Forum. Ex. 1003, ¶ 71
13.	A POSITA would have been motivated to combine Forsyth's teachings regarding the use of group objects and additional features and functions to enhance the Forums service taught by Randall which uses Randall's extensible database. (EX-1003, ¶¶72-78.) 538 Petition, p. 12	A POSITA would have been motivated to combine Forsyth's teachings regarding the use of group objects and additional features and functions to enhance the Forums service taught by Randall. Ex. 1003, ¶ 72
14.	Randall and Forsyth are also reasonably pertinent to problems addressed by the '801 patent, namely "overcom[ing] one or more of the	Randall and Forsyth are also reasonably pertinent to problems addressed by the '801 patent, namely "overcom[ing] one or more of the

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	drawbacks of” conventional techniques for content sharing for mobile devices. (See, e.g, EX-1001, 1:44-2:7; EX-1003, ¶73.) 538 Petition, p. 13	drawbacks of” conventional techniques for content sharing for mobile devices. (See, e.g, EX-1001, 2:1-4. Ex. 1003, ¶ 73
15.	A POSITA would have been motivated to make the above combination because Forsyth explicitly motivates the combination. (EX-1003, ¶¶74-78.) Forsyth stresses the benefits of group objects noting that its “invention is founded on the insight of providing an object which defines solely the identities of members of a group.” (EX-1006, 2:24-27.) 538 Petition, p. 13	A POSITA would have been motivated to make the above combination because Forsyth explicitly motivates the combination. Forsyth stresses the benefits of group objects noting that its “invention is founded on the insight of providing an object which defines solely the identities of members of a group” Ex. 1003, ¶ 74
16.	Forsyth further describes the “strengths” of Forums application utilizing group objects “over conventional communications” 538 Petition, p. 13	Forsyth further describes the “strengths” of Forums application utilizing group objects “over conventional communications.” Ex. 1003, ¶ 74
17.	Finally, the combination is nothing more than the application of a known technique (Forsyth’s group objects, features and functions) to a known method/product (Randall’s Forums service implemented with extensible database infrastructure) which was ready for further improvement. (EX-1003, ¶77. 538 Petition, p. 15	Finally, the combination is nothing more than the application of a known technique (Forsyth’s group objects, features and functions) to a known method/product (Randall’s Forums service implemented with extensible database infrastructure) which was ready for further improvement. Ex. 1003, ¶ 77
18.	A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been	A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been

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	predictable because both references are directed to the same service, Forums, are based on devices using the Symbian OS and use features and functionality associated with Symbian. (EX-1003, ¶78.) The Symbian OS was well-known and Symbian offered many technical developer resources prior to the earliest possible priority date of the ’801 patent. (See, e.g., EX-1017; EX-1012, 4-6, 229-31, EX-1016, 11-14.) 538 Petition, p. 15	predictable because both references are directed to the same service, Forums, are based on devices using the Symbian OS and use features and functionality associated with Symbian. The Symbian operating system was well-known and Symbian offered many technical developer resources prior to the earliest possible priority date of the ’801 patent. (See, e.g., EX-1017; Allin, 4-6, 229-31; Jipping, 11-14.) Ex. 1003, ¶ 78
19.	The Forums infrastructure includes “internet servers” hosting individual Private and Public Forums (enhanced by Forsyth’s teachings), “internet servers” hosting extensible databases (taught by Randall), wireless information devices which access these servers/databases, and non-mobile (fixed) computing systems. (EX-1003, ¶82.) 538 Petition, p. 16	The Symbian Forums infrastructure, illustrated below, includes “internet servers” hosting individual Private and Public Forums (as enhanced by Forsyth), “internet servers” hosting extensible databases (as taught by Randall), wireless information devices which access these servers/databases, and non-mobile (fixed) computing systems (represented by traditional desktop PC). Ex. 1003, ¶ 82
20.	As shown above, wireless information devices access servers via the GSM wireless network (purple line) and non-wireless devices access servers via the Internet (blue line). (EX-1003, ¶83.) 538 Petition, p. 17	As shown in the above figure, wireless information devices access servers via a GSM wireless network (depicted with a purple line) and non-wireless devices (e.g., fixed computers) access servers via the Internet (depicted with a blue line) Ex. 1003, ¶ 83
21.	This is confirmed by Randall which describes use of “existing transports” for client-server communication such	This arrangement is confirmed by Randall which describes the use of “existing transports” (communication

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	as “WAP to access the services on the server side” from wireless devices and “standard IP formats such as MIME, SMTP and HTTP” to access the servers over the Internet. (See EX-1005, 58:23-27.) 538 Petition, pp. 17-18	means) for client-server communication over these networks such as “WAP to access the services on the server side” from the wireless devices and “standard IP formats such as MIME, SMTP and HTTP” to “enable compatibility with Internet Messaging systems.” (See Randall, 58:23-27.) Ex. 1003, ¶ 83
22.	Randall describes that “a forum allows several people to be part of a ‘channel’ or room, which is usually themed; for instance supporters of a football team may meet in a channel devoted to that team to discuss the team.” (EX-1005, 40:17-19; see also EX-1005, 82:5-83:5. 538 Petition, p. 18	Randall describes that “a forum allows several people to be part of a ‘channel’ or room, which is usually themed; for instance supporters of a football team may meet in a channel devoted to that team to discuss the team.” (Randall, 40:17-19) Ex. 1003, ¶ 86
23.	Forsyth describes several examples of Forums being used to author and share content (e.g., text messages, photos, links, audio files, documents) among members: Group Based Text Messaging Scenario 1 (5:35-7:13), Discussion of Photos Scenario 2 (7:18-57), Social Scheduling Scenario 3 (7:58-9:4), and Digital Memento from a User’s Birthday Scenario 4 (9:5-35). (EX-1003, ¶87.) 538 Petition, p. 19	Forsyth describes several examples of Forums being used to author and share content among members: Group Based Text Messaging (Scenario 1) describing authoring and sharing text messages (5:35-7:13), Discussion of Photos (Scenario 2) describing capturing and sharing photos (7:18-57), Social Scheduling (Scenario 3) describing authoring and sharing messages and capturing and sharing links (7:58-9:4), and Digital Memento from a User’s Birthday (Scenario 4) describing authoring and sharing messages, and capturing and sharing photos, audio files, and documents (9:5-35

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		Ex. 1003, ¶ 87
24.	Each individual Forum (and its supporting network infrastructure) is a “medium for transferring information that allows users to author content”, meeting PO’s MDT-Meta-Litigation construction and Meta’s Meta-MDT-IPR construction and a “component of a mobile site [Forums running on the server] configured to permit a wide variety of mobile devices to send and receive content over a wireless network”, meeting PO’s Meta-MDT-IPR construction. The Randall-Forsyth combination therefore discloses a <i>“mobile information channel through which the first user can share access to content with a plurality of additional users.”</i> (EX-1003, ¶¶85-88. 538 Petition, p. 19	Each individual Forum (and its supporting network infrastructure) is a “medium for transferring information that allows users to author content”, meeting PO’s MDT-Meta-Litigation construction and Meta’s Meta-MDT-IPR construction. A Forum is also a “component of a mobile site [Forums running on the server] configured to permit a wide variety of mobile devices to send and receive content over a wireless network”, meeting PO’s Meta-MDT-IPR construction. The combination of Randall and Forsyth therefore discloses a <i>“mobile information channel through which [a] user can share access to content with a plurality of additional users.”</i> Ex. 1003, ¶ 88
25.	Forsyth describes creation and activation of a Forum in group-based text messaging Scenario 1. As shown in Figure 4 (below-right), the user is presented with a “new forum” screen on the user interface through which the user can create Forums. When WAP is used as the communication protocols between a mobile device and server, this “new forum” interface screen is a webpage provided by the server and displayed via a microbrowser or a client-side Forums application supporting WAP. (EX-1003, ¶89.) As shown, when creating a Forum, the user “has to select whom he wishes to invite” (e.g., Lucy/Steve), enter the Forum title (“Naked Chef”) and	Forsyth describes creation and activation of a Forum through its exemplary “Scenario 1—group-based text messaging.” As shown in Figure 4 (below-right), the user is presented with a “new forum” screen on the user interface through which the user creates a Forum. As I discussed in §IV.A.1.c.(2), when WAP is used as the protocols between the mobile devices and server (as taught by Randall), this “new forum” interface screen is a webpage provided by the server and displayed via a microbrowser or a client-side Forums application supporting WAP. (See Park, 5:5-33 (describing WAP).) As shown, when creating a Forum, the

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	provide content for the message (“Jamie Oliver is a culinary god!!”). (EX-1006, 5:50-51, Figure 3 (below-left).) [image omitted] Symbian Forums: Forsyth, Figure 3 (left), Figure 4 (right) 538 Petition, p. 20	user “has to select whom he wishes to invite.” (Forsyth, 5:50-51; Figure 3 (below-left).) As shown in Figure 3 of this scenario, the user selects Lucy and Steve as participants in the Forum, enters the Forum title (“Naked Chef”), and types in the initial message (“Jamie Oliver is a culinary god!!”). (Forsyth, 5:52-63.) [image omitted] Symbian Forums: Forsyth, Figure 3 (left), Figure 4 (right) Ex. 1003, ¶ 89
26.	The server “stores these two objects and forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (EX-1006, 6:9-14.) 538 Petition, p. 21	The server “stores these two objects and forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (Forsyth, 6:9-14.) Ex. 1003, ¶ 91
27.	Thus, in Randall-Forsyth combination, the server, through the Forums service, “<i>provide[s] an interface permitting a first user to control activation of a mobile channel</i>” [1A] by permitting the user to send message and group address objects to the server to create a new Forum which are received via the server’s wireless network (GSM) interface and/or by providing the webpage (user interface) from the server to the wireless device through which the user enters this information over WAP. (EX-1003, ¶¶91-92.) The server “<i>activat[es]</i>” the Forum upon receipt of the new Forum message	Thus, in the combination of Randall and Forsyth, the server, through the Forums service, “<i>provide[s] an interface permitting a first user to control activation of a mobile channel</i>” [1A] by permitting the user to send a message and group address objects to the server to create a new Forum received through the server’s wireless network (GSM) interface and/or providing the webpage (user interface) through which the user enters this information over WAP. The server “<i>activat[es]</i>” the Forum upon receipt of the new Forum message object and group address object from

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	object and group address object from the user. Specifically, the server handles inviting participants to the Forum and managing the group address list by, e.g., removing addresses of individuals that decline to participate. (See, e.g., EX-1006, 6:9-17.) Thus, in the Randall-Forsyth combination, the server “<i>activat[es] the mobile information channel response to input received from the first user via the interface</i>” [1B]. (EX-1003, ¶¶91-92.) 538 Petition, p. 21	the user. Specifically, the server handles inviting participants to the Forum and managing the group address list by, e.g., removing addresses of individuals that decline to participate. (See, e.g., Forsyth, 6:9-17.) Thus, in the combination of Randall and Forsyth, the server “<i>activat[es] the mobile information channel response to input received from the first user via the interface</i>” [1B]. Ex. 1003, ¶ 92
28.	When the “<i>first user</i>” sends an initial message (including content) “to the message server” as a “message/communication object” (EX-1006, 6:1-8.) The server stores the message object, which will act as the store for communications within the Forum, and “forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (EX-1006, 6:9-14, 4:18-24.) By forwarding the “<i>content provided by the first user</i>” to members of the Forum, the server is “<i>inserting content ... into the mobile information channel,</i>” as highlighted in Forsyth’s Figure 7 (below). (EX-1003, ¶93.) [image omitted] Symbian Forums—Forsyth, Figure 7 538 Petition, p.	As I discussed above, when the “<i>first user</i>” sends an initial message (including content) “to the message server” as a message/communication object” (Forsyth, 6:1-8.) The server stores the message/communication object, which will act as the store for communications within the Forum, and “forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (Forsyth, 6:9-14, 4:18-24 (message can “be treated as a single communication object” and “[a]ll linked (e.g. threaded) communications, such as replies and comments, then become part of the same communication object and, like any object are treated as a discrete entity”).) By forwarding the “<i>content provided by the first user</i>” to members of the Forum, the server is “<i>inserting content ... into the mobile information</i>

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		<i>channel.</i>” This is highlighted in Forsyth’s Figure 7 (below) [image omitted] Symbian Forums—Forsyth, Figure 7 Ex. 1003, ¶ 93
29.	Forums is a “group communication method for a wireless information device that enables communications to be sent and received between several wireless information devices operated by end-use[r]s that form a group of end users” (i.e., a Forum). (EX-1006, 1:64-2:1.) Each Scenarios described in Forsyth illustrates that a mobile device receives content (messages, photos, graphics, music files, etc.) though a Forum (“<i>mobile information channel</i>”) from Forum members, i.e., from “additional users” of the Forum. (EX-1003, ¶¶95, 87; see, e.g., EX-1006, 5:35-7:13, 7:18-57, 7:58-9:4, 9:5-35.) 538 Petition, pp. 23-24	Specifically, Forums is a “group communication method for a wireless information device that enables communications to be sent and received between several wireless information devices operated by end-use[r]s that form a group of end users” (i.e., a Forum). (Forsyth, 1:64-2:1.) Each of the Scenarios presented by Forsyth illustrates that a mobile device receives content (messages, photos, graphics, music files, etc.) associated with a Forum (“mobile information channel”) from other Forum members, i.e., from “additional users” of the Forum. Ex. 1003, ¶ 95
30.	For example, in group text messaging Scenario 1, “[i]f a user clicks on ‘Forum reply’, then a new message is posted to the Forum”; that is, the message “relat[es] to the mobile information channel.” (EX-1006, 6:54-55) 538 Petition, p. 24	For example, in “group based text messaging” Scenario 1, “[i]f a user clicks on ‘Forum reply’”, in the screen shown in Figure 9 (below), “then a new message is posted to the Forum.” (Forsyth, 6:54-55.) Ex. 1003, ¶ 96
31.	Thus, the new messages are the “additional content relating to the mobile information channel from one	The new messages are the “additional content relating to the mobile information channel from one or more

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	or more of said additional users” [1D] and as highlighted in Forsyth’s Figure 7 below, this new “additional content” is “insert[ed] ... into the mobile information channel” [1E]. (EX-1003, ¶¶94-97.) 538 Petition, p. 25	of said additional users” [1D] and as highlighted in Forsyth’s Figure 7 below, this new “additional content” is “insert[ed] ... into the mobile information channel” [1E] for delivery to Forum member devices. Ex. 1003, ¶ 97
32.	The Randall-Forsyth combination discloses the “additional content” is received at the server “via one or more respective wireless devices associated with at least one wireless network” [1D]. (EX-1003, ¶¶98-110.) 538 Petition, p. 26	The combination of Randall and Forsyth discloses that the “additional content” is received at the server “via one or more respective wireless devices associated with at least one wireless network.” Ex. 1003, ¶ 98
33.	(Randall “relates to the use of an open, universal data infrastructure for wireless information devices”); EX-1006, 1:15-16 (Forsyth “relates to a group communication method for a wireless information device”).) Although Figure 4 only depicts a single wireless information device, a POSITA would have understood that multiple wireless information devices would be present in the Forums network because as noted above Forsyth teaches that content is “sent and receiver between several wireless information devices” in a group. (EX-1006, 1:64-2:1; EX-1003, ¶99.) 538 Petition, pp. 26-27	Randall “relates to the use of an open, universal data infrastructure for wireless information devices which can be used by application developers to write new applications.” (Randall, 3:10-13.) Forsyth “relates to a group communication method for a wireless information device.” (Forsyth, 1:15-16.) Although Figure 4 only depicts a single wireless information device, a POSITA would have understood that multiple wireless information devices would be present in the Forums network, because Randall and Forsyth both discuss groups having multiple members and because, as I noted above, Forsyth teaches that content is “sent and receiver between several wireless information devices” in a group. (Forsyth, 1:64-2:1) Ex. 1003, ¶

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34.	The wireless information devices are configured for “communicat[ion] in any manner over any kind of network, such as GSM or UMTS, CDMA and WCDMA mobile radio, Bluetooth”, 802.11, and IrDa (infrared). (EX-1005, 1:11-13; EX-1006, 1:16-25.) Because these networks allow a device to communicate wirelessly over a network, each is therefore a “<i>wireless network</i>” under Meta’s Meta-MDT-IPR construction. (EX-1003, ¶101.) As shown in Figure 4 above, non-mobile (fixed) computing devices access the servers via the Internet, which is depicted as separate and independent from the GSM network. Each network is therefore a “<i>wireless network</i>” under PO’s Meta-MDT-IPR construction. (<i>Id.</i>) 538 Petition, p. 28	Each of the wireless information devices enumerated by both Randall and Forsyth are also configured for “communicat[ion] in any manner over any kind of network, such as GSM or UMTS, CDMA and WCDMA mobile radio, Bluetooth”, 802.11, and IrDa (infrared). (Randall, 1:11-13; Forsyth, 1:16-25.) Each listed network allow a device to communicate wireless over a network and is therefore a “<i>wireless network</i>” under Meta’s Meta-MDT-IPR construction. Ex. 1003, ¶ 101
35.	The “<i>wireless network</i>” and the wireless devices in the Randall-Forsyth combination implement “<i>at least one wireless networking functionality</i>”—messaging (EX-1003, ¶¶112-123; EX-1001, 1:34-39; 1:54-58, 9:48-53.) 538 Petition, p. 30	The “<i>wireless network</i>” and wireless devices in the combination of Randall and Forsyth implement “<i>at least one wireless networking functionality of said at least one wireless network</i>”—messaging. Ex. 1003, ¶ 117
36.	While neither Meta nor PO proposed a construction for this term in their IPR proceeding challenging the ’801 patent, the parties did propose constructions for this term in <i>Meta Platforms v. Mobile Data Tech.</i>, IPR2024-00248, challenging the ’039 patent. (See EX-1030, 16-17.) In that	While neither Meta nor PO proposed a construction for this term in their proceedings related to the ’801 patent, the parties did propose constructions for this term in at least one other IPR, <i>Meta Platforms v. Mobile Data Tech.</i>, IPR2024-00248, challenging the ’039 patent. (See EX-1030, 16-17.) In that

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	proceeding, PO contends the term means “functionality implementable by a mobile device via a wireless network independent of the Internet” (EX-1030, 16) whereas Meta contends the construction should be “functionality implementable over a wireless network” (EX-1031, 5). No construction is required here because the combination meets the limitation under either construction. 538 Petition, p. 30, fn 5	proceeding, PO contends the term means “functionality implementable by a mobile device via a wireless network independent of the Internet,” (EX-1030, 16), whereas Meta contends the construction should be “functionality implementable over a wireless network,” (EX-1031, 5). No construction is required here because the combination meets the limitation under either construction. Ex. 1003, ¶ 112, fn 5
37.	The scenarios and examples provided Forsyth and Randall demonstrate a “messaging action” initiated by the user—e.g., posting/sending a message to the Forum. For example, in Scenario 1 of Forsyth, when the “Naked Chef” Forum is created, the user sends an initial message to the message server. (See EX-1006, 6:1-9.) Subsequent responses “are of the form that the new message is sent to the server.” (EX-1006, 6:18-22.) 538 Petition, p. 31	The scenarios and examples provided by Randall and Forsyth demonstrate a “messaging action” initiated by the user—e.g., the posting/sending of a message to the Forum. For example, in the “group based text messaging” (Scenario 1) of Forsyth, when the “Naked Chef” Forum is created, the user sends an initial message to the message server. (See Forsyth, 6:1-9.) Subsequent responses “are of the form that the new message is sent to the server.” (Forsyth, 6:18-22.) Ex. 1003, ¶ 118
38.	These scenarios/examples also demonstrate “information associated” with the “wireless networking functionality” of messaging. (EX-1003, ¶¶116-123.) 538 Petition, p. 31	These scenarios/examples also demonstrate the “information associated” with the “wireless networking functionality” of messaging. Ex. 1003, ¶ 119
39.	Forsyth’s “Social Scheduling” (Scenario 3) provides a specific example of a “<i>collaboration action</i>” where a user in the group poses a	Forsyth’s “Social Scheduling” Scenario 3 provides a specific example of “collaboration actions” where a user in the group poses a question and

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	question (“Anyone fancy a trip to the cinema next week some time?”) and members of the group collaborate to provide an answer. (EX-1006, 8:44-46. 538 Petition, p. 32	members of the group collaborate to provide an answer. Ex. 1003, ¶ 126
40.	The content and the information associated with a wireless networking functionality are provided to the server and inserted into the “ <i>mobile information channel</i> .” Forums achieves the integration of the information with the content into the Forum in part through use of a single communication object associated with a Forum. (EX-1006, 4:19-20; see also 4:20-26, 7:6-8.) 538 Petition, p. 33	The content and the information associated with a wireless networking functionality are provided to the server and inserted into the “ <i>mobile information channel</i> .” Forums achieves this integration in part through use of a single communication object associated with a Forum. (Forsyth, 4:19-20; see also 4:20-26, 7:6-8.) Ex. 1003, ¶ 128
41.	Within the Forum (e.g., Naked Chef), “the user is shown the messages posted to that Forum.” (EX-1006, 6:38-40.) “Messages appear in date order, i.e. newest messages appear at the bottom.” (EX-1006, 6:40-42.) As shown in Figure 7 (below), the content (message; “No way!”) and at least a portion of the determined information (poster identity (e.g., Lucy) and date/time (Jan 8th 10:30am) is integrated “ <i>into the mobile information channel</i> ” 538 Petition, p. 33	Within the Forum (e.g., Naked Chef), “the user is shown the messages posted to that Forum”, as shown in Forsyth’s Figure 7 below. (Forsyth, 6:38-40.) “Messages appear in date order, i.e. newest messages appear at the bottom.” (Forsyth, 6:40-42.) As shown in Figure 7, the captured content (message; “No way!”) and at least a portion of the information (poster name (e.g., Lucy and Jan 8th 10:30 am) is integrated “ <i>into the mobile information channel</i> .” Ex. 1003, ¶ 130
42.	Thus, the Randall-Forsyth combination discloses “ <i>integrating into the mobile information channel information associated with at least one wireless networking functionality</i>	Thus, the combination of Randall and Forsyth discloses “ <i>integrating into the mobile information channel information associated with at least one wireless networking functionality</i>

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	<i>of said at least one wireless network” [1F]. (EX-1003, ¶¶111-131.) The combination further teaches that the “information associated with” the “wireless networking functionality” comprises “one or more messaging actions implementable over the wireless network [e.g., sending a message]” [7] and “one or more collaboration actions [e.g., exchanging messages to answer a question/solve a problem] implementable over the wireless network” [8]. (EX-1003, ¶¶116-131.)</i> 538 Petition, pp. 34-35	<i>of said at least one wireless network” [1F]. The combination further teaches that the “information associated with” the “wireless networking functionality” comprises “one or more messaging actions implementable over the wireless network [e.g., sending a message]” [7] and “one or more collaboration actions [e.g., exchanging messages to answer a question/solve a problem] implementable over the wireless network” [8].</i> Ex. 1003, ¶ 131
43.	Randall and Forsyth disclose the server performs processing and therefore has a server-side program component of Forums. 538 Petition, p. 35	Both Randall and Forsyth disclose that the server performs processing and therefore has a server-side program component of Forums. Ex. 1003, ¶ 132
44.	Although not explicit, a POSITA would have understood from these disclosures the server-side Forums program is “<i>executable code of one or more software programs</i>” which “<i>when executed by a processing element of the mobile device causes the mobile device to perform the</i>” recited actions. (EX-1003, ¶132.) 538 Petition, p. 35	Although not explicit, a POSITA would have understood from these disclosures that the server-side Forums program is “<i>executable code of one or more software programs</i>” which “<i>when executed by a processing element of the communication system</i>” implements the steps of the method specified in claim 1. Ex. 1003, ¶ 132
45.	The Randall-Forsyth combination discloses a server which is an “apparatus” [23P]. (EX-1003, ¶139.) As illustrated in Randall’s Figure 4, the Forums network infrastructure includes a server hosting Forums such	The combination of Randall and Forsyth discloses a server which is an “apparatus” [23P]. As illustrated in Randall’s Figure 4, the Forums network infrastructure includes a server hosting Forums, such as Private

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	as Private Forums. In Forums, the server “handles contacting each group member, storing messages, allowing message to be read, sending, receiving and distributing messages.” (EX-1006, 3:28-33.) 538 Petition, p.	Forums. In Forums, the server “handles contacting each group member, storing messages, allowing message to be read, sending, receiving and distributing messages.” (Forsyth, 3:28-31, 3:31-33) Ex. 1003, ¶ 139
46.	Specifically, the Forums server acts as “a store for resources which group-members may wish to discuss and share (e.g., personal information, personal photographs, music, web sites, etc.).” (EX-1006, 3:31-34.) The storage at the server is a “ <i>memory</i> .” (EX-1006, 3:31-34.) 538 Petition, p. 38	The server acts as “a store for resources which group-members may wish to discuss and share (e.g., personal information, personal photographs, music, web sites, etc).” (Forsyth, 3:31-34.) The storage at the server is “ <i>memory</i> .” Ex. 1003, ¶ 142
47.	Should PO contend “ <i>memory</i> ” of the “ <i>processing element</i> ” must store instructions executed by the processor, such memory would have been obvious, if not inherent in Randall and Forsyth which both teach software running on the server. Because the software/applications executing on a processor are stored in memory and also access information stored in memory, a POSITA would have understood Randall and Forsyth further disclose or suggest the “processor [is] coupled to a memory.” (EX-1003, ¶143; §V.B.2.) 538 Petition, pp. 38-39	Should PO contend “ <i>memory</i> ” of the “ <i>processing element</i> ” must store instructions executed by the processor, such memory would have been obvious, if not inherent in Randall and Forsyth which both teach software running on the server. Because the software/applications executing on a processor are stored in memory and also access information stored locally in memory, a POSITA would have understood Randall and Forsyth further disclose or suggest the “processor [is] coupled to a memory.” Ex. 1003, ¶ 143
48.	As discussed in §V.B.1.b for limitation [1A], the server and its processing element “ <i>provid[es] an interface</i> ” that “ <i>permit[s] a first user to control</i>	As I discussed in §IV.B.1.b.(3), the server and its processing element “ <i>provid[es] an interface</i> ” that “ <i>permit[s] a first user to control</i>

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	<i>activation ...</i>” and for the reasons discussed in that section, the Randall-Forsyth combination renders limitation [23B] obvious. Limitations [23C]-[23G] recites substantially overlapping subject matter as limitations [1B]-[1F]. For the reasons in §§V.B.1.b-d, the Randall-Forsyth combination discloses the processing element of the server performs these limitations. 538 Petition, p. 39	<i>activation ...</i>” and for the reasons discussed in that section, the Randall-Forsyth combination renders limitation [23B]. Limitations [23C]-[23G] recites substantially overlapping subject matter as limitations [1B]-[1F]. For the reasons in §§IV.B.1.b-d, the Randall-Forsyth combination discloses the processing element of the server performs these limitations. Ex. 1003, ¶ 150
49.	The Randall-Forsyth combination discloses a “<i>network-based communication system</i>” [25P] comprising “<i>a plurality of servers configured to communicate over the network</i>” [25A]. The Forums service, based on a client-server model, is implemented on a network such as the one illustrated in Randall’s Figure 4 (below). 538 Petition, p. 40	The combination of Randall and Forsyth discloses a “<i>network-based communication system</i>” [25P] comprising “<i>a plurality of servers configured to communicate over the network</i>” [25A]. The Forums service is based on a client-server model and is implemented on a network such as the one illustrated in Randall’s Figure 4 (below). Ex. 1003, ¶ 151
50.	The Symbian Forums infrastructure, illustrated below, includes “<i>a plurality of servers</i>”: “internet servers” hosting individual Private and Public Forums (as enhanced by Forsyth) and “internet servers” hosting extensible databases (as taught by Randall). As shown, wireless devices access these servers/databases via the wireless network and non-mobile devices access these servers via Internet respectively. (EX-1003, ¶151.) 538 Petition, p. 40	The Symbian Forums infrastructure, illustrated below, includes “<i>a plurality of servers</i>”: “internet servers” hosting individual Private and Public Forums (as enhanced by Forsyth) and “internet servers” hosting extensible databases (as taught by Randall). As shown, wireless devices access these servers/databases via the wireless network and non-mobile devices access these servers via Internet respectively. Ex. 1003, ¶ 151

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51.	As discussed in §V.B.1.b for limitation [1A], a server “<i>provid[es] and interface</i>” that “<i>permit[s] a first user to control activation ...</i>” and for the reasons discussed in that section, the Randall-Forsyth combination renders limitation [25B] obvious. Limitations [25C]-[25G] recites substantially overlapping subject matter as limitations [1B]-[1F] and [23C]-[23G]. For the reasons in §§V.B.1.b-d, the Randall-Forsyth combination discloses the processing element of the server performs these limitations. 538 Petition, pp. 41-42	As I discussed in §IV.B.1.b.(3), a server “<i>provid[es] an interface</i>” that “<i>permit[s] a first user to control activation ...</i>” and for the reasons discussed in that section, the Randall-Forsyth combination renders limitation [25B]. Limitations [25C]-[25G] recites substantially overlapping subject matter as limitations [1B]-[1F] and [23C]-[23G]. For the reasons in §§IV.B.1.b-d, the Randall-Forsyth combination discloses the processing element of the server performs these limitations. Ex. 1003, ¶ 153
52.	For example, Forsyth discloses that “personal content such as photographs, opinions, music playlists, music tracks etc.” is shared “amongst a pre-defined group.” (EX-1006, 4:9-11.) 538 Petition, p. 42	For example, Forsyth discloses that “personal content such as photographs, opinions, music playlists, music tracks etc.” is shared “amongst a pre-defined group.” Ex. 1003, ¶ 155
53.	The ability to capture text content, photo/image content, graphic content, music content, etc. is determined by the functionalities of the wireless device and the ability to post this content to the Forum (i.e., send to the server) is based on the “<i>wireless networking functionalities available</i>” to Forum members. As discussed in §§V.A.1 and V.B.1.c, WAP and GSM-SMS both support the ability to send text messages, photos/images in a message, a music file in a message, etc.	The ability to capture text content, photo/image content, graphic content, music content, etc. is determined by the functionalities of the wireless device and the ability to post this content to the Forum (i.e., send to the server) is based on the “<i>wireless networking functionalities available</i>” to Forum members. As I discussed in §§IV.A.1.c.(2)-(3), WAP and GSM-SMS both support the ability to send text messages, photos/images in a message, a music file in a message, etc.

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	538 Petition, p. 43	Ex. 1003, ¶ 159
54.	The Randall-Forsyth combination discloses that “<i>the one or more user-activatable control mechanisms comprise a hyperlink</i>” [12]. (EX-1003, ¶162.) Specifically, both Randall and Forsyth allow a user to share and post hyperlinks or create hyperlinks to content. For example, in Social Scheduling Scenario 3, Forsyth teaches that a Forum “has links to trailers, reviews and schedules etc. for each film.” (EX-1006, 8:60-64; see also, 9:21-24, 11:44-47, 7:37-38; EX-1005, 64:25-26.) In Digital Memento Scenario 4, Forsyth teaches that “[p]eople post MP3s of the kind of music played at each club and links to the club’s pages” which are “made available to all to download.” (EX-1006, 9:21-24.) In “Radio Forums”, Forsyth teaches the ability for a user to “creat[e] a link between the user’s store of digital music and the playlist stack” of the Forum. (EX-1006, 11:44-47.) And in Discussion of Photos Scenario 2, Forsyth teaches that group members receive an object “which incorporates or references the photographs.” (EX-1006, 7:37-38.) The statement “references the photographs” indicates a link provided in the object to the user’s photo storage which is accessible by a link structured like a WWW link. 538 Petition, pp. 44-45	The combination of Randall and Forsyth discloses that “<i>the one or more user-activatable control mechanisms comprise a hyperlink</i>” [12]. Specifically, both Randall and Forsyth allow a user to share and post hyperlinks or create hyperlinks to content. For example, in Social Scheduling Scenario 3, Forsyth teaches that a Forum “has links to trailers, reviews and schedules etc. for each film.” (Forsyth, 8:60-64.) In Digital Memento Scenario 4, Forsyth teaches that “[p]eople post MP3s of the kind of music played at each club and links to the club’s pages” which are “made available to all to download.” (Forsyth, 9:21-24.) In “Radio Forums”, Forsyth teaches the ability for a user to “creat[e] a link between the user’s store of digital music and the playlist stack” of the Forum. (Forsyth, 11:44-47.) And in Discussion of Photos Scenario 2, Forsyth teaches that group members receive an object “which incorporates or references the photographs.” (Forsyth, 7:37-38.) The statement “references the photographs” indicates a link provided in the object to the user’s photo storage which is accessible by a link structured like a WWW link. Ex. 1003, ¶ 162
55.	Randall and Forsyth each discloses capturing multiple types of content at	Randall and Forsyth each discloses capturing multiple types of content at

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	the mobile device. (EX-1003, ¶155.) For example, Forsyth discloses that “personal content such as photographs, opinions, music playlists, music tracks etc.” is shared “amongst a pre-defined group.” (EX-1006, 4:9-11.) 538 Petition, p. 45	the mobile device. For example, Forsyth discloses that “personal content such as photographs, opinions, music playlists, music tracks etc.” is shared “amongst a pre-defined group.” (Forsyth, 4:9-11.) Ex. 1003, ¶ 163
56.	Forsyth teaches the central server “act[s] as a store for resources which group-members may wish to discuss and share (e.g. personal information, personal photographs, music, web sites etc).” 538 Petition, p. 46	Forsyth teaches the central server “act[s] as a store for resources which group-members may wish to discuss and share (e.g. personal information, personal photographs, music, web sites etc).” Ex. 1003, ¶ 164
57.	Randall and Forsyth provided numerous examples of forums where members of a group collaborate—“<i>collaborative workspace[s]</i>.” (EX-1003, ¶¶171-174.) Forums is designed for group discussion and collaboration. (EX-1006, 2:59-60 (Forums is “tool for group working and communication”), 5:27-30, 11:32-39 (“Collaborative Activity”).)) 538 Petition, p. 46	Randall and Forsyth provide numerous examples of forums where members of a group collaborate—“<i>a collaborative workspace</i>.” In fact, Symbian Forums is designed with the goal of collaboration and group discussion. Forsyth describes Forums as “a tool for group working and communication.” (Forsyth, 2:59-60; see Forsyth, 5:27-30 Ex. 1003, ¶ 171
58.	The Randall-Forsyth combination discloses “<i>permitting the first user to establish a title for the mobile information channel</i>” [16]. (EX-1003, ¶175.) As shown in Figure 4 (below), a user access a “new forum” to create a Forum. As shown, the user enters the Forum title (“Naked Chef”), and types in the initial message (“Jamie Oliver is	As shown in Figure 4 (below), the user is presented with a “new forum” screen on the user interface through which the user creates a Forum. As shown, when creating a Forum, the user enters the Forum title (“Naked Chef”), and types in the initial message (“Jamie Oliver is a culinary god!!”). (Forsyth, 5:52-63.) Thus, the combination of Randall and Forsyth

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	a culinary god!!”). (EX-1006, 5:52-63.) [image omitted] Symbian Forums—Forsyth, Figure 4 538 Petition, p. 47	discloses “<i>permitting the first user to establish a title for the mobile information channel</i>” [16]. [image omitted] Symbian Forums—Forsyth, Figure 4 Ex. 1003, ¶ 175
59.	Forums “is designed specifically to allow current and very popular internet type services (e.g., chat/instant messaging between groups) to be handle[d] effectively between mobile devices.” 538 Petition, p. 48	Forums “is designed specifically to allow current and very popular internet type services (e.g., chat/instant messaging between groups) to be handle[d] effectively between mobile devices.” Ex. 1003, ¶ 176
60.	As discussed above, in Forsyth’s Scenario 1, a user creates a Forum to discuss the “Naked Chef” which was a television cooking program. (EX-1006, 5:35-6:62.) Thus, the combination discloses “<i>the mobile information channel is associated with an entertainment-related entity</i>” [18], specifically, “<i>a television program</i>” [19]. (EX-1003, ¶¶179-180.) 538 Petition, p. 48	As I discussed above, in Forsyth’s Scenario 1, the user creates a Forum to discuss the Naked Chef which was a television cooking program on the BBC. (Forsyth, 5:35-6:62.) Thus, the combination discloses “<i>the mobile information channel is associated with an entertainment-related entity</i>” [18], specifically, “<i>a television program</i>” [19]. Ex. 1003, ¶ 180
61.	Forums is a “<i>personalized content application</i>” [2] because a user manages her profile and can personalize her Forums experience. (EX-1003, ¶182.) 538 Petition, p. 49	Forums is a “<i>personalized content application</i>” because a user manages his or her profile and can personalize his or her experience in a number of ways. Ex. 1003, ¶ 182
62.	Forums further provides a user with the capability of creating a personalized Forum which is also a	Symbian Forums further provides a user with the capability of creating a personalized Forum which is also a

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	“<i>personalized content application</i>” operating within the Forums application. (EX-1003, ¶184.) 538 Petition, p. 49	“personalized content application” operating within the Forums application. Ex. 1003, ¶ 184
63.	The Randall-Forsyth combination discloses the server includes a “<i>processing element</i>” with “<i>at least one server accessible over the Internet via a network interface.</i>” 538 Petition, p. 49	The combination of Randall and Forsyth discloses that the server includes a “processing element” with “<i>at least one server accessible over the Internet via a network interface.</i>” Ex. 1003, ¶ 186
64.	Randall uses “existing transports” for client-server communication including “standard IP formats such as MIME, SMTP and HTTP” to “enable compatibility with Internet Messaging systems.” (See EX-1005, 58:23-27.) 538 Petition, p. 49	Randall uses “existing transports” (communication means) for client-server communication such as “WAP to access the services on the server side” and “standard IP formats such as MIME, SMTP and HTTP” to “enable compatibility with Internet Messaging systems.” (See Randall, 58:23-27.) Ex. 1003, ¶ 186
65.	That is, the server is “<i>accessible over the Internet via</i>”, e.g., an HTTP “<i>network interface</i>” and over the wireless network via, e.g, a GSM WAP interface. 538 Petition, p.	That is, the server is “<i>accessible over the Internet via</i>”, e.g., an HTTP “<i>network interface</i>” and over the wireless network via, e.g, a GSM WAP interface. Ex. 1003, ¶ 186
66.	Pelkey’s Figure 1B (below) illustrates a network architecture “in which the messaging service [] may be implemented.” (EX-1007, 2:58-60.) The network “includes game systems 10 connected via communications circuits (e.g., modems, network interfaces, etc.) to a wide area network.” (EX-1007, 2:60-62.) A network server 14 “stores games that	Figure 1B of Pelkey, reproduced below, illustrates a network “in which the messaging service described herein may be implemented.” (Pelkey, 2:58-60.) The network “includes game systems 10 connected via communications circuits (e.g., modems, network interfaces, etc.) to a wide area network.” (Pelkey, 2:60-62.) A network server 14 “stores games

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	may be played by users of the network,” including “multi-player games.” (EX-1007, 3:4-6.) A messaging service server may be included within the network server or as a standalone component. (EX-1007, 3:9-31.) (EX-1003, ¶188.) 538 Petition, p. 51	that may be played by users of the network.” (Pelkey, 3:4-5.) A messaging server may be included within the network server or as a standalone component. (Pelkey, 3:9-31.) Ex. 1003, ¶ 188
67.	Two game systems may be used for gate system 10. (EX-1007, 3:32-33.) First, an exemplary “GameBoy® Color game system”, Figure 3B (below), may be used. (EX-1007, 4:66-67.) Additionally, or alternatively, a game console such as the N64 video game system may be used. (EX-1007, 3:38-48, Figure 2.) (EX-1003, ¶189.) [image omitted] Pelkey, Figure 3B 538 Petition, p. 52	The game systems 10 include “a portable (hand-held) color-display game system,” shown, for example, in Figure 3B (below). (Pelkey, 4:55-57.) Additionally, or alternatively, a game console such as the N64 video game system may be used. (Pelkey, 3:38-48, Figure 2.) [image omitted] Pelkey, Figure 3B Ex. 1003, ¶ 189
68.	Messages are read, composed and sent from the “Message Center” inside PagerWorld. (EX-1008, 11:27-29.) “Message Center” includes an “Address Book” that “provides a listing of other users by their handles” and “the persona character of the other user as it appeared on his/her last communication with the user.” (EX-1008, 11:32-35; <i>see</i> EX-1008, 12:16-19.) 538 Petition, p. 54	Messages are read, composed and sent from the “Message Center” inside PagerWorld. (Eck, 11:27-29.) “Message Center” includes an “Address Book” that “provides a listing of other users by their handles” and “the persona character of the other user as it appeared on his/her last communication with the user.” (Eck, 11:32-35; <i>see</i> Eck, 12:16-19.) Ex. 1003, ¶ 237
69.	A POSITA would have been motivated to combine Eck’s teachings regarding	A POSITA would have been motivated to combine Eck’s teachings regarding

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	PagerWorld with the network and message server architecture taught in Pelkey. (EX-1003, ¶¶194-198.) 538 Petition, p. 55	PagerWorld with the network and message server architecture taught in Pelkey. Ex. 1003, ¶ 194
70.	Pelkey and Eck both disclose an enhanced version of the Nintendo GameBoy® in the same field as the ’801 patent—“network-based communication systems.” (EX-1001, 1:28-30; EX-1007, 1:37-42; EX-1008, Abstract.) Pelkey and Eck are also reasonably pertinent to problems addressed by the ’801 patent, namely “optimizing” the sharing of information content on mobile devices. (EX-1001, 1:48-53; EX-1003, ¶195.) 538 Petition, p. 55	Pelkey and Eck both disclose an enhanced version of the Nintendo GameBoy® that is in the same field as the ’801 patent—“network-based communication systems.” (See EX-1001, 1:28-30; Pelkey, 1:37-42; Eck, Abstract.) Pelkey and Eck are also reasonably pertinent to problems addressed by the ’801 patent, namely “optimizing” the sharing of information content on mobile devices. (See, e.g., EX-1001, 1:48-53.) Ex. 1003, ¶ 195
71.	Eck discloses the features of a multi-player game, PagerWorld. Eck further discloses the ability to share photos and sound clips and exchange messages with other players. In the preferred embodiment, such information is exchanged using a “pager cartridge” where “message charges are generally based on the number of characters in the message.” (EX-1008, 16:57-60.) While Eck discloses its “invention” can be applied to other technologies like WAP (EX-1008, 25:17-20), it does not specifically disclose a client-server structure as taught in Pelkey. 538 Petition, p. 55	Eck discloses the features of a multi-player game, PagerWorld. Eck further discloses the ability to share photos and sound clips and exchange messages with other players. In the preferred embodiment, such information is exchanged using a “pager cartridge” where “message charges are generally based on the number of characters in the message.” (Eck, 16:57-60.) While Eck discloses that its “invention” can be applied to other technologies like WAP, (Eck, 25:17-20), it does not specifically disclose a client-server structure as taught in Pelkey. Ex. 1003, ¶ 196

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72.	Pelkey discloses use of a network server and message server to facilitate game play and exchanging messages amongst users. A POSITA would be motivated to apply the network and message server architecture in Pelkey to Eck in order to avoid the charge-based system for exchanging messages and photos via pager cartridge in Eck. (EX-1003, ¶197.) In addition, a POSITA would be motivated to modify the “pager cartridge” in Eck as necessary to use PagerWorld in Pelkey given the disclosed benefits of PagerWorld including “exploration and adventure,” “chat and community interaction,” and “character growth.” (Id.; EX-1008, 10:13-19.) Notably, Pelkey does not describe any game play that includes in-game messaging in conjunction with the aforementioned features. In addition, the combination is nothing more than the application of a known technique (Eck’s PagerWorld game) to a known method/product (Pelkey’s client-server based messaging server) which was ready for further improvement to achieve predictable results. Replacing the pager system infrastructure in Eck with the client-server architecture in Pelkey is the simple substitution of a one known element for another to achieve a predictable result (internet-based functionality). (EX-1003, ¶197.) 538 Petition, p. 56	Pelkey discloses the use of a network server and message server to facilitate game play and exchanging messages amongst users. But it does not specifically disclose the integration of messaging and sharing content like photos and sound clips with other users within its client-server environment. A POSITA would be motivated to apply the network and message server architecture in Pelkey to Eck in order to avoid the charge-based system for exchanging messages and photos via pager cartridge in Eck. In addition, a POSITA would be motivated to modify the “pager cartridge” in Eck as necessary to use PagerWorld in Pelkey given the disclosed benefits of PagerWorld including “exploration and adventure,” “chat and community interaction,” and “character growth.” (Eck, 10:13-19.) Notably, Pelkey does not describe any game play that includes in-game messaging in conjunction with the aforementioned features. In addition, the combination is nothing more than the application of a known technique (Eck’s PagerWorld game) to a known method/product (Pelkey’s client-server based messaging server) which was ready for further improvement to achieve predictable results. Replacing the pager system infrastructure in Eck with the client-server architecture in Pelkey is the simple substitution of a one known element for another to achieve a predictable result (internet-based functionality).

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73.	A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been predictable because both references are directed to the same product and activity (game play). (EX-1003, ¶198.) Both Pelkey and Eck disclose the desirability of combining messaging capabilities with game play in a portable gaming system. (EX-1007, 2:20-23; EX-1008, 10:32-44.) As explained below, the complimentary network architecture disclosed in Pelkey and Eck further demonstrates such a modification could be made with a reasonable expectation of success. (EX-1003, ¶198. 538 Petition, pp. 56-57	A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been predictable because both references are directed to the same product and activity (game play). Both Pelkey and Eck disclose the desirability of combining messaging capabilities with game play in a portable gaming system. (Pelkey, 2:20-23; Eck, 10:32-44.) And as explained below, the complimentary network architecture disclosed in Pelkey and Eck further demonstrates that such a modification could be made with a reasonable expectation of success. Ex. 1003, ¶ 198
74.	As discussed in more detail below, the applicable “<i>mobile information channel</i>” includes at least PagerWorld. The interface discussed above “<i>control[s] activation</i>” of PagerWorld by facilitating connection to, and startup of, PagerWorld on the “portable game machine.” For example, in Eck, “[a] user interface enables a user to provide inputs to the game machine and a processing system is operable in response to user inputs to cause the image captured by the digital camera to be transmitted as part of a message via the paging system.” (EX-1008, 2:18-22.) Likewise, Eck notes that “[g]ame	As discussed in more detail below, the applicable “mobile information channel” includes at least PagerWorld. The interface discussed above “controls activation” of PagerWorld by facilitating connection to, and startup of, PagerWorld on the “portable game machine.” For example, Eck discloses that “[a] user interface enables a user to provide inputs to the game machine and a processing system is operable in response to user inputs to cause the image captured by the digital camera to be transmitted as part of a message via the paging system.” (Eck, 2:18-22.) Likewise, Eck notes that “[g]ame machine interface 908 interfaces game

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	machine interface 908 interfaces game machine 10 to the communication circuitry of the pager cartridge and the mask ROM 910 of the pager cartridge.” (EX-1008, 7:61-64.) (EX-1003, ¶202.) 538 Petition, p. 58	machine 10 to the communication circuitry of the pager cartridge and the mask ROM 910 of the pager cartridge.” (Eck, 7:61-64. Ex. 1003, ¶ 202
75.	Thus, the Pelkey-Eck combination <i>“provid[es] an interface”</i> and <i>“permit[s] a first user to control activation of a mobile information channel.”</i> 538 Petition, p. 58	Thus, Pelkey in combination with Eck <i>“provid[es] an interface”</i> and <i>“permit[s] a first user to control activation of a mobile information channel.”</i> Ex. 1003, ¶ 203
76.	The Pelkey-Eck combination discloses a <i>“mobile information channel”</i> having the claimed capabilities. Eck’s messaging cartridge includes a memory “storing software used” in the messaging (e.g., pager) operations and “one or more video game programs that are executable by CPU 26 of game machine 10.” (EX-1008, 7:7-22.) In addition to messaging (e.g., paging functions), the messaging cartridge “can be used in game playing.” (EX-1008, 9:60-61.) An example of a gaming application is “Multiple User Dungeon (MUD) games” which are “Internet-based on-line exploration and quest games in which an open-ended number of players simultaneously exist in the same game world, sharing experiences and adventures.” (EX-1008, 10:2-7.) “[K]ey components” of such games include “exploration and adventure,” “chat and community interaction,”	The combination of Pelkey and Eck discloses a “mobile information channel” having the claimed capabilities. Eck discloses that the messaging cartridge includes a memory “storing software used” in the messaging (e.g., pager) operations and “one or more video game programs that are executable by CPU 26 of game machine 10.” (Eck, 7:7-22.) In addition to messaging (e.g., paging functions), the messaging cartridge “can be used in game playing.” (Eck, 9:60-61.) An example of a gaming application is “Multiple User Dungeon (MUD) games” which are “Internet-based on-line exploration and quest games in which an open-ended number of players simultaneously exist in the same game world, sharing experiences and adventures.” (Eck, 10:2-7.) “[K]ey components” of such games include “exploration and adventure,” “chat and community

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	and “character growth and perpetual, dynamic worlds that grow, adapt and change.” (EX-1008, 10:13-19; EX-1003, ¶204.) 538 Petition, pp. 58-59	interaction, ” and “character growth and perpetual, dynamic worlds that grow, adapt and change.” (Eck, 10:13-19.) Ex. 1003, ¶ 204
77.	An exemplary MUD game described by Eck is “PagerWorld, a virtual community for the network of all users having pager cartridges. ” (EX-1008, 10:20-23.) Although Eck uses the word “PagerWorld” to reflect the communication means is paging, a POSITA would have understood such a MUD is equally applicable when the communication means is another messaging type such as SMS or messaging via a WAP protocol. (EX-1003, ¶205.) PagerWorld includes client software in the portable game machine (client program) and corresponding software in the server (server program). (See EX-1008, 4:61-5:7; 9:40-59.) As such, PagerWorld is persistent—it remains in existence after individual users exit the world. PagerWorld is therefore a “ <i>mobile information channel</i> ” under any of the proposed constructions in the MDT-Meta-Litigation or the Meta-MDT-IPR. For example PagerWorld is “a medium for transferring information that allows mobile device users to author content” under the construction proposed by PO in the MDT-Meta-Litigation and by Meta in the Meta-MDT-IPR. For example, users can import images taken using the digital camera that is part of the “portable	An exemplary MUD game described by Eck is “PagerWorld, a virtual community for the network of all users having pager cartridges. ” (Eck, 10:20-23.) Although Eck uses the word “PagerWorld” in the MUD title to reflect the communication means is paging, a POSITA would have understood that such a MUD is equally applicable when the communication means is another messaging type such as SMS or messaging via a WAP protocol. PagerWorld includes client software in the portable game machine (client program) and corresponding software in the server (server program). (See Eck, 4:61-5:7, 9:40-59.) As such, PagerWorld is persistent—it remains in existence after individual users exit the world. PagerWorld is therefore a “ <i>mobile information channel</i> ” under any of the proposed constructions in the MDT-Meta-Litigation or the Meta-MDT-IPR. For example PagerWorld is “a medium for transferring information that allows mobile device users to author content” under the construction proposed by Patent Owner in the MDT-Meta-Litigation and by Meta in the Meta-MDT-IPR. For example, users can import images taken using the digital camera that is

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	game machine” when a camera cartridge is inserted into PagerWorld and use such images to customize their persona. (See EX-1008, 12:38-40.) 538 Petition, pp. 59-60	part of the “portable game machine” when a camera cartridge is inserted into PagerWorld and use such images to customize their persona. (See Eck, 12:38-40.) Ex. 1003, ¶ 205
78.	For these same reasons, Pelkey-Eck combination also discloses “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site” where “content management site”—“a web site that allows a user without programming to create and manage content on a mobile website, or a portion thereof” under Meta’s proposed construction in the MDT-Meta-Litigation. (EX-1003, ¶¶205-206. 538 Petition, p. 60	For these same reasons, the combination of Pelkey and Eck also discloses “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site” where “content management site” = “a web site that allows a user without programming to create and manage content on a mobile website, or a portion thereof” under Meta’s proposed construction in the MDT-Meta-Litigation Ex. 1003, ¶ 206
79.	Once the “user session” is started, the user is taken to a “main screen” which gives the player choices including, as shown in Figure 8A (below), “Icon 206 (‘My Persona’) [which] is a face; icon 208 [which] is a book (‘Pager Lingo’); icon 210 [which] is an unopened envelope (‘Message Center’); and icon 212 [which] is a globe (‘PagerWorld’).” (EX-1008, 10:65-11:7. 538 Petition, p. 61	Once the “user session” is started, the user is taken to a “main screen” which gives the player choices including, as shown in Figure 8A, “Icon 206 (‘My Persona’) [which] is a face; icon 208 [which] is a book (‘Pager Lingo’); icon 210 [which] is an unopened envelope (‘Message Center’); and icon 212 [which] is a globe (‘PagerWorld’).” (Eck, 10:65-11:7.) Ex. 1003, ¶ 209
80.	In addition, Eck further discloses “[a]n activation routine via one or more messages communicated between the system operator and the player’s pager	In addition, Eck further discloses that “[a]n activation routine via one or more messages communicated between the system operator and the

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	cartridge may be implemented so that ... [u]pon a successful execution of the activation routine, pager cartridge 100 operates immediately.” (EX-1008, 18:10-17; EX-1003, ¶211.) 538 Petition, p. 62	player’s pager cartridge may be implemented so that the pager cartridge's unique hardware identification is logged into the system. Upon a successful execution of the activation routine, pager cartridge 100 operates immediately without any paperwork, advance payments or commitments on the part of the player.” (Eck, 18:10-17) Ex. 1003, ¶ 211
81.	Thus, the Pelkey-Eck combination “<i>provide[s] an interface permitting a first user to control activation of a mobile channel</i>” [1A]. By allowing a user to select an icon which facilitates sharing of images (My Persona) or exchanging messages (Message Center), Eck discloses “<i>activating the mobile information channel responsive to input received from the first user via the interface</i>” [1B]. (EX-1003, ¶210.) 538 Petition, pp.62-63	Thus, the combination of Pelkey and Eck “<i>provide[s] an interface permitting a first user to control activation of a mobile channel</i>” [1A]. By allowing a user to select an icon which facilitates sharing of images (My Persona) or exchanging messages (Message Center), Eck discloses “<i>activating the mobile information channel responsive to input received from the first user via the interface</i>” [1B]. Ex. 1003, ¶ 210
82.	The Pelkey-Eck combination also discloses “<i>inserting content provided by the first user into the mobile information channel.</i>” (EX-1003, ¶¶211-220.) Eck discloses “a game machine is provided with ... digital camera circuitry configured to capture an image.” (EX-1008, 2:16-18.) For example, in Eck, a messaging cartridge (e.g., pager cartridge) “is itself provided with a slot for receiving” another cartridge. (See, e.g., EX-1008, 5:23-25.) One example	The combination of Pelkey and Eck also discloses inserting and/or sharing content into the mobile information channel. Eck discloses that “a game machine is provided with ... digital camera circuitry configured to capture an image.” (Eck, 2:16-18.) For example, Eck discloses that a messaging cartridge (e.g., pager cartridge), “is itself provided with a slot for receiving” another cartridge. (See, e.g., Eck, 5:23-25.) One example of a “piggy-backed” cartridge is a

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	of a “piggy-backed” cartridge is a “digital camera cartridge”: “pager cartridge 100 itself includes a built-in cartridge slot to accept game cartridges or other accessories (such as read/write memory cartridges, a digital camera, etc.), thereby enabling game play or digital camera operations while pager cartridge 100 is attached to game machine 10.” (EX-1008, 22:14-20, Figure 14 (below), 23:36-38 (“digital camera cartridge is also selectively insertable ... into the slot of another cartridge such as pager cartridge 100”).) [image omitted] Eck, Figure 14 538 Petition, p. 63	“digital camera cartridge,” illustrated in Figure 14 (below): “pager cartridge 100 itself includes a built-in cartridge slot to accept game cartridges or other accessories (such as read/write memory cartridges, a digital camera, etc.), thereby enabling game play or digital camera operations while pager cartridge 100 is attached to game machine 10.” (Eck, 22:14-20; <i>see also</i> Eck 23:36-38 (“digital camera cartridge is also selectively insertable ... into the slot of another cartridge such as pager cartridge 100”).) [image omitted] Eck, Figure 14 Ex. 1003, ¶ 212
83.	The portable game machine having an inserted messaging cartridge and camera cartridge captures content. Eck’s digital camera cartridge “is usable to capture images, which images may then be transmitted to others via an operation using” the messaging cartridge into which the camera cartridge is inserted. (EX-1008, 23:38-41, 2:15-18.) The “digital camera cartridge” may also be “configured to capture sounds [and] these captured sounds may be used by game machine 10 and/or transmitted as a message using pager cartridge.” (EX-1008, 9:20-23.) 538 Petition, pp. 64-65	The portable game machine having an inserted messaging cartridge and an inserted camera cartridge captures content. Eck’s digital camera cartridge “is usable to capture images, which images may then be transmitted to others via an operation using” the messaging cartridge into which the camera cartridge is inserted. (Eck, 23:38-41; <i>see also</i> Eck, 2:15-18 (“a game machine is provided with ... digital camera circuitry configured to capture an image”).) The “digital camera cartridge” may also be “configured to capture sounds [and] these captured sounds may be used by game machine 10 and/or transmitted

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		as a message using pager cartridge.” (Eck, 9:20-23.) Ex. 1003, ¶
84.	In addition to photos/images, the message can include sounds (audio file). (EX-1008, 20:12-14 (discussing messages containing “digital camera picture transmission (with/without sound)” and “messages plus sound bites”).) (EX-1003, ¶215.) 538 Petition, p. 65	In addition to photos/images, the message can include sounds (audio file). (Eck, 20:12-14 (discussing messages containing “digital camera picture transmission (with/without sound)” and “messages plus sound bites”) Ex. 1003, ¶ 215
85.	Such a message can be sent through the Message Center accessed through an icon on the main screen. (EX-1008, 11:26-28.) While in the Message Center (e.g., screen illustrated in Figure 8C (below-left)), a user activates the quill icon 236 to navigate to the “Compose Message screen 290” of Figure 8F. (EX-1008, 11:37-38.) The “send to” window 292 “allows the user to choose to whom the message will be sent.” (EX-1008, 12:10-11.) A user can opt to send the message to an individual, to a pre-defined group (e.g., a buddy list), (EX-1008, 20:9), or as a broadcast to all messaging devices in PagerWorld, (EX-1008, 20:8, 9:46-49.). For group messaging, Pelkey teaches the messaging service client “allows the user to create a list (‘buddy list’) of other users (‘buddies’) with whom he/she wishes to remain in contact.” (EX-1007, 7:33-35.) The buddy list “is stored by the network server.” (EX-1007, 7:35-36.) In the Pelkey-Eck combination, the	Such a message can be sent through the Message Center accessed through an icon on the main screen. (Eck, 11:26-28.) While in the Message Center (e.g., screen illustrated in Figure 8C (below-left)), a user activates the quill icon 236 to navigate to the “Compose Message screen 290” of Figure 8F. (Eck, 11:37-38.) The “send to” window 292 “allows the user to choose to whom the message will be sent.” (Eck, 12:10-11.) A user can opt to send the message to an individual, to a pre-defined group (e.g., a buddy list), (Eck, 20:9), or as a broadcast to all messaging devices in PagerWorld, (Eck, 20:8, 9:46-49 (“messages from the paging system operator may be sent to all users in the paging system, to certain groups of users in the paging system or to a particular user in the paging system”)). For group messaging, Pelkey teaches that the messaging service client “allows the user to create a list (‘buddy list’) of other users

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	PagerWorld user can identify a “buddy list” in the “send to” window to send a “carbon copy” of the message. [image omitted] Eck, Figure 8C (left), Figure 8F (right) 538 Petition, pp. 65-66	(‘buddies’) with whom he/she wishes to remain in contact.” (Pelkey, 7:33-35.) The buddy list “is stored by the network server.” (Pelkey, 7:35-36.) In the combination of Pelkey and Eck, the PagerWorld user can identify a “buddy list” in the “send to” window to send a “carbon copy” of the message. [image omitted] Eck, Figure 8C (left), Figure 8F (right) Ex. 1003, ¶ 216
86.	The Pelkey-Eck combination discloses the server “<i>receiv[es] additional content relating to the mobile information channel from one or more of said additional users</i>” [1D] and “<i>insert[s] at least a portion of the additional content into the mobile information channel</i>” [1E]. (EX-1003, ¶¶221-229.) Such actions occur in Eck when a second PagerWorld user uses her own device (either another portable game machine or a fixed N64 console) to send a message including a photo/image or sound clip. Upon such action, a user receives content, at the portable game machine via the identified application-based information channel, from at least one of the additional users when receiving a message containing the other user’s customized persona avatar or accessing an address book listing other users along with their customized persona avatars. This is reflected in	The combination of Pelkey and Eck discloses that the server “<i>receiv[es] additional content relating to the mobile information channel from one or more of said additional users</i>” [1D] and “<i>insert[s] at least a portion of the additional content into the mobile information channel</i>” [1E]. Such actions occur in Eck when a second PagerWorld user uses her own device (either another portable game machine or a fixed N64 console) to send a message including a photo/image or sound clip. Upon such action, a user receives content, at the portable game machine via the identified application-based information channel, from at least one of the additional users when receiving a message containing the other user’s customized persona avatar or accessing an address book listing other users along with their customized persona avatars. This is reflected in Figure 8C below which

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	Figure 8C below depicting content received from other users within PagerWorld (“<i>mobile information channel</i>”). 538 Petition, pp. 67-68	depicts content received from other users within PagerWorld (“<i>mobile information channel</i>”). Ex. 1003, ¶ 221
87.	Specifically, both Pelkey and Eck disclose a “portable game machine and, more particularly, to a portable game machine that is selectively configurable for one or more different operations such as wireless communications, global positioning, image capturing and combinations thereof.” (EX-1008, 1:12-16, Figure 1B (below); <i>see</i> EX-1007, 4:55-57 (“FIGS. 3A, 3B and 3C show a portable (hand-held) color-display game system 110”), Fig. 3B.) An exemplary game machine is the “GameBoy® Color game machine,” (EX-1008, 3:29-33; <i>see</i> EX-1007, 4:66-67), a commercially available product widely known by the general public and a POSITA as of the earliest possible priority date. [image omitted] Eck, Figure 1B 538 Petition, p. 69	Specifically, both Pelkey and Eck disclose a “portable game machine and, more particularly, to a portable game machine that is selectively configurable for one or more different operations such as <i>wireless communications</i>, global positioning, image capturing and combinations thereof.” (Eck, 1:12-16, Fig. 1B (below); <i>see</i> Pelkey, 4:55-57 (“FIGS. 3A, 3B and 3C show a portable (hand-held) color-display game system 110”), Fig. 3B.) An exemplary game machine is the “GameBoy® Color game machine,” (Eck, 3:29-33; <i>see</i> Pelkey, 4:66-67), a commercially available product widely known by the general public and those skilled in the art as of the earliest possible priority date. [image omitted] Eck, Figure 1B Ex. 1003, ¶223
88.	The portable game machine described by both Pelkey and Eck is a “piece of handheld equipment” and therefore a “<i>mobile device</i>” under PO’s MDT-Meta-Litigation construction. This portable game machine processes information and is capable of being	The portable game machine described by both Pelkey and Eck is a “piece of handheld equipment” and therefore a “<i>mobile device</i>” under PO’s MDT-Meta-Litigation construction. This portable game machine processes information and is capable of being

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	configured for communication over a network. Thus, the portable game machine is a “<i>mobile device</i>” under Meta’s MDT-Meta-Ligation and Meta-MDT-IPR constructions. Finally, as illustrated by Eck’s Figure 1B, the portable game machine has limited display space and because it lacks a physical or soft keyboard, a POSITA would have understood the portable game machine also has U.S. Patent 8,825,801 IPR2025-00538 71 limited navigational capabilities. Thus, the portable game machine is also a “<i>mobile device</i>” under PO’s Meta-MDT-IPR construction (“a portable device with limited display space and limited navigational capabilities that connects to a mobile site and/or mobile channel via a wireless network”). (EX-1003, ¶¶222-224.) 538 Petition, pp. 70-71	configured for communication over a network, as I discussed above. Thus, the portable game machine is a “<i>mobile device</i>” under Meta’s MDT-Meta-Ligation and Meta-MDT-IPR constructions. Finally, as illustrated by Eck’s Figure 1B, the portable game machine has limited display space and because it lacks a physical or soft keyboard, a POSITA would have understood the portable game machine also has limited navigational capabilities. Thus, the portable game machine is also a “<i>mobile device</i>” under PO’s Meta-MDT-IPR construction (“a portable device with limited display space and limited navigational capabilities that connects to a mobile site and/or mobile channel via a wireless network”). Ex. 1003, ¶ 224
89.	The ’801 patent refers to “messaging, distributed collaboration, and location-based services” as examples of “wireless networking functionality.” (EX-1001, 1:37-39, 1:56-58.) 538 Petition, p. 71	The ’801 patent refers to “messaging, distributed collaboration, and location-based services” as examples of “wireless networking functionality.” (EX-1001, 1:34-39; 1:54-58) Ex. 1003, ¶ 113
90.	Pelkey discloses a network “in which the messaging service” may be implemented. (EX-1007, 2:58-60.) The network “includes game systems 10 connected via communications circuits 12 (e.g., modems, network interfaces, etc.) to a wide area network 16 such as the Internet.” (EX-1007, 2:60-62.) Pelkey explains game	Pelkey discloses a network “in which the messaging service” may be implemented. (Pelkey, 2:58-60.) The network “includes game systems 10 connected via communications circuits 12 (e.g., modems, network interfaces, etc.) to a wide area network 16 such as the Internet.” (Pelkey, 2:60-62.) Pelkey

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	system 10 may be a video game system, such as the N64 video game system, connected to a television, (EX-1007, 3:38-48), and may also be “the portable game machine 110,” (EX-1007, 4:55-57). Pelkey’s Figure 1A is reproduced below with the game system 10 on the left using the N64 game system illustrated in Pelkey’s Figure 2 and the game system 110 on the right using the portable game machine in Eck’s Figure 1B. The connection from the N64 game system to the server via the Internet as taught by Pelkey is also shown. 538 Petition, p. 71	explains that game system 10 may be a video game system, such as the N64 video game system, connected to a television. (See Pelkey, 3:38-48.) Game system 10 may also be the portable game machine 110. (Pelkey, 4:55-57.) I reproduced Pelkey’s Figure 1A below with the game system 10 on the left using the N64 game system illustrated in Pelkey’s Figure 2 and the game system 110 on the right using the portable game machine in Eck’s Figure 1B. I have also illustrated the connection from the N64 game system to the server via the Internet as taught by Pelkey. Ex. 1003, ¶ 225
91.	Pelkey does not disclose details of the wireless network used to provide wireless messaging from the game system to the server. And while Eck mentions use of a paging network for this functionality, Eck also explicitly discloses that its “present invention” may be “applied to other wireless technologies such a GSM (Global System for Mobile Communications) and WAP (Wireless Application Protocol).” (EX-1008, 25:17-20.) A POSITA would have been motivated to use either GSM or WAP for the messaging service, rather than paging, to obtain the enhanced features of those protocols. Based on Eck’s disclosure, a POSITA would have understood that the portable game machine communicates with the server via messaging available via the GSM	Pelkey does not disclose details of the wireless network used to provide wireless messaging from the game system to the server. However, while Eck mentions use of a paging network for this functionality, Eck also explicitly discloses that its “present invention” may be “applied to other wireless technologies such a GSM (Global System for Mobile Communications) and WAP (Wireless Application Protocol).” (Eck, 25:17-20.) A POSITA would have been motivated to use either GSM or WAP for the messaging service, rather than paging, to obtain the enhanced features of those protocols. Based on Eck’s disclosure, a POSITA would have understood that the portable game machine communicates with the server via messaging available via the GSM

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	network (e.g., SMS) or messaging available via WAP. 538 Petition, pp. 72-73	network (e.g., SMS) or messaging available via WAP. Ex. 1003, ¶ 226
92.	GSM-SMS is “functionality implementable over a wireless network” and as shown in Figure 1 of Pelkey, the GSM network is separate from the Internet connecting the N64 game system to the server. As noted above, the WAP protocol stack transports data over GSM’s SMS, and the SMS message includes a header with data fields indicating control and content details for the message. 538 Petition, p. 73	GSM-SMS is “functionality implementable over a wireless network” and as shown in my modified Figure 1 of Pelkey, the GSM network is separate from the Internet connecting the N64 game system to the server. As I discussed in §IV.A.1, the WAP protocol stack transports data over GSM’s SMS. I provided an overview of a mobile originated message in SMS in a GSM network in my analysis of this limitation in Ground 1. As discussed in that section, the SMS message includes a header with data fields indicating control and content details for the message. Ex. 1003, ¶ 227
93.	Thus, to send a message, the portable game machine determines this information to construct the GSM-SMS message. Figure 8C from Eck confirms that this information is determined. Specifically, this figure depicts the Message Center user interface screen presented to the player which shows a list of unread received messages with each message including the sending user’s name and associated persona image. 538 Petition, p. 73	Thus, to send a message, the portable game machine determines this information to construct the GSM-SMS message. Figure 8C from Eck confirms that this information is determined. Specifically, this figure depicts the Message Center user interface screen presented to the player which shows a list of unread received messages with each message including the sending user’s name and associated persona image. Ex. 1003, ¶ 228
94.	The term “<i>wireless network</i>” was also proposed for construction in the Meta-MDT-IPR. MDT contends a “wireless	As I discussed in §III.D.3, the term “<i>wireless network</i>” was also proposed for construction in the Meta-MDT-

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	network” is “a network separate from the internet that facilitates connection to the internet by a mobile device.” The Pelkey-Eck combination discloses such a “<i>wireless network</i>” because, as discussed above, the wireless network is depicted as separate from the internet and through the use of WAP, is a mobile device that has the ability to access the internet. Meta proposes that the term should be construed as “a network that allows a device to communicate wirelessly over a network.” The listed networks are each a “wireless network” under Meta’s construction. (EX-1003, ¶¶225-229.) The Pelkey-Eck combination thus discloses “<i>mobile devices associated with at least one wireless network.</i>” 538 Petition, pp. 73-74	IPR. MDT contends that a “wireless network” is “a network separate from the internet that facilitates connection to the internet by a mobile device.” As noted above, while I disagree with that construction, the combination of Pelkey and Eck discloses such a “wireless network” because, as discussed above, the wireless network is depicted as separate from the internet and through the use of WAP, a mobile device has the ability to access the internet. Meta proposes that the term should be construed as “a network that allows a device to communicate wirelessly over a network.” The listed networks are each a “wireless network” under Meta’s construction. The combination of Pelkey and Eck thus discloses “<i>mobile devices associated with at least one wireless network.</i>” Ex. 1003, ¶ 229
95.	The Pelkey-Eck combination discloses this limitation for the same reasons set forth above regarding the “<i>mobile devices associated with at least one wireless network</i>” limitation. As noted above, the WAP protocol stack transports data over GSM’s SMS and the SMS message includes a header with data fields indicating control and content details for the message. For the reasons discussed in §VI.B.1.c.(2), these fields, associated with the action of sending a message over the wireless network, are “<i>information associated with at least one wireless networking</i>	The combination of Pelkey and Eck discloses this limitation for the same reasons set forth above regarding the “<i>mobile devices associated with at least one wireless network</i>” limitation. (Supra §V.B.1.c.) As noted above, the WAP protocol stack transports data over GSM’s SMS. I provided an overview of a mobile originated message in SMS in a GSM network in my analysis of this limitation in Ground 1. (Supra §IV.B.1.d.) As discussed in that section, the SMS message includes a header with data fields indicating control and content

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	<i>functionality of said at least one wireless network.”</i> (EX-1003, ¶¶230-246.) 538 Petition, p. 75	details for the message. For the reasons I discussed in §V.B.1.c, these fields, associated with the action of sending a message over the wireless network, are “<i>information associated with at least one wireless networking functionality of said at least one wireless network.</i>” Ex. 1003, ¶ 230
96.	The Pelkey-Eck combination discloses “<i>wireless networking functionality of said at least one wireless network.</i>” As noted above, the ’801 patent refers to “messaging, distributed collaboration, and location-based services” as examples of “wireless networking functionality.” (EX-1001, 1:37-39, 1:56-58 (“integration of messaging, collaboration, location-based services or other wireless networking functionality with the generation of shared information content”).) The ’801 patent also mentions that the “services integration suite 38 includes an MMS center 70, an SMS center 71, email systems 72, billing systems 73, voice systems 74, and other systems 75, each of which may be viewed as representative of a particular type of wireless networking functionality accessible to the mobile devices 15 via the wireless network 12.” (EX-1001, 9:48-53.) 538 Petition, pp. 74-75	The combination of Pelkey and Eck discloses “<i>wireless networking functionality of said at least one wireless network.</i>” As noted above, the ’801 patent refers to “messaging, distributed collaboration, and location-based services” as examples of “wireless networking functionality.” (EX-1001, 1:37-39, 1:56-58 (“integration of messaging, collaboration, location-based services or other wireless networking functionality with the generation of shared information content”).) The ’801 patent also mentions that the “services integration suite 38 includes an MMS center 70, an SMS center 71, email systems 72, billing systems 73, voice systems 74, and other systems 75, each of which may be viewed as representative of a particular type of wireless networking functionality accessible to the mobile devices 15 via the wireless network 12.” (EX-1001, 9:48-53.) Ex. 1003, ¶ 231
97.	As likewise noted above, a POSITA would have been motivated to use	POSITA would have been motivated to use either GSM or WAP for the

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	either GSM or WAP for the messaging service, rather than paging, to obtain the enhanced features of those protocols. Based on Eck’s disclosure, a POSITA would have understood that the portable game machine communicates with the server via messaging available via the GSM network (e.g., SMS) or messaging available via WAP. 538 Petition, p. 76	messaging service, rather than paging, to obtain the enhanced features of those protocols. Based on Eck’s disclosure, a POSITA would have understood that the portable game machine communicates with the server via messaging available via the GSM network (e.g., SMS) or messaging available via WAP. Ex. 1003, ¶ 232
98.	GSM-SMS is “functionality implementable over a wireless network” and the GSM network is separate from the Internet connecting the N64 game system to the server. Thus, the Pelkey-Eck combination discloses “<i>wireless networking functionality.</i>” 538 Petition, p. 76	GSM-SMS is “functionality implementable over a wireless network” and the GSM network is separate from the Internet connecting the N64 game system to the server. Thus, the combination of Pelkey and Eck discloses “<i>wireless networking functionality.</i>” Ex. 1003, ¶ 233
99.	The Pelkey-Eck combination discloses “<i>information associated</i>” with a functionality implementable over a wireless network by a mobile device (e.g., via WAP or via GSM-SMS), including the exemplary “<i>information</i>” recited in claims 7-8. (EX-1003, ¶¶231-234.) 538 Petition, p. 76	The combination of Pelkey and Eck discloses “<i>information associated</i>” with a functionality implementable over a wireless network by a mobile device (e.g., via WAP or via GSM-SMS). Ex. 1003, ¶ 234
100.	As noted above, the ’801 patent lists messaging (MMS, SMS, email) as an example of a “<i>wireless networking functionality.</i>” (EX-1001, 1:37-39, 1:56-58.) Claim 7 recites that the information comprises “<i>one or more messaging actions implementable over</i>	As I noted above, the ’801 patent lists messaging (MMS, SMS, email) as an example of a “<i>wireless networking functionality.</i>” (EX-1001, 1:37-39, 1:54-58, .) Claim 7 (reproduced below) which depends from claim 1 recites that the information comprises

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	<i>the wireless network.</i>” (EX-1003, ¶¶235-240.) 538 Petition, pp. 76-77	<i>“one or more messaging actions implementable over the wireless network.”</i> Ex. 1003, ¶ 235
101.	The Pelkey-Eck combination describes <i>“at least one wireless networking functionality of the mobile device”</i>—messaging. (EX-1003, ¶¶236-242.) 538 Petition, p. 77	The combination of Pelkey and Eck describes <i>“at least one wireless networking functionality of the mobile device”</i>—messaging. Ex. 1003, ¶ 236
102.	“Message Center” includes an “Address Book” that “provides a listing of other users by their handles” and “the persona character of the other user as it appeared on his/her last communication with the user.” (EX-1008, 11:32-35, 12:16-19.) “Messages from the paging system operator may be sent to all users in the paging system, to certain groups of users in the paging system or to a particular user in the paging system.” (EX-1008, 9:46-49.) Eck’s Figure 8C depicts the Message Center user interface screen presented to the player which shows a list of unread received messages with each message including the sending user’s name and associated persona image. 538 Petition, p. 77	“Message Center” includes an “Address Book” that “provides a listing of other users by their handles” and “the persona character of the other user as it appeared on his/her last communication with the user.” (Eck 146 11:32-35; see Eck, 12:16-19.) “Messages from the paging system operator may be sent to all users in the paging system, to certain groups of users in the paging system or to a particular user in the paging system.” (Eck, 9:46-49.) Figure 8C in Eck depicts the Message Center user interface screen presented to the player which shows a list of unread received messages with each message including the sending user’s name and associated persona image. Ex. 1003, ¶ 237
103.	For the same reasons above (supra §VI.B.1.c.(2)), the GSM protocol includes fields associated with the action of sending a message over the wireless network and are therefore also <i>“information”</i> associated with <i>“wireless network functionality”</i> by	For the same reasons as above (supra §IV.B.1.d), the GSM protocol includes fields associated with the action of sending a message over the wireless network and are therefore also <i>“information”</i> associated with <i>“wireless network functionality”</i> by

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	inclusion in the protocol message originated by the sending mobile device. Messages transmitted via WAP will include the same additional information. 538 Petition, p. 78	inclusion in the protocol message originated by the sending mobile device. Messages transmitted via WAP will include the same additional information Ex. 1003, ¶ 240
104.	The Pelkey-Eck combination also “<i>integrat[es] information</i>” associated with a “<i>messaging action</i>.” For example, Eck discloses the use of “[n]otification circuitry 134 [which] provides notification to the user that a message has been received. Notification circuitry 134 may be implemented as a vibration circuit that is controlled by control circuit 136 to vibrate when a message is received. Notification circuit 134 may alternatively or additionally be implemented as a beeper circuit that is controlled by control circuit 136 to beep when a message is received.” (EX-1008, 6:43-49.) 538 Petition, pp. 78-79	The combination of Pelkey and Eck also “<i>integrat[es] information</i>” associated with a “<i>messaging action</i>.” For example, Eck discloses the use of “[n]otification circuitry 134 [which] provides notification to the user that a message has been received. Notification circuitry 134 may be implemented as a vibration circuit that is controlled by control circuit 136 to vibrate when a message is received. Notification circuit 134 may alternatively or additionally be implemented as a beeper circuit that is controlled by control circuit 136 to beep when a message is received.” (Eck, 6:43-46.) Ex. 1003, ¶ 241
105.	In Eck, a cartridge including messaging functionality (e.g., a pager cartridge) “is provided for use with a game machine having a game program executing processing system including a microprocessor.” (EX-1008, 1:61-63.) The messaging cartridge “includes a memory 145 for storing software used in the pager operations.” (EX-1008, 7:7-9.) Pelkey similarly discloses “[a] messaging service client is implemented by program code contained in an application (e.g., a	Eck explains that a cartridge including messaging functionality (e.g., a pager cartridge) “is provided for use with a game machine having a game program executing processing system including a microprocessor.” (Eck, 1:61-63.) The messaging cartridge “includes a memory 145 for storing software used in the pager operations.” (Eck, 7:7-9.) Pelkey similarly discloses “[a] messaging service client is implemented by program code contained in an application (e.g., a

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	video game, a web browser) executed by the game system.” (EX-1007, 1:42-44.) 538 Petition, pp. 80-81	video game, a web browser) executed by the game system.” (Pelkey, 1:42-44.) Ex. 1003, ¶ 248
106.	The inserted messaging cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (See, e.g., EX-1008, 4:5-6, 7:7-12 (“[p]ager cartridge 100 includes a memory 145 for storing software used in the pager operations ... [i]t is of course possible to store the software for implementing at least some of these operations in the memory of game machine 10”).) When inserted, the “game machine circuitry [] access[es] information contained with ROM 42 (and read/write memory 46), which information controls the game machine ... under control of the ROM game program information.” (EX-1008, 4:9-20.) The game machine 10 then “automatically activates a display of messages on the display thereof in accordance with the operating software stored in the memory of the pager.” (EX-1008, 22:10-14.) 538 Petition, p. 81	The inserted messaging cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (See, e.g., Eck, 4:5-6, 7:7-12 (“[p]ager cartridge 100 includes a memory 145 for storing software used in the pager operations ... [i]t is of course possible to store the software for implementing at least some of these operations in the memory of game machine 10”).) When inserted, the “game machine circuitry [] access[es] information contained with ROM 42 (and read/write memory 46), which information controls the game machine ... under control of the ROM game program information.” (Eck, 4:9-20.) The game machine 10 then “automatically activates a display of messages on the display thereof in accordance with the operating software stored in the memory of the pager.” (Eck, 22:10-14.) Ex. 1003, ¶ 249
107.	The Pelkey-Eck combination discloses “a processing element comprising a processor coupled to a memory.” (EX-1003, ¶¶252-256.) Eck explains that a cartridge including messaging functionality (e.g., a pager cartridge) “is provided for use with a game machine having a game program	The combination of Pelkey and Eck discloses “a processing element comprising a processor coupled to a memory.” Eck explains that a cartridge including messaging functionality (e.g., a pager cartridge) “is provided for use with a game machine having a game program executing processing

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	executing processing system including a microprocessor to execute a video game program and player controls operable by a player to generate video game control signals.” (EX-1008, 1:60-65; see also EX-1007, 6:44-46 (“program contained in cartridge 112 [] includes program code for a messaging service client”).) This arrangement is illustrated in Eck’s Figure 2 (below, identical to EX-1007, Figure 4) showing the portable game machine with an inserted cartridge. [image omitted] Eck, Figure 2 538 Petition, pp. 81-82	system including a microprocessor to execute a video game program and player controls operable by a player to generate video game control signals.” (Eck, 1:60-65; see also Pelkey, 6:44-46 (“program contained in cartridge 112 [] includes program code for a messaging service client”).) This arrangement is illustrated in Eck’s Figure 2 (below) showing the portable game machine with an inserted cartridge. I note this figure which is identical to Pelkey’s Figure 4. [image omitted] Eck, Figure 2 Ex. 1003, ¶ 253
108.	As shown above, the “game machine 10” includes “a central processing unit (CPU) 26 [misabeled as 25 in Fig. 2 above],” which “further includes a CPU core 30 [shaded blue] that is connected to an internal read only memory (ROM) 32 and an internal random access memory (RAM) 34.” (EX-1008, 3:42-46.) Eck explains that “[i]nternal RAM 34 is used as a work memory of CPU core 30.” (EX-1008, 3:46-47.) For example, when executing a game program, “character data supplied from game cartridge 12 and the controller data from operating keys 48a–48e, CPU 26 executes data processing and writes display data into a display RAM 52, using an extended RAM 50 when necessary” in	As shown above, the “game machine 10” includes “a central processing unit (CPU) 26 [misabeled as 25 in Fig. 2 above],” which “further includes a CPU core 30 [shaded blue] that is connected to an internal read only memory (ROM) 32 and an internal random access memory (RAM) 34.” (Eck, 3:42-46.) Eck explains that “[i]nternal RAM 34 is used as a work memory of CPU core 30.” (Eck, 3:46-47.) For example, when executing a game program, “character data supplied from game cartridge 12 and the controller data from operating keys 48a–48e, CPU 26 executes data processing and writes display data into a display RAM 52, using an extended RAM 50 when necessary” in

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	accordance with the game program. (EX-1008, 4:46-50.) CPU 26 is the “<i>processor</i>”; ROM 50 and RAM 52 (shaded red) are “<i>memory</i>”; and as shown each of ROM and RAM is coupled to the processor. 538 Petition, pp. 83-84	accordance with the game program. (Eck, 4:46-50.) CPU 26 is the “<i>processor</i>”; ROM 50 and RAM 52 (shaded red) are “<i>memory</i>”; and as shown each of ROM and RAM is coupled to the processor. Ex. 1003, ¶ 254
109.	Should PO contend the recited “<i>memory</i>” in the “<i>processing element</i>” must store instructions executed by the “<i>processor</i>,” the Pelkey-Eck combination discloses this arrangement, as would any device running software. In the portable game machine illustrated above, the inserted cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (See, e.g., EX-1008, 4:5-6, 7:7-12 (“[p]ager cartridge 100 includes a memory 145 for storing software used in the pager operations ... [i]t is of course possible to store the software for implementing at least some of these operations in the memory of game machine 10”).) When inserted, the “game machine circuitry [] access[es] information contained with ROM 42 (and read/write memory 46), which information controls the game machine ... under control of the ROM game program information.” (EX-1008, 4:9-20. 538 Petition, p. 84	Should PO contend that the recited “<i>memory</i>” in the “<i>processing element</i>” must store instructions executed by the “<i>processor</i>,” I disagree, but the combination of Pelkey and Eck discloses this arrangement, as would any device running software. In the portable game machine illustrated above, the inserted cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (See, e.g., Eck, 4:5-6, 7:7-12 (“[p]ager cartridge 100 includes a memory 145 for storing software used in the pager operations ... [i]t is of course possible to store the software for implementing at least some of these operations in the memory of game machine 10”).) When inserted, the “game machine circuitry [] access[es] information contained with ROM 42 (and read/write memory 46), which information controls the game machine ... under control of the ROM game program information.” (Eck, 4:9-20. Ex. 1003, ¶ 255
110.	Moreover, it would have been within the general knowledge of a POSITA	Moreover, it would have been within the general knowledge of a POSITA

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	that a server includes “ <i>a processor coupled to a memory</i> ” for the reasons discussed above. 538 Petition, p. 84	that a server includes “ <i>a processor coupled to a memory</i> ” for the reasons discussed above. Ex. 1003, ¶ 256
111.	Limitations [23B]-[23G] recites substantially overlapping subject matter as limitations [1A]-[1F] as indicated in the table above. For the reasons in §§VI.B.1.b-d, the Pelkey-Eck combination discloses these limitations. (EX-1003, ¶257.) 538 Petition, p. 85	Limitations [23B]-[23G] recites substantially overlapping subject matter as limitations [1A]-[1F] as indicated in my table above. For the reasons in §§V.B.1.b-d, the combination of Pelkey and Eck discloses these limitations. Ex. 1003, ¶ 257
112.	The Pelkey-Eck combination discloses a “ <i>network-based communication system</i> ” [25P] comprising “ <i>a plurality of servers configured to communicate over the network</i> ” [25A]. (EX-1003, ¶258.) For example, Figure 1B (below) in Pelkey discloses an embodiment that includes a “Messaging Service Server” 18 and a “Network Server” 14 that communicate over the internet (depicted as “WAN” 16). The “Message Service Server” and “Network Server” together comprise a “ <i>plurality of servers.</i> ” [image omitted] Pelkey, Figure 1B 538 Petition, p. 85	The combination of Pelkey and Eck discloses a “ <i>network-based communication system</i> ” [25P] comprising “ <i>a plurality of servers configured to communicate over the network</i> ” [25A]. For example, Figure 1B in Pelkey (below) discloses an embodiment that includes a “Messaging Service Server” 18 and a “Network Server” 14 that communicate over the internet (depicted as “WAN” 16). The “Message Service Server” and “Network Server” together comprise a “ <i>plurality of servers.</i> ” [image omitted] Pelkey, Figure 1B Ex. 1003, ¶ 258
113.	The Pelkey-Eck combination discloses claims 7-8 for the reasons discussed in §VI.B.1.(d)(1). (EX-1003, ¶154.)	The Pelkey-Eck combination discloses claims 7-8 for the reasons discussed in §V.B.1.d.(1). (EX-1003, ¶154.)

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	538 Petition, p. 86	Ex. 1003, ¶ 259
l 14.	The Pelkey-Eck combination discloses multiple “<i>content integration options.</i>” (EX-1003, ¶¶260-262.) As noted above, Pelkey discloses “a messaging service for communicating messages between and among users of video game systems.” (EX-1007, 1:14-16.) And Eck discloses transferring images taken with an integrated digital camera into PagerWorld and sharing such photos with other users through customizing personas with the camera photos and attaching photos and sound clips to messages. (EX-1008, 12:38-40; see also EX-1008, 16:42-45.) 538 Petition, p. 87	The combination of Pelkey and Eck discloses multiple “<i>content integration options.</i>” As noted above, Pelkey discloses “a messaging service for communicating messages between and among users of video game systems.” (Pelkey, 1:14-16.) And Eck discloses transferring images taken with an integrated digital camera into PagerWorld and sharing such photos with other users through customizing personas with the camera photos and attaching photos and sound clips to messages. (Eck, 12:38-40; <i>see also</i> Eck 16:42-45.) Ex. 1003, ¶ 260
l 15.	Eck likewise discloses that “image and sound data may be compressed/decompressed in accordance with well-known compression/decompression techniques to more effectively utilize the available bandwidth.” (EX-1008, 16:45-48.) A POSITA would understand the reference to “utilize the available bandwidth” to mean that content integration options are based in part on available wireless networking functionalities. 538 Petition, p. 87	Eck likewise discloses that “image and sound data may be compressed/decompressed in accordance with well-known compression/decompression techniques to more effectively utilize the available bandwidth.” (Eck, 16:45-48.) A POSITA would understand the reference to “utilize the available bandwidth” to mean that content integration options are based in part on available wireless networking functionalities. Ex. 1003, ¶ 261
l 16.	Thus, the Pelkey-Eck combination “<i>provid[es] one or more content integration options to the first user and the plurality of additional users</i>” [9] where “<i>the one or more content integration options are based in part</i>	Thus, the combination of Randall and Forsyth “<i>provid[es] one or more content integration options to the first user and the plurality of additional users</i>” [9] where “<i>the one or more content integration options are based</i>

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	<i>on respective wireless networking functionalities available to the first user and the plurality of additional users” [10].</i> 538 Petition, p. 87	<i>in part on respective wireless networking functionalities available to the first user and the plurality of additional users” [10].</i> Ex. 1003, ¶ 160
117.	By choosing a specific portal into which a user places, e.g., their persona character that has been customized using a photo taken with the integrated digital camera, Eck discloses additional content associated with PagerWorld via one or more user-activatable control mechanisms. 538 Petition, p. 88	By choosing a specific portal into which they place, e.g., their persona character that has been customized using a photo taken with the integrated digital camera, Eck discloses additional content associated with PagerWorld via one or more user-activatable control mechanisms. Ex. 1003, ¶ 263
118.	The Pelkey-Eck combination also discloses “<i>the method of claim 11 wherein the one or more user-activatable control mechanisms comprise a hyperlink.</i>” As noted above, Eck discloses that its invention may be applied to wireless technologies including “GSM (Global System for Mobile Communications) and WAP (Wireless Application Protocol).” (EX-1008, 25:17-20.) 538 Petition, p. 88	The combination of Pelkey and Eck also discloses “<i>the method of claim 11 wherein the one or more user-activatable control mechanisms comprise a hyperlink.</i>” As noted above, Eck discloses that its invention may be applied to wireless technologies including “GSM (Global System for Mobile Communications) and WAP (Wireless Application Protocol).” (Eck, 25:17-20.) Ex. 1003, ¶ 264
119.	Use of WAP teaches or at least suggests that selection of a specific portal from the main PagerWorld screen constitutes selecting a “<i>hyperlink.</i>” WAP is “based on the WWW communication protocols” and “WWW content formats.” (WAP Architecture, 13.) WAP “enables the supplying of advanced Internet services into digital mobile stations of	Use of WAP teaches or at least suggests that selection of a specific portal from the main PagerWorld screen constitutes selecting a “<i>hyperlink.</i>” WAP is “based on the WWW communication protocols” and “WWW content formats.” (WAP Architecture, 13.) WAP “enables the supplying of advanced Internet services into digital mobile stations of

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	wireless communication networks.” (EX-1020, 6:51-53.) The WAP proxy “allows content and applications to be hosted on standard WWW servers.” (WAP Architecture, 14.) For example, when a user of a WAP-enabled terminal enters a URL, the WAP-enabled terminal transmits a wireless Internet service request to the WAP gateway server. (<i>See, e.g.</i>, EX-1027, 1:66-2:4.) The WAP gateway may respond to the request if hosting the request web page or may convert the request into an HTTP request for a server on the Internet. (<i>See, e.g.</i>, EX-1027, 2:5-10.) The Internet web server responds and the WAP gateway converts the HTTP response into a WAP response for transmission to the WAP-enabled terminal. (<i>See, e.g.</i>, EX-1027, 2:15-25.) Thus, where PagerWorld is implementing in a WAP environment, a POSITA would understand that selecting a specific portal from the main PagerWorld screen constitutes selecting a “<i>hyperlink</i>.” 538 Petition, p. 89	wireless communication networks.” (Salmi, 6:63-65.) The WAP proxy “allows content and applications to be hosted on standard WWW servers.” (WAP Architecture, 14.) For example, when a user of a WAP-enabled terminal enters a URL, the WAP-enabled terminal transmits a wireless Internet service request to the WAP gateway server. (<i>See, e.g.</i>, Park, 1:66-2:4.) The WAP gateway may respond to the request if hosting the request web page or may convert the request into an HTTP request for a server on the Internet. (<i>See, e.g.</i>, Park, 2:5-10.) The Internet web server responds and the WAP gateway converts the HTTP response into a WAP response for transmission to the WAP-enabled terminal. (<i>See, e.g.</i>, Park, 2:15-25.) Thus, where PagerWorld is implementing in a WAP environment, a POSITA would understand that selecting a specific portal from the main PagerWorld screen constitutes selecting a “<i>hyperlink</i>.” Ex. 1003, ¶
120.	The Pelkey-Eck combination discloses—“<i>a collaborative workspace</i>” for the same reasons set forth in claim 8 above. In Eck, users communicate and collaborate on topics of interest, e.g., by allowing each group member to post or send messages and/or photos, and respond to the messages and/or photos posted or sent by other group members. For	The combination of Pelkey and Eck discloses—“<i>a collaborative workspace</i>.” In Eck, users communicate and collaborate on topics of interest, e.g., by allowing each group member to post or send messages and/or photos, and respond to the messages and/or photos posted or sent by other group members. For example, Eck discloses that “[a]s

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	example, Eck discloses that “[a]s players interact with other players in PagerWorld (e.g., by sending messages and playing games), players will share the fun and excitement of discovering new items, skills and appearances as their persona characters gain experience.” (EX-1008, 10:27-31.) (EX-1003, ¶¶266-267.) 538 Petition, p. 90	players interact with other players in PagerWorld (e.g., by sending messages and playing games), players will share the fun and excitement of discovering new items, skills and appearances as their persona characters gain experience.” (Eck, 10:27-31.) Ex. 1003, ¶ 266
121.	The Pelkey-Eck combination discloses “<i>a chat channel facilitating interaction between the first user and the plurality of additional users.</i>” (EX-1003, ¶¶268-269.) Eck discloses multiple user games, such as PagerWorld, include the feature of “Chat and community interaction.” (EX-1008, 10:15-19; see also EX-1008, 16:55-63, Figs. 11A-B (disclosing chat codes to “reduce[] the number of characters in a message, thereby reducing message charges”).) Pelkey similarly discloses that the server “set[s] up text-based chat sessions between two or more logged-in players.” (EX-1007, 17:6-10.) 538 Petition, p. 90	The combination of Pelkey and Eck discloses “<i>a chat channel facilitating interaction between the first user and the plurality of additional users.</i>” Eck discloses that multiple user games, such as PagerWorld, include the feature of “Chat and community interaction.” (Eck, 10:15-19; see also Eck, 16:55-63, Figs. 11A-B (disclosing chat codes to “reduce[] the number of characters in a message, thereby reducing message charges”).) Pelkey similarly discloses that the server “set[s] up text-based chat sessions between two or more logged-in players.” (Pelkey, 17:6-10.) Ex. 1003, ¶ 268
122.	The Pelkey-Eck combination discloses, an “<i>application</i>” with a program component at the portable game machine and a program component on the server. (EX-1003, ¶¶270-275.) 538 Petition, p. 91	The combination of Pelkey and Eck discloses, an “<i>application</i>” with a program component at the portable game machine and a program component on the server. Ex. 1003, ¶ 270
123.	Pelkey discloses “[a] messaging service client [that] is implemented by	Pelkey discloses “[a] messaging service client [that] is implemented by

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	program code contained in an application (e.g., a video game, a web browser) executed by the game system.” (EX-1007, 1:42-44.) 538 Petition, p. 91	program code contained in an application (e.g., a video game, a web browser) executed by the game system.” (Pelkey, 1:42-44.) Ex. 1003, ¶ 271
124.	Pelkey likewise describes different alternatives for storing the program code for the messaging application. (EX-1007, 1:44-51.) 538 Petition, p. 91	Pelkey likewise describes different alternatives for storing the program code for the messaging application: “The application containing the program code for the messaging service client may be stored in a removable game cartridge. In other instances, some or all of the program code for the messaging service client may be stored in some other memory such as a memory associated with a communications circuit (e.g., modem) for establishing the network connection.” (Pelkey, 1:44-51.) Ex. 1003, ¶ 272
125.	In addition, in Eck, “FIGS. 9A-9C show various screens in PagerWorld,” an application running on the portable game machine. (EX-1008, 2:57.) 538 Petition, p. 91	In addition, in Eck, “FIGS. 9A-9C show various screens in PagerWorld” an application running on the portable game machine. (Eck, 2:57.) Ex. 1003, ¶ 274
126.	Because the message application in Pelkey and PagerWorld in Eck are designed to be run on the portable game machine, the combination of Pelkey and Eck discloses, a “<i>mobile information channel [] associated with a mobile device application.</i>” 538 Petition, p. 92	Because the message application in Pelkey and PagerWorld in Eck are designed to be run on the portable game machine, the combination of Pelkey and Eck discloses, a “mobile information channel [] associated with a mobile device application.” Ex. 1003, ¶ 275
127.	The Pelkey-Eck combination discloses “<i>at least one server accessible over the</i>	The combination of Pelkey and Eck discloses “<i>at least one server</i>

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	<i>Internet via a network interface.” (EX-1003, ¶¶276-279.)</i> 538 Petition, p. 92	<i>accessible over the Internet via a network interface.”</i> Ex. 1003, ¶ 276
128.	Pelkey discloses in Figure 1B (below) an exemplary embodiment showing a plurality of servers accessible over the internet (depicted as WAN 16). [image omitted] Pelkey, Figure 1B 538 Petition, p. 93	Pelkey discloses in Figure 1B (below) an exemplary embodiment showing a plurality of servers accessible over the internet (depicted as WAN 16). [image omitted] Pelkey, Figure 1B Ex. 1003, ¶ 277
129.	Pelkey explains that the communication circuits 12 “may be provided internally to the game system or embodied as cartridges ... removably attachable to a port or bay of the game systems.” (EX-1007, 2:65-3:2.) Eck discloses the embodiment of a network interface in a cartridge. As shown in Eck’s Figure 5A, the pager cartridge includes “an antenna 130 connected to a conventional radio section 132 for receiving and sending messages.” (EX-1008, 6:34-36; see also EX-1008, 7:36-53 (describing a pager cartridge includes a codec/DSP section, bandpass filter, RF mixer and dual PLL section, crystal, transmitter, receiver and antenna).) The radio section and/or antenna is a “<i>network interface</i>.” 538 Petition, p. 94	Pelkey explains that the communication circuits 12 “may be provided internally to the game system or embodied as cartridges ... removably attachable to a port or bay of the game systems.” (Pelkey, 2:65-3:2.) Eck discloses the embodiment of a network interface in a cartridge. As shown in Eck’s Figure 5A, the pager cartridge includes “an antenna 130 connected to a conventional radio section 132 for receiving and sending messages.” (Eck, 6:34-36; see also Eck, 7:36-53 (describing a pager cartridge includes a codec/DSP section, bandpass filter, RF mixer and dual PLL section, crystal, transmitter, receiver, and antenna).) The radio section and/or antenna is an “<i>interface</i>.” Ex. 1003, ¶ 201