

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.
Petitioner,

v.

VUSURA TECHNOLOGY LLC,
Patent Owner,

U.S. Patent No. 11,227,303
Issue Date: January 18, 2022
Title: METHOD AND APPARATUS FOR CONTENT PRESENTATION IN
ASSOCIATION WITH A TELEPHONE CALL

Inter Partes Review No.: IPR2026-00255

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT 11,227,303
UNDER 35 U.S.C. §§311-319 AND 37 C.F.R. §§42.1-.80, 42.100-.107**

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[14.2] pause establishment of the communication connection without soliciting action by the first	

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PETITIONER'S EXHIBIT LIST

<i>Exhibit #</i>	<i>Description</i>
1001	U.S. Patent No. 11,227,303 (“the ’303 Patent”).
1002	Prosecution History of the ’303 Patent (“File History”)
1003	Declaration of Petitioner’s Expert Thomas F. La Porta, Ph.D.
1004	U.S. Pat. Publication No. 2007/0173237 (“Roundtree”).
1005	WIPO International Publication No. WO 2006/130783
1006	U.S. Pat. Publication No. 2007/0116227 A1
1007	Excerpts of J. Thorner, “Intelligent Networks”, Artech House, Inc. 1994.
1008	Excerpts of L. Goleniewski, “Telecommunications Essentials”, Pearson Education, Inc., 2003.

I. INTRODUCTION

Cisco Systems, Inc. (“Petitioner”) hereby petitions for an *inter partes* review (“IPR”) of U.S. Patent No. 11,227,303 (“the ’303 Patent”, EX-1001). Petitioner respectfully submits that Claims 1-25 (the “Challenged Claims”) of the ’303 Patent are unpatentable under 35 U.S.C. §103 in view of the prior art discussed herein. This Petition demonstrates by a preponderance of the evidence that there is a reasonable likelihood that Petitioner will prevail regarding at least one of these claims. Accordingly, it is respectfully requested that the Board institute an IPR.

II. OVERVIEW

The ’303 Patent is directed to providing multimedia content associated with a telephone call to a called or calling party after the called party’s number has been dialed but before the voice connection is made, and providing additional content to the called or calling party after the voice connection is terminated. The content presented may relate to parties to the telephone call, entertainment for one or more of the parties, commercial information (e.g., sales offers, transaction details, advertisements, coupons) and the subject matter of the call, and may be displayed on a communication device of the called or calling party.

However, systems and methods for providing multimedia content associated with a telephone call to a called or calling party after the called party’s number has been dialed, but before the voice connection is made, and providing additional

content to the called or calling party after the voice connection is terminated, were well-known by April 2009. For example, Roundtree (EX-1004) discloses that a system can decide to “enhance” a telephone call by providing multimedia content and additional content to the called or calling party’s communication device at these same relative points in time. Roundtree describes that the content may include information about the parties, content directly or indirectly related to contents or subjects within the voice communications, graphics or other visual content, songs, tones or other audio content, and/or other content capable of providing communications to a user, and may be displayed on a communication device of the called or calling party. Roundtree also provides two of the same examples provided by the ’303 Patent: (1) a subscriber call to a customer service call center, and (2) a customer call to a pizza restaurant to order a pizza. Thus, Roundtree, which predates the ’303 Patent by two years, discloses the limitations recited in the Challenged Claims in the same way that the Challenged Claims read onto the ’303 Patent’s disclosure.

III. GROUNDS FOR STANDING 37 C.F.R. § 42.104(a)

Petitioner certifies that the ’303 Patent is available for IPR.

IV. REASONS FOR THE REQUESTED RELIEF

As explained in §§II and IV-V of this Petition and in the attached Declaration of Petitioner’s Expert, *EX-1003*, the subject matter claimed in the ’303

Patent was obvious over the prior art to a person of ordinary skill in the art (“POSITA”) at the time of the purported invention.

A. Overview of the ’303 Patent

The ’303 Patent is directed to presenting multimedia content to a caller and/or called party in association with a telephone call. The ’303 Patent explains that one prior art problem is that calls from/to a mobile telephone are typically accompanied by minimal display content. For example, when placing a call, the caller may simply see a dialer screen used to enter a telephone number, or select a number/contact to be dialed. When receiving a call, a called party may see the caller’s telephone number or name of the caller, but little else. EX-1001 1:29-43.

The ’303 Patent’s solution to enrich the experience of a person making or receiving a telephone call is to present multimedia content to a caller and/or called party in association with the call. Content presented to a party may be related to another party participating in the call or to a third party (e.g., an advertiser paying to have its content presented). EX-1001 1:58-67, 2:4-7.

FIG. 2 illustrates an embodiment of presenting content to a caller and/or called party in association with a telephone call. At step A, the caller enters or selects a telephone number for called party 250, in order to initiate a voice call to that party. Alternatively, the caller may enter part of the target party’s name or

number and select the party from results produced by her communication device and/or a source external to her device. EX-1001 8:25-33.

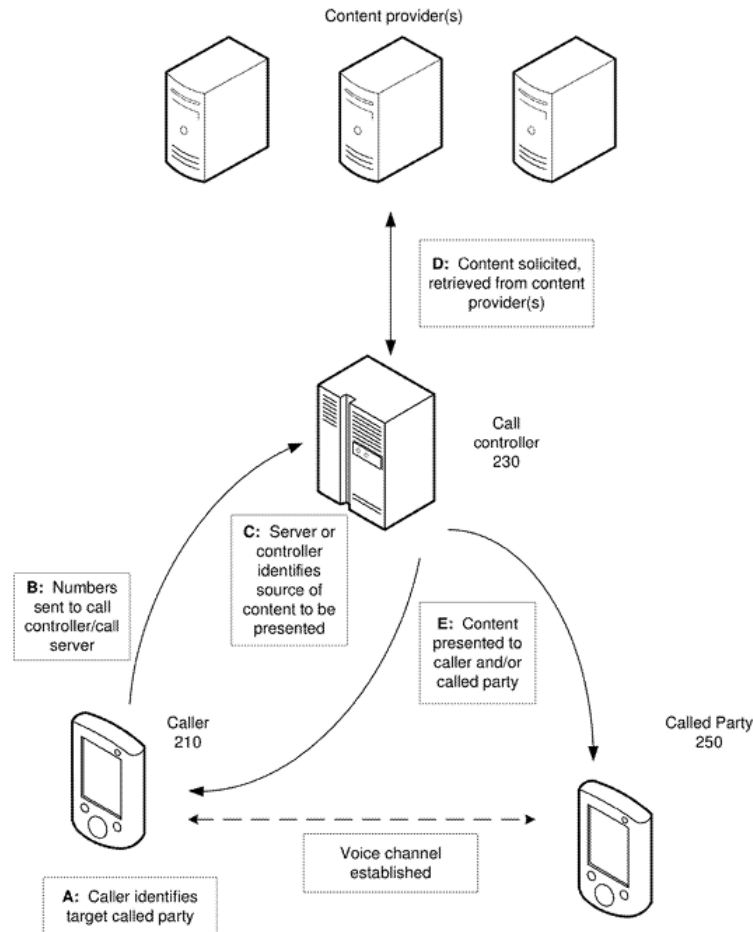


FIG. 2

At step B, the telephone numbers and/or other identifiers of the caller and called party are transmitted to call controller/call server 230 via a data channel of the caller's telephone. EX-1001 8:33-37.

In step C, call controller 230 identifies a source of content to be presented to caller 210 and/or called party 250, or may identify specific content (i.e., not just a

content source). In step D, the call controller solicits content from a selected source, which may be a web server, a data server, an advertisement server or other advertisement repository, an organization's data server, etc. EX-1001 8:46-52. A call controller may be operated by, among other entities, a caller or a called party, particularly when that party represents an organization. EX-1001 7:9-11, 3:48-50, 9:64-67, 10:27-34. Local storage on a party's communication device, or an internal database (*e.g.*, of a calling organization or called organization), may be a source of content to be presented to a caller and/or called party. EX-1001 5:61-6:1, 14:10-20, 8:49-52, 16:17-19.

Content may be selected for presentation based on an identity of a particular party, a relationship between the caller and called party, a purpose of the call, and/or other factors. EX-1001 8:53-56, 16:19-23.

In step E, call controller 230 forwards the selected content to either or both of the caller and called party. In some embodiments, the content may be served directly to a caller or called party from a content provider. Content may be presented to either party before the called party's telephone rings, during the parties' voice call, and/or after the voice call is terminated. EX-1001 8:57-63.

The voice channel between caller 210 and called party 250 may be routed and established in a normal fashion. However, initiation of the voice connection may be delayed for a short period of time (*e.g.*, by call processor logic operating on

the caller's telephone). Thus, the actual voice connection may be completed/established any time after Step A. EX-1001 8:64-9:2.

A call may include a voice portion and a data portion, and the call's voice portion may be delayed to allow the call's data portion to be established between the calling device and a server, a telephone agent (automated or human), an operator, or other entity. EX-1001 14:31-40. A POSITA understood that the '303 Patent's description of a "data portion" of a call refers to a data connection/channel over which a caller and/or called party may receive multimedia content, and that is independent from the voice connection/channel which, once established/completed, couples the caller and called party for the "voice portion" of a call. *Id.*; EX-1001 17:42-45, 11:31-33, 4:1-19, FIGS. 1-2; EX-1003, ¶43.

In some embodiments, a call processor may delay signaling of a voice call from a caller's telephone to the caller's telephone service provider in order to delay establishment of the voice channel. For example, calls placed to certain numbers or to certain types of parties (e.g., merchants, other organizations) may be delayed while such pre-ring content is selected and transmitted to the caller's telephone. EX-1001 4:37-47. Content may be provided to the called party or caller after the voice portion of the call is terminated (after one or both of the parties hang up, thereby terminating the voice channel of the call). EX-1001 17:50-58.

Illustrative content that may be presented to a caller or a called party pre-ring includes commercial offers and advertisements, private content such as pictures, communications, present status, current location, notifications, alerts, an identifier of the other party to the call, etc. EX-1001 9:3-10; *see also* EX-1001 16:34-35, 4:37-43, 8:64-9:2.

Illustrative content that may be presented to a party during a call includes any or all types of content that may be presented pre-ring. In-call content may also or instead relate to the parties' voice connection, perhaps to provide visual description of a subject of the parties conversation to graphically show different products or product options, show a transcript of the conversation in real-time or near real-time, guide a party through an IVR (Interactive Voice Response) menu, provide customer assistance graphically, exchange information textually/graphically instead of having to speak it or punch it in via a keypad, promote an up-sell, guide a party through an organization's telephone directory to find a desired person, etc. EX-1001 9:15-29; *see also* EX-1001 16:35-36, 17:13-22.

Illustrative post-call content includes content that may be presented pre-ring and/or in-call. Post-call content may also or instead summarize the parties' conversation or transaction, provide a receipt, identify follow-on later appointment

or other scheduled event, etc. EX-1001 9:30-34; *see also* EX-1001 16:36-37, 17:50-58.

In other words, the '303 Patent describes presenting multimedia content to a caller and/or called party at three time periods relative to a telephone call: (1) before establishment/completion of the voice connection/channel of the telephone call, also described as “pre-ring” and “before the called party’s communication device rings”; (2) after the voice connection/channel of the telephone call is established/completed, also described as “after the called party answers”, “in-call” and “during a call”; and (3) after the voice connection/channel of the telephone call is terminated, also described as “after one or both parties hangs up” and “post-call.” EX-1001 1:66-2:3, 4:37-47, 8:64-9:34, 14:31-40, 16:34-37, 17:13-22, 17:50-58, FIG. 2; EX-1003, ¶48.

The '303 Patent does not make any distinction that presenting multimedia content to a caller and/or called party before a voice connection between the parties is established is more technologically challenging than presenting such content after the voice connection is established or after the voice connection is terminated. *Id.*; EX-1003, ¶49. Rather, the '303 Patent treats the presentation of multimedia content to a caller and/or called party at each of these relative time periods the same and identifies *the exact same method and apparatus* for presenting multimedia content to such parties at each of these relative time periods (where the

source of such content may be local storage on a party's communication device, an internal database of a calling organization or called organization, the other party (via a data connection between the parties), a third party (via a data connection between the content-receiving-party and the content source), etc.). *Id.* Indeed, the '303 Patent describes that the exact same method and apparatus used to present content to either or both of such parties *in-call (during a voice call)* is also used to present content to such parties *pre-ring (before the voice connection is established/completed)* and *post-call (after the voice connection is terminated)*. *Id.*

The '303 Patent issued with 25 Claims, with Claims 1 (method), 13 (computer-readable medium) and 14 (apparatus). While the '303 Patent describes embodiments for presenting content to a caller and/or a called party before, during and/or after a telephone call between the parties—*i.e.*, before a telephone call's voice connection is established ("pre-ring"), after the call's voice connection is established ("in-call"), and/or after the call's voice connection is terminated ("post-call")—, the independent claims are limited to embodiments for presenting content to a caller and/or a called party before "a communication connection" is established ("selected content"), and after "the communication connection" is terminated ("additional content"). The '303 Patent does not use the words

“pausing”, “communication connection”, “additional content”, or “new transaction” apart from the claims.

1. Pizza Example

One of the '303 Patent's examples of presenting content to a caller and/or called party is in association with a telephone call from a customer to a pizza restaurant to order a pizza. EX-1001 FIG. 4, 10:5-33. For this pizza example, as explained below, the '303 Patent: (1) explicitly discloses presenting content to a customer caller and/or called pizza restaurant after the call's voice connection is established (“in-call”), and/or after the call's voice connection is terminated (“post-call”), regarding a transaction conducted during the voice connection, and (2) discloses to POSITAs presenting content before the call's voice connection is established (“pre-ring”) regarding a previous transaction between the parties. EX-1003, ¶¶52-54.

Specifically, in this pizza example, the '303 Patent describes that a telephone agent associated with the pizza merchant (*i.e.*, the called party in this example) is the call controller that manages the presentation of content on the customer's caller's telephone. EX-1001 10:26-33. The only content specifically described in this example as being transmitted to the customer caller is “content 410 [that] verifies the customer's order (*i.e.*, for one large Chicago style pizza, with pepperoni) and the delivery address, and also reminds the customer of a special

offer (*i.e.*, \$0.99 apple pies on Tuesday night).” EX-1001, 10:8-17, FIG. 4. The only content specifically described in this example as being transmitted to the called pizza merchant is “the caller’s address (e.g., home address, work address, current address).” EX-1001 10:18-25. The ’303 Patent does specifically describe, in this pizza example, that the pizza merchant’s telephone agent may transmit, “after the call” and over a data connection, details of the pizza-ordering transaction conducted over the now-terminated voice connection between the calling customer and called pizza merchant (*i.e.*, the customer’s order). EX-1001 FIG. 4, 10:5-17; EX-1003, ¶53.

The ’303 Patent describes that, especially when a called party is a commercial organization like a merchant, the voice call connection may be delayed while a call controller (*e.g.*, agent that works for the called organization) presents pre-ring content that the agent believes may be useful to the caller during the call, including details of a previous transaction between the caller and the organization. EX-1001 4:44-47, 7:11-22, 10:49-55, 14:5-16, 14:61-64, 15:18-24, 16:60-66. Accordingly, although these words do not specifically appear in FIG. 4 or 10:5-33, the ’303 Patent discloses to POSITAs that the pizza merchant’s agent may, before a voice connection is established, transmit information regarding a previous transaction between the pizza merchant and the customer to the customer over a data connection as the agent may believe such pre-ring information would be

useful to, for example, simplify and speed up the current transaction. *Id.*; EX-1003, ¶54.

2. Customer Service Call Center Example

Another one of the '303 Patent's examples of presenting content to a caller and/or called party is in association with a telephone call from a customer service call center to a customer that has an account with the service provider. EX-1001 FIG. 6, 10:60-11:20. For this example, as explained below, the '303 Patent: (1) explicitly discloses presenting content to a caller and/or called party before the call's voice connection is established ("pre-ring") regarding a previous transaction between the parties, and (2) discloses to POSITAs presenting content after the call's voice connection is established ("in-call"), and/or after the call's voice connection is terminated ("post-call"), regarding a transaction conducted during the voice connection. EX-1003, ¶¶55-57.

Specifically, in this example, the '303 Patent describes that a telephone agent associated with the customer service provider (*i.e.*, the caller in this example) is the call controller that manages the presentation of content on the customer called party's telephone. EX-1001 11:17-20. The only content specifically described in this example as being transmitted to the customer is "content 610... presented pre-ring (*i.e.*, before [the customer's] telephone rings)", which includes "some digits of the [customer's] account number,... details of a previous

transaction with the organization, etc.”, or “controls for taking action such as accepting the call as planned, completing the call immediately, postponing the call, scheduling it for a particular time, etc.”. EX-1001 10:59-11:13, FIG. 6; EX-1003, ¶56.

The '303 Patent describes that, especially when the calling or called party is an organization or commercial enterprise, a call controller (*e.g.*, telephone agent working for a calling customer service provider) may select in-call and/or post-call content for presentation on the customer's communication device that directly relates to the ongoing, and/or recently terminated, call between the telephone agent and the customer (*e.g.*, transaction summary, information regarding a current or recent transaction). EX-1001 3:33-39, 7:11-17, 15:15-27, 22:15-19. Accordingly, although these words do not specifically appear in FIG. 6 or 10:60-11:20, the '303 Patent discloses to POSITAs that, after a voice connection between a customer called party and the calling service provider's agent is terminated, the provider's agent transmits, over a data connection, details of a transaction recently conducted over the now-terminated voice connection between the provider's agent and the customer. *Id.*; EX-1003, ¶57.

B. Prosecution History of the '303 Patent

The claims of the '303 Patent application, filed October 9, 2019, were rejected numerous times over the prior art until the Applicant amended the independent claims to include the underlined limitations below:

1. (Currently amended) A method of controlling presentation of
2 content on a communication device, the method comprising:
upon receipt of notification of initiation of a communication connection
4 from a first device associated with a first party to a second device associated with
a second party:
6 pausing establishment of the communication connection without
soliciting action by the first party; and
8 during said pausing, transmitting selected content toward the first
device and/or the second device; and
10 after one of the first party and the second party terminates the
communication connection, transmitting additional content toward the first device
12 and/or the second device;
wherein the selected content comprises information regarding a previous
14 transaction between the first party and the second party;
wherein the additional content comprises information regarding a new
16 transaction conducted between the first party and the second party during the
communication connection; and
18 wherein the first device and/or the second device display the additional
content after receipt.
20 ~~wherein the selected content comprises a guide to routing the~~
~~communication connection;~~
22 ~~wherein the guide comprises a menu for routing the communication~~
~~connection within an organization comprising the second party; and~~
24 ~~wherein the first device and/or the second device display the selected~~
~~content after receipt.~~

EX-1002 33-42.

In the Notice of Allowance, the examiner stated:

As to claims 1, 13 and 14, in combination with other limitations of the claims, the prior art of record fails to disclose or specifically suggested wherein the selected content comprises information regarding a previous transaction between the first party and the second party, wherein the additional content comprises information regarding a new transaction conducted between the first party and the second party during the communication connection, and wherein the first device and/or the second device display the additional content after receipt. In the specific with combined limitations recited in the claims.

EX-1002 14.

C. Priority Date of the Challenged Claims

The '303 Patent was filed October 9, 2019, and claims priority through a string of continuation applications to the filing of Provisional Application No. 61/167,105 on April 6, 2009. This Petition assumes April 6, 2009 as the “Priority Date.”

D. Claim Construction

Petitioner proposes that each claim term in the Challenged Claims be given its plain and ordinary meaning in this proceeding, and that no specific construction of any claim term is required because the prior art relied on in this Petition meets each of the claim terms under any reasonable construction. EX-1003, ¶¶62-64.

E. Level of Ordinary Skill in the Art

A Person of Ordinary Skill in the Art (“POSITA”) in April 2009 would have been someone knowledgeable and familiar with call processing techniques and providing enhanced data content to cell phones. A POSITA would have gained knowledge of these concepts through a mixture of training and work experience, such as by having at least a bachelor’s degree in electrical engineering, computer science, or a related field, and at least two to three years of training or additional work experience in the area of telecommunications, or a related field. Additional hands-on and design experience could compensate for less formal education, and vice versa. The knowledge and skill of a POSITA is further reflected in the prior art references themselves, as well as the State of the Art, discussed below. EX-1003, ¶¶65-68.

F. State of the Art

This section describes the state of the art as of the Priority Date. This section, and the expert testimony and documentary evidence cited, provide additional factual support for the general knowledge, common understanding and skill of a POSITA at the Priority Date. This section provides additional factual support and motivation to modify and combine the teachings in the reference in the Ground, and further demonstrates why doing so would involve a reasonable expectation of success. EX-1003, ¶69.

Providing content to a caller and/or called party before, during, or after a voice call connection, and providing such content over a data communication channel that was separate from the voice communication channel, was well-known to POSITAs by April 2009. EX-1003, ¶¶70-78.

One such architecture—Intelligent Networks (IN)—was introduced in the 1980s, and well-known and widely used in the 1990s as AINs. EX-1007, xi, 13-23, 34-38, 44-55; EX-1008, 144-150. An exemplary, long-standing service implemented by IN logic was “calling line identification (CLI)” in which, during call setup (before a call was answered), the caller’s identity was transferred to the called party (and presented on his/her telephone). EX-1007, 45, 83, 111-114. For example, when an account holder called his insurance company, the company’s representative could use the caller’s identity, which was transferred via CLI during call setup, to immediately find the caller’s personal file on the representative’s computer to simplify and speed up the current transaction by giving the caller a quick reply to his/her questions EX-1007, 45, 113. Another long-standing service implemented by IN logic was “malicious call identification” in which, after an obscene/malicious call was received and terminated, the called party initiated this service on his terminal within a certain period of time (to request a trace of the recently-terminated call) and, once initiated, the IN logic registered the caller’s

number and presented such content to the called party. EX-1007, 67, 72; EX-1003, ¶¶71-73.

Another such architecture was Integrated Services Digital Network (“ISDN”), which was standardized in 1983 and usable to implement IN logic. EX-1008, 186-188; EX-1007, 28, 36, 145-146. In ISDN configurations for residential services, there were typically three channels to the house: two voice channels and a data channel. EX-1008, 187-188, FIG. 7.11. An example ISDN application where content was provided to a caller and/or called party over the data channel before, during, or after a voice channel connection was “High-capacity access” where a user needed to increase his/her capacity for things, *e.g.*, graphics, file transfer, video, and multimedia networking. *Id.*; EX-1003, ¶¶74-75.

Another example of a prior art architecture is described in EX-1005. After a called party number was dialed and during call setup, logic determined content to be “pushed” to the called or calling party prior to the call being answered (during call setup), while the call is in progress, or after the call connection is completed. EX-1005 [0039]. The content to be delivered was determined by application logic and could be based on profiles and preferences of the called and/or calling party, including caller identity, called party identity, third party identity, call history information, time of day, season, relationships, default order to play the push

content in case of simultaneous incoming calls, etc.. EX-1005 [0044]; EX-1003, ¶76.

Another prior art system describes providing content in the form of advertisements for goods and services to the caller before pushing, or instead of, a dial tone, or during the ringing of the called party, or during an active voice call after completion of the voice connection, or after termination of the call. EX-1006 [0008], [0009], [0024], [0035], [0037], [0040], [0050]; FIG. 3. The content of the ads selected to be sent to the called or calling party is based on the personal interests and/or other characteristics of one or more telephony end-users. EX-1006 [0031]; EX-1003, ¶77.

Thus, the architecture and methods for identifying, retrieving, and displaying multimedia content to a caller and/or called party before, during or after a telephone call were well-developed by 2009, and the '303 Patent simply uses these architectures and techniques for their intended purpose to provide various content to the called and calling parties. EX-1003, ¶78.

V. IDENTIFICATION OF HOW CLAIMS ARE UNPATENTABLE

A. Ground 1: Claims 1-25

The Challenges are set forth in detail below and summarized as follows:

Ground	Claims	Basis	Reference
1	1-25	§103	Roundtree (EX-1004)

Roundtree (EX-1004) is Patent Publication No. 2007/0173237, filed February 7, 2007, and published July 26, 2007. Roundtree is prior art at least under (pre-AIA) §102(b), and was not cited, nor applied by, the Examiner during the '303 Patent prosecution.

1. Roundtree

Roundtree is directed to a system and method for enhancing voice calls with data services. EX-1004 [0029]. Roundtree describes that the use of mobile services has rapidly increased in recent years, due in part to services available on mobile devices. In addition to traditional voice calls, mobile devices allow users to communicate via email, text messaging, instant messaging, etc. Some mobile devices provide music playback, video playback, games, photo taking and sharing, and other content, often interacting with users via full color displays. EX-1004 [0002]-[0003].

Like the '303 Patent's identified prior art problem, Roundtree identifies that one prior art problem is that, despite these additional capabilities for communicating and displaying multimedia content on mobile devices, users place/receive voice calls using these devices without utilizing such capabilities. That is, when using a mobile device to communicate over a data channel, *e.g.*, text message, a user may utilize and send a photo with the text message, synergizing several different mobile device capabilities. In contrast, during voice

communications, users do not utilize other mobile device capabilities (such as these capabilities for communicating and displaying multimedia content). EX-1004 [0003]; EX-1003, ¶82.

Like the '303 Patent's solution "to enrich the experience of a person making or receiving a telephone call", Roundtree describes that a solution to the same identified problem involves "enhancing voice calls with data services." EX-1004 [0029]. For example, Roundtree describes that a system for enhancing voice calls with data services may receive an indication of a voice call (*e.g.*, dialed number), intercept the voice call to determine if the dialed number is associated with data services, and provide the data services to a user. The data services may be provided by providing content to a user via a display on the user's mobile device. The system may display graphics or other visual content, songs, tones or other audio content, and other content capable of providing communications to a user. EX-1004 [0029]-[0030]; EX-1003, ¶83.

Like the '303 Patent, Roundtree describes that initiation of a voice call begins with the caller dialing, or selecting, a phone number of a called party. EX-1004 [0054]. Roundtree discloses the identical concept of delaying the voice portion of a telephone call to determine whether to display enhanced data, but does not use the word "pausing" or "delaying." EX-1004 [0029]-[0030]. Instead,

Roundtree describes intercepting a call to determine whether to provide enhanced content to the called or calling party. *Id.*; EX-1003, ¶84.

Roundtree includes a broad disclosure that before, during, or after completion of a voice call, it can determine if the voice call is to be enhanced. EX-1004 [0055], [0073]. Like the '303 Patent, Roundtree uses the word completion of a voice call to mean the voice connection has been established. EX-1004 [0050], [0054]-[0055]. Thus, when Roundtree describes that it determines whether the voice call is to be enhanced “before, [or] during... completion” of the call, this is during the time period after initiation of the telephone call (*e.g.*, phone number dialed/selected) but before the voice connection is made. EX-1004 [0055], [0073]. Additionally, like the '303 Patent, when Roundtree describes that it determines whether the voice call is to be enhanced “after completion” of the call, this is referring to the time period after the voice connection is established. EX-1004 [0055], [0073]. Like the '303 Patent, Roundtree further discloses that content may be provided to the caller and/or called party after the voice portion of the call is terminated. EX-1004 [0071]-[0072]; EX-1003, ¶85.

One embodiment for enhancing voice calls with content is described regarding FIGS. 7A and 7B.

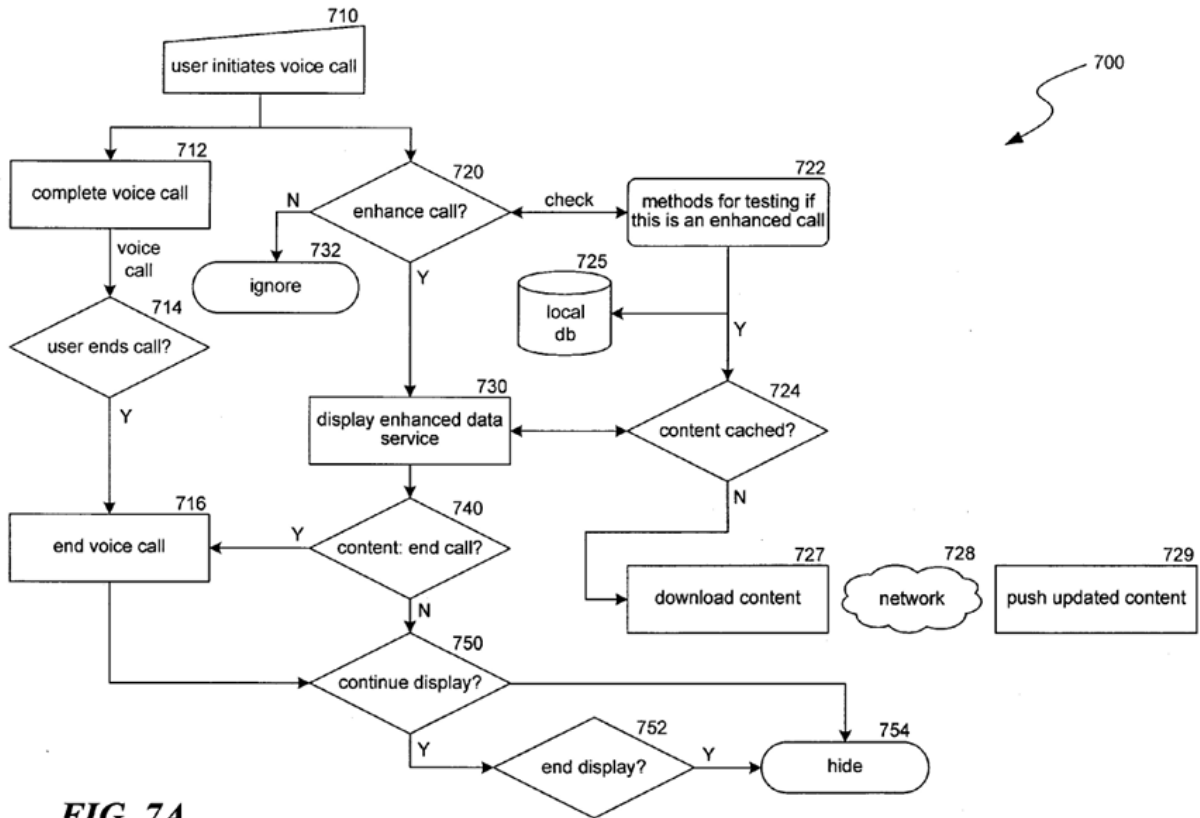


FIG. 7A

In block 710, the system receives an indication of a user-initiated voice call. Once the voice call is initiated, routine 700 proceeds to block 712 (for the voice connection aspect of the call) and to block 720 (for possible enhancements to the call). The system, in block 712, completes, connects, or establishes the voice call. The system maintains the voice call until, in block 714, the system receives an indication that the user has ended the voice call. If the system receives the indication, routine 700 proceeds from block 714 to block 716, and the system ends the voice call. EX-1004 [0054].

Before, during, or after completion of the voice call, as in block 712, the system, in block 720, decides if the voice call is to be enhanced. The system

proceeds through some or all of a number of different methods in determining whether or not to enhance a call. EX-1004 [0055].

Block 720 determines if the initiated voice call supports data enhancements. If the system determines the initiated voice call does not support data enhanced services, the routine proceeds to block 732, and proceeds as a typical voice call, effectively ignoring any data enhancement aspects. However, if the system determines the initiated voice call supports data services, the routine proceeds to block 730, and the system displays the enhanced services. The system may, in block 724, check for content 727, and/or download or otherwise obtain content from other non-local databases 729 via a network 728. The system may display content stored in both local database 725 and one or more remote databases 729. EX-1004 [0063].

Upon displaying the content, the system, in block 740, determines if the voice call is to end. If the system determines the call is to end, routine 700 proceeds to block 716, and the system ends the call. The system may determine to end the call from the displayed content, user input, etc. If the voice call is to remain connected, routine 700 proceeds to block 750, and the system determines whether or not to continue displaying the content. The system may then end the display (block 752), hide the display from the user (block 754) or continue displaying the enhancements to the user. The system may choose one or more of

these options depending on user input, the type of displayed enhancement, duration of the voice connection, a lack of user activity regarding the displayed content, etc. EX-1004 [0064].

Furthermore, in some cases, routine 700 may proceed from block 716 (when the system ends the voice call) directly to block 750 (when the system decides to continue or end displaying enhanced data services). EX-1004 [0065].

Accordingly, like the '303 Patent, Roundtree describes providing multimedia content to a caller and/or called party at each of the same three time periods relative to a telephone call: (1) before establishment/completion of the voice connection/channel of the telephone call; (2) after the voice connection/channel of the telephone call is established/completed; and (3) after the voice connection/channel of the telephone call is terminated. EX-1003, ¶92.

Moreover, like the '303 Patent, Roundtree describes that the source of such multimedia content, that is provided to such parties at any of these relative time periods, may be local storage on a party's communication device, an internal database of a calling establishment/provider or called establishment/provider, the other party (via a data connection between the parties), a third party (via a data connection between the content-receiving-party and the content source), etc. *Id.*; EX-1004 [0029]-[0032], [0063], [0066], Claims 16-19. Like the '303 Patent,

Roundtree provides several examples of a system that augments a voice call with data services.

i. Pizza Example

Like the '303 Patent, one of Roundtree's examples of providing content to a caller and/or called party is in association with a telephone call from a customer to a pizza restaurant to order a pizza. EX-1004 FIGS. 8A-8C, [0067]-[0071]. As explained below, like the '303 Patent's pizza example, Roundtree: (1) explicitly discloses presenting content to a customer caller and/or called pizza restaurant after the call's voice connection is established/completed, and after the call's voice connection is terminated, regarding a transaction conducted during the voice connection, and (2) discloses to POSITAs presenting content before the call's voice connection is established regarding a previous transaction between the parties. EX-1003, ¶¶93-97.

The content specifically described by Roundtree in this pizza example as being transmitted and displayed to the customer caller includes, (1) "after completion of the voice call" (*i.e.*, after establishing the voice connection), "content... to illustrate available choices to the user (similar to giving the user a menu at the restaurant)", "content... to display results of the order", "the user's order details 855", "confirmed order details 865", and "the order and payment details 875"; and, (2) after "end[ing] the voice call", content "based on status of the

user's order (*e.g.*, provid[ing] a display showing the order as 'in preparation,' in transit, 'delivered,['] 'transaction complete,' and so on)." EX-1004 FIGS. 8A-8C, [0070]-[0071]. Accordingly, just like the '303 Patent pizza example, Roundtree specifically describes, in this pizza example, that, after "end[ing] the voice call", the pizza restaurant may transmit, over a data connection, details of the pizza-ordering transaction conducted over the now-terminated voice connection between the calling customer and called restaurant (*i.e.*, the customer's order, status of the ordered pizza, and delivery status), which are displayed on the customer's mobile device after receipt. EX-1004 [0071].

Moreover, like the '303 Patent pizza example, although these exact words do not specifically appear in Figures 8A-8C and paragraphs [0067]-[0071], as explained below, Roundtree discloses to POSITAs that, before the voice connection between the calling customer and the called pizza restaurant is established, information regarding a previous transaction between the restaurant and the customer may be transmitted to the customer's mobile device over a data connection. EX-1003, ¶¶96-97. For example, in its pizza example, Roundtree describes that "the system may... save any or all displays, depending on user preferences" from the recently completed pizza ordering transaction, which POSITAs understood to mean saving the content that was displayed (*e.g.*, saving "order details" ("one large pepperoni pizza with extra sauce") for the recently

completed transaction as shown in FIG. 8C). EX-1004, [0071]. Additionally, in its pizza example, Roundtree describes that “the system may encode a token in the dialing string [for the caller’s ‘favorite pizza delivery establishment’] that indicates that the following dialed inputs are part of an enhanced data link identification[, *e.g.*,] a dialed string such as ‘1-800-749-9263*669’ may relate to retrieving enhanced content from URL ‘http://www.18007499263*669.’” EX-1004, [0069], [0067]. And, in its pizza example, Roundtree describes that “[t]he system may use some or all of the enhanced number lookup methods discussed herein” (EX-1004 [0068]), which POSITAs understood to include, for example, the customer’s mobile device intercepting the call to the pizza restaurant and, before a voice connection is made, launching a browser to the predetermined “http://www.18007499263*669” webpage via a data network connection that displays, based on the customer’s preferences, historical information about previous calls (*e.g.*, saved previously displayed content regarding prior transactions between the customer and the restaurant). EX-1004 [0067]-[0069], [0071], [0050], [0075], [0082]-[0083]; EX-1003, ¶97.

ii. Customer Service Call Center Example

Like the ’303 Patent, another of Roundtree’s examples of providing content to a caller and/or called party is in association with a telephone call between a subscriber and a customer service call center. EX-1004 FIGS. 11-14, [0080]-

[0093]. As explained below, like the '303 Patent's customer service call center example, Roundtree: (1) explicitly discloses presenting content to a subscriber caller and/or called customer service agent after a call's voice connection is established regarding a transaction being conducted during the voice connection, and before a call's voice connection is established regarding a previous transaction between the parties, and (2) discloses to POSITAs presenting content after the call's voice connection is terminated regarding a transaction conducted during the now-terminated voice connection. EX-1003, ¶¶98-104.

Specifically, in its customer service call center example, Roundtree discloses that, “[w]hile on a call with a subscriber”, in order to “quickly correct issues” during the call and without having to “ask [the subscriber] to call back on a land line”, a called customer service agent “can, from his or her desktop computer, send diagnostic commands over the air to [a calling subscriber's] mobile device” and, “[i]n response, the mobile device retrieves or gathers diagnostics and status information and sends them back to the agent's computer, via the network.” EX-1004 [0089]. Also, in this example, Roundtree discloses that, for each of these subscriber-call center transactions, “[t]he system may then relate the transmitted information to a unique identifier of the [subscriber's mobile] device and store the information in the database.” EX-1004, [0082]. Likewise, in this example, Roundtree discloses that “[t]he system may also resolve handset issues and record

how the matter was resolved.” EX-1004 [0088]. Then, “upon receipt of a unique [subscriber] identifier” of a mobile device of a calling subscriber for a subsequent telephone call between the parties, and “before a voice conversation occurs,” a call center representative may retrieve, from the database, “historical information about previous calls” with the subscriber. EX-1004 [0082]-[0083]. Accordingly, just like the ’303 Patent example, Roundtree does specifically describe, in its call center example, that, “before a voice conversation occurs”, a party to the call (here, the center’s representative) may receive, over a data connection, information regarding a previous transaction between the call center and the subscriber (*i.e.*, “historical information about previous calls”). EX-1004 [0082]-[0083], [0088]-[0090], FIG. 13; EX-1003, ¶¶99-100.

Moreover, like the ’303 Patent’s example, although these exact words do not specifically appear in Figures 11-14 and paragraphs [0080]-[0093], as explained below, Roundtree discloses to POSITAs that, after the voice connection between the subscriber and the call center agent is terminated, information regarding a transaction conducted between the agent and the subscriber during the now-terminated voice connection may be transmitted over a data connection to, and be displayed after receipt at, the agent’s computer and/or at the subscriber’s mobile device. EX-1003, ¶¶101-104.

For example, POSITAs understood Roundtree discloses that, after an agent of the called customer service call center “correct[ed] issues” with a calling subscriber’s mobile device (“handset”) “[w]hile on a call with [the] subscriber”, “[t]he system... record[ed] how the matter was resolved” in the database described in [0082], and after the call’s voice connection is terminated, the agent may retrieve information regarding this recently completed transaction from the database, and via the network, using his/her computer and, after receipt, display such information on such computer. EX-1004 [0082], [0088]-[0090], FIG. 13; EX-1003, ¶102.

Roundtree also describes, referring to FIG. 6B, for intercepted calls routed to a call center, the subscriber’s mobile device may “retrieve[] data or scripts from the network to address the subscriber’s support issue” and, if “the call center determines... no more items need to be processed, then the subscriber’s call ends.” EX-1004 [0051]-[0052]. Additionally, Roundtree describes, referring to FIG. 9, that, “[i]n block 940, the system may execute a script associated with the dialed number [e.g., customer service call center]... [t]he script may then end the voice call and begin displaying content to the user, as in block 950... [t]he script may output text, images or other content to a display screen of the user’s device.” EX-1004 [0074]. And, Roundtree describes, referring to FIG. 7A, for intercepted voice calls supporting data services [e.g., to a call center], the system may “download or

otherwise obtain content from... non-local databases 729 via a network 728”, “display content stored in... one or more remote databases”, and “may proceed from block 716 (when the system ends the voice call) directly to block 750 (when the system decides to continue... displaying enhanced data services).” EX-1004 [0063]-[0065]. Accordingly, Roundtree discloses to POSITAs that, after the voice connection between a calling subscriber and a called call center agent is terminated, a subscriber may download information regarding how his/her handset issue was resolved during the now-terminated call with the call center from a remote database and, after receipt, display it on the handset. EX-1004 [0088]-[0089], [0051]-[0052], [0063]-[0065], [0074], [0044]-[0045], FIG. 3; EX-1003, ¶¶103-104.

2. Detailed Application of Roundtree to the Challenged Claims

Claim 1

[1.0] A method of controlling presentation of content on a communication device, the method comprising:

To the extent the preamble is limiting, Roundtree describes a system and method for enhancing voice calls with data services. EX-1004 [0029]. Roundtree describes that the system may provide data services (*e.g.*, provide content to a user via a display on his/her mobile device) (1) upon receiving an indication of a voice call (*e.g.*, a dialed number), (2) during an ongoing voice call, and/or (3) after

ending the voice connection. EX-1004 [0029]-[0030]. For example, Roundtree describes that a user may call a party to place an order for an item, and the system may end the voice call and establish a data connection between the user and the called party in order for the called party to provide displayable content to the user to enable the user to place an order. EX-1004 [0032]. Further, Roundtree discloses that its system enables call interception methods to provide data services to voice calls having such capabilities, such as visually displayed content to a user [*a method of controlling presentation of content on a communication device*]. EX-1004 [0066]; EX-1003, ¶105.

[1.1] upon receipt of notification of initiation of a communication connection from a first device associated with a first party to a second device associated with a second party:

Roundtree discloses this limitation. Roundtree discloses receiving an indication of an initiated voice call, such as a user of a first device associated with a first party dialing a phone number of a second device associated with a second party [*upon receipt of notification initiation of a communication connection from a first device associated with a first party to a second device associated with a second party*]. EX-1004 [0029], [0073], FIG. 9. Roundtree discloses a number of examples describing an action triggered upon this receipt of an indication of an initiated voice call (*e.g.*, dialed phone number) such as, for example, determining if the dialed number supports data services and, if so, providing data services

(including displayable content) to the caller and/or called party over a data connection. EX-1004 [0029]-[0030], [0056]-[0058], [0062]-[0063]; EX-1003, ¶106.

[1.2] pausing establishment of the communication connection without soliciting action by the first party; and during said pausing, transmitting selected content toward the first device and/or the second device; and

Roundtree discloses several examples of this limitation. The '303 Patent specification does not use the word “pausing” (or “pause”); these words were included in the as-filed claims in October 2019, but were not included in the claims of a parent application. EX-1001, 1-2; EX-1002, 184-189. Instead, the '303 Patent uses the word “delay” and “delaying” when it describes “delaying” the voice connection to allow call processing, such as in order to determine and present the called party’s status, retrieve content to be presented, allow the caller to review content or choose an alternate course of action if the called party is not currently available, etc. EX-1001 12:1-6.

Roundtree discloses the identical concept, but does not use “pausing” or “delaying.” Instead, Roundtree describes intercepting a call to determine whether to provide enhanced content to the caller and/or called party. Roundtree includes a broad disclosure that before, during, or after completion of a voice call, it can determine if the voice call is to be enhanced. EX-1004 [0055], [0073]. Like the

'303 Patent, Roundtree uses the word completion of a voice call to mean the voice connection has been established. EX-1004 [0050], [0054]-[0055]. Thus, when Roundtree describes that the system determines whether the voice call is to be enhanced "before, [or] during... completion" of the call, this is during the time period after the system intercepts an initiated telephone call (*e.g.*, phone number dialed) but before the voice connection is made [*upon receipt...([1.1]) pausing establishment of the communication connection without soliciting action by the first party*]. EX-1004 [0055]; EX-1003, ¶¶107-108.

FIG. 6A illustrates an example of a routine for intercepting and displaying content on a caller's mobile device upon receiving an indication of a user-initiated voice call (*e.g.*, dialed phone number) and before establishment of a voice communication connection with a called party.

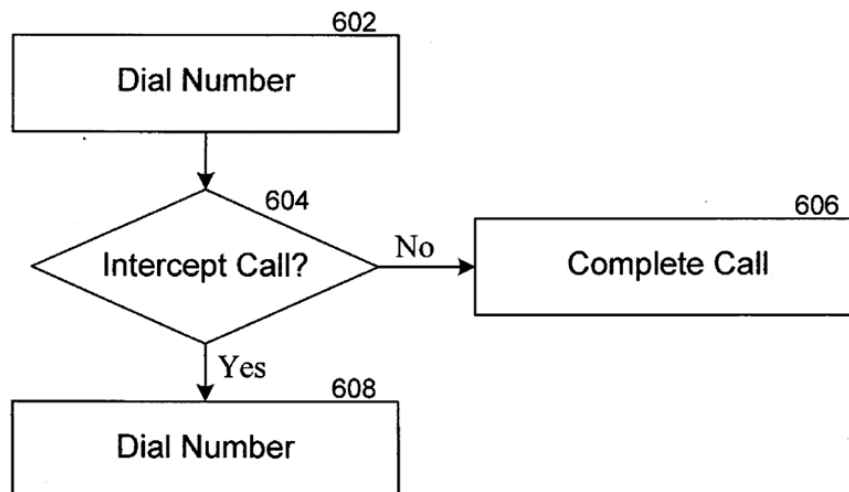


FIG. 6A

In block 602, a subscriber dials a customer service support number, *e.g.*, “611”, to access a customer support call center. The subscriber’s mobile device determines locally if the number dialed matches a number stored on the mobile device (block 604); if so, then the mobile device locally intercepts the call and performs actions at the mobile device (block 608). In one embodiment, the mobile device may intercept the call and display locally stored content (*e.g.*, series of help screens), or launch a browser to a predetermined webpage via a network connection.¹ If the number does not match, then the mobile device allows the call to be completed to a call center (block 606). EX-1004 [0050].

Roundtree further describes that, upon receiving an indication of a user-initiated voice call (*e.g.*, dialed phone number) and before a voice call is connected, the voice call can be intercepted, and Roundtree describes several different methods for determining whether the dialed number supports enhanced data capabilities. EX-1004 [0055]-[0062]. Specifically, Roundtree describes that

¹ Block 608 in FIG. 6A recites “Dial Number” (the same words recited inside block 602); however, the corresponding text for block 608 in EX-1004 [0050] specifies that block 608 is where actions are performed at the mobile device such as display locally stored content or launch a browser to a predetermined webpage. EX-1003, ¶110.

before, during, or after completion of the voice call, as in block 712, the system, in block 720, decides if the voice call is to be enhanced. The system proceeds through some or all of a number of different methods, such as in block 722, in determining whether or not to enhance a call. EX-1004 [0055], FIGS. 7A-7B.

Thus, Roundtree discloses that upon receiving an indication of a voice call (e.g., dialed number), intercepting the voice call to determine if the dialed number is associated with enhanced data services, and if so, providing the enhanced data services to a calling party user of a mobile device before a voice call is connected [*pausing establishment of the communication connection without soliciting action by the first party and during said pausing, transmitting... content toward the first device*]. EX-1004 [0029], [0052]-[0054], [0066], Claim 9. Roundtree further discloses if the voice call supports data services, displaying the enhanced services to the first party without requiring user input. The system may download or otherwise obtain content from a local database and one or more remote databases. EX-1004 [0063], [0056]-[0058] EX-1003, ¶¶109-112.

In a customer service call center example, Roundtree describes that a call center may contain a database relating unique identifiers for mobile devices and corresponding status or other reporting information. Upon receipt of a dialed number and appended unique identifier for the calling subscriber's mobile device at the call center, the system matches the received unique identifier with a similar

stored unique identifier and retrieves information about the subscriber's mobile device from a database. The retrieved information from the database may be diagnostic information retrieved, or received, from the subscriber's mobile device during previous calls with the call center [*selected content*, see limitation [1.4]]. EX-1004, [0082]-[0083], [0088]-[0090]. For example, Roundtree discloses that, while on a call with a subscriber, in order to quickly correct issues during the call and without having to ask the subscriber to call back on a land line, a call center agent can, from his/her desktop computer, send diagnostic commands over the air to the subscriber's mobile device and, in response, the mobile device retrieves or gathers diagnostics and status information and sends them back to the agent's computer, via the network. EX-1004 [0089]. Roundtree discloses that, for each of these subscriber-call center transactions, the system records how issues with a subscriber's mobile device were resolved by the call center (EX-1004, [0088]), and relates the transmitted information (from the subscriber's mobile device) to the unique identifier of the subscriber's mobile device and stores the information in the database. EX-1004, [0082], [0090]. Roundtree explains that customer service calls may be shorter and more effective as a result of representatives receiving information from the user identifiers, as they may be able to diagnose problems without receiving much information from users. For example, a service provider may modify or selectively determine what information to retrieve upon receipt of a

unique identifier. They may use historical information about previous calls, historical information about the device or caller, or may determine the information most useful to their representatives. EX-1004 [0083]. Thus, upon receipt of a unique identifier of a calling subscriber's mobile device, and before a voice conversation occurs, the system enables a representative at a called customer service center to receive, and display on the representative's computer, dynamically or recently updated information about the characteristics or status of the subscriber's mobile device (and/or associated subscriber) (including historical information about previous calls with the subscriber) *[pausing establishment of the communication connection without soliciting action by the first party and during said pausing, transmitting selected content toward... the second device, see limitation [1.4]]*. EX-1004 [0082]-[0083], [0088]-[0090]; FIG. 13; EX-1003, ¶¶112-115.

In another example, Roundtree describes enabling a user to place an order for an item from a second party (e.g., pizza restaurant). The first party is able to place the order via the first device (e.g., via the first device's display), send data about the order to the second party, and receive, from the second party, details of the transaction (e.g., the user's order, status of the ordered pizza, pizza delivery status). Roundtree describes this type of data can be exchanged as displayable content, between the caller and called party, and further describes that the displays

from the recently completed transaction can be saved depending on user preferences, which POSITAs understood to mean, saving the content that was displayed (*e.g.*, saving “order details” (“one large pepperoni pizza with extra sauce”) for the recently completed transaction as shown in FIG. 8C). EX-1004 [0032], [0071]; EX-1003, ¶116. Additionally, in its pizza example, Roundtree describes that the system may encode a token in the dialing string for the caller’s favorite pizza delivery establishment that indicates that the following dialed inputs are part of an enhanced data link identification, *e.g.*, a dialed string such as 1-800-749-9263*669 may relate to retrieving enhanced content from URL http://www.18007499263*669. EX-1004, [0069], [0067]. And, in its pizza example, Roundtree describes that the system may use some or all of the enhanced number lookup methods discussed herein (EX-1004 [0068]), which POSITAs understood to include, for example, using the architecture described in FIG. 6A (EX-1004 [0050]), the calling customer’s mobile device intercepting the telephone call to the pizza restaurant and, before a voice connection is made, launching a browser to the predetermined “http://www.18007499263*669” webpage via a data network connection that displays, based on the customer’s preferences, the customer’s previous orders for pizza from this restaurant to allow the caller to select a pizza to reorder [*pausing establishment of the communication connection without soliciting action by the first party and during said pausing, transmitting*

selected content toward the first device, see limitation [1.4]]. EX-1004 [0067]-[0069], [0071], [0082]-[0083]; EX-1003, ¶117.

[1.3] after one of the first party and the second party terminates the communication connection, transmitting additional content toward the first device and/or the second device;

Roundtree provides several examples of this limitation. In its pizza example, Roundtree describes that, after the calling customer [*first party*] or the called pizza restaurant [*second party*] ends the voice call, the restaurant may transmit, over a data connection, details of the pizza-ordering transaction conducted over the recently-terminated voice connection between the calling customer and called restaurant (*i.e.*, customer's order, status of the ordered pizza, and delivery status), which are displayed on the customer's mobile device after receipt [*after one of the first party and the second party terminates the communication connection, transmitting additional content toward the first device, see limitation [1.5]].* EX-1004 [0071]; EX-1003 ¶¶118-119.

Additionally, in a customer service call center example, POSITAs understood Roundtree discloses that, after an agent of the called call center “correct[ed] issues” with a calling subscriber's mobile device (“handset”) “[w]hile on a call with [the] subscriber” (EX-1004 [0089]), “[t]he system... record[ed] how the matter was resolved” in a database relating unique identifiers for mobile devices and corresponding status or other information about the mobile device

(EX-1004 [0088], [0082]), and after the voice connection of the call is terminated, the agent may retrieve information regarding this recently completed transaction from the database, and via the network, using the agent's computer [*second device*] and, after receipt, display such information on such computer (e.g., EX-1004 [0090], FIG. 13) [*after one of the first party and the second party terminates the communication connection, transmitting additional content toward... the second device, see limitation [1.5]*]. EX-1004 [0082], [0088]-[0090], FIG. 13; EX-1003, ¶120.

Roundtree also describes, referring to FIG. 6B, for intercepted calls routed to a call center, the subscriber's mobile device may retrieve data or scripts from the network to address the subscriber's support issue and, if the call center determines no more items need to be processed, then the subscriber's call ends. EX-1004 [0051]-[0052]. Additionally, Roundtree describes that, referring to FIG. 9, the system may execute a script associated with the dialed number (e.g., call center), the script may then end the voice call and begin displaying content to the user, and the script may output text, images or other content to a display screen of the user's device. EX-1004 [0074]. And, Roundtree describes, referring to FIG. 7A, for intercepted voice calls supporting data services (e.g., to a call center), the system may download content from remote databases via a network, display content stored in a remote database, and "may proceed from block 716 (when the system ends the

voice call) directly to block 750 (when the system decides to continue... displaying enhanced data services).” EX-1004 [0063]-[0065]. Accordingly, Roundtree discloses to POSITAs that, after the voice connection between a calling subscriber and a called call center agent is terminated, a subscriber may download information regarding how his/her handset issue was resolved during the now-terminated call with the call center from a remote database and, after receipt, display it on the handset [*after one of the first party and the second party terminates the communication connection, transmitting additional content toward the first device, see limitation [1.5]*]. EX-1004 [0088]-[0089], [0051]-[0052], [0063]-[0065], [0074]; EX-1003, ¶121.

[1.4] wherein the selected content comprises information regarding a previous transaction between the first party and the second party;

Roundtree discloses several examples of this limitation. As described regarding limitation [1.2] for one of Roundtree’s customer service call center examples, Roundtree discloses that, upon receipt of a unique identifier of a calling subscriber’s mobile device [*first party*], and before a voice conversation occurs, the system enables a representative at a called call center [*second party*] to select and retrieve, from a database and via a network connection, and display on the representative’s computer, dynamically or recently updated information about the characteristics or status of the calling subscriber’s mobile device (and/or associated

subscriber), including historical information about previous calls with the subscriber such as records of how issues with the subscriber's mobile device were previously resolved by the call center and diagnostic information received from the subscriber's mobile device during previous calls with the call center [*the selected content comprises information regarding a previous transaction between the first party and the second party*]. EX-1004, [0082]-[0083], [0088]-[0089]; EX-1003, ¶122.

As described regarding limitation [1.2] for Roundtree's pizza example, Roundtree describes that the displays from the recently completed pizza ordering transaction can be saved depending on user preferences, which POSITAs understood to mean, saving the content that was displayed (*e.g.*, saving "order details" ("one large pepperoni pizza with extra sauce") for the recently completed transaction as shown in FIG. 8C). EX-1004 [0071]; EX-1003, ¶123. As also described regarding limitation [1.2] for Roundtree's pizza example, Roundtree describes that the system may encode a token in the dialing string for the customer's favorite pizza delivery establishment that indicates that the following dialed inputs are part of an enhanced data link identification, *e.g.*, a dialed string such as 1-800-749-9263*669 may relate to retrieving enhanced content from URL http://www.18007499263*669. EX-1004, [0069], [0067]. And, as described regarding limitation [1.2] for Roundtree's pizza example, Roundtree describes that

the system may use some or all of the enhanced number lookup methods discussed in Roundtree (EX-1004 [0068]), which POSITAs understood to include, for example, using the architecture described in FIG 6A (EX-1004 [0050]), the calling customer's mobile device intercepting the telephone call to the pizza restaurant and, before a voice connection is made, launching a browser to the predetermined "http://www.18007499263*669" webpage via a data network connection that displays, based on the customer's preferences, the customer's previous orders for pizza from this restaurant to allow the calling customer to select a pizza to reorder [*the selected content comprises information regarding a previous transaction between the first party and the second party*]. EX-1004 [0067]-[0069], [0071], [0050], [0082]-[0083]; EX-1003, ¶123. A POSITA understood that Roundtree teaches that previous orders for pizza placed by the customer would be stored in a database, and accessible and displayable on the calling customer's mobile device via the "http://www.18007499263*669" webpage, as historical information about previous calls. *Id.*.

[1.5] wherein the additional content comprises information regarding a new transaction conducted between the first party and the second party during the communication connection; and

Roundtree discloses several examples of this limitation. As described regarding limitation [1.3] for Roundtree's pizza example, the content specifically described by Roundtree in this example as being transmitted and displayed to the

customer caller [*first party*] includes, after “end[ing] the voice call”, content “based on status of the user’s order (such as provid[ing] a display showing the order as ‘in preparation,’ in transit, ‘delivered,[’] ‘transaction complete,’ and so on).” EX-1004 FIG. 8C, [0071]. Accordingly, Roundtree discloses in this pizza example, that, after “end[ing] the voice call”, the pizza restaurant may transmit, over a data connection, details of the new pizza-ordering transaction conducted over the now-terminated voice connection between the calling customer [*first party*] and called pizza restaurant [*second party*] (*i.e.*, the customer’s order, status of the ordered pizza, and delivery status) [*the additional content comprises information regarding a new transaction conducted between the first party and the second party during the communication connection*], which are displayed on the customer’s mobile device [*first device*] after receipt. *Id.*; EX-1003, ¶124.

As described regarding limitation [1.3] for one of Roundtree’s customer service call center examples, POSITAs understood Roundtree discloses that, after an agent of the called call center [*second party*] “correct[ed] issues” with a calling subscriber’s [*first party’s*] mobile device (“handset”) “[w]hile on a call with [the] subscriber” (EX-1004 [0089]), “[t]he system... record[ed] how the matter was resolved” in a database relating unique identifiers for mobile devices and corresponding status or other information about the mobile device (EX-1004 [0088], [0082]), and after the voice connection of the call is terminated, the agent

may retrieve information regarding this recently completed transaction from the database, and via the network, using the agent's computer [*second device*] and, after receipt, display such information on such computer (*e.g.*, EX-1004 [0090], FIG. 13) [*the additional content comprises information regarding a new transaction conducted between the first party and the second party during the communication connection*]. EX-1004 [0082], [0088]-[0089]; EX-1003, ¶125.

As also described regarding limitation [1.3] for one of Roundtree's customer service call center examples, Roundtree describes, referring to FIG. 6B, for intercepted calls routed to a call center, the subscriber's mobile device may retrieve data or scripts from the network to address the subscriber's support issue and, if the call center determines no more items need to be processed, then the subscriber's call ends. EX-1004 [0051]-[0052]. Additionally, Roundtree describes, referring to FIG. 9, that the system may execute a script associated with the dialed number (*e.g.*, call center), the script may then end the voice call and begin displaying content to the user, and the script may output text, images or other content to a display screen of the user's device. EX-1004 [0074]. And, Roundtree describes, referring to FIG. 7A, for intercepted voice calls supporting data services (*e.g.*, to a call center), the system may download or otherwise obtain content from remote databases via a network, display content stored in a remote database, and "may proceed from block 716 (when the system ends the voice call) directly to block 750

(when the system decides to continue... displaying enhanced data services).” EX-1004 [0063]-[0065]. Accordingly, as described regarding limitation [1.3], Roundtree discloses to POSITAs that, after the voice connection between a calling subscriber and a called call center agent is terminated, a subscriber may download information regarding how his/her handset issue was resolved during the now-terminated call with the call center [*the additional content comprises information regarding a new transaction conducted between the first party and the second party during the communication connection*] from a remote database and, after receipt, display it on the subscriber’s handset. EX-1004 [0088]-[0089], [0051]-[0052], [0063]-[0065], [0074]; EX-1003, ¶126.

[1.6] wherein the first device and/or the second device display the additional content after receipt.

As described regarding limitation [1.5], in Roundtree’s pizza example, Roundtree discloses that the calling customer’s mobile device [*first device*] displays the additional content after receipt. EX-1004 [0071]. And, as described regarding limitation [1.5], in its call center examples, Roundtree discloses to POSITAs that the computer of the call center agent that resolved issues with the calling subscriber’s handset in the recently completed transaction conducted during the now-terminated voice connection of the call [*second device*], and/or the subscriber’s handset [*first device*], display the additional content after receipt. EX-

1004 [0082], [0088]-[0090], FIG. 13, [0051]-[0052], [0063]-[0065], [0074]; EX-1003, ¶127.

Claim 2

[2.1] The method of claim 1, wherein pausing establishment of the communication connection comprises: transmitting to the first device a signal indicating that the communication connection should be paused;

Roundtree discloses this limitation. As shown in FIG. 12, if a subscriber-dialed number on the mobile device [*first device*] (block 1201) matches a locally stored number, then the SIM card on the mobile device intercepts [*pausing establishment of the communication connection*] and redirects the call to the mobile device (block 1802) using SMS, supplementary service control strings, network and mobile device based control commands, and others. EX-1004 [0085]. The SIM card may send a command via SMS or other protocol to the mobile device to launch a support application or launch a browser to a URL in order to provide enhanced content to the mobile device [*transmitting to the first device a signal indicating that the communication connection should be paused*]. EX-1004 [0086]. Thus, POSITAs understood that Roundtree discloses intercepting the establishment of the communication connection in order to provide enhanced content to the mobile device, thus delaying the communication connection. *Id.*; EX-1003, ¶128.

[2.2] wherein, in response to receipt of the signal, the first device initiates a delay in establishing the communication connection.

Roundtree discloses that the mobile device runs a script, and launches a support application or browser in response to the command from the SIM card, which delays establishing the communication connection [*in response to receipt of the signal, the first device initiates a delay in establishing the communication connection*]. EX-1004 [0085]-[0086]; EX-1003, ¶129.

Claim 3

[3.1] The method of claim 1, wherein: the communication connection is a call; and

Roundtree discloses initiating a *call* by the user of a first device associated with a first party dialing a phone number of a second device associated with a second party. EX-1004 [0073]; FIGS. 6, 7A, 9, 12; *see also* limitations [1.0], [1.1].

[3.2] pausing establishment of the communication connection comprises instructing the first device to delay completion of dialing of the call.

Roundtree discloses this limitation for the reasons discussed regarding limitation [2.1]-[2.2]. Roundtree discloses that, if the dialed number matches, a SIM card on the subscriber's mobile device intercepts and re-directs the call to the mobile device, and sends a command via SMS or other protocol to the mobile device to launch a support application or launch a browser to a URL in order to provide enhanced content to the mobile device [*instructing the first device to delay*

completion of dialing of the call]. EX-1004 [0085]-[0086], FIG. 12. Thus, POSITAs understood that Roundtree discloses intercepting the establishment of the communication connection in order to provide enhanced content to the mobile device, thus instructing the mobile device to delay completion of dialing the call. *Id.*; EX-1003, ¶131.

Claim 4

[4.1] The method of claim 1, wherein pausing establishment of the communication connection comprises: transmitting to a call server associated with the first device a signal indicating that the communication connection should be paused;

Roundtree discloses this limitation. When a call placed by a mobile device is to a call center (of which the caller is a subscriber), the call center uses an interactive voice recognition system (IVRS) to determine if the subscriber's call should be intercepted. EX-1004, [0053], [0051]. The call center utilizes the IVRS to communicate with the subscriber, whereby the call would be routed to the IVRS (and not to the call center) to determine whether the call should be intercepted. EX-1004, [0053], [0051], [0050]. Roundtree also discloses that the call center includes a software application, running on a processor, which POSITAs understood to be a call server, to direct mobile equipment. EX-1004 [0053]; EX-1003, ¶132. Accordingly, Roundtree discloses to POSITAs that the IVRS transmits a signal to the call server containing information indicating that the call should be intercepted and, if the call server determines that the call should be

intercepted in response to receiving the information in the IVRS signal, then the call server redirects the call back to the mobile device from the IVRS for local processing (block 620) [*pausing establishment of the communication connection comprises: transmitting to a call server... a signal indicating that the communication connection should be paused*]. EX-1004 [0053], [0051], [0050]; EX-1003, ¶133. A POSITA also understood that, since Roundtree discloses that the calling party is a subscriber of the called call center's services (including enhanced data services for the subscriber's mobile device [*first device*]), Roundtree's call center call server is "*associated with the first device.*" *Id.*

[4.2] wherein, in response to receipt of the signal, the call server initiates a delay in completing the establishment of the communication connection.

Roundtree discloses this limitation because, as described for limitation [4.1], in response to receipt of the information in the IVRS signal, the call server redirects the call back to the mobile device from the IVRS for local processing. EX-1004 [0053], [0051], [0050]. Thus, by routing the subscriber's call back to the mobile device from the IVRS, which is done in response to the call server's receipt of the information in the IVRS signal, the call server initiates a delay in completing the establishment of a voice connection between the subscriber and the customer support call center [*in response to receipt of the signal, the call server initiates a*

delay in completing the establishment of the communication connection]. Id.; EX-1003, ¶134.

Claim 5

[5.1] The method of claim 1, wherein: the communication connection is a call; and

Roundtree discloses this limitation for the reasons discussed regarding limitation [3.1].

[5.2] pausing establishment of the communication connection comprises instructing a call server associated with the first device to delay signaling of the call toward the second device.

Roundtree discloses this limitation for the reasons discussed regarding limitations [4.1]-[4.2]. A POSITA understood that the IVRS signal to the call server (and information contained therein) is effectively *instructing a call server associated with the first device to delay signaling of the call toward the second device*, because the received signaling information results in a determination that the voice call should be intercepted, and causes the call server to further delay signaling of the call toward the called call center device [*second device*] by re-directing the call back to the mobile device from the IVRS for local processing. EX-1004 [0053], [0051], [0050]; EX-1003, ¶136.

Claim 6

The method of claim 1, wherein the selected content is selected by the first party.

Roundtree discloses this limitation. For example, as described regarding limitations [1.2] and [1.4] for Roundtree's pizza example, Roundtree discloses to POSITAs that the selected content on the predetermined "http://www.18007499263*669" webpage, that is stored in a database, and accessible and displayable via a data network connection before a voice connection is made between the calling customer and called pizza restaurant,—i.e., the customer's saved previous orders for pizza from this restaurant—, is based on the calling customer's preferences [*the selected content is selected by the first party*]. EX-1004 [0067]-[0069], [0071], FIG. 8C, [0050]-[0052] (FIG. 6A); EX-1003, ¶¶137-138.

Claim 7

The method of claim 1, wherein the selected content is selected by the second party.

Roundtree discloses this limitation. As discussed regarding limitations [1.2] and [1.4], in one of Roundtree's customer service call center examples, Roundtree discloses that calls to a customer service call center include a user identifier which the call center agent [*second party*] can use to determine what information to retrieve and display upon receipt of a unique identifier of a calling subscriber's

mobile device (and before a voice connection is made), including, *e.g.*, historical information about previous calls between the subscriber and the call center [*the selected content is selected by the second party*]. EX-1004 [0082]-[0083], [0088]-[0089]; FIG. 13, [0090]; EX-1003, ¶¶139-140.

Claim 8

The method of claim 1, wherein the selected content is selected by a call controller operating in a path of communication between the first device and the second device.

Roundtree discloses this limitation. The '303 Patent discloses that the “call controller” controls presentation of content to the mobile phone and is also known as a call server. EX-1001 12:9-11.

Roundtree discloses that, if the call center determines the initiated voice call—*i.e.*, intercepted call for which the voice connection is not yet established/completed—supports data services, the system displays the enhanced services to the mobile device. The system may check for content and may download content and display content from local or remote databases [*the selected content is selected by a call controller operating in a path of communication between the first device and the second device*]. EX-1004 [0063]; *see also* limitations [1.2], [1.4] (including examples of “selected content”). Roundtree also discloses that the call center includes a software application running on a processor, which the '303 Patent refers to as a call controller, to direct mobile

devices, including routing a call from and back to a mobile device without, for example, establishing a voice connection between a calling subscriber's mobile device [*first device*] and a call center agent's computer [*second device*]. EX-1004 [0053], [0051], FIG. 2, [0035]. Thus, POSITAs understood that the call center includes a *call controller*. *Id.*; EX-1003, ¶142.

Claim 9

The method of claim 1, wherein the selected content is displayed one or more of: during said pausing; after the communication connection is established; and after the communication connection is terminated.

Roundtree discloses this limitation for the reasons discussed regarding limitations [1.2] and [1.4]. Roundtree discloses providing enhanced data services to the first device before, during, after completion of, or after termination of, a voice call, which encompasses each of the three recited time periods. EX-1004 [0055], [0072]-[0074].

As discussed regarding limitations [1.2] and [1.4], in a customer service call center example, Roundtree discloses that, upon receipt of a unique identifier of a mobile device of a calling subscriber [*first party*], and before a voice conversation occurs [*during said pausing*], the system enables a representative at a called call center [*second party*] to retrieve, from a database and via a network connection, and display on the representative's computer [*second device*], the selected content (historical information about previous calls with the subscriber) [*the selected*

content is displayed... during said pausing]. EX-1004, [0082]-[0083], [0088]-[0090]; EX-1003, ¶144. Roundtree also discloses to POSITAs displaying (and/or continuing to display) the selected content on the second device after establishment/completion of the voice connection. *Id.*

As discussed regarding limitations [1.2] and [1.4], in the pizza example, Roundtree discloses to POSITAs that the selected content—*i.e.*, the calling customer’s saved previous orders for pizza from the called pizza restaurant—would be stored in a database, and accessible and displayable on the calling customer’s mobile device [*first device*], before a voice connection is made, via the “http://www.18007499263*669” webpage, as historical information about previous calls [*the selected content is displayed... during said pausing*]. EX-1004 [0067]-[0069], [0071], [0050]-[0052] (FIG. 6A), [0083]; EX-1003, ¶145. Roundtree also discloses to POSITAs displaying (and/or continuing to display) the selected content on the first device after establishment/completion of the voice call. *Id.*

Claim 10

The method of claim 1, wherein the selected content further comprises information regarding a prospective new transaction between the first party and the second party.

Roundtree discloses several examples for this limitation. For example, Roundtree discloses, in FIGS. 5 and 6A, a calling subscriber [*first party*] can

contact customer support by dialing “611.” EX-1004, [0049]-[0050]. If the subscriber’s mobile device locally determines that the dialed number matches a stored number, then the mobile device locally intercepts the call—*i.e.*, before a voice connection is established—and displays locally stored content (e.g., series of help screens, list of top issues or questions 500, which may answer common customer support questions), or launches a browser to a predetermined webpage [*the selected content further comprises information regarding a prospective new transaction between the first party and the second party*]. EX-1004, [0049]-[0050]; EX-1003, ¶¶146-147.

As another example, if a subscriber-dialed number matches a locally stored number (*e.g.*, for a customer service call center), then the SIM card on the mobile device intercepts [*i.e.*, before a voice connection is established, *see* limitation [1.2]] and redirects the call to the mobile device. EX-1004 [0085], FIG. 12. The SIM card may send a command to the mobile device to launch a support application, which may locally perform diagnostic scripts to gather user, device, and network data, which may be displayed on the mobile device and collected by the call center agent, via scripts, over the air, without asking the subscriber, which enables the agent to receive dynamically or recently updated information about the characteristics or status of a mobile device (and/or associated calling subscriber) before a voice conversation occurs [*the selected content further comprises*

information regarding a prospective new transaction between the first party and the second party]. EX-1004, [0086]-[0087], [0082]; EX-1003, ¶148.

And, as discussed regarding limitations [1.2] and [1.4] for Roundtree's pizza example, Roundtree describes that the system may use some or all of the enhanced number lookup methods discussed in Roundtree (EX-1004 [0068]), which POSITAs understood to include, for example, using the architecture described in FIG 6A (EX-1004 [0050]), the calling customer's mobile device intercepting the telephone call to the pizza restaurant and, before a voice connection is made, launching a browser to the predetermined "http://www.18007499263*669" webpage via a network connection that displays, based on the customer's (and/or restaurant's) preferences, the restaurant's saved available pizza sizes and types of pizza toppings (which Roundtree equates to a menu at the restaurant) [*the selected content further comprises information regarding a prospective new transaction between the first party and the second party*]. EX-1004 [0069]-[0071], FIG. 8B, [0050]. A POSITA understood that Roundtree teaches that the restaurant's available pizza sizes and types of pizza toppings would be stored in a database, and accessible and displayable on the calling customer's mobile device via the "http://www.18007499263*669" webpage, to shorten, and make more effective, the not-yet-established voice call between the customer and the restaurant. *Id.*; EX-1004 [0082]-[0083]; EX-1003, ¶149.

Claim 11

The method of claim 1, wherein the selected content further comprises content displayed on one or more of the first device and the second device at the time of initiation of the communication connection.

Roundtree discloses this limitation as discussed regarding Claims 9 and 10, and limitations [1.2] and [1.4].

Claim 12

The method of claim 1, further comprising, during said pausing: transmitting to the first device a menu for routing the communication connection within an organization comprising the second party; wherein the first device displays the menu after receipt.

Roundtree discloses, in FIG. 5 (and associated text), a display, of a calling customer's mobile device [*first device*], of a menu for routing the communication connection within an organization of the call center [*second party*] including, menu selections, pull-down menus or entries allowing one or more options to be selected, hypertext links. EX-1004 [0047]. The options include routing the data portion of the call to take different actions associated with the call center, e.g.,

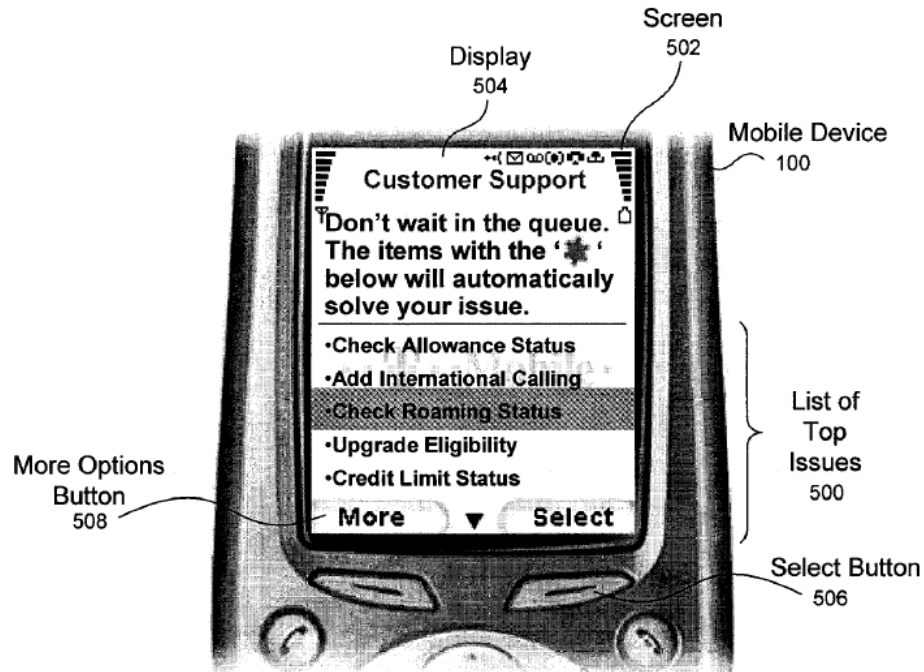


FIG. 5

EX-1004 [0047], [0048], FIG. 5. Roundtree discloses that the above-identified menu of routing options is received and then displayed, on the display of the calling customer's mobile device [*first device*], after the calling customer's call to a customer service support center is intercepted and before a voice connection is established [*during said pausing*] as discussed regarding limitations [1.1] and [1.2].

EX-1004 [0049-[0050]; FIG. 6A. Roundtree also discloses that the call center includes a software application, running on a processor, which POSITAs understood to be a call server, to direct mobile equipment so that it automatically processes requests it receives from mobile devices. EX-1004, [0053], FIG. 2, [0035]; EX-1003, ¶151.

Roundtree's above-identified disclosure that the data portion of the call can be routed to the call server at the call center for action, and within the organization of the call center, is consistent with the disclosure of the '303 Patent that describes the data channel may be re-routed to the call controller, and is used to convey content to the telephones and to convey other data to the call server as necessary (e.g., to upload data from a telephone, activate a control within presented content). EX-1001 4:15-20; 22:1-2; EX-1003, ¶152.

Claim 13

[13.0] A non-transitory computer-readable medium storing instructions that, when executed by a processor, cause the processor to perform a method of controlling presentation of content on a communication device, the method comprising:

To the extent the preamble is limiting, Roundtree discloses that mobile device and network-based service include computer-readable medium storing instructions that, when executed by a processor, cause the processor to perform the method recited below (and in claim 1). EX-1004 FIG. 2, [0034]-[0036], [0116]; *see also* limitation [1.0].

[13.1] upon receipt of notification of initiation of a communication connection from a first device associated with a first party to a second device associated with a second party:

Roundtree discloses this limitation as discussed regarding limitation [1.1].

[13.2] pausing establishment of the communication connection without soliciting action by the first party; and during said

pausing, transmitting selected content toward the first device and/or the second device; and

Roundtree discloses this limitation as discussed regarding limitation [1.2].

[13.3] after one of the first party and the second party terminates the communication connection, transmitting additional content toward the first device and/or the second device;

Roundtree discloses this limitation as discussed regarding limitation [1.3].

[13.4] wherein the selected content comprises information regarding a previous transaction between the first party and the second party;

Roundtree discloses this limitation as discussed regarding limitation [1.4].

[13.5] wherein the additional content comprises information regarding a new transaction conducted between the first party and the second party during the communication connection; and

Roundtree discloses this limitation as discussed regarding limitation [1.5].

[13.6] wherein the first device and/or the second device display the additional content after receipt.

Roundtree discloses this limitation as discussed regarding limitation [1.6].

Claim 14

[14.0] Apparatus for controlling presentation of content on a communication device external to the apparatus, the apparatus comprising: one or more processors; and memory storing instructions that, when executed by the one or more processors, cause the apparatus to:

To the extent the preamble is limiting, Roundtree discloses that mobile device and network-based service include one or more processors and memory

storing instructions that, when executed by the one or more processors, cause the apparatus to perform the method recited below (and in claim 1). EX-1004 FIG. 2, [0034]-[0036], [0116]; *see* limitations [1.0], [13.0].

[14.1] upon receipt of notification of initiation of a communication connection from a first device associated with a first party to a second device associated with a second party;

Roundtree discloses this limitation as discussed regarding limitation [1.1].

[14.2] pause establishment of the communication connection without soliciting action by the first party; and during said pausing, transmit selected content toward the first device and/or the second device; and

Roundtree discloses this limitation as discussed regarding limitation [1.2].

[14.3] after one of the first party and the second party terminates the communication connection, transmit additional content toward the first device and/or the second device;

Roundtree discloses this limitation as discussed regarding limitation [1.3].

[14.4] wherein the selected content comprises information regarding a previous transaction between the first party and the second party;

Roundtree discloses this limitation as discussed regarding limitation [1.4].

[14.5] wherein the additional content comprises information regarding a new transaction conducted between the first party and the second party during the communication connection; and

Roundtree discloses this limitation as discussed regarding limitation [1.5].

[14.6] wherein the first device and/or the second device display the additional content after receipt.

Roundtree discloses this limitation as discussed regarding limitation [1.6].

Claim 15

[15.1] The apparatus of claim 14, wherein pausing establishment of the communication connection comprises: transmitting to the first device a signal indicating that the communication connection should be paused;

Roundtree discloses this limitation as discussed regarding limitation [2.1].

[15.2] wherein, in response to receipt of the signal, the first device initiates a delay in establishing the communication connection.

Roundtree discloses this limitation as discussed regarding limitation [2.2].

Claim 16

[16.1] The apparatus of claim 14, wherein: the communication connection is a call; and

Roundtree discloses this limitation as discussed regarding limitation [3.1].

[16.2] pausing establishment of the communication connection comprises instructing the first device to delay completion of dialing of the call.

Roundtree discloses this limitation as discussed regarding limitation [3.2].

Claim 17

[17.1] The apparatus of claim 14, wherein pausing establishment of the communication connection comprises: transmitting to a call server associated with the first device a signal indicating that the communication connection should be paused;

Roundtree discloses this limitation as discussed regarding limitation [4.1].

[17.2] wherein, in response to receipt of the signal, the call server initiates a delay in completing the establishment of the communication connection.

Roundtree discloses this limitation as discussed regarding limitation [4.2].

Claim 18

[18.1] The apparatus of claim 14, wherein: the communication connection is a call; and

Roundtree discloses this limitation as discussed regarding limitation [5.1].

[18.2] pausing establishment of the communication connection comprises instructing a call server associated with the first device to delay signaling of the call toward the second device.

Roundtree discloses this limitation as discussed regarding limitation [5.2].

Claim 19

The apparatus of claim 14, wherein the selected content is selected by the first party.

Roundtree discloses this limitation as discussed regarding Claim 6.

Claim 20

The apparatus of claim 14, wherein the selected content is selected by the second party.

Roundtree discloses this limitation as discussed regarding Claim 7.

Claim 21

The apparatus of claim 14, wherein the selected content is selected by a call controller operating in a path of communication between the first device and the second device.

Roundtree discloses this limitation as discussed regarding Claim 8.

Claim 22

The apparatus of claim 14, wherein the selected content is displayed one or more of: during said pausing; after the communication connection is established; and after the communication connection is terminated.

Roundtree discloses this limitation as discussed regarding Claim 9.

Claim 23

The apparatus of claim 14, wherein the selected content further comprises information regarding a prospective new transaction between the first party and the second party.

Roundtree discloses this limitation as discussed regarding Claim 7.

Claim 24

The apparatus of claim 14, wherein the selected content further comprises content displayed on one or more of the first device and the second device at the time of initiation of the communication connection.

Roundtree discloses this limitation as discussed regarding Claim 11.

Claim 25

The apparatus of claim 14, wherein the method further stores instructions that, when executed by the one or more processors, further cause the apparatus to: transmit to the first device a menu for routing the communication connection within an organization comprising the second party; wherein the first device displays the menu after receipt.

Roundtree discloses this limitation as discussed regarding Claim 12.

VI. MANDATORY NOTICES UNDER 37 C.F.R. §42.8

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

Petitioner certifies that the real party-in-interest in this Petition is Cisco Systems, Inc.

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

1. Judicial Matters

To Petitioners' knowledge, the '303 Patent is involved in the following pending litigation:

Case Heading	Number	Tribunal	Date
<i>Vusura Technology LLC v. Cisco Systems, Inc.</i>	2:25-cv-00871	E.D. Tex.	8/25/2025

2. Administrative Matters

As of this Petition's filing and to the best knowledge of Petitioner, the '303 Patent has not been subject to any *inter partes* reviews, reissues or reexaminations.

3. Related Patents

To the best knowledge of Petitioner, the '303 Patent claims priority, as a continuation, to the following U.S. patents: U.S. Patent Nos. 8,577,000, 8,804,930, 9,264,540, 9,819,812 and 10,511,942. To the best knowledge of Petitioner, the following U.S. patents and patent applications claim priority, as continuations, to the '303 Patent: U.S. Patent Nos. 12,141,832, 12,136,103, 12,299,710, 12,260,426 and 12,288,221, and U.S. Patent Application Serial No. 19/172,789.

C. Lead and Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3)

Lead Counsel	Back-Up Counsel
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D. Service Information 37 C.F.R. §42.8(b)(4)

Service via hand-delivery may be made at the postal mailing address of lead counsel. Petitioner consents to service by e-mail.

E. Payment of Fees – 37 C.F.R. §42.103

The required fee is being paid using the Patent Review Processing System.

VII. CONCLUSION

Petitioner requests the Board institute an IPR and cancel the Challenged Claims.

Respectfully submitted,

DUANE MORRIS LLP

Dated: February 24, 2026

/ Patrick D. McPherson /

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CERTIFICATE OF COMPLIANCE WITH WORD COUNT

Pursuant to 37 C.F.R. §42.24 *et seq.*, the undersigned certifies that this document complies with the type-volume limitations. This document contains 13,903 words as calculated by the “Word Count” feature of Microsoft Word 365, the word processing program used to create it.

Pursuant to 37 C.F.R. §42.24(d), this word count excludes the table of contents, table of authorities, mandatory notices under §42.8, certificate of service, and certificate of word count.

Dated: February 24, 2026

/ Patrick D. McPherson /

Patrick D. McPherson

Reg. No. 46,255

Lead Counsel for Petitioner

Petition for *Inter Partes* Review of U. S. Patent No. 11,227,303

CERTIFICATION OF SERVICE ON PATENT OWNER

Pursuant to 37 C.F.R. §§42.6(e), 42.8(b)(4) and 42.105, the undersigned certifies that on February 24, 2026, a complete and entire copy of this Petition for *Inter Partes* Review of U.S. Patent 11,227,303 and all supporting exhibits were served via Federal Express, postage prepaid, to the correspondence address of record for the '303 Patent:

Date of service February 24, 2026

Manner of service FEDERAL EXPRESS

Documents served Petition for *Inter Partes* Review of U.S. Patent No. 11,227,303; Petitioner's Exhibit List; All Exhibits; Petitioner's Power of Attorney.

Persons served 22200 - Park, Vaughan, Fleming
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