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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

SOFTVIEW LLC,
Patent Owner.

Case No. IPR2026-00282
U.S. Patent No. 9,519,729

PATENT OWNER'S PRELIMINARY RESPONSE

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2002	Fifth Amended Docket Control Order, <i>SoftView, LLC v. Samsung Electronics Co., Ltd.</i> , Case No. 2:25-cv-00246, Dkt. No. 60 (E.D. Tex. Mar. 19, 2026)
2003	Second Amended Complaint, <i>SoftView LLC v. Apple Inc. et al.</i> , No. 10-389, Dkt. No. 108 (D. Del. Sept. 30, 2011)
2004	DocketNavigator Time to Trial Statistics for Judge Gilstrap (as of April 5, 2026)
2005	Joint Claim Construction and Prehearing Statement, <i>SoftView, LLC v. Samsung Electronics Co., Ltd.</i> , Case No. 2:25-cv-00246, Dkt. No. 57 (E.D. Tex. Mar. 4, 2026)
2006	Defendants' Joint P.R. 3-3 and 3-4 Disclosures, <i>SoftView, LLC v. Samsung Electronics Co., Ltd.</i> , Case No. 2:25-cv-00246 (E.D. Tex. Aug. 20, 2025)
2007	Appendix A to Samsung's P.R. 3-3 Invalidity Contentions (E.D. Tex. Aug. 20, 2025)
2008	Defendants' Subject Matter Eligibility Contentions (E.D. Tex. Aug. 20, 2025)
2009	Declaration of R. Alan Burnett

I. INTRODUCTION

SoftView is a company based in Bellingham, Washington. EX2001 ¶ 2. Named inventors Gary Rohrbaugh and Scott Sherman initially worked together at a predecessor company, SoftSource, founded in 1982. *Id.* ¶ 29. Mr. Rohrbaugh and his team leveraged their years of expertise in developing Simple Vector Format (SVF) and leading-edge and award-winning CAD tools and display list software to bring to reality their vision of putting the entire Internet on mobile devices.

Despite its Petition spanning two grounds based on a collage of five asserted references to target twenty-two patent claims, Google has not met its burden to establish a reasonable likelihood of prevailing on any patent claim. Across both grounds, which are based almost entirely on references cited during prosecution of the '729 Patent, the Petition fails to show obviousness based on the Zaurus-Pad-SVG combination. The Petition's contentions are also incoherent, inconsistently relying in some places on Pad's browser, instead of Zaurus' browser, for the browser limitations. And the Petition's request that the Board cancel the challenged claims as "patentably indistinct from unpatentable claims," Paper 1 ("Pet.") at 10, is legally and factually unsupported.

Institution should be denied.

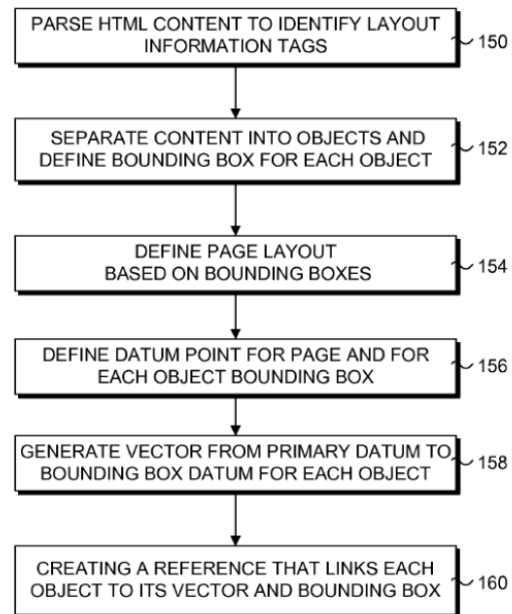
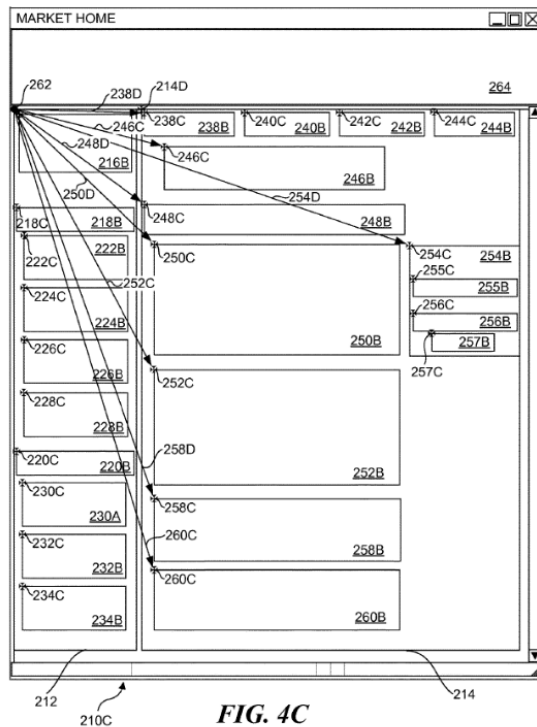
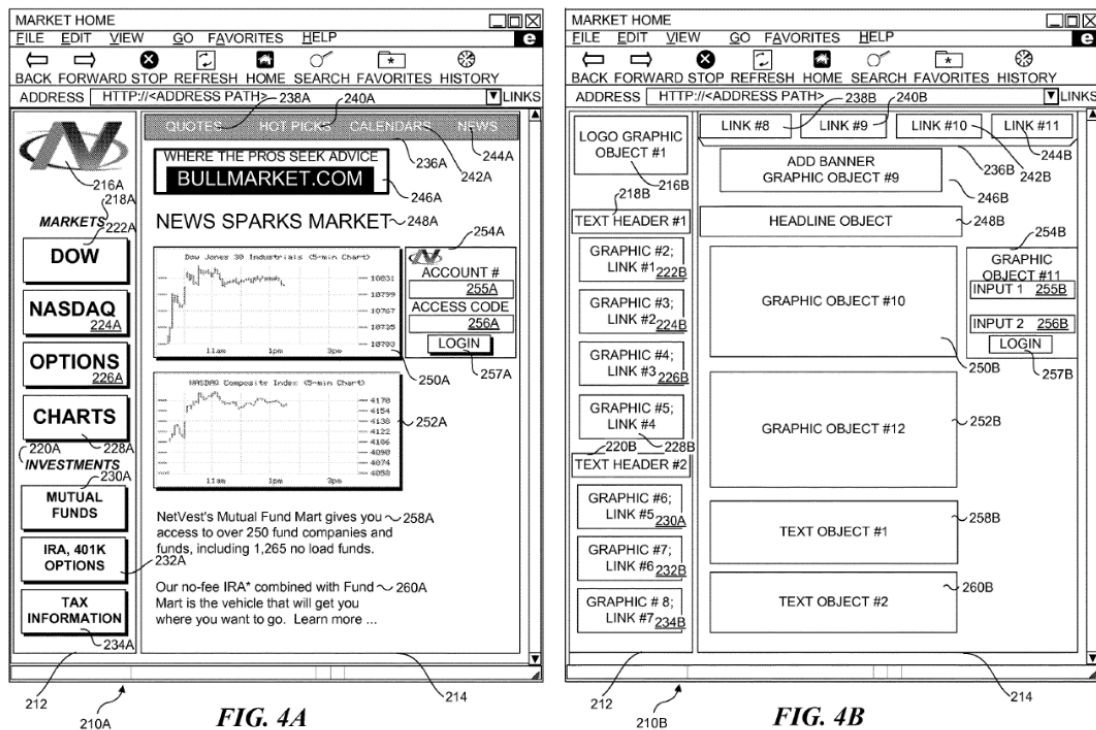
II. BACKGROUND

A. Overview Of The '729 Patent

The '729 Patent is titled “Scalable Display of Internet Content on Mobile Devices.” EX1001 at 1. The '729 Patent generally describes an apparatus and methods “for creating resolution independent vector display of Internet content to allow it to be scaled (zoomed) larger and smaller for better viewing or to fit any resolution or screen size.” *Id.* at 4:4-7. For example, “[i]n accordance with aspects of the invention, mobile devices are enabled to support resolution-independent scalable display of Internet (Web) content to allow Web pages to be scaled (zoomed) and panned for better viewing on smaller screen sizes....” *Id.* at 2:38-42. Among other things, the '729 Patent discloses processes for translating HTML content—including “elements such as tables, column definitions, graphic images, paragraphs” and the like—into a scalable (vector) representation for display on a mobile device. *Id.* at 14:63-17:39. “According to further aspects, the mobile devices employ touch-sensitive display screens that enable users to provide various inputs to control display of content within Web pages.” *Id.* at 2:50-53.

As an example, Figures 4A, 4B, and 4C of the '729 Patent show an HTML document comprising HTML elements (4A) that are identified and logically grouped into HTML objects (4B) and translated to generate a vector representation (4C), and Figure 5 sets forth an exemplary translation process. Figures 4D and 4G show

scaling of two HTML objects using the scalable vector representation. Figure 4E shows a scaled page, and Figure 4F shows a scaled page layout.



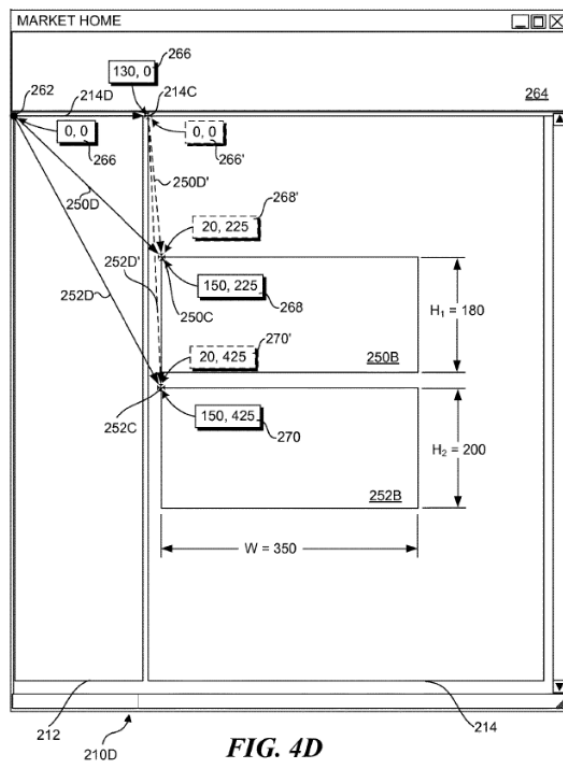


FIG. 4D

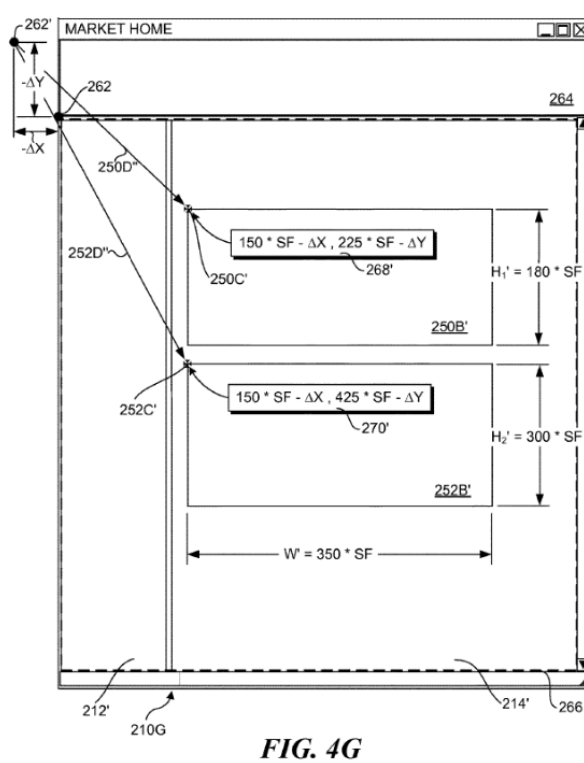


FIG. 4G

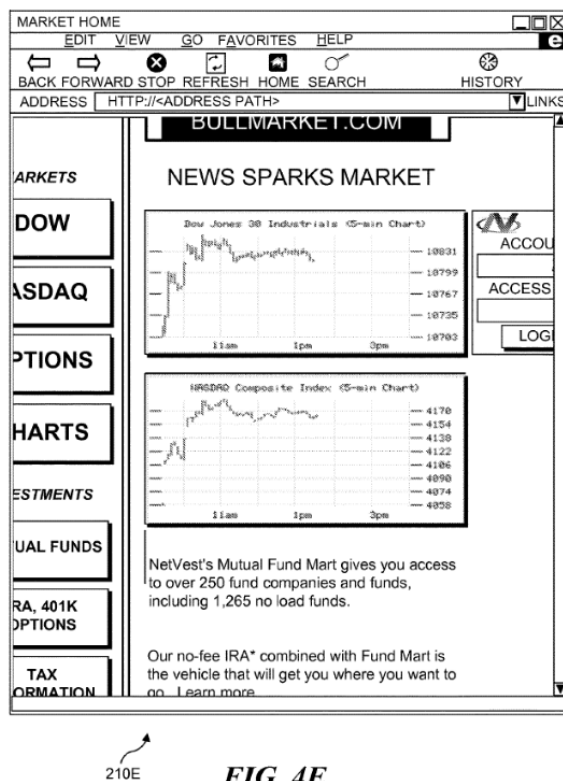


FIG. 4E

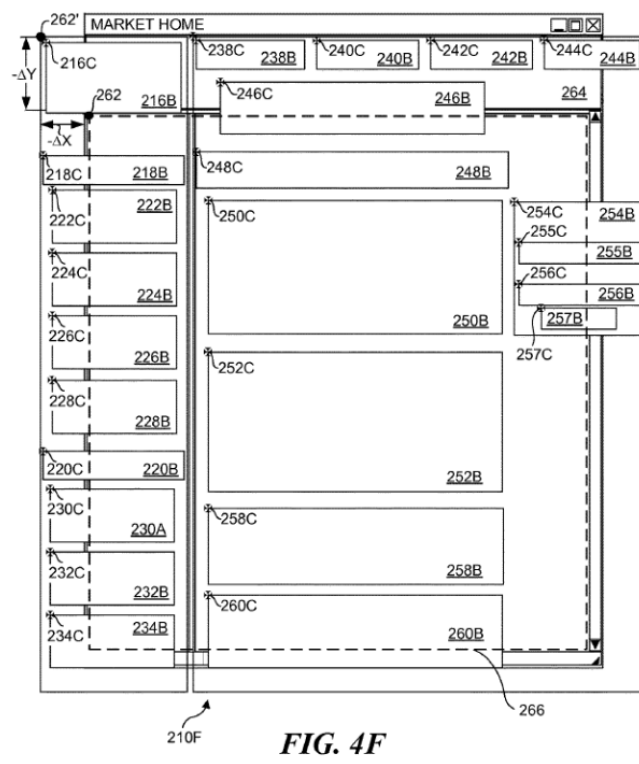


FIG. 4F

EX1001 at Figs. 4A-4G, 5.

B. Zaurus (EX1004)

Zaurus purports to be a Japanese to English translation of “Pages from Zaurus MI-106, MI-106M, and MI-110M User Guides.” EX1004 at 1. Zaurus included an “Internet browser” that “is partially different or limited” and lists 13 ways in which it differs “in terms of character fonts and sizes, images, and voice data handling compared to the WWW browser widely used in PCs, etc.” *Id.* at 41. For example, Zaurus stated that “portions of the display may not be visible or display may become irregular at times” and “[c]orrect display is not possible when a large table of data is received.” *Id.* Zaurus also stated that “[p]ages composed of frames can also be viewed by displaying them frame by frame.” *Id.* at 40. Finally, Zaurus warns, “[p]lease note that the screen is different from instances where the home page is displayed by using a PC, etc.” *Id.* at 41.

Zaurus was cited during prosecution of the ’729 Patent. EX1001 at 3 (middle left column).

C. Pad (EX1005, EX1007)

Google’s expert, Dr. Goldberg, opines that “Pad++ (‘Pad’) discloses an HTML browser with zooming capabilities that functions as ‘a zooming version of Mosaic and Netscape.’” EX1002 ¶ 23 (quoting EX1007 at 86). Although SoftView does not agree with Dr. Goldberg’s characterization, it will not dispute it for purposes of this Preliminary Response.

Pad (at least EX1007 and a slightly earlier version of EX1005) was cited during prosecution of the '729 Patent. EX1001 at 3 (upper left column).

D. SVG (EX1008)

SVG is a W3C Working Draft of Scalable Vector Graphics (SVG) Requirements dated October 29, 1998. EX1008 at 1. It was “a work in progress representing the current consensus of the W3C Scalable Vector Graphics Working Group” and was “the first public review draft of this document.” *Id.* It lists SVG Design Goals and SVG Detailed Requirements, which were lists of proposed features at the time of publication. *Id.* at 3-16. The draft was an early proposal for a vector graphics language specification that would meet the Web community’s needs.

Although this specific SVG reference does not appear to have been cited during prosecution of the '729 Patent, multiple comparable references were, including two versions of the same working draft dated roughly 4 and 6 months later. *E.g.*, EX1001 at 4 (lower left column listing two SVG working draft references among other SVG references).

III. LEVEL OF ORDINARY SKILL IN THE ART

For purposes of denying institution and finding that Google has not met its burden to show a reasonable likelihood of prevailing, SoftView submits that the Board need not determine the level of ordinary skill in the art. *Johnson & Johnson*

Surgical Vision v. Alcon, IPR2021-01003, Paper 14 at 9 (P.T.A.B. Nov. 23, 2021) (denying institution: “For our analysis on whether to institute, we need not determine the level of ordinary skill in the art”).

SoftView reserves the right to address the level of ordinary skill in the event the Board institutes trial.

IV. CLAIM CONSTRUCTION IS NOT NECESSARY TO DENY INSTITUTION

Google asserts in the Petition that “the Board need not construe any terms of the challenged claims to resolve the underlying controversy” in this proceeding. Pet. at 17. For purposes of denying institution because Google has not met its burden to show a reasonable likelihood of prevailing, SoftView submits the Board need not construe any terms of the challenged claims. *Realtime Data v. Iancu*, 912 F.3d 1368, 1375 (Fed. Cir. 2019) (“The Board is required to construe ‘only those terms... that are in controversy, and only to the extent necessary to resolve the controversy.’” (quoting *Vivid Techs. v. Am. Sci. & Eng’g*, 200 F.3d 795, 803 (Fed. Cir. 1999))).

SoftView reserves the right to assert claim construction positions if trial is ordered.

V. THE PETITION’S REQUEST FOR CANCELLATION OF CLAIMS BASED ON ESTOPPEL HAS NO BASIS IN LAW OR FACT

Google’s collateral estoppel argument should be rejected because it is unsupported by the law or the facts. The Federal Circuit recently held that it “has

never applied collateral estoppel... by cobbling together limitations from disparate claims to replicate another claim.” *DK Crown Holdings v. AG 18*, No. 2024-2078, 2026 WL 1242446, at *3 (Fed. Cir. May 6, 2026). The Court specifically rejected the IPR petitioner’s argument “that because the Board invalidated other claims, i.e., claims 10, 12, 15, 16, and 17, which, in the aggregate, contain all the limitations of claim 18, it follows that claim 18 is invalid under collateral estoppel.” *Id.*

Google’s similar reasoning here should be rejected. Google purports to “show[] how the challenged claims are disclosed and/or suggested by previously canceled claims of the related ’353 and ’926 patents.” Pet. at 12. Its only support is a table cobbling together limitations from disparate claims in an attempt to replicate the ’729 Patent claims, which is insufficient to invoke collateral estoppel. *See id.* at 12-16; *DK Crown Holdings*, 2026 WL 1242446, at *3.

Google cites *SoftView v. Apple*, *see* Pet. at 10, but there the Court confirmed that estoppel under 37 C.F.R. § 42.73(d)(3)(i) “applies to ‘obtaining’ a claim—not maintaining an existing claim” in an IPR, 108 F.4th 1366, 1373 (Fed. Cir. 2024). Google’s reliance on *Google v. Hammond Development International* and *Apple v. Smart Mobile Technologies*, *see* Pet. at 10-11, is also misplaced because, unlike here, there were “identical issues of patentability” based on a comparison of the claims, 54 F.4th 1377, 1381 (Fed. Cir. 2022); No. 2024-1352, 2026 WL 160563, at *3 (Fed. Cir. Jan. 21, 2026) (“A side-by-side, limitation-by-limitation comparison of the

claims reveals their marked similarity.”). As explained in SoftView’s Request for Discretionary Denial (Paper 6), Google never compares the ’729 Patent claims in their entirety with the claims of the ’353 or ’926 Patents, instead identifying limitations from disparate claims in isolation. *See* Paper 6 at 15-19.

For example, as shown in the illustrative comparison below, the claims of the ’729 Patent, including Claim 1, are more detailed than and bear little resemblance to the claims of the ’926 Patent, including Claim 52 relied upon by Google.

’729 Patent Claim 1 (Pet. at Appendix A, 1)	’926 Patent Claim 52 In IPR2013-00004 (EX1002 at 144)
[1.pre] A method comprising:	[52.pre] A mobile device, comprising:
[1.a] requesting through a mobile device having a touch-sensitive display a Web page comprising HTML-based Web content defining an original page layout, functionality, and design for viewing on a commercially available desktop browser,	[52.a] a processor,
said HTML-based Web content including HTML code for at least one form and multiple columns and Cascading Style Sheets (CSS) content;	[52.b] wireless communications means, to facilitate wireless communication with a network via which Web content may be accessed;
[1.b] retrieving and processing at the mobile device the HTML-based Web content including the HTML code for the at least one form and the multiple columns	[52.c] a touch-sensitive display;
and the CSS content	[52.d] flash memory, operatively coupled to the processor, in which a plurality of instructions are stored that when executed by the processor enable the mobile device to perform operations including,
	[52.e] rendering a browser interface via which a user is enabled to request access to a Web page comprising

	HTML-based Web content defining an original page layout, functionality, and design of content on the Web page;
to generate a scalable vector representation of the Web page;	[52.f] retrieving and processing the HTML-based Web content to produce scalable content; and
[1.c] rendering the Web page on the touch-sensitive display utilizing the scalable vector representation	[52.g] employing the scalable content and/or data derived therefrom to,
to produce a first view of the Web page at a first zoom level that preserves the original page layout, functionality and design defined by the HTML-based Web content including the at least one form and the multiple columns	[52.h] render a view of the Web page on the touch-sensitive display; and
and the CSS content	[52.i] re-render the Web page in response to associated user inputs to enable the user to iteratively zoom in and out views of the Web page while preserving an original page layout, functionality, and design defined by the HTML-based Web content as interpreted by a rendering engine,
relative to the original page layout, functionality and design defined by the HTML-based Web content including the at least one form and the multiple columns	[52.j] wherein preservation of the functionality defined by the HTML-based Web content includes preservation of hyperlink functionality.
and the CSS content	
when rendered by the commercially available desktop browser; and	
[1.d] re-rendering the Web page utilizing the scalable vector representation	
in response to associated user inputs to iteratively zoom in and out views of the Web page at multiple different zoom levels	

while preserving the original page layout, functionality, and design defined by the HTML-based Web content including the at least one form and the multiple columns	
and the CSS content	
relative to the original page layout, functionality and design defined by the HTML-based Web content including the at least one form and the multiple columns	
and the CSS content	
when rendered by the commercially available desktop browser.	

Further, Google’s reliance on prior Board decisions relating to the ’353 and ’926 Patents is misplaced. Those decisions were based on the broadest reasonable interpretation standard, *see generally* EX1013; EX1017, not the *Phillips* standard that applies to this IPR, *see* 37 C.F.R. § 42.100(b). Collateral estoppel is inapplicable here for that additional reason. *See, e.g., RØDE Microphones v. Zaxcom*, IPR2025-00557, Paper 15 at 19 (P.T.A.B. Sept. 30, 2025) (“Although the Lectrosonics IPRs involved patents from the same family as the ’444 patent, which recite many similar claim limitations, the Lectrosonics IPRs were all decided using the BRI standard, not the *Phillips* standard. Thus, no claim interpretation has been made using the standard that will be applied in this case, and the asserted prior art has not been applied to claims interpreted according to the standard in this case. Accordingly, on

this record, we are not persuaded that collateral estoppel applies to any of the disputed issues in this proceeding.”).

Google’s collateral estoppel argument is meritless, is not a basis for institution, and should be rejected.

VI. THE PETITION FAILS TO SHOW OBVIOUSNESS BASED ON THE ZAURUS-PAD-SVG COMBINATION

A. The Petition Fails To Show A Reason To Use Zaurus’ Browser

The Petition’s Ground 1 theory fails because it assumes a particular combination of features without even attempting to show any reason one of ordinary skill in the art would have combined the references in the manner asserted. The Petition asserts that in the proposed Zaurus-Pad-SVG combination, “Zaurus discloses ‘rendering the Web page on the touch-sensitive display’” and that “Zaurus suggests that its mobile HTML browser was expected to reproduce the desktop Web experience as closely as possible by ‘incorporat[ing] HTML 3.2 specifications in important places’ and supporting images, frames, image maps, and PowerPoint.” Pet. at 29 (alteration and emphasis in original); *see also id.* at 61 (“In the Zaurus-Pad-SVG combination, Zaurus processes and renders HTML 3.2 Web pages, including pages composed of frames, images, links, and other structural elements.”). But the Petition fails to even argue, much less show, any reason one of ordinary skill in the art would use the Zaurus browser in the proposed Zaurus-Pad-SVG

combination, as it must to carry its burden to show invalidity. *See, e.g., F5 Networks v. Radware*, IPR2017-00124, Paper 48 at 65 (P.T.A.B. Apr. 23, 2018) (“Petitioner, however, fails to provide sufficient reasons that a skilled artisan considering the two references together, would choose the particular combination Petitioner advances.”); *see also In re Mouttet*, 686 F.3d 1322, 1333 (Fed. Cir. 2012) (“[W]here the relevant factual inquiries underlying an obviousness determination are otherwise clear, characterization by the examiner of prior art as ‘primary’ and ‘secondary’ is merely a matter of presentation with no legal significance.”).

Indeed, the Petition asserts that one of skill in the art would have used the Pad browser instead of the Zaurus, contradicting its proposed combination. In asserting a motivation to combine, the Petition argues that “Pad teaches a more flexible solution [than Zaurus], including continuous zoom and pan that ‘allows users to zoom in and out of pages, enabling control of how much context is viewed at any time,’ and Pad targets ‘small screens, such as handheld computers (i.e. PDA’s),’ making it a natural enhancement to Zaurus’s magnify/reduce approach.” Pet. at 18-19. In fact, Google’s expert, Dr. Goldberg, opines that “Pad++ (‘Pad’) discloses an HTML browser with zooming capabilities that functions as ‘a zooming version of Mosaic and Netscape.’” EX1002 ¶ 23 (quoting EX1007 at 86). According to the Petition then, one of skill would have modified Zaurus’ browser with Pad’s browser with all its capability but apparently not for rendering HTML.

Google bears the burden of proving not simply that one of skill *could* have made such a combination but that one of skill in the art *would* have made such a combination. *Belden v. Berk-Tek*, 805 F.3d 1064, 1073 (Fed. Cir. 2015) (“[O]bviousness concerns whether a skilled artisan not only *could have made* but *would have been motivated to make* the combinations or modifications of prior art to arrive at the claimed invention.” (emphases in original)). Google must show why one of skill in making the Zaurus-Pad-SVG combination would have opted for the Zaurus browser despite its drawbacks when Google and its expert assert that the Pad browser was far more capable and according to the Petition targeted to handheld devices, such as PDAs. *See* Pet. at 18-19; EX1002 ¶ 23.

Zaurus’ browser has a very limited capability and cannot display a web page normally. Zaurus discloses only that it “incorporates HTML 3.2 specifications *in important places*.” EX1004 at 40 (emphasis added). As Zaurus acknowledged, “[d]isplay using the Internet browser installed in this product is partially different or limited in the following ways in terms of character fonts and sizes, images, and voice data handling compared to the WWW browser widely used in PCs, etc.” *Id.* at 41. It provided a list of 13 ways in which the limited browser differs from conventional PC browsers at that time. *See id.* Among other deficiencies, the page layout rendered by the Zaurus browser was not consistent with the HTML specification, as evidenced by arguments in the Petition itself concerning how the Zaurus browser

displayed HTML frames. *E.g.*, Pet. at 41 (quoting EX1004 at 40 (“Pages composed of frames can also be viewed by displaying them frame by frame [instead of as a single page].”)). Zaurus ends its difference list with the following warning: “Please note that the screen is different from instances where the home page is displayed by using a PC, etc.” EX1004 at 41.

By contrast, Google’s expert, Dr. Goldberg, asserts that Pad described its browser as “a zooming version of Mosaic and Netscape.” EX1002 ¶ 23 (quoting EX1007 at 86). And Dr. Goldberg opines that “[a] person of ordinary skill in the art would have understood that Mosaic and Netscape were the dominant desktop web browsers of that era” and that, “[b]y describing the mobile-compatible Pad browser as a ‘version of’ these desktop browsers (EX1007, 86), a person of ordinary skill in the art would have recognized Pad as a predictable solution for replicating desktop browsing on a handheld device.” EX1002 ¶ 33. Google fails to articulate any reason why one of skill would opt for Zaurus’ limited and marginally functional browser over Pad’s allegedly “predictable solution for replicating desktop browsing on a handheld device.” *Id.*

The Petition nevertheless relies on Zaurus’ browser with Pad’s zoom techniques and SVG’s scalable graphics. In its Motivation to Combine section, the Petition asserts that “the Zaurus-Pad-SVG combination would have predictably improved handheld browsing by pairing *Zaurus’s handheld HTML browser* with

Pad’s zoomable navigation techniques and SVG’s scalable graphics standard.” Pet. at 19 (emphasis added). The Petition confirms this theory by exclusively relying on the Zaurus browser for multiple limitations. For example, when addressing limitation [1.a], the Petition contends, “[g]iven that the [Zaurus] browser ‘incorporates HTML 3.2 specifications’ (EX1004, 40), such character-entry regions would be implemented using HTML form elements in the underlying HTML source (‘said HTML-based Web content including HTML code for at least one form’).” Pet. at 22 (emphasis in original). Similarly, when addressing the “rendering the Web page” limitation (limitation [1.c]), the Petition identifies the Zaurus browser as satisfying this limitation: “Zaurus discloses ‘rendering the Web page on the touch-sensitive display.’” Pet. at 29 (emphasis in original); *see also id.* at 33 (“In the combination, a POSITA would have understood that (i) Zaurus provided a touch-screen mobile device running an HTML browser that reproduces desktop Web pages....”). Thus, the Petition’s proposed combination relies exclusively on Zaurus’ browser to render Web pages and to satisfy other limitations.

Google fails to offer any reason why one of skill in the art would have been motivated to use the Zaurus browser in its proposed combination. In the absence of some reason why one of skill would have opted for Zaurus’ limited browser over Pad’s browser, the Petition’s proposed combination must fail. *Pers. Web Techs. v. Apple*, 848 F.3d 987, 993-94 (Fed. Cir. 2017) (holding that it is not enough to say

one of skill could combine two references in *some* manner, but instead a clear and particular showing the references *would be combined as claimed* is required); *Polaris Indus. v. Arctic Cat*, 882 F.3d 1056, 1069 (Fed. Cir. 2018) (holding that when a reference is modified by the teachings of a secondary reference, the party seeking to invalidate a claim cannot ignore teachings in the secondary reference that would lead one of skill away from the claimed combination). Thus, Google’s obviousness theory for Claim 1 must fail.

Because Google has not met its burden to establish that one of skill would have combined the references in the manner asserted, it cannot prevail on Claim 1.

B. The Petition Cannot Prevail Based On Its Inconsistent Mapping

The Petition’s inconsistent mapping of Claim 1’s browser-related limitations gets even worse for Google. As explained in Section VI.A above, in its Motivation to Combine section, the Petition asserts that “the Zaurus-Pad-SVG combination would have predictably improved handheld browsing by pairing ***Zaurus’s handheld HTML browser*** with Pad’s zoomable navigation techniques and SVG’s scalable graphics standard.” Pet. at 19 (emphasis added). In conformance with that theory, the Petition relies exclusively on the Zaurus browser for aspects of limitation [1.a] and for limitation [1.c]’s “rendering the Web page.” Pet. at 22, 29.

Elsewhere, however, the Petition purports to rely on Pad’s HTML browser for other than its “zoomable navigation techniques” as articulated in the Motivation to

Combine section. For example, for limitation [1.a], the Petition asserts, “*Pad’s HTML browser* discloses a multi-column layout because when the user follows an HTML link from a home page, ‘the relevant document is loaded into Pad++ and placed on the surface to the right of the original document, at a smaller scale,’ and ‘[t]he *Pad++ HTML browser* will lay out sub-documents in two columns next to the parent document’ (‘multiple columns’).” Pet. at 23 (underline in original and emphases added).

Similarly, when addressing the “commercially available desktop browser” of limitation [1.a], Google affirmatively asserts the following:

Pad describes the mobile-compatible *Pad browser* as a “version of” Mosaic and Netscape (EX1007, 86); Mosaic and Netscape were commercially available desktop browsers well before the earliest effective filing date of the ’729 patent (“commercially available desktop browsers”).

Pet. at 22 (underline in original and bold and italics added). Thus, the Petition’s reliance on Zaurus’ browser for “rendering the Web page” in limitation [1.c] is inconsistent with its limitation [1.a] reliance on Pad’s browser for comparable rendering relative to the “commercially available desktop browsers,” meaning its obviousness theory is internally inconsistent and cannot survive.

Further obscuring the Petition’s theory, the Petition elsewhere refers to *both* “Zaurus’s and Pad’s HTML browsers.” Pet. at 24. Specifically, in discussing the

“Cascading Style Sheets (CSS) content” limitation (limitation [1.a]), the Petition asserts that, “[i]n view of SVG, a POSITA would have understood that Web pages designed for desktop browsers and retrieved by *Zaurus’s and Pad’s HTML browsers* would include CSS stylesheets or CSS style attributes as part of their HTML-based content.” Pet. at 20, 24 (emphasis added).

The Petition’s inconsistent and unclear mapping in this instance also warrants denying institution. *See, e.g., Hirsch Glass Corp. v. Cambria Co.*, IPR2022-00583, Paper 7 at 22 (P.T.A.B. Aug. 8, 2022) (denying institution where it is “unclear whether Petitioner intends to rely on both Benito Lopez or Bigi or possibly the combination of the two”); *Bestway (USA) v. Intex Mktg.*, IPR2017-00848, Paper 10 at 21 (P.T.A.B. Aug. 30, 2017) (denying institution: “[W]e find persuasive Patent Owner’s argument... that Petitioner’s ground is confusing and ambiguous in that it is unclear as to Barker’s role where Petitioner appears to rely on Curlin for the same aspects purportedly taught by Barker.”); *Trend Micro v. Open Text*, IPR2023-00677, Paper 8 at 18 (P.T.A.B. Nov. 6, 2023) (similar: “We additionally find it unclear which reference Petitioner relies on for the correlating. It appears that Petitioner finds the correlating in Rockwood (the reference with the attacker profile); but if Rockwood is intended to provide the correlating, it is unclear what role Xie has in Petitioner’s proposed combination.”).

Even if the Petition had intended to rely on both Zaurus’ and Pad’s browsers, the Petition establishes no motivation to use both browsers. The Petition’s “Motivation to Combine” section purports to rely on only “Zaurus’ handheld HTML browser,” not both browsers or Pad’s browser, for the Zaurus-Pad-SVG combination. *See* Pet. at 18-19 (relying solely on Pad’s “zoomable navigation techniques” in its proposed combination).

The Petition cannot prevail based on its inconsistent and faulty Claim 1 analysis.

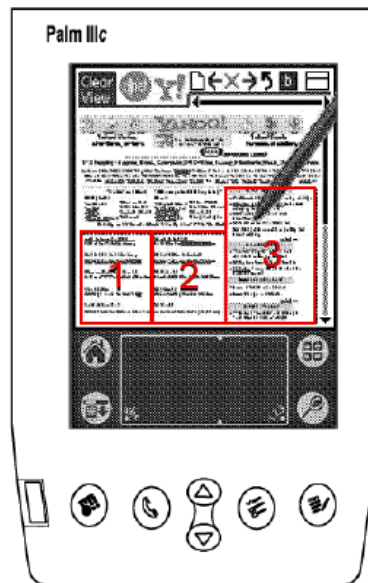
C. The Petition Fails To Show The Combination Disclosed Or Suggested The “Multiple Columns” Limitations Of All Claims

The Petition fails to show that Zaurus or Pad disclosed or suggested requesting, retrieving, processing, and rendering on a mobile device “multiple columns” as required by independent Claims 1 and 14. Absent such a showing, the Petition’s obviousness grounds fail for all claims.

Claim 1 of the ’729 Patent requires requesting a Web page comprising HTML-based Web content “including HTML code for at least one form and multiple columns.” EX1001 at 21:29-35 (limitation [1.a]). Independent Claim 14 includes a similar limitation requiring “HTML code for at least multiple columns.” *Id.* at 23:2-5 (limitation [14.a]). Both independent claims require “retrieving and processing at the mobile device the HTML-based Web content” including multiple

columns. *Id.* at 21:37-39 (limitation [1.b]); *see also id.* at 23:6-8 (similar requirement in limitation [14.b]). And both independent claims require “rendering the Web page ... to produce a first view of the Web page” including multiple columns. *Id.* at 21:42-48, 23:11-16 (limitations [1.c] and [14.c]). Thus, both independent claims require receiving HTML code for multiple columns and rendering those multiple columns to produce a first view on a mobile device.

During prosecution of the '729 Patent, the issue of multiple columns arose and was addressed by reference to the following modified version of Figure 7A, which depicts three columns within a web page:



EX1003 ('729 Patent File History) at 771 (red annotations added). As the applicant explained, “[A] PHOSITA would recognize that HTML code for multiple columns

would form multiple columns of content in an HTML context when processed by a Web browser (such as shown in FIG. 7A).” *Id.*

No asserted reference disclosed or suggested requesting, retrieving, processing, and rendering HTML code for multiple columns to produce a first view on a mobile device. The Petition relies solely on Pad for these limitations but utterly fails to show that Pad disclosed or suggested requesting, receiving, processing, and rendering HTML code for multiple columns.

For limitation [1.a], the Petition asserts, “Pad’s HTML browser discloses a multi-column layout because when the user follows an HTML link from a home page, ‘the relevant document is loaded into Pad++ and placed on the surface to the right of the original document, at a smaller scale,’ and ‘[t]he Pad++ HTML browser will lay out sub-documents in two columns next to the parent document’ (‘multiple columns’).” Pet. at 23 (alteration and emphasis in original) (citing EX1007 at 91; EX1002 ¶ 42). The limitation, however, requires “HTML code for ... multiple columns.” EX1001 at 21:29-35 (limitation [1.a]). The Petition’s example of Pad displaying two separate web pages side-by-side in a column format does not in any way address the claims’ requirement that HTML code for multiple columns be retrieved and then processed and rendered into a view. The example cited by the Petition is reproduced below:



EX1007 at 91, *cited by* Pet. at 23. As the description makes clear, “[w]hen you follow a link, the *relevant document* is loaded into Pad++ and placed on the surface to the right of the *original document*, at a smaller scale.” *Id.* (emphases added). Similarly, Pad’s additional description fares no better: “The Pad++ HTML browser will lay out sub-documents in two columns next to the parent document.” *Id.* The additional reference to placing sub-documents—*i.e.*, separate documents referenced from within a parent document—next to the parent document simply is not HTML code for multiple columns. Thus, the Petition’s example from Pad does not disclose requesting, retrieving, processing, and rendering *HTML code* for multiple columns as required by Claims 1 and 14.

For limitation [1.b], which recites in part retrieving and processing the HTML code for multiple columns requested in limitation [1.a], the Petition abandons its example from limitation [1.a] and asserts an entirely new theory, which nevertheless

still lacks merit. For limitation [1.b], the Petition asserts, “Pad supports multi-column layouts via its ‘grid’ items, which ‘arrange one or more items in rows and columns and [treat] them as a group,’ with commands to configure columns, rows, spans, and padding.” Pet. at 26 (alteration in original) (quoting EX1005 at 53-56). But the Petition makes no effort to show that any “grid” in Pad results from HTML code for multiple columns as required by limitations [1.a], [1.b], [14.a], and [14.b]. In the absence of such a showing, even if it were true that Pad could display a grid including one or more rows or columns, it simply does not address the claims’ requirements.

Because the Petition fails to show any disclosure or suggestion of HTML code for multiple columns being requested, retrieved, processed, and rendered to produce a first view on a mobile device, its challenge to Claims 1 and 14 and thus all claims must fail.

D. The Remaining Ground 1 Challenges Cannot Prevail

The Ground 1 challenges to Claims 2-22 also cannot prevail.

For independent Claim 14, the Petition cross-references Claim 1 for each of limitations [14.pre], [14.a], [14.b], [14.c], and [14.d]. *See* Pet. at 56-57. Thus, the challenge to Claim 14 fails for at least the same reasons the Claim 1 challenge fails.

The Ground 1 challenges to dependent Claims 2-13 and 15-22 fall with the Ground 1 challenges to Claims 1 and 14 from which they depend. *Ubiquiti v.*

Intellectual Ventures, IPR2024-01290, Paper 9 at 32 (P.T.A.B. Mar. 7, 2025) (“Because each of the dependent claims incorporates the limitations of the independent claim from which it depends, Petitioner has also necessarily failed to demonstrate a reasonable likelihood that these claims are unpatentable over the prior art.”).

E. The Ground 2 Challenge Cannot Prevail

The Ground 2 challenge to Claim 21 cannot prevail either. Ground 2 relies on Ground 1, adding SVF to the Zaurus-Pad-SVG combination only for “certain features directed to the ‘datum’ that are recited in claim 21.” Pet. at 66; *see also id.* at 67-71. Ground 2 thus fails for the same reasons Ground 1 fails based on its reliance on Ground 1. *See, e.g., 3Shape v. Align Tech.*, IPR2020-00173, Paper 14 at 34-35 (P.T.A.B. June 12, 2020) (denying institution: “The deficiencies in Petitioner’s Ground 1 rationale for combining Okamoto and Xu with respect to claim element 1.3... are not remedied by Petitioner’s arguments and evidence regarding Ground 2. The additional reference—Babayoff—is not relied upon as support for a motivation to combine Okamoto and Xu....”).

VII. PETITIONER’S VERBATIM EXPERT DECLARATION SUPPORTS DENYING INSTITUTION

The Petition is supported by an expert declaration from Google’s expert, Dr. Goldberg, that, in many places, “merely repeats, *verbatim*, the conclusory

assertion[s] for which it is offered to support.” *Xerox v. Bytemark*, IPR2022-00624, Paper 9 at 15 (P.T.A.B. Aug. 24, 2022) (precedential) (emphasis in original) (denying institution); *compare* Pet. at 20-71, with EX1002 ¶¶ 38-130.

Dr. Goldberg’s numerous instances of parroting verbatim Google’s Petition, as shown in the illustrative snapshot below, confirms the Petition’s weakness. *See, e.g., Xerox*, IPR2022-00624, Paper 9 at 15-17 (declining to institute IPR where expert declaration “merely repeats, *verbatim*, the conclusory assertion for which it is offered to support” (emphasis in original)); *TikTok v. NTECH Props.*, IPR2024-01339, Paper 9 at 16 (P.T.A.B. Feb. 25, 2025) (“Petitioner fails to establish a reasonable likelihood of” prevailing where its expert “testimony repeats, almost verbatim, the language in the Petition without any further explanation or supporting reasoning or evidence.”).

Pet. at 20-24 Ground 1, Claims [1.pre]-[1.a] (excerpts)	Goldberg Decl. ¶¶ 38-44 Ground 1, Claims [1.pre]-[1.a] (excerpts)
Zaurus discloses a mobile device with a touch-sensitive display that is operated with a “touch pen,” with which the user can “touch [the screen] lightly” and use the pen to operate on-screen keys and icons (“ <u>a mobile device having a touch-sensitive display</u> ”). (EX1004, 12-13.) The user can “Connect to the Internet, and open Zaurus Plaza (the Zaurus home page) and other home pages using the	38. Zaurus discloses a mobile device with a touch-sensitive display that is operated with a “touch pen,” with which the user can “touch [the screen] lightly” and use the pen to operate on-screen keys and icons (“ <u>a mobile device having a touch-sensitive display</u> ”). (EX1004, 12-13.) The user can “Connect to the Internet, and open Zaurus Plaza (the Zaurus home page) and other home pages using the

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Internet browser,” thereby requesting Web pages through the device’s Internet browser (“requesting...a Web page”). (EX1004, 39.) The “ZAURUS PLAZA (Zaurus home page) screen” illustrates that the user can “Open another home page by specifying URL,” “Go to home page,” and “Reload currently displayed screen,” confirming that the touch-screen device is used to request and load Web pages. (EX1004, 46-47.) These requested pages are standard HTML-based Web content because the “Internet Advantages of the Internet Browser” section explains that the “Internet browser in the MI-100 series incorporates HTML 3.2 specifications in important places, and therefore has rich expressive capabilities” (“a Web page comprising HTML-based Web content”). (EX1004, 40.) Because the requested Web pages are encoded in HTML and associated CSS style information, they are provided in a particular way that the information is encoded (i.e., in that HTML/CSS “format”). (EX1004, 40; EX1008, 4, 13-14; EX1002, ¶38.)

Zaurus’s “Quick Start” section states that, when displaying a home page, “the home page is displayed in a 16-gradation grayscale” and that “a separate page which is linked is displayed by touching the underlined characters,” describing standard Web “home pages” with hyperlinks. (EX1004, 10.) Zaurus Plaza provides URLs for various reservation, shopping, and information services, showing that the device is used to access general-purpose Web sites that were designed for “commercially available desktop browsers.” (EX1004, 40, 44-45, 48; EX1002, ¶39.) Pad describes the mobile-compatible Pad browser as a “version of” Mosaic and Netscape (EX1007, 86); Mosaic and Netscape were commercially available desktop browsers well before the earliest effective filing date of the ’729 patent (“commercially available desktop browsers”). (EX1050, 1-2.) A POSITA would have understood that these are conventional HTML Web pages rendered on the mobile touch-screen device in a defined layout, functionality, and design for desktop browsers (“HTML-based Web content defining an original page layout, functionality, and design for viewing on a commercially available desktop browser”). (EX1002, ¶39.)

In describing how to perform “Internet searches” and “reserving airline tickets,” Zaurus explains that “a space for entering characters is displayed” on the screen; the user taps the entry space to bring up a keyboard, “enter[s] characters,” and then touches “Enter,” after which “[c]haracters are entered into the entry space.” (EX1004, 49-50.) A POSITA would have recognized that these “spaces for entering characters” on Web pages are standard HTML form input fields used on search and reservation pages. (EX1002, ¶40.) Given that the browser “incorporates HTML 3.2 specifications” (EX1004, 40), such character-entry regions would be implemented using HTML form elements in the underlying HTML source (“said HTML-based Web content including HTML code for at least one form”). (EX1002, ¶40; EX1043, 14-22.)

Internet browser,” thereby requesting Web pages through the device’s Internet browser (“requesting...a Web page”). (EX1004, 39.) The “ZAURUS PLAZA (Zaurus home page) screen” illustrates that the user can “Open another home page by specifying URL,” “Go to home page,” and “Reload currently displayed screen,” confirming that the touch-screen device is used to request and load Web pages. (EX1004, 46-47.) These requested pages are standard HTML-based Web content because the “Internet Advantages of the Internet Browser” section explains that the “Internet browser in the MI-100 series incorporates HTML 3.2 specifications in important places, and therefore has rich expressive capabilities” (“a Web page comprising HTML-based Web content”). (EX1004, 40.) Because the requested Web pages are encoded in HTML (and associated CSS style information), they are provided in a particular way that the information is encoded (i.e., in that HTML/CSS “format”). (EX1004, 40; EX1008, 4, 13-14.)

39. Zaurus’s “Quick Start” section states that, when displaying a home page, “the home page is displayed in a 16-gradation grayscale” and that “a separate page which is linked is displayed by touching the underlined characters,” describing standard Web “home pages” with hyperlinks. (EX1004, 10.) Zaurus Plaza then provides URLs for various reservation, shopping, and information services, showing that the device is used to access general-purpose Web sites that were designed for “commercially available desktop browsers.” (EX1004, 44-45.) Pad describes the mobile-compatible Pad browser as a “version of” Mosaic and Netscape (EX1007, 86); Mosaic and Netscape were commercially available desktop browsers well before the earliest effective filing date of the ’729 patent (“commercially available desktop browsers”). (EX1050, 1-2.) A person of ordinary skill would have understood that these are conventional HTML Web pages rendered on the mobile touch-screen device in a defined layout, functionality, and design for desktop browsers (“HTML-based Web content defining an original page layout, functionality, and design for viewing on a commercially available desktop browser”).

40. In describing how to perform “Internet searches” and “reserving airline tickets,” Zaurus explains that “a space for entering characters is displayed” on the screen; the user taps the entry space to bring up a keyboard, “enter[s] characters,” and then touches “Enter,” after which “[c]haracters are entered into the entry space.” (EX1004, 49-50.) A person of ordinary skill in the art would have recognized that these “spaces for entering characters” on Web pages are standard HTML form input fields used on search and reservation pages. Given that the browser “incorporates HTML 3.2 specifications” (EX1004, 40), such character-entry regions would be implemented using HTML form elements in the underlying HTML source (“said HTML-based Web content including HTML code for at least one form”).

VIII. CONCLUSION

For any of these reasons, the Board should deny institution of the Petition.

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Dated: June 12, 2026

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CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that foregoing **PATENT OWNER'S PRELIMINARY RESPONSE** exclusive of the parts exempted as provided in 37 C.F.R. § 42.24, contains 6,307 words and therefore complies with the type-volume limitations of 37 C.F.R. § 42.24.

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PATENT OWNER’S PRELIMINARY RESPONSE** is being served electronically on June 12, 2026 to the following lead and backup counsel for Petitioner to the following email addresses:

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