

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner

v.

SOFTVIEW LLC,
Patent Owner

Patent No. 8,533,628

**DECLARATION OF DR. BENJAMIN GOLDBERG IN SUPPORT OF
PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,533,628**

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I. INTRODUCTION

1. I have been retained as an independent expert consultant in this proceeding before the United States Patent and Trademark Office (“PTO”) regarding U.S. Patent No. 8,533,628 (“the ’628 patent”) (EX1001).¹ I have been asked to consider whether prior art references disclose or suggest the features recited in claims 1-37 (“the challenged claims”) of the ’628 patent. My opinions are set forth below.

II. BACKGROUND AND QUALIFICATIONS

2. I am a tenured Associate Professor in the Department of Computer Science of the Courant Institute of Mathematical Sciences, New York University (“NYU”), in New York, New York. I have held this position since September 1994. From 1987 to 1994, I was an Assistant Professor in the Department of Computer Science at NYU. From September 2014 through August 2022, I was the Director of Graduate Studies for the MS programs in the Department of Computer Science, having previously served in that role from September 2009 through August 2012. I served as the Director of Undergraduate Studies for the Department of Computer Science from September 1995 through August 1998 and from September 2003

¹ In this Declaration, I refer to exhibits that I understand are to be attached to the petition for *Inter Partes* Review of the ’628 patent.

through August 2006. In addition, I have held a one-year visiting professorship at the Institut National de Recherche en Informatique et en Automatique (INRIA), a national laboratory in France, and was twice appointed to a month-long position as an invited professor at the Ecole Normale Supérieure, a university in Paris.

3. I received my Doctoral degree in Computer Science from Yale University, New Haven, Connecticut in 1988, having previously received Master of Science and Master of Philosophy degrees in Computer Science from Yale in 1984. My undergraduate degree from Williams College in 1982 was a Bachelor of Arts degree with highest honors in Mathematical Sciences.

4. I have taught courses and lectured at the undergraduate and graduate level in programming languages, hardware design, operating systems, user interfaces, web services, computer networks, and other areas related to the technology at issue in this matter.

5. Additional information concerning the computer science courses that I have taught, my professional publications and presentations in the field of computer science, and cases in which I have testified as an expert at trial or deposition in the past five years are set forth in my current Curriculum Vitae, a copy of which is attached as EX1006.

6. I am being compensated at a rate of \$525 per hour for my work in this case. I will be compensated at the same rate for any deposition I give in this matter. My compensation is in no way conditioned on the outcome of this matter.

III. MATERIALS REVIEWED

7. The opinions contained in this Declaration are based on the documents I reviewed, my professional judgment, as well as my education, experience, and knowledge regarding systems and processes in the field of graphics interface technology.

8. In forming my opinions expressed in this Declaration, I reviewed the following materials:

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EX1001	U.S. Patent No. 8,533,628 to Rohrabauh et al. (“the ’628 patent”)
EX1003	Prosecution History of U.S. Patent App. No. 11/735,477
EX1004	Power Zaurus Specifications: User Manual - Mobile Business Tool - Model MI-106 / MI-106M / MI-110M (Nov. 1997) (“Zaurus”)
EX1005	Pad++ Reference Manual Version 0.2.7 (Oct. 2, 1996) (“Pad_1”)
EX1007	Pad++ Tour (Apr. 1997) (“Pad_2”)
EX1008	Ferraiolo, Jon, <i>Scalable Vector Graphics Requirements: W3C Working Draft</i> (Oct. 29, 1998) (“SVG”)
EX1011	U.S. Patent No. 7,831,926 to Rohrabauh et al. (“the ’926 patent”)
EX1015	U.S. Patent No. 7,461,353 to Rohrabauh et al. (“the ’353 patent”)
EX1035	World Wide Web Consortium (W3C) Working Draft, <i>Level 1 Document Object Model Specification</i> , W3C (July 20, 1998)
EX1036	Lisa Rein, <i>Structuring Graphical Data</i> , XML.com (June 22, 1998)
EX1037	Definition of Cascading Style Sheets (CSS) from W3C Proposed Recommendation, <i>Cascading Style Sheets, Level 2</i> , W3C (Mar. 24, 1998)
EX1040	W3C, <i>11 Tables</i> , W3C (Wayback Machine Capture on Aug. 16, 2000)
EX1041	W3C, <i>16 Frames</i> , W3C (Wayback Machine Capture on Aug. 16, 2000)
EX1042	W3C, <i>Paragraphs</i> , W3C (Wayback Machine Capture on June 6, 1997)
EX1043	W3C, <i>HTML 3.2 Reference Specification publication history</i> , W3C (Jan. 14, 1997)
EX1046	W3C Recommendation, <i>Extensible Markup Language (XML) 1.0</i> , W3C (dated Feb. 10, 1998; Wayback Machine Capture dated Feb. 13, 1998)

EX1050	<i>Marc Andreessen</i> , BRITANNICA, https://www.britannica.com/biography/Marc-Andreessen (last visited Jan. 27, 2026)
EX1051	<i>History of the Mozilla Project</i> , MOZILLA, https://www.mozilla.org/en-US/about/history/ (last visited Jan. 27, 2026)

9. I also considered any other documents and materials I refer to in this Declaration.

10. My opinions contained in this declaration are based on the documents I reviewed and my knowledge and professional judgment. My opinions have also been guided by my appreciation of how a person of ordinary skill in the art would have understood the state of the art, the prior art, and the claims and the specification of the '628 patent at the time of the alleged invention, which I discuss below.

11. I have been asked to consider that the time of the alleged invention of the '628 patent was around 2000 (including and up to June 12, 2000), which corresponds to the filing date of the earliest application associated with the '628 patent. (EX1001, Cover.)

12. Based on my experience and expertise, it is my opinion that certain references disclose and/or suggest all the features recited in challenged claims of the '628 patent, as I discuss in detail below.

IV. PERSON OF ORDINARY SKILL IN THE ART AND THE TIME OF THE ALLEGED INVENTION

13. I am familiar with the level of ordinary skill in the art regarding the '628 patent as of around June 12, 2000. Considering the '628 patent, the technology, the educational level and experience of workers in the field relating to the patent, and problems and solutions in that field, and drawing on my own experience, I believe a person of ordinary skill in the art at the time of the alleged invention of the '628 patent would have had an undergraduate degree in electrical engineering, computer engineering, computer science or a related field along with two years of work experience in the field of web development, graphics rendering, and/or mobile applications. More education can substitute for practical experience and vice versa.

14. My opinions in this Declaration regarding the '628 patent and the prior art (including the state of the art) are from the perspective of one of ordinary skill in the art as I defined above, during the relevant timeframe (e.g., the time of the alleged invention), which I discussed above as being around June 12, 2000.

V. OVERVIEW OF THE '628 PATENT

15. The '628 patent is directed to improving the readability of web pages on small screen devices by converting HTML and Cascading Style Sheets (CSS) into a resolution-independent, scalable representation that can be zoomed and panned while preserving the page's original layout and functionality. (EX1001, Abs., 1:55-2:51.) The '628 patent relies on conventional browsers such as Mozilla

for pre-rendering such as parsing, grouping objects, making bounding boxes, and defining page layout. (EX1001, FIG. 5 (150-154), 17:21-31; *see also id.* at 15:38-17:31.) The '628 patent utilizes the SVF (Simple Vector Format) considered by the W3C (World Wide Web Consortium) to translate content into a scalable vector representation. (EX1001, 4:39-52, 5:58-6:6, 6:39-53, 8:44-49, 12:6-14.)

16. Relative to the prior art, the '628 patent specification asserts that it discloses unique steps for using layout data generated during pre-rendering to generate a scalable vector representation of the original page content. (EX1001, 17:32-35.) These steps in the specification include defining a primary page datum and computing vectors from that datum to each object's datum, storing references that link object content and attributes to those vectors and boxes. (EX1001, 17:32-19:3, FIG. 4C-4D, 5, 6.) While rendering, the device builds a display list, applies user-selectable scale and offset, computes a display-limit bounding box, fetches and scales the content that intersects that region (e.g., fonts, images, borders), and renders the content in a way that enables fast zooming and panning. (EX1001, 19:4-20:34, FIG. 4E-4G, 5, 6.)

17. The '628 patent acknowledges that building the display list of vectors and rapid zooming of vector-based objects was well known in the art. (EX1001, 19:10-12.) The '628 patent asserts to enable "context zooms" (e.g., tap to zoom a column, image, or paragraph) without reducing quality, and the use of display lists

to improve rendering speed. (EX1001, Abs., 20:35-21:2.) The '628 patent illustrates these interface behaviors such as tap-to-zoom for columns, images, and paragraphs on a mobile device. (EX1001, FIGs. 7-9.)

18. The independent claim of the '628 patent is directed to mobile hand-held device browsing by (i) retrieving HTML and CSS content, (ii) generating Web page content at multiple scale factors, (iii) enabling the user to zoom in on an image by scaling the image, and (iv) enabling the user to browse the Web page at multiple zoom levels while preserving the original layout and design. (EX1001, 22:6-22:43.)

19. During prosecution, SoftView initially filed 116 claims but replaced them with 116 new claims via preliminary amendment before the first Office action. (EX1003, 42-65, 207-235.) After the Examiner rejected the claims on grounds including double patenting and prior art, SoftView canceled them and presented 37 new claims. (EX1003, 313-355, 437-452.) In the second and third Office actions, SoftView presented amendments and arguments against the prior art but did not dispute the assigned priority date of June 8, 2001 for certain claims. (EX1003, 510-536, 602-622, 639-674, 702-723.) The claims were allowed following an interview and Examiner's amendments. (EX1003, 742-765.)

VI. UNPATENTABLE CLAIMS IN RELATED PATENTS

20. I have been informed that claims of the related '926 and '353 patents have previously been found unpatentable and canceled. (EX1011, 42-48; EX1015,

52.) I have been asked to consider whether the challenged claims would be disclosed and/or suggested by the previously canceled claims. As such, I have provided my analysis in Appendices A-E.

VII. OVERVIEW OF THE PRIOR ART

A. Zaurus (EX1004)

21. Zaurus discloses a handheld device with an HTML browser that supports touch inputs and switching between reduced and magnified displays, among other features. (EX1004, 10-16, 20-21, 40, 46-47.) Zaurus is designed to offer the user a portable and compact browsing experience. (EX1004, 10.) The Internet browser includes HTML 3.2 with client-side clickable maps and offline saving of pages. (EX1004, 40.) Zaurus describes user selectable zooming while browsing. (EX1004, 14, 15 (“Touch the screen with a pen. Let's try various operations by touching the screen with a pen.”), 16, 46 (“Switch between reduced display and magnified display”), 47 (“To switch the screen from a reduced view to a magnified view, touch Reduce ▼ followed by Magnify. To switch back from a magnified view to a reduced view, touch Magnify ▼ followed by Reduce.”).) Zaurus lists a bundled touch pen and PC linking software (“Zaurus Power Connection”), further supporting exchanging data with a desktop environment. (EX1004, 20.)

B. Pad (EX1005 and EX1007)

22. Pad++ (“Pad”) discloses an HTML browser with zooming capabilities that functions as “a zooming version of Mosaic and Netscape.” (EX1007, 86; *see also id.*, 82 (“only loads the contents of the files that you zoom in on”), 86-96, 113 (clicking a link “performs an animated pan/zoom to the location that the author specified”), 116 (“When you pan and zoom the Pad++ surface, sticky object remain stationary”), 141 (“Pad++ uses an R-Tree internally to quickly determine which objects are visible in a given view”).) Pad discloses mechanisms to animate and control view changes for small screens and personal digital assistants (PDAs). (EX1007, 139-141.) Pad provides a zoomable surface and rendering primitives for line, polygon, text, and image drawing, with an efficient, byte-compiled scripting interface that can render “directly on the Pad++ surface.” (EX1005, 79; EX1007, 89.) Pad further discloses file I/O, read, write, and rendering commands for changing views, drawing lines, polygons, and text. (EX1005, 5, 82.)

C. SVG (EX1008)

23. SVG discloses standards-based vector graphics that can be implemented in browsers designed for “small mobile devices.” (EX1008, 1 (“graphics in Web documents will be smaller, faster, more interactive, and be displayable on a wider range of device resolutions from small mobile devices through office computer monitors to high resolution printers”).) The SVG standard

“should support zoom and pan on graphics, with true scalability.” (EX1008, 14.)

SVG was designed to be widely implemented “on a wider range of device resolutions from small mobile devices through office computer monitors to high resolution printers.” (EX1008, 1.) SVG also supports transformations such as nested two by three matrices for scaling, translation, and rotation to provide uniform scalability. (EX1008, 10-12.)

VIII. CLAIM CONSTRUCTION

24. I understand that when considering the meaning of patent claims, one must consider the language of the claims, the specification, and the prosecution history of the patent. I also understand that claim terms are typically given their ordinary and customary meanings as they would have been understood by a person of ordinary skill in the art at the time of the invention for the patent. For the '628 patent, as I explained above in Section IV, the relevant time that I have been asked to consider is around June 12, 2000. For purposes of my opinions in this declaration, I have been asked to consider the challenged claims as understood by a person of ordinary skill in the art at the time of the alleged invention, and I have applied such understandings in my analysis of the '628 patent and the prior art.

25. I understand that the following terms appearing in the '628 patent were previously construed by a district court and/or submitted as proposed constructions in district court.

Term	Construction
“A mobile device, comprising”	The preamble is limiting.
“A method for enabling a user to perform full page browsing of a Web page on a hand-held wireless device in a manner that replicates browsing the Web page on a desktop Web browser, wherein the Web page comprises HTML-based content and cascading style sheet (CSS) content defining a page layout and design of display content on the Web page, the method comprising”	The preamble is limiting.
“scalable” / “scaling” / “scaled” / “scale” ²	“capable of being rendered at multiple zoom levels” / “rendering at multiple zoom levels” / “rendered at multiple zoom levels” / “render at multiple zoom levels”
“enabling a user to zoom on [a column / a paragraph / an image] [of the Web page / of the Web content]” / “enabling the user to perform full page browsing of the Web page at multiple zoom levels” / “enabling the user to perform zooming operations”	“enabling a user to use scalable content to zoom on [a column / a paragraph / an image] [of the Web page / of the Web content]” / “enabling the user to use scaled Web page content to perform full page browsing of the Web page at multiple zoom levels”

² I understand the term “scale” is only intended to encompass the term when used as a verb.

	“enabling the user to use scaled Web page content to perform zooming operations”
“processing the HTML-based [Web] content ... to generate page layout information”	“converting Web content from [HTML / markup language] to [scalable content / page layout information / a scalable vector representation of the Web page]”
“tapping” / “tap-based user input”	Plain and ordinary meaning
“fit across”	Plain and ordinary meaning
“object(s)”	“a grouping of webpage content, such as the paragraph of text or a graphic image”
“vector”	“for each object, a directional data structure that stores X & Y values from a point for the page or frame to the object”
“bounding box”	“an outlined shape within which an object’s content (<i>e.g.</i> , text or graphic image) will appear”

26. Where applicable, I have also applied those constructions in my analysis.

IX. DETAILED EXPLANATION OF GROUNDS

27. In my opinion, the prior art I discuss below discloses and/or suggests the limitations of claims 1-37.

A. Ground 1: Zaurus, Pad, and SVG Disclose and/or Suggest Claims 1-37

1. Motivation to Combine

28. A person of ordinary skill in the art would have been motivated to combine the references to improve small-screen navigation using known techniques. Zaurus's HTML support, Pad's HTML support, and SVG were basic software designs directed at rendering Web pages that a person of ordinary skill in the art would have been motivated to combine. (*See e.g.*, EX1008; EX1035; EX1037; EX1043; EX1046.)

29. A person of ordinary skill in the art would have been motivated to incorporate the browsing techniques taught by Pad into the Zaurus browser to improve the browsing experience on the Zaurus device. The browser on the Zaurus device already supports viewing content in either a "magnified view" or a "reduced view." (EX1004, 46-47.) A person of ordinary skill in the art would have been motivated to incorporate Pad's zooming techniques into the Zaurus browser so that the Zaurus browser could display content at more than two views, which "seems especially attractive for systems which have small screens, such as handheld computers (i.e. PDA's)." (EX1007, 141.) Pad's FAQ identifies motivation to apply Pad to small-screen systems such as handheld computers and explains performance measures (level of detail, adaptive render scheduling) for fast zoom animations. (EX1007, 136-142.)

30. Pad discloses that its “Pad++ web browser” functions as “a zooming version of Mosaic and Netscape.” (EX1007, 86.) A person of ordinary skill in the art would have understood that Mosaic and Netscape were the dominant desktop web browsers of that era. (EX1050, 1-2 (noting Netscape “became the most popular browser...taking over 75 percent of the market share by mid-1996” and was co-founded by Marc Andreessen, who “played a key role in creating the Web browser Mosaic”).)³ By 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.

31. SVG discloses techniques for zooming and panning content with true scalability on a variety of devices including small mobile devices. (EX1008, 1, 14.) A person of ordinary skill in the art would have been motivated to incorporate SVG’s

³ Notably, the ’628 patent explains that the invention uses “core functionality provided by the Mozilla rendering engine source code.” (EX1001, 17:21-31.) A person of ordinary skill in the art would have known that Netscape is the predecessor to Mozilla. (EX1051, 1 (“The Mozilla project was created in 1998 with the release of the Netscape browser suite source code.”).)

techniques into the Zaurus browser to ensure that the zoomed content is readable and that its design and functionality is preserved. With Pad's zooming techniques with SVG's standards-based vector graphics, the Zaurus browser would display a scalable and interactive interface on the touchscreen display of the Zaurus handheld device.

2. Reasonable Expectation of Success

32. A person of ordinary skill in the art would also have had a reasonable expectation of success in combining these known elements. Each reference demonstrates that the underlying technology (handheld hardware, touch screen inputs, and HTML rendering) was well known. Zaurus's HTML browser, Pad's HTML browser, and SVG were also based on basic software designs known to a person of ordinary skill in the art to be interoperable with each other. (*See e.g.*, EX1008; EX1035; EX1037; EX1043; EX1046.) A person of ordinary skill in the art would have had no technical obstacles and every reason to expect the combination of interoperable concepts to function as intended.

33. A person of ordinary skill in the art would have a reasonable expectation of success in combining Pad's zoom and layout mechanisms with SVG's vector model and deploying them on the handheld Zaurus device. Zaurus supported a stylus-operated Internet browser with basic zooming ("magnified view" vs. "reduced view"), demonstrating that the hardware could handle variable display states and that incorporating a zoomable UI would be a predictable adaptation to a

known device and input method. (EX1004, 15-16, 20-21, 46-47.) Likewise, SVG was designed to be implemented on “small mobile devices,” ensuring that the vector graphics format was compatible with Zaurus. (EX1008, 1.)

34. Furthermore, Pad implemented smooth animated zoom of objects via bounding boxes (EX1005, 23, 30), which provided a framework for the zoomable interactions taught by SVG to attain scalable zoom and pan (EX1008, 14-15.) Pad disclosed items and SVG disclosed object access and per-object events; incorporating SVG’s scriptable objects would have been a predictable change aligned with the standard. (EX1005, 22-23; EX1008, 15.) Pad’s grids and visibility options correspond to SVG’s grouping and layering, which would have allowed a person of ordinary skill in the art to make a routine integration of known mechanisms to organize controls and content at various zoom levels. (EX1005, 54-56, 71; EX1008, 13.) Thus, a person of ordinary skill in the art would have expected the combination to function as intended: a handheld browser (Zaurus) utilizing vector scaling (SVG) to enable continuous zooming (Pad) of Web content.

3. Claim 1

- i) **[1.pre] “A method for enabling a user to perform full page browsing of a Web page on a hand-held wireless device in a manner that replicates browsing the Web page on a desktop Web browser, wherein the Web page comprises HTML-based content and cascading style sheet (CSS) content defining a page layout and design of display content on the Web page, the method comprising:”**

35. Zaurus discloses a “Mobile Business Tool” that is “highly portable” and includes a “modem” or adapter for communications (“hand-held wireless device”). (EX1004, 3, 10, 18.) Zaurus enables the user to “Connect to the Internet, and open Zaurus Plaza (the Zaurus home page) and other home pages using the Internet browser” (“enabling a user to perform full page browsing of a Web page”). (EX1004, 10, 39, 45-47.) The Zaurus browser “incorporates HTML 3.2 specifications in important places, and therefore has rich expressive capabilities,” enabling it to display “home pages composed of frames” and images in standard formats like GIF and JPEG. (EX1004, 40.) A person of ordinary skill in the art would have understood that by implementing the HTML 3.2 standard used by desktop browsers, the Zaurus device performs browsing (“in a manner that replicates browsing the Web page on a desktop Web browser”). (EX1004, 40.)

36. Pad discloses the claimed “method for enabling a user to perform full page browsing of a Web page” by describing a “Pad++ web browser” that functions as “a zooming version of Mosaic and Netscape.” (EX1007, 86.) Pad states that its zooming interface is “especially attractive for systems which have small screens, such as handheld computers (i.e. PDA’s)” (“hand-held wireless device”). (EX1007, 141.) Pad’s browser parses HTML to create “HTML items” that represent the file (“HTML-based content”). (EX1005, 60.) By aiming to be a “zooming version of

Mosaic and Netscape,” Pad discloses the claimed “replicates browsing the Web page on a desktop Web browser.” (EX1007, 86.)

37. SVG discloses that standard Web content includes “cascading style sheet (CSS) content defining a page layout and design of display content on the Web page.” (EX1008, 4, 13.) SVG discloses that “attributes which make sense to be part of a style should be expressed in CSS” and that “Complete support for CSS is what the Web community will expect.” (EX1008, 4, 7, 13.) SVG further confirms that vector graphics allow Web documents to be “displayable on a wider range of device resolutions from small mobile devices through office computer monitors to high resolution printers.” (EX1008, 1.) In the Zaurus-Pad-SVG combination, the combined device would browse the claimed “HTML-based content and cascading style sheet (CSS) content defining a page layout and design of display content.” (EX1008, 1, 4, 11.)

- ii) **[1.a] “in response to a user request to access the Web page, retrieving HTML-based content and the CSS content corresponding to the Web page and processing the HTML-based content and CSS content with the Web browser rendering engine to interpret the page layout and design of the display content on the Web page at a first scale; and”**

38. Zaurus enables the user to “Connect to the Internet, and open Zaurus Plaza (the Zaurus home page) and other home pages using the Internet browser” and allows users to “Open another home page by specifying URL” (“in response to a

user request to access the Web page, retrieving HTML-based content”). (EX1004, 39, 44-47.) Zaurus discloses the claimed “processing the HTML-based content...with the Web browser rendering engine to interpret the page layout and design of the display content” by using an engine that “incorporates HTML 3.2 specifications in important places,” which enables it to display “boundaries so that the information displayed within the boundaries can be freely switched,” images, and layouts such as “home pages composed of frames.” (EX1004, 40, 48.) Zaurus discloses the user’s ability to “Switch between reduced display and magnified display,” confirming an initial rendered view before user-initiated scaling (“at a first scale”). (EX1004, 46.)

39. Pad discloses the HTML browser can “automatically fetch a file from a URL... as well as in-line images” (“retrieving HTML-based content...and processing the HTML-based content”). (EX1005, 60.) Pad discloses that “the html data is fetched, it is parsed and the HTML item is created which contains a method for rendering the page” (“processing...to interpret the page layout”). (EX1005, 60.) Pad further discloses interpreting the layout (“at a first scale”) because the browser “will lay out sub-documents in two columns” as part of its initial layout process (before any user zoom). (EX1007, 91; *see also id.*, 30). Thus, Pad’s parsing and creation of “HTML items” constitute converting the HTML-based content into page

layout information (i.e., scalable layout data/structures used for rendering at multiple zoom levels).

40. SVG discloses that “attributes which make sense to be part of a style should be expressed in CSS” and requires that “All CSS text/font attributes...should be honored by all conforming SVG processors” (“Web content includes...CSS content corresponding to the Web page”). (EX1008, 4, 7, 13.) A person of ordinary skill in the art would have understood that a standard desktop-compatible rendering engine like that in Zaurus or Pad would process this CSS content as per the claimed “interpret the page layout and design.” (EX1008, 1.) In the combination, the mobile device would retrieve and process the HTML and CSS content to generate an initial (“first scale”) interpretation of the page layout before any user-initiated zooming occurs.

iii) [1.b] “employing scaled page layout information and/or content derived therefrom to generate scaled Web page content at multiple scale factors; and”

41. Zaurus also discloses the claimed “generate scaled Web page content at multiple scale factors” by allowing the user to “Switch between reduced display and magnified display.” (EX1004, 46-47.) Pad extends beyond Zaurus’s binary scaling by disclosing a zooming user interface on an “infinite zoomable space” that allows for “smooth animated zooms” (“generates scaled Web page content at multiple scale factors”). (EX1007, 71, 97.) Pad renders views based on a “zoom

[that] specifies the magnification” (“scale factor”). (EX1005, 30.) Pad discloses that objects such as HTML items are “laid out” and rendered at different scales, allowing the user to change the view based on the scale factor. (EX1005, 63; EX1007, 54 (“When you click on a piece of text, Pad++ zooms in so that that text fills the screen.”).)

42. SVG discloses that this content is defined by vector-based graphics designed to be scalable such that “all objects and attributes...should grow/shrink uniformly with the zoom level.” (EX1008, 14.) SVG uses vector coordinates and transformations to generate the content at the desired size applied to scalable vector-based content (“employing scaled page layout information”). (EX1008, 11-14.) A person of ordinary skill in the art would have understood that the combination of Pad’s zooming engine and SVG’s scalable content enables the generation of Web page content at multiple scale factors (i.e., graphic content that (1) is capable of being rendered at multiple zoom levels and (2) includes one or more vectors).

iv) [1.c.1] “enabling a user of the mobile device to zoom in on an image via a user input to a touchscreen display and”

43. Zaurus discloses a “Mobile Business Tool” (“mobile device”) with a “touch-sensitive display” (“touchscreen display”) where operations are performed by “touch[ing]” the screen. (EX1004, 5, 10-13, 46.) Zaurus allows users to “Switch between reduced display and magnified display” (“zoom”). (EX1004, 46.) Pad

discloses zooming behavior in which selecting displayed content causes Pad to zoom in so that the selected content fills the screen. (EX1007, 54.) Pad further discloses that HTML items can contain “in-line images.” (EX1005, 60.) A person of ordinary skill in the art would have treated text objects and image objects analogously because both are items with bounding boxes. Given that SVG confirms that “images and text should scale along with the sizes of the shapes,” a person of ordinary skill in the art would have understood that Pad’s zoom-based scaling also applies to images, allowing a user to zoom in on a specific image (“zoom in on an image via a user input”). (EX1008, 11.) In the combination, a person of ordinary skill in the art would have understood the “touch” to be the claimed “user input to a touchscreen display” to trigger the zoom.

- v) **[1.c.2] “wherein said scaled Web page content including one or more images is generated by”**
 - (1) **[1.c.2.a] “scaling bounding boxes corresponding to the one or more images to produce scaled bounding boxes and,”**

44. Zaurus explains that “a single page is divided into a certain number of boundaries so that the information displayed within the boundaries can be freely switched.” (EX1004, 48.) Pad discloses rendering HTML items that include “in-line images” at different scales based on the view’s zoom magnification (“scaled Web page content including one or more images”). (EX1005, 30, 60.) Pad discloses operations to “[z]oom the view around a specified point” (EX1005, 3) and supports

“[z]oom around specified pad position by multiplicative factor” (“scaling bounding boxes”). (EX1005, 46.) Pad discloses managing objects using “bounding boxes” to define their geometric extent used for layout and rendering, which a person of ordinary skill in the art would have understood is an outlined box/shape defining the region within which the item’s content (text/image) appears. (EX1005, 29, 65.) Pad further explains that internal spatial indexing is used to determine which objects are visible at a given scale level, confirming that view generation operates over scaled object geometry. (EX1007, 141.)

45. Pad also discloses scaling object geometry by “multiplying the size of the item with scaleAmount.” (EX1005, 36.) SVG confirms that “images and text should scale along with the sizes of the shapes,” which a person of ordinary skill in the art would have understood define the scaled geometry of the layout. (EX1008, 11, 12.) In the combination, when zooming, the view is scaled, which scales the coordinate system and the bounding boxes within it (“scaling bounding boxes corresponding to the one or more images to produce scaled bounding boxes”).

(2) [1.c.2.b] “for each of the one or more images, scaling content associated with the image to produce a scaled image that fits within its corresponding scaled bounding box; and”

46. Pad discloses rendering pages containing multiple items including “in-line images.” (EX1005, 35, 58, 60.) Pad’s rendering engine iterates through these objects to display them, managing the layout and rendering for each item in the view

(“for each of the one or more images”). (EX1005, 29, 35, 58.) Pad defines the extent of every object using a “bounding box,” and as the view scales, the coordinate system for the bounding box scales (“scaled bounding box”). (EX1005, 17, 29, 65.) Pad defines the mechanics of this scaling, stating that “magnification is defined as the multiplication of the current view...with the object’s size,” ensuring that the content is mathematically transformed to fit the new coordinate dimensions. (EX1005, 29; *see also id.*, 36, 54.) A person of ordinary skill in the art would have understood this behavior applies equally to the “in-line images” (EX1005, 60) to satisfy the claimed “produce a scaled image that fits within its corresponding scaled bounding box.”

47. SVG discloses that “images and text should scale along with the sizes of the shapes,” ensuring that as the bounding box is resized, the content inside is scaled. (EX1008, 11, 14.) In the combined device, the Zaurus magnify feature would scale the content of each image according to the scaling features of Pad and SVG, ensuring the image fits within the scaled bounding boxes defined by the layout.

- vi) **[1.d] “enabling the user to perform full page browsing of the Web page at multiple zoom levels by generating corresponding views of the Web page on the hand-held device under which the page layout and design of the display content is retained relative to the interpretation of the page layout and design of the display content at the first scale,”**

48. Zaurus discloses a “Mobile Business Tool” (“hand-held device”) that enables users to browse Web pages to “Connect to the Internet, and open Zaurus Plaza” (EX1004, 3, 39). Zaurus allows users to “Switch between reduced display and magnified display.” (EX1004, 46.) Pad discloses the capability to “[r]eturns the current view...in ‘xview yview zoom’ form,” where “zoom specifies the magnification.” (EX1005, 30.) Pad further discloses that view changes are implemented by the moveto command: “Change the view so that the point ‘xview yview’ is at the center of the screen with a magnification of zoom,” and if one parameter is left unchanged, it remains fixed: “If xview, yview, or zoom is specified as ‘,’ then that coordinate is not changed.” (EX1005, 32.)

49. Pad illustrates this capability by disclosing a zooming interface where “clicking and holding on the middle mouse button performs a smooth animated zoom in.” (EX1007, 4.) A person of ordinary skill in the art would have integrated Pad’s continuous zooming into the Zaurus browser to enhance the reduced and magnified options (“enabling the user to perform full page browsing of the Web page at multiple zoom levels”). Pad discloses generating the content at the requested

zoom factor, where the Pad system calculates the “current view” and renders the objects accordingly on an “infinite zoomable space” (“generating corresponding views of the Web page on the hand-held device”). (EX1005, 23-30; EX1007, 97.)

50. SVG discloses “true scalability” defined as ensuring that “all objects and attributes (including such things as text and linewidths) should grow/shrink uniformly with the zoom level.” (EX1008, 14.) A person of ordinary skill in the art would have understood that if all content “scales uniformly” as taught by SVG, the relative positions and proportions (“layout and design”) defined at the initial view (“first scale”) are mathematically preserved at any subsequent zoom level. (EX1007, 54.) Pad confirms this behavior, describing the zooming interface as a system of “‘magic magnifying glasses’ through which we can read... on an indefinitely enlargeable (‘zoomable’) surface.” (EX1007, 3.) In the combined device, Zaurus’s browser running Pad’s zooming engine and utilizing SVG’s uniform scaling rules, enables full-page browsing where the layout integrity is maintained across all zoom levels (“the page layout and design of the display content is retained relative to the interpretation of the page layout and design of the display content at the first scale”).

- vii) [1.e] “wherein each of the Web browser rendering engine and a Web browser rendering engine employed by a desktop browser for which browsing is replicated are the same.”

51. Zaurus discloses a “Web browser rendering engine” on the handheld device that processes standard HTML content. Zaurus states that its “Internet browser...incorporates HTML 3.2 specifications in important places,” enabling it to display “home pages.” (EX1004, 40.) A person of ordinary skill in the art would have understood that “HTML 3.2” was the standard markup language used by desktop browsers (e.g., Netscape Navigator, Internet Explorer) at the time of the invention. (EX1043). By incorporating the “HTML 3.2 specifications,” the combined device would functionally be “the same” type of engine as that “employed by a desktop browser.” (EX1004, 40.)

52. The limitation recites that the engines are “the same” in the context of “browsing is replicated.” Zaurus discloses the device is designed to replicate the desktop browsing experience, allowing users to “download the information you want, and view it later at your own pace” just as they would on a PC. (EX1004, 10.) Zaurus confirms that the device “can display images not only in GIF format, but also in the commonly found JPEG format” and supports “frames,” features that define the claimed “desktop...browsing” experience. (EX1004, 40.) A person of ordinary skill in the art would have understood that the “Web browser rendering engine” on

the Zaurus device is the same type (i.e., an HTML 3.2 engine) as the desktop engine it emulates, ensuring the content is “replicated.”

53. Pad confirms that the rendering engine concepts are transferable between desktop and mobile environments to achieve this replication. Pad describes its “Pad++ web browser” as “a zooming version of Mosaic and Netscape.” (EX1007, 86.) A person of ordinary skill in the art would have understood that Mosaic and Netscape were the dominant desktop web browsers of that era. (EX1050, 1-2.) Because Mosaic and Netscape were desktop browsers, Pad provides the motivation to a person of ordinary skill in the art to use the same rendering engine (e.g., the Netscape/Mozilla codebase) for parsing HTML on the mobile Zaurus device to replicate the desktop browsing experience. In view of Pad’s desktop-browser lineage, a person of ordinary skill in the art would have been motivated to use a desktop-class HTML/CSS rendering-engine implementation (i.e., the same rendering-engine implementation used for the replicated desktop browser experience) to replicate desktop browsing. Thus, the combined device satisfies this limitation under both an interpretation of supporting the “same” HTML 3.2 specifications and an interpretation of using the “same” Netscape rendering engine on the handheld device as is used on the desktop to achieve the claimed replication.

54. The reliance on Pad’s “version of Netscape” disclosure further confirms that the combination satisfies this limitation in view of SoftView’s

consistent arguments during prosecution. In responding to two Office actions, SoftView repeatedly highlighted that its invention uses “core functionality provided by the Mozilla rendering engine source code.” (EX1003, 617 (quoting EX1001, 17:21-31), 720-721 (same).) A person of ordinary skill in the art would have known that Netscape is the predecessor to Mozilla. (EX1051, 1.)

55. SoftView argued that by “employing the same rendering engine, Web pages will have the same appearance (i.e., the layout and formatting of content will be substantially identical),” whereas the prior art did not disclose “employing the same rendering engine in the two devices.” (EX1003, 617, 721.)⁴ To the extent SoftView maintains that “the same” engine requires the same code, Pad satisfies this interpretation because by disclosing a “zooming version of...Netscape” (the predecessor to the Mozilla engine cited by SoftView), Pad discloses using the desktop engine codebase on the mobile device. (EX1007, 86.)

⁴ Notably, the Examiner initially rejected this argument and maintained the same rejection of this limitation, determining that a prior art browser that allows a user “to perceive the graphical information...regardless of the display size” satisfies this limitation. (EX1003, 642, 671, 672.) The claims were allowed only after subsequent amendments. (*Id.*, 749-750.)

56. Additionally, SoftView acknowledged that “in the case of HTML and CSS standard compliant rendering engines, different rendering engines will render the same Web pages substantially identically.” (EX1003, 617.) Thus, to the extent “the same” refers to standard-compliant engines that render pages “substantially identically,” the combination satisfies this interpretation (Zaurus for HTML and SVG for CSS). Accordingly, the combination satisfies the limitation regardless of whether “the same” is interpreted to be the same standard or the same code.

4. Claim 2: “The method of claim 1, wherein the views of the Web page are generated by employing a vector-based rendering engine to effect scaling of the display content as interpreted at the first scale.”

57. Pad and SVG disclose employing a vector-based rendering engine to effect scaling of the display content that satisfies this definition. Pad discloses a “rendering engine” capable of drawing graphical objects (e.g., lines, polygons, text, images) on a zoomable surface using specific X, Y coordinate pairs in a two-dimensional space. (EX1005, 2, 6 (“drawline...drawpolygon...drawtext”), 11, 25, 47, 49-50, 53-54.) For example, the drawline command takes arguments “x1 y1 x2 y2” to create a line segment. (EX1005, 6.) A person of ordinary skill in the art would have understood that “x1 y1” represents the origin point and “x2 y2” represents the value relative to that origin, mathematically defining a length and direction between the two points. Similarly, Pad renders polygons using a list of “x

y” coordinates, where each segment constitutes a vector defined by mathematical expressions of vertices in the 2D coordinate system. (EX1005, 6 (“drawpolygon”).)

58. Pad’s engine is designed to handle scalable content and includes “zoomaction” scripts that are “evaluated when an item grows or shrinks,” which a person of ordinary skill in the art would have understood as executing when the view is scaled (i.e., when a zoom-level changes). (EX1005, 53 (“zoomaction ... evaluated when an item grows or shrinks”), 54.) SVG further requires support for “zoom and pan on graphics, with true scalability,” and teaches coordinate systems and transformations (including matrix transformations) for scaling vector-defined graphics. (EX1008, 1, 11, 14.) Thus, in the combination, Pad’s vector-based drawing and scaling mechanisms, together with SVG’s required zoom/pan and uniform scalability, effect scaling of the display content by applying vector-based transformations to the first-scale interpretation to generate the zoomed views (“employing a vector-based rendering engine to effect scaling of the display content”). (EX1005, 23-30, 53-54; EX1007, 54; EX1008, 1, 11, 14.)

59. As I explained in limitation [1.a], the combined device can “interpret” the HTML and CSS content to define the claimed “page layout” at the “first scale.” (Section IX.A.3.ii.) Pad then converts this interpreted content into “HTML items” that maintain their relative positions and geometric relationships. (EX1005, 60 (“it is parsed and the HTML item is created...lay them out with scale.”).) When the user

zooms, a coordinate transformation is applied to this content to generate the scaled view. (EX1007, 54 (“Pad++ zooms in so that that text fills the screen horizontally”); EX1008, 11 (“matrix transformations”).) In the context of the Pad browser, the system “zooms in so that that text fills the screen horizontally,” modifying the scale of the original interpreted layout. In the combination, the visual result at any zoom level is a scaled version of the initial interpretation driven by the vector engine (“effect scaling of the display content as interpreted at the first scale”).

5. Claim 3: “The method of claim 1, wherein the method enables the user to browse arbitrary user-selected pages from among billions of Web pages accessible via the World Wide Web on the hand-held wireless device in a manner that replicates browsing of those Web pages on a desktop Web browser in accordance with the method.”

60. Zaurus is described as a “Mobile Business Tool” equipped with wireless communication adapters (e.g., “Digital Cellular Phone Adapter”) to “Connect to the Internet.” (EX1004, 4, 7, 10, 12.) Zaurus instructs users to “Open another home page by specifying URL” and notes that “browsing can be done by accessing the Internet” to view “other home pages” beyond the default Zaurus Plaza. (EX1004, 10, 46.) A person of ordinary skill in the art would have understood that by allowing a user to specify a URL to access the Internet, the device provides access to the vast number (“billions”) of Web pages available on the World Wide Web (“the method enables the user to browse arbitrary user-selected pages from among billions

of Web pages accessible via the World Wide Web on the hand-held wireless device”).

61. Zaurus discloses that its “Internet browser...incorporates HTML 3.2 specifications in important places,” enabling it to display standard Web content such as “JPEG images” and “frames” just as a desktop browser would. (EX1004, 40.) Pad confirms this motivation to replicate a desktop by describing its browsing application as “a zooming version of Mosaic and Netscape” (“desktop Web browser”). (EX1007, 86; *see also* EX1005, 30; EX1007, 97.) Furthermore, SVG is designed to ensure that graphics “be displayable on a wider range of device resolutions from small mobile devices through office computer monitors,” ensuring that the visual result on the handheld device replicates the appearance on a desktop. (EX1008, 1, 4.) Thus, the combined device allows users to access arbitrary URLs on the handheld device while maintaining the layout and design of a desktop browser (“in a manner that replicates browsing of those Web pages on a desktop Web browser in accordance with the method.”).

6. Claim 4

- i) [4.a] “The method of claim 1, wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed,”**

62. Zaurus describes itself as a “Mobile Business Tool” that includes an “Internet browser” capable of displaying “home pages.” (EX1004, 40). Zaurus

includes a content display area below the “Menu palette” and navigation controls where the Web page views (e.g., “ZAURUS PLAZA”) are rendered for the user. (EX1004, 12, 44). Pad confirms this architecture by describing the “Pad++ web browser” as a tool where “the relevant document is loaded into Pad++ and placed on the surface” for viewing. (EX1007, 86, 91). A person of ordinary skill in the art would have understood that the combined device defines a specific rectangular region on the screen dedicated to rendering the HTML content (“browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed”).

- ii) **[4.b] “further comprising enabling the user to perform zooming operations using tap-based user input detected by the touchscreen display and within the content display area.”**

63. Zaurus discloses a mobile device with a touchscreen display where operations are performed by “touching keys such as...icons, buttons, and menu” or by “touching the screen with a pen.” (EX1004, 15.) Pad discloses an interface where clicking on an object triggers a zooming operation, stating that “clicking and holding on the middle mouse button performs a smooth animated zoom in” and “when you click on a piece of text, Pad++ zooms in.” (EX1007, 4, 54.) A person of ordinary skill in the art would have adapted Pad’s mouse-click-based zooming for the Zaurus by utilizing a tap-based user input (the standard touchscreen equivalent of a click) to trigger the zoom function (“enabling the user to perform zooming operations using

tap-based user input detected by the touchscreen display and within the content display area”).

7. Claim 5

- i) [5.a] “The method of claim 1, wherein Web page views are displayed within a content display area, the method further comprising:”**

As I explained above in Claim 4, the combined device implements a browser that satisfies the claimed “wherein Web page views are displayed within a content display area.” (Section IX.A.6.)

- ii) [5.b] “generating a scaled view of the Web page on the hand-held wireless device under which a width of the Web page is rendered to fit across a width of the content display area,”**

64. Pad can compute an image item’s bounding box (“x1 y1 x2 y2”), then adjust the view so the item (or its bounding box) “fills the specified amount of screen” via a center command or set the view magnification using a move command for “magnification of zoom.” (EX1005, 17, 22, 30, 32.) In the context of the Pad browser tutorial, the reference states that “Pad++ zooms in so that that text fills the screen horizontally.” (EX1007, 54.) Because the Web page is an object or group of objects in Pad, the “center” or “fill screen” command applies to the page object just as it does to text objects (“fit across a width of the content display area”). A person of ordinary skill in the art would have been motivated to apply this scaling capability to the Zaurus handheld browser because Zaurus already offered a reduced display

mode to fit more content on its small screen. (EX1004, 46.) Given the limited width of the Zaurus display, a person of ordinary skill in the art would have recognized that scaling the Web page width to fit the content display area would eliminate the need for horizontal scrolling, significantly improving readability and navigation on the handheld device (“generating a scaled view of the Web page on the hand-held wireless device under which a width of the Web page is rendered to...”).

iii) [5.c] “wherein the scaled view of the Web page comprises a magnified view of the Web page as interpreted at the first scale.”

65. As I discussed in Claim 1, Pad and SVG treat the rendered content as scalable vector objects derived from the initial HTML interpretation (“first scale”). (Section IX.A.3.ii.) Zaurus allows users to switch to a “magnified display” to show a zoomed-in view of the content. (EX1004, 46.) Pad describes zooming as a process where the view changes magnification, acting like a “magic magnifying glass.” (EX1007, 3, 30.) Because the scaling is performed by applying a coordinate transformation to the vectors (Section IX.A.4 (Claim 2)), the visual result is mathematically identical to the original layout as viewed at a higher or lower magnification. SVG confirms this by requiring “true scalability” where objects scale uniformly, ensuring the claimed “scaled view” is a magnification of the content as interpreted at the claimed “first scale,” rather than a re-flowed layout (“wherein the

scaled view of the Web page comprises a magnified view of the Web page as interpreted at the first scale”). (EX1008, 14.)

8. Claim 6: “The method of claim 1, wherein each scaled view of the Web page comprises a magnified view of a corresponding portion of the Web page as interpreted at the first.”⁵

66. Zaurus allows users to switch to a “magnified display” to show a zoomed-in view of the content. (EX1004, 46.) Pad further details this behavior, teaching that when a user zooms in on a specific object (e.g., text or image), the view is updated so that the object “fills the screen,” thereby presenting a magnified view of that specific corresponding portion of the document (“wherein each scaled view of the Web page comprises a magnified view of a corresponding portion of the Web page”). (EX1005, 22 (“largest dimension... fills the specified amount of screen”); EX1007, 54.)

67. As I discussed in Claim 1, Pad and SVG utilize a vector-based approach where the initial layout interpreted from the HTML is preserved as a coordinate geometry. (Section IX.A.3.ii.) When the view is scaled, SVG discloses applying a mathematical transformation to the existing vector objects. (EX1008, 11.) The zoomed view is enlarged and visually identical to the original interpretation,

⁵ I have been instructed to interpret “first” as the “first scale” introduced in claim 1.

ensuring the layout remains consistent with how it was interpreted at the first scale (“as interpreted at the first”).

9. Claim 7: “The method of claim 1, wherein there is no degradation in quality of the presentation of text content when the zoom level is increased.”

68. SVG is designed to replace raster graphics with a vector format that supports “text data” with “precise control of text sizing [and] positioning... so that graphic artists have a way to ensure that the end user sees what was intended.” (EX1008, 1, 7-8.) SVG ensures “true scalability,” stating that “all objects and attributes (including such things as text and linewidths) should grow/shrink uniformly with the zoom level.” (EX1008, 10, 14; *see also* EX1005, 75 (text items scalable).) A person of ordinary skill in the art would have understood that “true scalability” in a vector format means the content is mathematically recalculated at the new size, avoiding the pixelation inherent in zooming bitmap images, thereby ensuring no degradation in quality (“wherein there is no degradation in quality of the presentation of text content when the zoom level is increased”).

10. Claim 8

i) [8.a] “The method of claim 1, wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed,”

69. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [4.a]. (Section IX.A.6.i.)

- ii) **[8.b] “further comprising enabling a user to zoom on a column of content displayed in a current view of the Web page by tapping, via the touchscreen display, within a portion of the column,”**

70. Pad discloses organizing content into columns, stating that its HTML browser “will lay out sub-documents in two columns next to the parent document.” (EX1007, 91.) Pad further discloses that users can interact with specific objects or regions to zoom, noting that “when you click on a piece of text, Pad++ zooms in.” (EX1007, 54.) Because Pad’s zoom operates by scaling the existing rendered items (rather than reflowing or redesigning the layout), the user’s tap enables zooming using scaled Web page content. A person of ordinary skill in the art would have adapted this interaction for the Zaurus touchscreen (“touch-sensitive display”). (EX1004, 32.) Zaurus users operate the device by “touching the screen with a pen.” (EX1004, 15.) Therefore, the combination suggests enabling the user to tap on one of the columns defined by Pad’s layout engine to trigger the zoom function (“further comprising enabling a user to zoom on a column of content displayed in a current view of the Web page by tapping, via the touchscreen display, within a portion of the column”).

- iii) **[8.c] “wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that a width of the column is displayed to fit across a width of the content display area in the updated view.”**

71. Pad describes the specific behavior of the zoom operation triggered by clicking: “Pad++ zooms in so that that text fills the screen horizontally.” (EX1007, 54.) A person of ordinary skill in the art would have understood that when this “fill screen” behavior is applied to a column of content as taught in Pad’s two-column layout, the combined device updates the zoom level and view so that the column’s width matches the display width.

72. This scaling behavior is supported by Pad computing an image item’s bounding box (“x1 y1 x2 y2”), then adjusting the view so the item (or its bounding box) “fills the specified amount of screen” via a center command or set the view magnification using a move command for “magnification of zoom.” (EX1005, 17, 22, 30, 32.) Applying this command to a column object on the Zaurus screen would result in the column fitting across the width of the display in the updated view (“wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that a width of the column is displayed to fit across a width of the content display area in the updated view”).

11. Claim 9

i) [9.a] “The method of claim 1, wherein the Web page includes at least one image, and”

73. The combination discloses the claimed “Web page includes at least one image.” Zaurus teaches that its browser can display standard Web pages containing images, stating that it “can display images not only in GIF format, but also in the

commonly found JPEG format.” (EX1004, 40.) Pad similarly supports the inclusion of images as distinct objects within the document structure, referring to “image items” that can be loaded and rendered. (EX1005, 64-65.)

ii) [9.b] “wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed,”

74. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [4.a]. (Section IX.A.6.i.)

iii) [9.c] “further comprising enabling a user to zoom on an image displayed in a current view of the Web page by tapping, via the touchscreen display, within the image,”

75. Pad teaches that the user interface allows zooming on specific objects by interacting with them. Pad describes “image items” as a type of object that can be manipulated and discloses that “when you click on a piece of text, Pad++ zooms in.” (EX1005, 65; EX1007, 54.) Pad further discloses “zoomaction” scripts that are “evaluated when an item grows or shrinks.” (EX1005, 53.) Because Zaurus uses a “touch-sensitive display” where input is provided by “touching the screen,” a person of ordinary skill in the art would have applied Pad’s object zooming to images on the Zaurus device to enable the user to trigger the zoom function by tapping on the image object itself (“further comprising enabling a user to zoom on an image displayed in a current view of the Web page by tapping, via the touchscreen display, within the image”). (EX1004, 32.)

- iv) **[9.d] “wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that the image is displayed to fit across a width of the content display area in the updated view.”**

76. Pad discloses a “center” command that changes the view so that “the largest dimension of its bounding box fills the specified amount of screen.” (EX1005, 22, 54 (“Pad++ zooms in so that that text fills the screen horizontally.”).) Pad can compute an image item’s bounding box (“x1 y1 x2 y2”), then adjust the view so the item (or its bounding box) “fills the specified amount of screen” via a center command or set the view magnification using a move command for “magnification of zoom.” (EX1005, 17, 22, 30, 32.) A person of ordinary skill in the art would have understood that this fit width feature applies equally to “image items” (which have bounding boxes) as taught by Pad. When applied to the Zaurus, this function updates the view so that the tapped image scales to fill the width of the display (“wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that the image is displayed to fit across a width of the content display area in the updated view”). The “fit across” requirement is met by selecting the zoom such that the object’s width fills the content display area horizontally, consistent with Pad’s “fills the screen horizontally” zoom behavior.

12. Claim 10

- i) **[10.a] “The method of claim 1, wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed,”**

77. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [4.a]. (Section IX.A.6.i.)

- ii) **[10.b] “further comprising enabling a user to zoom on a paragraph displayed in a current view of the Web page by tapping, via the touchscreen display, on text content within the paragraph,”**

78. In a Web context, a person of ordinary skill in the art would have understood that a “paragraph” is a discrete block of text. (EX1042, 1-3; EX1043, 10.) A person of ordinary skill in the art would therefore have understood that selecting a displayed “piece of text” that include “one or more lines” in Pad (“text item”) corresponds to selecting text content within a paragraph when the Web page is rendered as text objects. (EX1007, 54; EX1005, 6, 60, 75, 78.) A person of ordinary skill in the art would have adapted this interaction for the Zaurus touchscreen environment. Because Zaurus operations are performed by “touching the screen with a pen,” the mouse-click interaction of Pad is naturally replaced by tapping. (EX1004, 15.) Thus, the combination teaches allowing a user to tap on the text of a paragraph to initiate the zoom (“further comprising enabling a user to zoom

on a paragraph displayed in a current view of the Web page by tapping, via the touchscreen display, on text content within the paragraph”).

- iii) **[10.c] “wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that paragraph is displayed to fit across a width of the content display area in the updated view.”⁶**

79. The combination discloses the claimed “paragraph is displayed to fit across a width of the content display area.” (EX1007, 54 (“Pad++ zooms in so that that text fills the screen horizontally”).) A person of ordinary skill in the art would have understood that by zooming so the text fills the screen horizontally, the system updates the zoom level and offset to fit the width of the clicked paragraph across the display width. Pad can compute an image item’s bounding box (“x1 y1 x2 y2”), then adjust the view so the item (or its bounding box) “fills the specified amount of screen” via a center command or set the view magnification using a move command for “magnification of zoom.” (EX1005, 17, 22, 30, 32, 54.) When applied to the Zaurus, this ensures the text is readable without horizontal scrolling (“wherein in response thereto, a zoom level, offset, and view of the Web page is updated such

⁶ I have been instructed to interpret “paragraph” as the “paragraph” introduced in limitation [10.b].

that paragraph is displayed to fit across a width of the content display area in the updated view”).

13. Claim 11

- i) [11.a] **“The method of claim 1, further comprising:”**
- ii) [11.b] **“defining a content display area comprising a rectangular portion of a browser user interface on which Web page content is to be displayed;”**

80. Zaurus discloses a device with an Internet browser that utilizes a specific portion of the screen to display content, distinct from the menu bars and icons. (EX1004, 11-13.) Pad describes the interface as a “window” through which the user views the content surface. (EX1005, 30.) Accordingly, the combined device satisfies the claimed “defining a content display area comprising a rectangular portion of a browser user interface on which Web page content is to be displayed.”

- iii) [11.c] **“generating scaled display content in accordance with a current zoom level and pan offset; and”**

81. Pad operates by maintaining a “current view” defined by coordinates (“pan offset”) and magnification (“zoom level”). (EX1005, 30 (“current view (x, y, z)”).) Pad “normally does fast pans... copying the portion of the screen that doesn’t change, and re-rendering the new portion.” (EX1005, 11.) SVG mandates support for “zoom and pan on graphics, with true scalability,” ensuring attributes

“grow/shrink uniformly with the zoom level.” (EX1008, 14.) In the combination, the rendering engine generates the visual output (“scaled display content”) based on the user's current zoom and pan settings (“in accordance with a current zoom level and pan offset”).

- iv) [11.d] “**employing a display limit bounding box associated with the content display area to define a rectangular portion of the scaled display content that is to be displayed within the content display area to render a view of the Web page in accordance with the current zoom level and pan offset,**”

82. Pad discloses “Spatial Indexing” to “quickly determine which objects are visible in a given view” and limits rendering to those objects. (EX1007, 141.) A person of ordinary skill in the art would have understood that determining visibility requires comparing object bounds against the bounding box of the current view (“employing a display limit bounding box associated with the content display area”). The view’s bounding box defines the specific rectangular portion of the infinite pad surface that maps to the screen window. (EX1005, 34 (“A frame is a bounding box, and all coordinates are specified within the unit square where the unit square is mapped to the frame.”).) SVG describes establishing a “viewport,” which acts as a clipping rectangle to define what portion of the graphic is visible. (EX1008, 11.) In the combination, the browser uses the viewport geometry (“display limit bounding box”) to identify and render only the portion of the scaled Web page that

fits within the screen's content area ("to define a rectangular portion of the scaled display content that is to be displayed... to render a view of the Web page").

- v) **[11.e] "wherein a resolution of the display limit bounding box is the same as a resolution of the content display area."**

83. Zaurus has a specific display resolution ("320 x 240"). (EX1004, 18.) Pad provides window-to-pad coordinate conversions for rendering within the window. (EX1005, 5 (converting window points to pad coordinates), 30.) SVG aims for display on devices with "a wider range of device resolutions," implying the rendering engine maps the logical viewport to the device's physical resolution. (EX1008, 1.) A person of ordinary skill in the art would have understood that the "display limit bounding box" is represented in screen coordinates for rendering and maps to the pixel grid of the "content display area," implying a mapping between the view's screen-coordinate "display limit bounding box" and the content display area resolution ("resolution... is the same").

14. **Claim 12: "The method of claim 1, where the touch screen display of the hand-held wireless device is disposed on a top portion of the device."**

84. Zaurus illustrates the device layout, showing the "Screen (display portion)" located on the top face of the device body, accessible when the "Top cover" is opened, which corresponds to the display being placed on the upper surface for viewing ("disposed on a top portion of the device"). (EX1004, 12.) The user manual

instructs to “Touch the screen with a pen,” confirming the display’s position is accessible for user interaction on the device’s surface (“where the touch screen display... is disposed on a top portion”). (EX1004, 15.)

15. Claim 13: “The method of claim 1, where the hand-held wireless device comprises a mobile phone.”

85. Zaurus discloses a mobile handheld with cellular connectivity to access the Internet. (EX1004, 7-8 (adapters), 10 (portable), 24 (modem).) Pad is compatible with “a small home computer” and is “especially attractive for systems which have small screens, such as handheld computers (i.e. PDA’s).” (EX1007, 141.) SVG discloses support for “small mobile devices.” (EX1008, 1, 4.) In view of these teachings, a person of ordinary skill in the art would have implemented the combination on “a mobile phone.”

16. Claim 14: “The method of claim 1, wherein the hand-held wireless device is configured to be held in the palm of a user.”

86. Zaurus is branded as a “Zaurus Pocket” device, indicating a form factor small enough for handheld use. (EX1004, 10-15.) It is described as “Highly portable with compact size and lightweight,” enabling it to be easily carried and held. (EX1004, 10.) The device’s dimensions are specified as “Approximately 146mm (width) x 83mm (depth) x 15mm (thickness)” while “Touch[ing] the screen with a pen” (“configured to be held in the palm of a user”). (EX1004, 15, 20.)

17. Claim 15

- i) **[15.pre] “A method to facilitate browsing of a Web page on a device employing a browser having a browser display area, comprising:”**

87. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.pre], [4.a], [11.b]. (Sections IX.A.3.i, IX.A.6.i, IX.A.13.ii.)

- ii) **[15.a] “retrieving HTML-based content and cascading style sheet (CSS) content corresponding to the Web page defining layout information and attributes of content on the Web page comprising a plurality of objects including text objects, image objects, and layout objects;”**

88. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.a], [8.b], [9.a], [10.b]. (Section IX.A.3.ii, IX.A.10.ii, IX.A.11.i, IX.A.12.ii.)

89. In the Zaurus-Pad-SVG combination, the mobile browser retrieves HTML and CSS content and parses it into a “plurality of objects” including text items (“text objects”), image items (“image objects”), and grid/group items (“layout objects”) to define the layout and attributes of the page.

90. Zaurus discloses a mobile device that retrieves HTML-based Web pages containing “HTML 3.2 specifications” and can display images, text, and frames. (EX1004, 40.) As I discussed above, SVG requires “CSS support” and that attributes “should be expressed in CSS,” meaning the retrieved content includes

“cascading style sheet (CSS) content corresponding to the Web page.” (EX1008, 4, 7, 14.)

91. The combination retrieves content that defines the claimed object types. For “text objects,” Zaurus displays text content on Web pages (EX1004, 10.) Pad discloses creating “text items” (e.g., via the “drawtext” command) which are vector-based text objects that render strings of characters. (EX1005, 29, 75.) SVG similarly supports “text data” where “all text/font attributes from CSS should be supported.” (EX1008, 7, 14.) For “image objects,” Zaurus displays “images not only in GIF format, but also in the commonly found JPEG format.” (EX1004, 40.) Pad discloses “image items” that define bounding boxes and rendering for image data fetched from URLs (EX1005, 30, 60, 64). For “layout objects,” Zaurus supports “tables” and “frames,” which are HTML structures defining page layout. (EX1004, 40.) Pad discloses specific items designed to manage layout, such as “Grid items” which “arrange one or more items in rows and columns and treat them as a group.” (EX1005, 54.) Pad also discloses “Group items” which are “used just for creating structure.” (EX1005, 59.) A person of ordinary skill in the art would have understood that parsing HTML tables or frames into Pad’s environment would utilize these grid or group items to represent and manage the page’s layout structure, thereby creating “layout objects.”

- iii) **[15.b] “processing the HTML-based content with a Web browser rendering engine to generate page layout information defining a layout location for each of the plurality of objects included in the Web page as interpreted at a first scale,”**

92. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.a]. (Section IX.A.3.ii.)

93. In the Zaurus-Pad-SVG combination, the Zaurus device employs a browser rendering engine to process HTML content and generate a page view. (EX1004, 40.) Pad discloses that when data (such as HTML) is fetched, it is parsed and an “HTML item is created” which contains a method for rendering the page, effectively generating layout information for the content. (EX1005, 60.) Thus, Pad’s parsing and creation of “HTML items” constitute converting the HTML-based content into page layout information (i.e., scalable layout data/structures used for rendering at multiple zoom levels).

94. Pad defines the location of every object (item) using a specific coordinate system that provides these points. For example, text items are defined by an (x, y) position (EX1005, 29, 75), and image items are defined by a bounding box location (EX1005, 64). Pad’s “Grid items” generate layout information by arranging items in rows and columns, defining the precise grid location for each member object. (EX1005, 54.)

95. SVG similarly relies on “Coordinate systems” and “Transformations” to define exactly where an object is located on the canvas. (EX1008, 11.) A person of ordinary skill in the art would have understood that this layout is initially “interpreted at a first scale” because it is the default view generated before any user-initiated zooming occurs. Zaurus renders pages initially in a “Reduced Display” mode or standard view, which corresponds to the first interpretation of the page layout. (EX1004, 46-47.) Pad describes establishing a default view from which the initial layout is established. (EX1005, 30.) Thus, the combination processes the HTML to generate coordinates and grids (“page layout information”) for every object (e.g., text, images, layout groups) as they are initially positioned (“interpreted at a first scale”). In other words, for each object, the system maintains and applies an X/Y directional offset from a page or frame reference point to the object’s location.

iv) **[15.c] “wherein generation of the page layout information includes, for each of the plurality of objects,”**

(1) **[15.c.1] “generating page layout information for the object including a bounding box;”**

96. The Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as I discussed for limitations [1.c.2], [1.c.2.a], [11.d]. (Sections IX.A.3.v, IX.A.13.iv.)

97. Zaurus explains that “a single page is divided into a certain number of boundaries so that the information displayed within the boundaries can be freely switched.” (EX1004, 48.) Pad’s grid arrangement and multi-column HTML browser layout involve page-layout computations that define the extent of each object, which a person of ordinary skill in the art would have understood is an outlined box/shape defining the region within which the item’s content (text/image) appears. (EX1005, 54-55, 57.) Pad discloses generating bounding boxes in the context of object modeling, layout, and navigation. (EX1005, 16, 17 (“Returns a list with four elements giving the bounding box”), 22 (“Change the view so as to center the first of the specified items so the largest dimension of its bounding box fills the specified amount of screen (z).”), 33, 34 (“A frame is a bounding box...”).) Pad discloses “Spatial Indexing” to determine visibility of the objects, which means the generation occurs during the layout phase. (EX1007, 141.)

98. The combination satisfies all claimed object types. For text and image objects, Pad generates bounding boxes for individual items to handle rendering and events. (EX1005, 29, 64.) For layout objects, Pad relies on bounding boxes to prevent overlapping nodes by “calculating the bounding box of the subtree rooted at a node.” (EX1005, 41.) Pad also describes groups (layout objects) as geometric entities with their own bounding boxes for grouping other items. (EX1005, 59-60 (“Items of type group are special items that group other items...if the event is within

the bounding box of the group, but does not hit any members, then it will be ignored by the group.”.)

99. SVG similarly describes computing object bounds during layout. (EX1008, 15 (“Supplemental utility methods (e.g., query an object’s bounds...”)).) A person of ordinary skill in the art implementing a rendering environment would have understood “object’s bounds” to mean the bounding box maintained by the rendering engine for each object in the layout. In the Zaurus-Pad-SVG combination, the rendering engine generates page layout information such as bounding boxes for each of the plurality of objects (i.e., text, image, and layout objects) (“for each of the plurality of objects, generating page layout information for the object including a bounding box.”).

(2) [15.c.2] “generating information that links the object with its corresponding page layout information;”

100. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.c.2.b]. (Section IX.A.3.v.2.)

101. In the Zaurus-Pad-SVG combination, each object (text, image, layout) includes information that links its logical definition with its geometric layout data. Pad describes associating nodes (“object”) with layout information to facilitate view adjustments and event handling. (EX1005, 16 (“addtag”), 17 (“bbox...bind”).)

Each object stores unique IDs or tags that link the object to its properties. (EX1005, 1 (“Related Commands and Options”), 15, 29 (“gettags”), 30, 32 (“itemconfigure”), 60, 65.) Pad’s commands (e.g., “bbox”) use these links to retrieve the specific geometry for a given object identifier that can associate the parsed HTML content with its specific bounding box. (EX1005, 17 (“returns a list...giving the bounding box”).) For layout objects, Pad links the group object to a coordinate region. (EX1005, 54 (“The bounding box (in pixels) is returned for the space occupied by the grid position indicated by column and row.”).)

102. SVG describes elements and geometric utilities for storing and associating layout attributes with elements via the DOM. (EX1008, 14-15.) The objects are scriptable, meaning the browser maintains a link between the document object and its layout attributes. (EX1008, 9 (“Groups should have the following attributes... accessible and/or controllable via scripting...”), 15 (“Supplemental utility methods (e.g., query an object’s bounds...”)).) Given that Pad discloses per-object stored bounding boxes addressable by tags and identifiers (EX1005, 17 (“bbox”), 54 (“grid bbox”), 59 (“Groups”)), a person of ordinary skill in the art would have “generat[ed] information that links the object with its corresponding page layout information” in the mobile browser.

- v) **[15.d] “wherein the page layout information further includes information from which a page layout**

location of each of the bounding boxes can be determined;”

103. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.d] because maintaining the layout relative to the first scale requires determining the layout location of the bounding boxes. (Section IX.A.3.vi.)

104. In the Zaurus-Pad-SVG combination, the page layout information includes coordinate data defining the location of each object’s bounding box within the page’s coordinate system. Pad discloses that the layout information for every item includes coordinates. For example, the “bbox” command returns a list of coordinates (e.g., “x1 y1 x2 y2”) that define the spatial location and dimensions of the bounding box. (EX1005, 17, 22, 29, 33, 65.) Pad further discloses coordinate mapping that allows these locations to be determined relative to the page or the window, utilizing “pad coordinates” to define the absolute position of items on the zoomable surface. (EX1005, 5, 34 (“A frame is a bounding box, and all coordinates are specified within the unit square where the unit square is mapped to the frame.”).) SVG similarly relies on “Coordinate systems” and “Transformations” (e.g., 2x3 matrices) to define exactly where an object or viewport is located on the canvas. (EX1008, 11.) This coordinate data constitutes “information from which a page layout location of each of the bounding boxes can be determined” by the rendering engine.

- vi) **[15.e] “employing scaled page layout information and/or content derived therefrom to generate scaled Web page content at multiple scale factors;”**

105. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.b]. (Section IX.A.3.iii.)

- vii) **[15.f.1] “enabling a user of the mobile device to zoom in on an object via a user input to the touchscreen display and”**

106. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.1] and [4.b]. (Section IX.A.3.iv, IX.A.6.ii.)

- viii) **[15.f.2] “wherein said scaled Web page content including one or more objects is generated by scaling bounding boxes corresponding to the one or more objects to produce scaled bounding boxes and,”**

107. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.c.2.a]. (Section IX.A.3.v.1.)

- ix) **[15.f.3] “for each of the one or more objects, scaling content associated with the object to produce a scaled object that fits within its corresponding scaled bounding box; and”**

108. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.c.2.b]. (Section IX.A.3.v.2.)

- x) **[15.g] “enabling zooming on objects on the Web page, wherein, in response to a user tapping on an object within a first Web page view, a zoom level, offset, and view of the Web page is updated based on page layout information corresponding to the object,”**

109. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [8.b]-[8.c], [9.c]-[9.d], [10.b]-[10.c]. (Sections IX.A.10.ii-iii, IX.A.11.iii-iv, IX.A.12.ii-iii.)

110. In the Zaurus-Pad-SVG combination, the device enables zooming on objects via user input. Zaurus discloses a touchscreen interface where a user interacts with content by tapping with a stylus or finger (“in response to a user tapping on an object”). (EX1004, 15 (“Touch the screen with a pen.”), 40 (clicking links/maps).) Pad discloses a mechanism for updating the view in response to selecting an object because Pad’s commands allow the system to “Change the view so as to center the first of the specified items so the largest dimension of its bounding box fills the specified amount of screen.” (EX1005, 17, 22.) A person of ordinary skill in the art would have understood that this command scales the view so the object “fills the specified amount of screen,” which changes the magnification (“a zoom level... is updated”). (EX1005, 22; EX1007, 54.) The command “centers” the item,

which updates the X/Y pan position (“offset... is updated”). (EX1005, 22.) The command executes a “Change the view” operation to render the new state (“view of the Web page is updated”). (EX1005, 22, 30, 32, 60.) The calculation relies on the “bounding box” of the item to determine the necessary scale and center point (“based on page layout information corresponding to the object”). (EX1005, 17,22.)

xi) [15.h.1] “wherein the objects comprise a plurality of different types of objects, and”

111. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.a], [1.c.1], [8.b], [10.b], [15.a]-[15.c]. (Sections IX.A.3.ii, iv, IX.A.10.ii, IX.A.12.ii, IX.A.17.ii.) A person of ordinary skill in the art would have understood that the distinct item definitions in Pad (text, image, and layout) constitute the claimed plurality of different object types. (EX1004, 40; EX1005, 30, 60; EX1007, 54; EX1008, 11-14.)

xii) [15.h.2] “wherein under the updated zoom level and Web page view the layout locations of objects are retained relative to the layout location of the objects as interpreted at the first scale.”

112. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.d]. (Section IX.A.3.vi.)

18. Claim 16

- i) **[16.a] “The method of claim 15, wherein one of the plurality of different types of objects comprises a column, the method further comprising:”**

113. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [1.a], [8.b], [15.a]. (Sections IX.A.3.ii, IX.A.10.ii, IX.A.17.ii.)

- ii) **[16.b.1] “in response to a user tapping within an area on a view of the Web page occupied by at least a portion of a column, zooming the Web page view on the column to produce a zoomed view of the Web page,”**

114. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [8.b]-[8.c]. (Sections IX.A.3.ii-iii.)

115. Zaurus displays HTML content including tables and frames, which typically define columns. (EX1004, 5, 10-13, 40, 46-47.) Pad parses this structure into “Grid items” which “arrange one or more items in rows and columns.” (EX1005, 54.) Zaurus detects a tap input (“in response to a user tapping”). (EX1004, 15.) Pad discloses that events (like clicks/taps) are detected based on the geometry of the group or grid. (EX1005, 54, 59-60.) Pad discloses that events are detected based on geometry, stating that events “pass[] through the group to its members” if they hit a member, but “If the event is within the bounding box of the

group, but does not hit any members, then it will be ignored.” (“within an area...occupied by at least a portion of a column.”). (EX1005, 59-60.) In response to selecting the column (Grid item), Pad allows the view to “center the first of the specified items so the largest dimension of its bounding box fills the specified amount of screen.” (EX1005, 22; *see also id.*, 60; EX1007, 54; EX1008, 14.) By applying this command to the Grid item representing the column, the browser executes the claimed step of “zooming the Web page view on the column to produce a zoomed view of the Web page” that may be filled by that column.

iii) [16.b.2] “wherein in the zoomed view of the Web page the column is enlarged and centered horizontally within the browser display area.”

116. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [8.b]-[8.c]. (Sections IX.A.3.ii-iii.)

117. Pad’s zoom command modifies the view scale such that the selected item “fills the specified amount of screen.” (EX1005, 22.) By filling the screen with a column that previously occupied only a portion of the page, the column is necessarily magnified (“enlarged”) relative to its original size. (EX1005, 54.) Pad’s navigation command is defined to “center the first of the specified items.” (EX1005, 22.) This active alignment calculates the necessary pan offset to align the geometric center of the column’s bounding box with the center of the viewport (“centered

horizontally”). (EX1005, 22, 30, 32.) The Zaurus device provides the screen in which this rendering occurs. (EX1004, 10, 46-47.) Pad’s view calculation ensures the object fills this defined drawing surface. (EX1005, 22, 30.) A person of ordinary skill in the art would have understood that executing Pad’s center and fill command on a grid/column object satisfies the claimed “column is enlarged and centered horizontally within the browser display area.” (EX1008, 14.)

19. Claim 17: “The method of claim 16, wherein the column is enlarged so as to fit a width of the column across a width of the browser display area.”

118. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [8.c]. (Section IX.A.3.iii.)

20. Claim 18

i) [18.a] “The method of claim 15, wherein one of the plurality of different types of objects comprises an image, the method further comprising:”

119. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [1.c.1] and [9.c]. (Sections IX.A.3.iv, IX.A.11.iii.)

ii) [18.b.1] “in response to a user tapping on an image, zooming the Web page view on the image to produce a zoomed view of the Web page,”

120. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [9.c]. (Section IX.A.11.iii.)

- iii) **[18.b.2] “wherein in the zoomed view of the Web page the image is enlarged and centered horizontally within the browser display area.”**

121. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [9.d]. (Section IX.A.11.iv.)

- 21. **Claim 19: “The method of claim 18, wherein the image is enlarged so as to fit a width of the image across a width of the browser display area.”**

122. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [9.d]. (Section IX.A.11.iv.)

22. **Claim 20**

- i) **[20.a] “The method of claim 15, wherein one of the plurality of different types of objects comprises a paragraph, the method further comprising:”**

123. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [10.b]. (Section IX.A.12.ii.)

- ii) **[20.b.1] “in response to a user tapping on a paragraph, zooming the Web page view on the paragraph to produce a zoomed view of the Web page,”**

124. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [10.b]. (Section IX.A.12.ii.)

- iii) **[20.b.2] “wherein in the zoomed view of the Web page, the paragraph is enlarged and centered horizontally within the browser display area.”**

125. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [10.c] and [16.b.2]. (Sections IX.A.12.iii, IX.A.18.iii)

23. Claim 21: “The method of claim 20, wherein the paragraph is enlarged so as to fit a width of the paragraph across a width of the browser display area.”

126. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [10.c]. (Section IX.A.12.iii.)

24. Claim 22

i) [22.a] “The method of claim 15, wherein the Web page comprises Cascading Style Sheet (CSS) content defining page layout aspects of the Web page, and”

127. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.pre], [1.a], and [15.a]. (Sections IX.A.3.i-ii, IX.A.17.ii.)

ii) [22.b] “wherein the page layout information is generated, at least in part, by processing the CSS content.”

128. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.a] and [15.b]. (Section IX.A.3.ii.)

129. SVG states that “CSS support” is required and that object attributes “should be expressed in CSS.” (EX1008, 4, 11-14.) For example, it states that for

text objects, “all text/font attributes from CSS should be supported.” (EX1008, 7.) SVG also utilizes “CSS positioning” to determine where objects are placed. (EX1008, 11.) As established in limitation [15.b], Pad’s rendering engine calculates the bounding boxes (“page layout information”). To calculate the bounding box of a text object, the engine processes the CSS font-size and font-family attributes. (EX1005, 29 (“The bounding box is affected by the setfont and setfontheight commands.”), 30, 37; EX1008, 4, 14.) Similarly, to position a layout group, the engine must process the CSS positioning or grid attributes. (EX1005, 54; EX1008, 11.) A person of ordinary skill in the art would have understood that because the visual properties (size, font, position) are defined by the CSS content, the rendering engine necessarily generates the final page layout information by processing that CSS content (“at least in part”).

25. Claim 23

- i) **[23.a] “The method of claim 15, wherein the device comprises a hand-held wireless device and the Web page is designed to be viewed by a desktop Web browser, further comprising,”**

130. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.pre]. (Section IX.A.3.i.)

- ii) **[23.b] “after zooming the Web page view on the object, enabling the user to browse an entirety of the HTML-based content at the updated zoom level by panning views of the Web page in response to corresponding user input,”**

131. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.d], [4.a], [6], [11.c], and [15.g]. (Sections IX.A.3.vi, IX.A.6.ii, IX.A.13.iii, IX.A.17.x.)

132. As I discussed in limitation [15.g], the system updates the view to a new magnification (“zoom level”) centered on a specific object. Pad separates the position (x, y) from the scale (z). (EX1005, 30.) Pad is an interface where the entire dataset (“entirety of the HTML-based content”) exists on a large 2D surface. (EX1005, 5, 30.)

133. To view different parts of this surface, Pad provides navigation commands like “moveto” that modify the x, y, coordinates to translate the view window across the surface without altering the zoom coordinate. (EX1005, 22 (“Pan...Move the view by amount (x, y) in screen units.”), 30 (“moveto”); EX1007, 54.) Once the zoom level is set, a person of ordinary skill in the art would have understood that unless a command modifies the z parameter (like zoom or moveto), the zoom level set by the previous interaction remains fixed (“at the updated zoom level”) during the panning operation. The Zaurus device utilizes a touchscreen where the user provides input via stylus or finger. (EX1004, 15.) A person of

ordinary skill in the art would have understood that mapping a gesture on the Zaurus screen to Pad's view translation commands would enable navigating a large document on a small mobile display ("panning views of the Web page in response to corresponding user input").

iii) [23.c] "**wherein each panned view of the Web page comprises a magnified view of a corresponding portion of the Web page as would be rendered by a desktop Web browser employing the Web browser rendering engine at the first scale.**"

134. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.d] and [6]. (Section IX.A.3.vi, IX.A.8.)

135. Zaurus processes standard "HTML 3.2 specifications" in its browser. (EX1004, 40, 46-47.) Pad's rendering approach defines a static surface and Pad coordinate system where all items are placed during the initial parse. (EX1005, 30.) The layout (e.g., where a column is located relative to the header) is established when the page is loaded ("first scale") and does not change dynamically. (EX1007, 54, 91, 97.) Pad discloses that the view is defined by a transform that maps points in the Pad coordinate system to the screen. (EX1005, 5 ("padxy"), 30.) When the user zooms and pans, they are moving a view over this static surface without triggering a re-flow of the text. (EX1005, 22 ("smooth animation").) A person of ordinary skill in the art would have understood that because Pad preserves the

geometric relationships, the content displayed in any “panned view” is enlarged (“magnified”) but geometrically identical to the “desktop” layout generated at the “first scale.” (EX1005, 32; EX1008, 14.)

26. Claim 24

- i) [24.a] “The method of claim 15, further comprising, after zooming the Web page view on the object, enabling the user to browse an entirety of the HTML-based content at the updated zoom level by panning views of the Web page,”**

136. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitation [23.b]. (Section IX.A.25.ii.)

- ii) [24.b] “wherein the layout of objects in each panned view is retained relative to the layout of the objects as interpreted by the Web browser rendering engine at the first scale.”**

137. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [1.d], [15.b], and [15.h.2]. (Sections IX.A.3.vi, IX.A.17.x, IX.A.17.xii.)

138. As established in limitation [15.b], the rendering engine processes the content to place items at specific coordinates (“interpreted by the Web browser rendering engine at the first scale”). (EX1005, 30; EX1004, 40.) Pad’s objects exist at fixed coordinates on the pad surface (“layout of objects”). (EX1005, 5, 30.) The view is defined by a transform (x, y, z) that maps these fixed points to the screen. (EX1005, 30.) When the user pans (modifying the x, y of the view), the operation

acts on the view transform rather than the object coordinates. (EX1005, 22, 32; EX1007, 54, 97.) Because the objects themselves are not moved or reflowed, their relative positions are “retained” exactly as they were calculated in the initial “first scale” interpretation. (EX1004, 46-47; EX1008, 14.)

27. Claim 25: “The method of claim 15, wherein the device comprises a hand-held device.”

139. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.pre]. (Section IX.A.3.i.)

28. Claim 26: “The method of claim 24, wherein the hand-held device is configured to be held in the palm of a user.”

140. The Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as I discussed for claim 14. (Section IX.A.16.)

29. Claim 27: “The method of claim 15, wherein the device comprises a mobile phone.”

141. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for claim 13. (Section IX.A.15.)

30. Claim 28

i) [28.pre] “A mobile device, comprising:”

ii) [28.a] “a processor;”

142. The Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as I discussed for limitation [1.pre]. (Section IX.A.3.i.) Zaurus is further powered by a “processor.” (EX1004, 18.)

iii) [28.b] “a touchscreen display, operatively coupled to the processor;”

143. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.c.1]. (Section IX.A.3.iv.) Zaurus includes a “display” and input from the touch panel is processed by the system software running on the processor. (EX1004, 18.)

iv) [28.c] “a wireless communication interface, operatively coupled to the processor, to facilitate wireless communication with a network that supports access to the Internet; and”

144. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for claim 3. (Section IX.A.5.) Zaurus can connect to an “access point.” (EX1004, 38.)

- v) **[28.d] “memory, operatively coupled to the processor, in which a plurality of instructions are stored including instructions comprising an operating system and a mobile browser having a Web browser rendering engine, wherein execution of the plurality of instructions by the mobile device enable the mobile device to perform operations including,”**

145. The Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as I discussed for limitations [1.a]. (Section IX.A.3.ii.) Zaurus includes “memory” for running the functionality such as the browser. (EX1004, 18.)

- vi) **[28.e.1] “enabling a user to perform full page browsing of a Web page on the mobile device in a manner that replicates browsing the Web page on a desktop Web browser,”**
- vii) **[28.e.2] “wherein the Web page comprises HTML-based content and cascading style sheet (CSS) content defining a page layout and design of display content on the Web page, and”**
- viii) **[28.e.3] “enabling full page browsing of the Web page is implemented by,”**

146. The Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as I discussed for limitation [1.pre]. (Section IX.A.3.i.)

- (1) **[28.e.3.a] “in response to a user request to access the Web page, retrieving HTML-based content and CSS content corresponding to the Web page and processing the HTML-based content and CSS content with the Web browser rendering engine to interpret the page layout and design of the display content on the Web page at a first scale;”**

147. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.a]. (Section IX.A.3.ii.)

- (2) **[28.e.3.b] “enabling scaled page layout information and/or content derived therefrom to generate scaled Web page content at multiple scale factors; and”**

148. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.b]. (Section IX.A.3.iii.)

- (3) **[28.e.3.c.1] “enabling a user of the mobile device to zoom in on an image via a user input to the touchscreen display and”**

149. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.c.1]. (Section IX.A.3.iv.)

- (4) **[28.e.3.c.2] “wherein scaled Web page content including one or more images is generated by scaling bounding boxes corresponding to the**

one or more images to produce scaled bounding boxes and,”

150. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.2] and [1.c.2.a]. (Sections IX.A.3.v, IX.A.3.v.1.)

(5) [28.e.3.c.3] “for each of the one or more images, scaling content associated with the image to produce a scaled image that fits within its corresponding scaled bounding box;”

151. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.c.2.b]. (Section IX.A.3.v.2.)

ix) [28.f] “wherein each of the Web browser rendering engine and a Web browser rendering engine employed by a desktop browser for which browsing is replicated are the same.”

152. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.e]. (Section IX.A.3.vii.)

31. Claim 29

- i) **[29.a] “The mobile device of claim 28, wherein the plurality of instructions further comprise instructions for implementing a vector-based rendering engine, and”**
- ii) **[29.b] “wherein scaled views of the Web page are generated by executing instructions corresponding to the vector-based rendering engine to effect scaling of the display content as interpreted at the first scale.”**

153. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for claim 2. (Section IX.A.4.)

32. Claim 30: “The mobile device of claim 28, wherein execution of the plurality of instructions enables the user to browse arbitrary user-selected pages from among billions of Web pages accessible via the World Wide Web on the mobile device in a manner that replicates browsing of those Web pages on a desktop Web browser.”

154. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for claim 3. (Section IX.A.5.)

33. Claim 31

- i) **[31.a] “The mobile device of claim 28, wherein the mobile browser is configured to display Web page views within a content display area on the touchscreen display, and”**
- ii) **[31.b] “wherein execution of the instructions further enables the user to perform zooming operations using tap-based user input detected by the touchscreen display and within the content display area.”**

155. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for claim 4. (Section IX.A.6.)

34. Claim 32: “The mobile device of claim 28, wherein the mobile device comprises a mobile phone.”

156. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for claim 13. (Section IX.A.15.)

35. Claim 33: “The mobile device of claim 28, wherein the mobile device is configured to be held in the palm of a user.”

157. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for claim 14. (Section IX.A.16.)

36. Claim 34

i) [34.pre] “A mobile device, comprising:”

ii) [34.a] “a processor;”

158. The Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as I discussed for limitations [1.pre], [28.pre], and [28.a]. (Sections IX.A.3.i, IX.A.30.i, IX.A.30.ii.)

iii) [34.b] “a touchscreen display, operatively coupled to the processor;”

159. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.1] and [28.b]. (Sections IX.A.3.iv, IX.A.30.iii.)

iv) [34.c] “a wireless communication interface, operatively coupled to the processor, to facilitate wireless communication with a network that supports access to the Internet; and”

160. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for claim 3 and limitation [28.c]. (Section IX.A.5, IX.A.30.iv.)

v) [34.d.1] “memory, operatively coupled to the processor, in which a plurality of instructions are stored including instructions comprising an operating system and a browser having a Web browser rendering engine,”

161. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.a] and [28.d].

(Sections IX.A.3.ii, IX.A.30.v.) Zaurus discloses system software stored in memory for operating the device and running the Internet browser, and the browser's rendering engine is the software component that interprets standard HTML (e.g., HTML 3.2) and renders the resulting page view on the display. (EX1004, 18, 40.)

- vi) **[34.d.2] “wherein execution of the plurality of instructions by the mobile device enable a user to perform full page browsing of a Web pages on the mobile device in a manner that replicates browsing the Web pages on a desktop Web browser by performing operations comprising,”**

162. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.pre] and [28.e.1]. (Sections IX.A.3.i, IX.A.30.vi.)

- vii) **[34.e] “in response to a user request to access each of a plurality of Web pages arbitrarily selected from among billions of Web pages accessible via the World Wide Web,”**

163. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for claim 3. (Section IX.A.5.) Zaurus allows a user to specify a URL and open “other home pages” beyond the default page, which a person of ordinary skill in the art would have understood permits requesting arbitrary user-selected pages on the World Wide Web from among the vast number of available pages. (EX1004, 10, 46.)

- viii) **[34.e.1] “retrieving HTML-based content associated with the Web page and processing the HTML-based**

content with the Web browser rendering engine to interpret a page layout and design of display content on the Web page at a first scale and generate corresponding page layout information,”

164. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.a] and [15.b]. (Sections IX.A.3.ii, IX.A.17.iii.)

ix) [34.e.2] “wherein the page layout information defines a layout location for each of a plurality of objects included in the Web page as interpreted at the first scale and generation of the page layout information includes,”

165. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.a], [1.c.2], [15.b], and [15.c]. (Sections IX.A.3.ii, IX.A.3.v, IX.A.17.iii, IX.A.17.iv.)

x) [34.e.2.a] “for each of the plurality of objects,”

(1) [34.e.2.a.1] “generating page layout information including a bounding box for the object; and”

166. The Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as I discussed for limitations [1.c.2], [11.d], [15.c], and [15.c.1]. (Sections IX.A.3.v, IX.A.13.iv, IX.A.17.iv, IX.A.17.iv.1.)

(2) [34.e.2.a.2] “generating information that links the object with its corresponding page layout information;”

167. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.2.b] and [15.c.2]. (Sections IX.A.3.v.2, IX.A.17.iv.2.)

- xi) **[34.e.3] “wherein the page layout information further includes information from which a page layout location of each of the bounding boxes can be determined;”**

168. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.d] and [15.d]. (Sections IX.A.3.vi, IX.A.17.v.)

- xii) **[34.f.1] “enabling the user to perform zooming of the Web page at multiple zoom levels and pan views of the Web page at each of the multiple zoom levels by generating corresponding scaled views of the Web page,”**

169. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.b], [1.d], [11.c], and [23.b]. (Sections IX.A.3.iii, IX.A.3.vi, IX.A.13.iii, IX.A.25.ii.) Pad represents the current view as a transform (xview, yview, zoom), so zooming changes the scale component and panning changes the position components while preserving the underlying first-scale layout geometry, enabling zoom and pan at “multiple zoom levels by generating corresponding scaled views.” (EX1005, 30, 32; EX1007, 97.)

- xiii) **[34.f.2] “wherein enabling the user to perform zooming operations includes performing zooming operations in response to tap-based user input, and”**

170. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.1] and [4.b]. (Sections IX.A.3.iv, IX.A.6.ii.)

- xiv) **[34.f.3] “wherein generation of a scaled view of the Web page is effected by,”**
- xv) **[34.f.3.a] “for each text object to be included in scaled display content employed to generate the scaled view,”**

171. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.b], [1.c.2], [7], and [10.b]. (Sections IX.A.3.iii, IX.A.3.v, IX.A.9, IX.A.12.ii.)

172. Pad generates a view of the document surface based on a transformation that includes a zoom factor (“generation of a scaled view”). (EX1005, 30 (“Returns the current view of the main window in ‘xview yview zoom’ form”).) The rendering engine executes specific drawing commands to make this generation. (EX1005, 30.) Pad’s rendering engine identifies visible objects to generate the view. Pad employs “Spatial Indexing” based on an “R-Tree” to “quickly determine which objects are visible in a given view.” (EX1007, 141; *see also id.*, 54.) A person of ordinary skill in the art would understand that this step determines which objects are “to be included” in the current “scaled display content.” Once the visible objects are

identified, Pad iterates through them to perform rendering (“for each... object...”). (EX1007, 141.) This iteration includes text items that display “a string of characters on the screen” (“text object”). (EX1005, 75.) A person of ordinary skill in the art would have understood that the generation of the final view is necessarily “effected by” this loop, which executes rendering logic for every text object contained in the current zoom window. SVG similarly describes a rendering standard that processes text elements within the viewport. (EX1008, 7, 11-14.)

(1) [34.f.3.a.1] “scaling page layout information associated with the text object using a scale factor associated with the scaled display content to determine a scaled datum that defines a scaled page layout location of the text object;”

173. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.b] and [1.c.2.a] and claim 2. (Sections IX.A.3.iii, IX.A.3.v.1, IX.A.4.)

174. The combination further applies the view’s zoom (“scale factor”) to the object’s coordinates (“page layout information”) to determine its scaled location (“scaled datum”) on the screen. (EX1005, 30 (“zoom specifies the magnification”), 36 (“multiplying”), 46; EX1008, 11-13, 14 (“all objects and attributes... should grow/shrink uniformly with the zoom level”).) A person of ordinary skill in the art would have understood that this mathematical transformation of coordinates results in the claimed “scaled datum” that defines the object's location on the display. In

other words, for each object, the system maintains and applies an X/Y directional offset from a page or frame reference point to the object's location.

(2) [34.f.3.a.2] “determining display attributes for the text object, including a font typeface, font size and color attribute; and”

175. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.a]. (Section IX.A.3.ii)

176. Pad and SVG support attributes for text objects such as font typeface, size, and color (e.g., via CSS). (EX1005, 30, 37 (“Sets the font for future drawing with render callbacks”), 78 (“Specifies the font to be used for rendering text for this item... Color specifies a color to use for drawing the text”), 81 (“Sets the height of the font”); EX1008, 7 (“All text/font attributes from CSS should be supported”), 11-12, 13 (“All CSS text/font attributes... should be honored”), 14.) A person of ordinary skill in the art would have understood that by processing these CSS attributes or Pad command options, the rendering engine is “determining display attributes for the text object” prior to rendering.

(3) [34.f.3.a.3.a] “employing a scalable font associated with the font typeface to render text associated with the text object in a color associated with the color attribute,”

177. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for claim 7. (Section IX.A.9.)

178. Pad uses scalable fonts (e.g., Type 1 or vector fonts) to render text without degradation. (EX1005, 30, 37 (“setfont fontname...Specifies the font to be used...Fontname must specify a filename which contains an Adobe Type 1 font”), 75 (“Text items are created at a default size... Their size can be changed with the scale command”); EX1007, 54.) SVG also discloses scalable text rendering. (EX1008, 11 (“images and text should scale along with the sizes of the shapes”), 13 (“All CSS text/font attributes... should be honored”).) A person of ordinary skill in the art would have understood that Pad’s “Adobe Type 1” are vector-based and therefore constitute the claimed “scalable font.” Given Pad’s pen color and SVG’s CSS attributes, a person of ordinary skill in the art would have understood that rendering engines process the “color attribute” to render the text in the specific color associated with that attribute. (EX1005, 78.)

**(4) [34.f.3.a.3.b] “wherein the text is rendered
relative to a location associated with the scaled
datum for the text object, and”**

179. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [1.d]. (Section IX.A.3.vi.)

180. Pad renders text at the location defined by its transformed (scaled) coordinates. (EX1005, 29 (“Magnification is defined as the multiplication of the current view...with the object’s size”), 30 (defining the view transform as “xview

yview zoom”).) A person of ordinary skill in the art would have understood that the coordinate resulting from mapping the text object’s position to the screen using the view transform constitutes the claimed “location associated with the scaled datum for the text object” because the text is rendered relative to this point. (EX1005, 46; EX1007, 54; EX1008, 11-14.)

(5) [34.f.3.a.3.c] “wherein the scale applied to the scalable font is a function of the scale factor and the font size; and”

181. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for claim 7. (Section IX.A.9.) SVG and Pad disclose that text size scales uniformly with the zoom level, making the rendered size a function of the base font size and the view’s scale factor. (EX1005, 29 (“Magnification is defined as the multiplication of the current view... with the object’s size”), 30; EX1008, 11 (“linewidths, images and text should scale along with the sizes of the shapes”); EX1008, 14 (“text and linewidths) should grow/shrink uniformly with the zoom level”); *see also* EX1004, 46-47.) A person of ordinary skill in the art would have understood that the “scale” requires the final rendered size to be a mathematical “function” of the object’s defined size (“font size”) and the global zoom level (“scale factor”).

xvi) [34.f.3.b] “for each image object to be included in scaled display content employed to generate the scaled view,”

182. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.2], [15.f.2], and [15.f.3]. (Section IX.A.3.v, IX.A.17.viii, IX.A.17.ix.)

183. Pad iterates through visible image objects to render them in the scaled view. (EX1005, 64 (“Image Items”); EX1007, 141 (“Pad++ uses an R-Tree internally to quickly determine which objects are visible in a given view”).) A person of ordinary skill in the art would have understood that the rendering engine uses this visibility determination to identify the specific image objects “to be included” in the current “scaled display content” before processing them for display. (EX1004, 40; EX1005, 30, 60; EX1008, 12.)

(1) [34.f.3.b.1] “scaling page layout information associated with the image object using the scale factor to determine a scaled datum that defines a scaled page layout location of the image object; and”

184. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.2.a] and [15.f.2]. (Section IX.A.3.v.1, IX.A.17.viii.)

185. Pad scales the image object’s layout information (e.g., bounding box location) using the view’s scale factor to determine its scaled location. (EX1005, 29 (“Magnification is defined as the multiplication of the current view...with the object’s size”), 30 (defining the view as “xview yview zoom” where “zoom specifies

the magnification”), 36, 46, 64 (“Image Items”).) A person of ordinary skill in the art would have understood that applying the view transform including the “scale factor” to the image’s coordinates (“page layout information”) results in a “scaled datum” that defines the image’s location on the screen (“scaled page layout location”). (*see also* EX1008, 11-14.)

(2) [34.f.3.b.2] “scaling scalable image content corresponding to the image object to produce a scaled image having a size that is a function of the scale factor and the bounding box corresponding to the image object; and”

186. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitations [1.c.2.b] and [15.f.3]. (Section IX.A.3.v.2, IX.A.17.ix.)

187. Pad scales the “scalable image content” to fit its bounding box, which scales with the magnification (“scale factor”). (EX1005, 29 (“Magnification is defined as the multiplication of the current view...with the object’s size”), 30, 36, 60, 64 (“Image Items”).) SVG requires uniform scaling of images with the zoom level (“scale factor”). (EX1008, 11 (“images and text should scale along with the sizes of the shapes”), 12-13, 14 (“all objects and attributes... should grow/shrink uniformly”).) A person of ordinary skill in the art would have understood that the “multiplication of the current view...with the object’s size constitutes determining

the size as the claimed “function of the scale factor” (zoom) and the “bounding box” (object’s size).

xvii) [34.f.3.c] “generating a scaled view of the Web page on the touchscreen display under which a width of the Web page is rendered to fit across a width of a content display area employed by the browser for displaying Web views.”

188. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [5.b]. (Section IX.A.7.ii.)

189. Pad’s “center” command can scale the view, so an object (like the web page) fills the screen width. (EX1005, 17, 22 (“Change the view so as to center... so the largest dimension of its bounding box fills the specified amount of screen”), 30, 32, 54; EX1007, 54 (“so that that text fills the screen horizontally”).) Zaurus’s “reduced display” mode motivates fitting content to the small screen. (EX1004, 46 (“Switch between reduced display and magnified display”), 47.) A person of ordinary skill in the art would have understood that applying Pad’s “zoom to fill horizontally” functionality to a Web page object within the Zaurus browser interface results in “generating a scaled view...under which a width of the Web page is rendered to fit across a width of a content display area.” (EX1008, 11-14.)

37. Claim 35: “The mobile device of claim 34, wherein each of the Web browser rendering engine and a Web browser rendering engine employed by a desktop browser for which browsing is replicated are the same.”

190. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [1.pre], [1.e], and [28.f]. (Sections IX.A.3.i, IX.A.3.vii, IX.A.30.ix.)

38. Claim 36

- i) [36.a] “The mobile device of claim 34, wherein a portion of the billions of Web pages comprise Web pages including Cascading Style Sheet (CSS) content defining aspects of the design of those Web pages, and wherein execution of the instructions performs further operations comprising:”**
- ii) [36.b] “in response to a user request to access a Web page including CSS content, employing the Web browser rendering engine to interpret the page layout and design of the display content on the Web page in accordance with the CSS content.”**

191. The Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as I discussed for limitations [1.pre]-[1.a] and claim 22. (Sections IX.A.3.i-ii, IX.A.24.)

192. Zaurus enables a user to initiate a request to access a Web page by specifying a URL. (EX1004, 40, 46, 47.) SVG discloses that Web content includes “CSS content” and mandates that attributes defining style and layout “should be expressed in CSS.” (EX1008, 4, 11-14.) A person of ordinary skill in the art would

have understood that the rendering engine employs this CSS content to “interpret the page layout and design,” such as text attributes and positioning. (EX1008, 11 (“SVG should use CSS positioning”), 13 (“All CSS text/font attributes...should be honored”).)

39. Claim 37

- i) [37.a] “The mobile device of claim 34, wherein each scaled view of the Web page comprises a magnified view of a corresponding portion of the Web page as interpreted at the first scale, and”**

193. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for limitation [5.c] and claim 6. (Sections IX.A.7.iii, IX.A.8.)

- ii) [37.b] “wherein there is no degradation in quality of the presentation of text content when the zoom level is increased.”**

194. The Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as I discussed for claim 7. (Section IX.A.9.)

X. CONCLUSION

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

Dated: March 2, 2026

By: 
Dr. Benjamin Goldberg

Appendix A - Comparison to Unpatentable Claims

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
[1.pre] A method for enabling a user to perform full page browsing of a Web page on a hand-held wireless device in a manner that replicates browsing the Web page on a desktop Web browser, wherein the Web page comprises HTML-based content and cascading style sheet (CSS) content defining a page layout and design of display content on the Web page, the method comprising: [25] The method of claim 15, wherein the device comprises a hand-held device.	[66] The mobile hand-held device of claim 36, wherein a portion of the HTML-based Web content comprises cascaded style sheet data defining aspects of the Web page design that are preserved at each zoom level and panned view. [149.a] rendering a browser interface on a hand-held device 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; [252.f] wherein the Web browser enables a user of	Appendix C (IPR2013-00004) [30.f] rendering a browser interface via which a user is enabled to request to access to a Web page having an original format comprising HTML-based content defining an original page layout, functionality, and design of content on the Web page; Appendix D (90/009,995) [1.f] enabling a user to request access to a Web page comprising HTML-based Web content defining an original page layout, functionality, and	Both this limitation and the unpatentable limitations disclose the technical elements of using a device to browse HTML and CSS content defining page layout and design. The replication of browsing on the desktop is equivalent to the resulting outcome of the unpatentable claims because rendering content while preserving layout, functionality, and design across various zoom levels results in the user's mobile browsing experience being the same as the desktop experience.

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	the device to browse, zoom, and pan billions of Web pages in a manner that preserves the original layout, functionality, and design of the HTML-based Web page content of each Web page at each zoom level and panned view.	design of content on the Web page; [3] The mobile device of claim 1, wherein the device comprises one of a hand-held device or a palm-held device. Appendix E (95/000,635) [29] The mobile device of claim 1, wherein the HTML-based Web content includes cascading style sheet content defining layout and presentation attributes for the Web page. [54] The mobile device of claim 52, wherein the device comprises one of a Personal Digital Assistant (PDA) or pocket PC.	

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[1.a] in response to a user request to access the Web page, retrieving HTML-based content and the CSS content corresponding to the Web page and processing the HTML-based content and CSS content with the Web browser rendering engine to interpret the page layout and design of the display content on the Web page at a first scale; and	[58.b] parsing HTML-based code corresponding to the retrieved Web page to determine the original page layout of the content on the Web page;	Appendix C (IPR2013-00004) [30.g] retrieving HTML-based content associated with the Web page; [72.b] parsing HTML-based code corresponding to the received Web content to identify content on the Web page; Appendix D (90/009,995) [21.b] processing the HTML-based Web content with a rendering engine to generate page layout information corresponding to the original page layout as interpreted by the rendering engine; and	Both this limitation and the unpatentable limitations recite the user request, and both recite retrieving and processing or translating the Web page including HTML and CSS. Interpreting the first scale is equivalent to translating from the original format.

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		Appendix E (95/000,635) [78] The mobile device of claim 52, wherein a portion of the HTML-based Web content comprises cascading style sheet data.	
[1.b] employing scaled page layout information and/or content derived therefrom to generate scaled Web page content at multiple scale factors; and	[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.	Appendix C (IPR2013-00004) [43.c] employing the display list to re-render the display at different scale factors to enable rapid zooming of the Web page. Appendix D (90/009,995) [7] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling the	Employing the scalable page layout or data to generate the Web page at multiple scale factors is equivalent to employing the scalable content or data to render the Web page at various zoom levels and panned views.

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		Web content to be displayed at different resolutions by scaling the scalable vector-based page layout information to resize a view of the Web page on the display in response to associated user inputs. Appendix E (95/000,635) [57] The mobile device of claim 52, wherein the display of the Web page is re-rendered in real-time to effect zooming operations.	
[1.c.1] enabling a user of the mobile device to zoom in on an image via a user input to a touchscreen display and	[52] The mobile hand-held device of claim 51, wherein the corresponding user input comprises tapping on the image via the display.	Appendix C (IPR2013-00004) [41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the	This limitation is similar to the unpatentable limitations that enable a user to “view an image at a higher resolution” (zoom in) or “zoom in on an image” by “tapping on the image” via a

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		instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area of the touch-sensitive display. Appendix D (90/009,995) [13] The mobile device of claim 1, wherein the Web content includes at least one image, and wherein execution of the instructions performs	“touch-sensitive display” (touchscreen).

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		further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across a width of a display area of the touch-sensitive display. Appendix E (95/000,635) [65] The mobile device of claim 52, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a	

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		user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit a width of a display area of the touch-sensitive display.	
[1.c.2] wherein said scaled Web page content including one or more images is generated by	[1.c] in response to a user request to access the Web page, retrieving the Web page via the wireless communication means, and translating at least a portion of the HTML-based Web content from its original format into scalable content that supports a scalable resolution-independent representation of the Web	Appendix C (IPR2013-00004) [41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a	This limitation is similar to the unpatentable limitations that describe the specific mechanism of “translating” or “processing” the original HTML-based Web content to “produce” the “scalable content” (or “scalable vector-based content”).

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	page that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered; and [59] The mobile hand-held device of claim 58, wherein execution of the instructions performs further operations comprising: generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.	current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area of the touch-sensitive display. Appendix D (90/009,995) [18.c] generating page layout information including a bounding box for each object, the bounding box defining width and height dimensions for the object; and Appendix E (95/000,635)	

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		[73] The mobile device of claim 72, wherein execution of the instructions performs further operations comprising generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.	
[1.c.2.a] scaling bounding boxes corresponding to the one or more images to produce scaled bounding boxes and,	[59] The mobile hand-held device of claim 58, wherein execution of the instructions performs further operations comprising: generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's	Appendix C (IPR2013-00004) [75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and Appendix D (90/009,995)	This limitation is similar to the unpatentable limitations that describe the step of “generating a bounding box” for content objects, providing the specific structural antecedent that is acted upon in the target limitation.

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	associated group of content.	[18.c] generating page layout information including a bounding box for each object, the bounding box defining width and height dimensions for the object; and Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the	

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		Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	

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[1.c.2.b] for each of the one or more images, scaling content associated with the image to produce a scaled image that fits within its corresponding scaled bounding box; and	[51] The mobile hand-held device of claim 36, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to zoom on an image via a corresponding user input, wherein in response thereto, the display is re-rendered such that the image is rendered to fit across the display. [118.c] scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display.	Appendix C (IPR2013-00004) [41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area of the touch-sensitive display.	This limitation is similar to the unpatentable limitations that define a “bounding box” for content objects, providing the specific structural antecedent representing the area occupied by content that the target limitation describes filling with a scaled image.

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		[43.c] employing the display list to re-render the display at different scale factors to enable rapid zooming of the Web page. Appendix D (90/009,995) [13] The mobile device of claim 1, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is	

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		displayed to fit across a width of a display area of the touch-sensitive display. [23.b.3] scaling content associated with the display object using the scale factor; and Appendix E (95/000,635) [65] The mobile device of claim 52, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in	

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		response thereto, the display is re-rendered such that the image is displayed to fit a width of a display area of the touch-sensitive display. [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit	

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		bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[1.d] enabling the user to perform full page browsing of the Web page at multiple zoom levels by generating	[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom	Appendix C (IPR2013-00004) [52.i] re-render the Web page in response to	Both describe enabling the user to browse the Web page at multiple zoom levels. Generating views of the Web page while

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corresponding views of the Web page on the hand-held device under which the page layout and design of the display content is retained relative to the interpretation of the page layout and design of the display content at the first scale,	levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.	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, Appendix D (90/009,995) [1.i.2.a] re-render the Web page in response to associated user inputs to enable a user to iteratively zoom in and out views of the Web page on the display while preserving the original page layout, functionality, and design of the content on the Web page defined by the	retaining the interpretation at the first scale is equivalent to rendering at various views while preserving the original layout.

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		HTML-based Web content, Appendix E (95/000,635) [79.i.2] re-render the Web page in response to associated user inputs made via the touch-sensitive display means 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,	
[1.e] wherein each of the Web browser rendering engine and a Web browser rendering engine employed by a desktop browser for which	[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the	Appendix C (IPR2013-00004) [52.i] re-render the Web page in response to associated user inputs to enable the user to	The two engines can be the same because rendering HTML and CSS content while preserving layout, functionality, and design across various zoom levels results in the user's mobile

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browsing is replicated are the same.	original page layout, functionality, and design of the Web page content at each zoom level and panned view. [58.b] parsing HTML-based code corresponding to the retrieved Web page to determine the original page layout of the content on the Web page;	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, Appendix D (90/009,995) [21.b] processing the HTML-based Web content with a rendering engine to generate page layout information corresponding to the original page layout as interpreted by the rendering engine; and Appendix E (95/000,635) [79.i.2] re-render the Web page in response to associated user inputs made via the touch-	browsing experience being the same as their desktop experience.

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		sensitive display means 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,	
[2] The method of claim 1, wherein the views of the Web page are generated by employing a vector-based rendering engine to effect scaling of the display content as interpreted at the first scale. [29.a] The mobile device of claim 28, wherein the plurality of instructions further comprise instructions for	[1.d] scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display. [33] The wireless device of claim 1, wherein a portion of the scalable content comprises vector-based content.	Appendix C (IPR2013-00004) [30.h] translating at least a portion of the HTML-based content from its original format to produce translated content including scalable vector-based content that supports a scalable resolution-independent representation of the HTML-based content	Both this limitation and the unpatentable limitations recite scaling vector-based content, and affirmatively employing the vector-based rendering engine is not patentably distinct.

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implementing a vector-based rendering engine, and [29.b] wherein scaled views of the Web page are generated by executing instructions corresponding to the vector-based rendering engine to effect scaling of the display content as interpreted at the first scale.		that preserves an original page layout, functionality and design of the at least a portion of the HTML-based content when scaled and rendered; and [30.i] employing the scalable vector-based content to render a view of at least a portion of the Web page on the display using a first scale factor, [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,	

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		Appendix D (90/009,995) [1.i.1] render a view of at least a portion of the Web page on the touch-sensitive display using a first scale factor; and [1.h] translating the HTML-based Web content to produce scalable vector-based page layout information; [21.b] processing the HTML-based Web content with a rendering engine to generate page layout information corresponding to the original page layout as interpreted by the rendering engine; and Appendix E (95/000,635) [79.i.1] render a view of the Web page on the	

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		touch-sensitive display; and [79.i.2] re-render the Web page in response to associated user inputs made via the touch-sensitive display means 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,	
[3] The method of claim 1, wherein the method enables the user to browse arbitrary user-selected pages from among billions of Web pages accessible via the World Wide Web on the	[252.f] wherein the Web browser enables a user of the device to browse, zoom, and pan billions of Web pages in a manner that preserves the original layout, functionality, and design of the HTML-	Appendix C (IPR2013-00004) [30.f] rendering a browser interface via which a user is enabled to request to access to a Web page having an	Both this limitation and the unpatentable limitations recite enabling the user to browse billions of Web pages and that many Web pages would be arbitrarily selected by the user, and replicating the browsing of

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hand-held wireless device in a manner that replicates browsing of those Web pages on a desktop Web browser in accordance with the method. [30] The mobile device of claim 28, wherein execution of the plurality of instructions enables the user to browse arbitrary user-selected pages from among billions of Web pages accessible via the World Wide Web on the mobile device in a manner that replicates browsing of those Web pages on a desktop Web browser.	based Web page content of each Web page at each zoom level and panned view.	original format comprising HTML-based content defining an original page layout, functionality, and design of content on the Web page; Appendix D (90/009,995) [1.f] enabling a user 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; Appendix E (95/000,635) [79.g] rendering a browser interface via which a user is enabled to request to access to a Web page comprising HTML-based Web content defining an	a desktop browser is equivalent to preserving the layout, functionality, and design.

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		original page layout, functionality, and design of content on the Web page;	
[4.a] The method of claim 1, wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed, [8.a] The method of claim 1, wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed, [9.b] wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed,	[317.e] rendering a browser interface on the display via which a user is enabled to request access to a Web page including at least one image, at least one column, at least one hyperlink to an external reference and having a width and height;	Appendix C (IPR2013-00004) [30.f] rendering a browser interface via which a user is enabled to request to access to a Web page having an original format comprising HTML-based content defining an original page layout, functionality, and design of content on the Web page; [52.h] render a view of the Web page on the touch-sensitive display; and Appendix D (90/009,995)	Both this limitation and the unpatentable limitations recite the browser implemented on the device. The display area for Web pages is equivalent to the display with the browser interface for Web pages.

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[10.a] The method of claim 1, wherein a browser is implemented on the hand-held wireless device having a content display area in which Web page views are displayed, [31.a] The mobile device of claim 28, wherein the mobile browser is configured to display Web page views within a content display area on the touchscreen display, and		[1.i.1] render a view of at least a portion of the Web page on the touch-sensitive display using a first scale factor; and Appendix E (95/000,635) [79.i.1] render a view of the Web page on the touch-sensitive display; and	
[4.b] further comprising enabling the user to perform zooming operations using tap-based user input detected by the touchscreen display and within the content display area.	[317.j] zoom in on an image of the Web page by tapping on the image via the display;	Appendix C (IPR2013-00004) [31] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling the	Both this limitation and the unpatentable limitations recite enabling the user to zoom by tapping on the display. Tapping within the display area is equivalent to tapping on the image or the column that are displayed in

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[31.b] wherein execution of the instructions further enables the user to perform zooming operations using tap-based user input detected by the touchscreen display and within the content display area.		user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display. Appendix D (90/009,995) [4] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display. Appendix E (95/000,635)	the browser interface on the display.

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		[82] The mobile device of claim 79, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display.	
[5.a] The method of claim 1, wherein Web page views are displayed within a content display area, the method further comprising:	[317.e] rendering a browser interface on the display via which a user is enabled to request access to a Web page including at least one image, at least one column, at least one hyperlink to an external reference and having a width and height;	Appendix C (IPR2013-00004) [52.h] render a view of the Web page on the touch-sensitive display; and Appendix D (90/009,995) [1.i.1] render a view of at least a portion of the Web page on the touch-	The Web pages displayed within the display area are equivalent to the Web pages displayed on the browser interface on the display.

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		sensitive display using a first scale factor; and Appendix E (95/000,635) [79.i.1] render a view of the Web page on the touch-sensitive display; and	
[5.b] generating a scaled view of the Web page on the hand-held wireless device under which a width of the Web page is rendered to fit across a width of the content display area,	[118.c] scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display.	Appendix C (IPR2013-00004) [75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and Appendix D (90/009,995) [25.a] The mobile device of claim 21, wherein the original format of the Web page defines a width for the Web page, as interpreted by the	Generating the scaled view on the device under which the width of the page fits across width of the display area is equivalent to scaling the scaled content such that the width of the page fits across width of the display on which the browser interface is rendered.

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		rendering engine, and wherein execution of the instructions performs further operations comprising [25.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and [25.c] employing the scale factor that is determined as the first scale factor. Appendix E (95/000,635) [64] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a	

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		user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed across the touch-sensitive display.	
[5.c] wherein the scaled view of the Web page comprises a magnified view of the Web page as interpreted at the first scale.	[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at	Appendix C (IPR2013-00004) [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	A magnified view relative to the first scale is equivalent to a zoomed view that preserves the original layout and design.

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	each zoom level and panned view.	defined by the HTML-based Web content as interpreted by a rendering engine, Appendix D (90/009,995) [1.i.2.a] re-render the Web page in response to associated user inputs to enable a user to iteratively zoom in and out views of the Web page on the display while preserving the original page layout, functionality, and design of the content on the Web page defined by the HTML-based Web content, Appendix E (95/000,635) [79.i.2] re-render the Web page in response to associated user inputs made via the touch-	

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		sensitive display means 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,	
[6] The method of claim 1, wherein each scaled view of the Web page comprises a magnified view of a corresponding portion of the Web page as interpreted at the first.	[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.	Appendix C (IPR2013-00004) [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	The limitation relies on the first scale factor baseline to define a “magnified view” of a “portion” of the page, concepts which correspond directly to unpatentable limitations rendering of “at least a portion” using a “first scale factor” and viewing content at a “higher resolution.”

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		interpreted by a rendering engine, Appendix D (90/009,995) [9] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to pan a display of the Web content in response to a corresponding user input made via the touch-sensitive display. Appendix E (95/000,635) [61] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a user to pan a display of the Web content in	

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		response to a corresponding user input made via the touch-sensitive display.	
[7] The method of claim 1, wherein there is no degradation in quality of the presentation of text content when the zoom level is increased.	[1.c] in response to a user request to access the Web page, retrieving the Web page via the wireless communication means, and translating at least a portion of the HTML-based Web content from its original format into scalable content that supports a scalable resolution-independent representation of the Web page that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered; and	Appendix C (IPR2013-00004) [30.h] translating at least a portion of the HTML-based content from its original format to produce translated content including scalable vector-based content that supports a scalable resolution-independent representation of the HTML-based content that preserves an original page layout, functionality and design of the at least a portion of the HTML-based content when scaled and rendered; and	No degradation of the text is equivalent to generating scalable content that supports a scalable resolution-independent representation.

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		Appendix D (90/009,995) [19] The mobile device of claim 1, wherein the scalable vector-based content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content. Appendix E (95/000,635) [74] The mobile device of claim 52, wherein the scalable content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content.	

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[8.b] further comprising enabling a user to zoom on a column of content displayed in a current view of the Web page by tapping, via the touchscreen display, within a portion of the column,	[317.k] zoom in on a column of the Web page by tapping on the column via the display; and [48] wherein execution of the instructions performs further operations comprising enabling a user to zoom on a column of the Web content via a corresponding user input, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is rendered to fit across the display.	Appendix C (IPR2013-00004) [40] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed to fit across the touch-sensitive display. Appendix D (90/009,995)	The browser implemented on the device having the display area for displaying the Web content is equivalent to the browser stored on the device having the display with the rendered browser interface for Web pages.

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		[12] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed to fit across the touch-sensitive display. Appendix E (95/000,635) [64] The mobile device of claim 52, wherein execution of the instructions performs	

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		further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed across the touch-sensitive display.	
[8.c] wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that a width of the column is displayed to fit across a width of the content display area in the updated view.	[48] The mobile hand-held device of claim 36, wherein execution of the instructions performs further operations comprising enabling a user to zoom on a column of the Web content via a corresponding user input,	Appendix C (IPR2013-00004) [40] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling a user to view a column of	Updating the zoom, offset, and view of the Web page such that the width of the column fits across width of the display area is equivalent to rendering content corresponding to the column such that its width fits across width of the

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[17] The method of claim 16, wherein the column is enlarged so as to fit a width of the column across a width of the browser display area.	wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is rendered to fit across the display.	the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed to fit across the touch-sensitive display. Appendix D (90/009,995) [12] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column	display with the rendered browser interface, and rendering enables browsing at various zoom levels and panned views while preserving layout, functionality, and design.

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		via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed to fit across the touch-sensitive display. Appendix E (95/000,635) [64] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered	

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		such that content corresponding to the selected column is displayed across the touch-sensitive display. [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated	

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		with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[9.a] The method of claim 1, wherein the Web page includes at least one image, and	[51] The mobile hand-held device of claim 36, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations	Appendix C (IPR2013-00004) [41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the	Both this limitation and the unpatentable limitations disclose the image.

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	comprising enabling a user to zoom on an image via a corresponding user input, wherein in response thereto, the display is re-rendered such that the image is rendered to fit across the display.	instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area of the touch-sensitive display. Appendix D (90/009,995) [13] The mobile device of claim 1, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations	

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		comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across a width of a display area of the touch-sensitive display. Appendix E (95/000,635) [65] The mobile device of claim 52, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a	

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		current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit a width of a display area of the touch-sensitive display.	
[9.c] further comprising enabling a user to zoom on an image displayed in a current view of the Web page by tapping, via the touchscreen display, within the image,	[317.j] zoom in on an image of the Web page by tapping on the image via the display;	Appendix C (IPR2013-00004) [41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive	Both this limitation and the unpatentable limitations disclose enabling the user to zoom on the image by tapping on the display.

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		display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area of the touch-sensitive display. Appendix D (90/009,995) [13] The mobile device of claim 1, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the	

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		display is re-rendered such that the image is displayed to fit across a width of a display area of the touch-sensitive display. Appendix E (95/000,635) [65] The mobile device of claim 52, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit a width of	

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		a display area of the touch-sensitive display.	
[9.d] wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that the image is displayed to fit across a width of the content display area in the updated view. [19] The method of claim 18, wherein the image is enlarged so as to fit a width of the image across a width of the browser display area.	[51] The mobile hand-held device of claim 36, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to zoom on an image via a corresponding user input, wherein in response thereto, the display is re-rendered such that the image is rendered to fit across the display.	Appendix C (IPR2013-00004) [41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area	Updating the zoom, offset, and view of the Web page such that the width of the image fits across width of the display area is equivalent to rendering the Web page at various zoom levels and panned views such that the Web page, which includes the image, fits across width of the display with the rendered browser interface.

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		of the touch-sensitive display. Appendix D (90/009,995) [13] The mobile device of claim 1, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across a width of a display area of the touch-sensitive display.	

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		Appendix E (95/000,635) [65] The mobile device of claim 52, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit a width of a display area of the touch-sensitive display.	
[10.b] further comprising enabling a user to zoom on a paragraph displayed in a current view of the	[36.e] re-render the display in response to associated user inputs to enable the Web page to be	Appendix C (IPR2013-00004)	The paragraph is equivalent to the column because both are HTML elements and the column can include the

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Web page by tapping, via the touchscreen display, on text content within the paragraph,	browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.	[31] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display. Appendix D (90/009,995) [14] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to view a paragraph of the Web content at a higher resolution than a current resolution by	paragraph. (<i>See</i> specification - “elements such as ...column definitions ... paragraphs...a user may select to view a column (results represented in FIG. 7B by tapping that column with a stylus, a shown in FIG. 7A...or select to view a paragraph in an article by tapping on the paragraph, as shown in FIGS. 9A and 9B.”)

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		tapping on the paragraph via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected paragraph is displayed to fit across a width of a display area of the touch-sensitive display. Appendix E (95/000,635) [66] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a user to view a paragraph of the Web content at a higher resolution than a current resolution by tapping on the paragraph	

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		via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected paragraph is displayed across at least one of a width and height of a display area of the touch-sensitive display.	
[10.c] wherein in response thereto, a zoom level, offset, and view of the Web page is updated such that paragraph is displayed to fit across a width of the content display area in the updated view. [21] The method of claim 20, wherein the paragraph is enlarged so as to fit a width of the paragraph	[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.	Appendix C (IPR2013-00004) [31] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via	Both this limitation and the unpatentable limitations disclose enabling the user to zoom on a paragraph/column by tapping on the display. Updating the zoom, offset, and view of the Web page such that the width of the paragraph fits across width of the display area is equivalent to rendering the Web page at various zoom levels and panned views

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across a width of the browser display area.		the touch-sensitive display. Appendix D (90/009,995) [14] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to view a paragraph of the Web content at a higher resolution than a current resolution by tapping on the paragraph via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected paragraph is displayed to fit across a width of a display area of the touch-sensitive display.	such that the Web page, which includes the column, fits across width of the display with the rendered browser interface.

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		Appendix E (95/000,635) [66] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a user to view a paragraph of the Web content at a higher resolution than a current resolution by tapping on the paragraph via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected paragraph is displayed across at least one of a width and height of a display area of the touch-sensitive display.	

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[11.a] The method of claim 1, further comprising: [11.b] defining a content display area comprising a rectangular portion of a browser user interface on which Web page content is to be displayed;	[317.e] rendering a browser interface on the display via which a user is enabled to request access to a Web page including at least one image, at least one column, at least one hyperlink to an external reference and having a width and height;	Appendix C (IPR2013-00004) [30.f] rendering a browser interface via which a user is enabled to request to access to a Web page having an original format comprising HTML-based content defining an original page layout, functionality, and design of content on the Web page; Appendix D (90/009,995) [1.c] a touch-sensitive display; Appendix E (95/000,635) [79.g] rendering a browser interface via which a user is enabled to	The display area including the rectangular portion of the browser interface for content is equivalent to the browser interface on the display including the box (which would be rectangular) representing the portion of the rendered page (which would be in the browser interface) for content.

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		request to access to a Web page comprising HTML-based Web content defining an original page layout, functionality, and design of content on the Web page;	
[11.c] generating scaled display content in accordance with a current zoom level and pan offset; and	[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.	Appendix C (IPR2013-00004) [55] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display. Appendix D (90/009,995)	Generating scaled content at the zoom level and pan offset is equivalent to rendering the Web page of content at various zoom levels and panned views.

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		[23.a] The mobile device of claim 22, wherein execution of the instructions performs further operations comprising effecting a zoom operation combined with a pan operation by, [23.b] for each of the plurality of display objects to be included in a panned view of the Web page to be rendered on the display, [23.b.1] scaling page layout information associated with the display object using a scale factor corresponding to a zoom level associated with the zoom operation to determine a scaled datum;	

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		[23.b.2] determining an offset corresponding to the pan operation and combining the scaled datum with the offset to produce a scaled and offset datum that defines a location where the display object is to be rendered on the panned view of the Web page; [23.b.3] scaling content associated with the display object using the scale factor; and [23.b.4] rendering the scaled content at the location defined by the scaled and offset datum to render the display object on the panned view of the Web page. Appendix E (95/000,635)	

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		[70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling	

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		within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[11.d] employing a display limit bounding box associated with the content display area to define a rectangular portion of the scaled display content that is to be displayed within the content display area to render a view of the Web page in accordance with the current zoom level and pan offset,	[59] The mobile hand-held device of claim 58, wherein execution of the instructions performs further operations comprising: generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.	Appendix C (IPR2013-00004) [75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and Appendix D (90/009,995) [17] The mobile device of claim 16, wherein	Employing the bounding box associated with the display area is equivalent to generating the bounding box for the object associated with the content in the browser interface on the display (display area). Employing the bounding box to define the rectangular portion of the scaled display content is equivalent to the generating

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		execution of the instructions performs further operations comprising mapping the object vectors to a virtual display area in memory. Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user;	the bounding box to represent the portion (the box is rectangular) of the rendered display page occupied by the content, which by being rendered would be the scalable content that was translated from the portion of the content. Displaying the scaled display content in the display area to render the view of the page in accordance with the zoom level and pan offset is equivalent to scaling the scalable content to render the page at various zoom levels and panned views.

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		[70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[11.e] wherein a resolution of the display limit bounding box is the	[59] The mobile hand-held device of claim 58, wherein execution of the instructions performs	Appendix C (IPR2013-00004)	The resolution of the box being the same as the display area is equivalent to the box representing the

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same as a resolution of the content display area.	further operations comprising: generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content. [1.d] scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display.	[75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and [75.c] employing the scale factor to render the display area. Appendix D (90/009,995) [27] The mobile device of claim 26, wherein the mathematical transformation is applied to points in a first coordinate system comprising a virtual coordinate system associated with a virtual display area onto which page layout information is mapped to a second coordinate system	portion of the rendered page because the portion can be the entire page of the browser interface on the display. The resolution of the box and the area could be the same because the box represents content that is translated into scalable content that supports a scalable resolution-independent representation of the Web page.

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		comprising a device coordinate system corresponding to a pixel resolution of the display of the mobile device, wherein points are mapped from the first coordinate system to the second coordinate system using the mathematical transformation. Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan	

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		corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor	

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		to the content to render the display.	
[12] The method of claim 1, where the touch screen display of the hand-held wireless device is disposed on a top portion of the device.	[36.a] a processor, a wireless communications device, to facilitate wireless communication with a network that supports access to the Internet; a display; and flash memory, operatively coupled to the processor, in which a plurality of instructions are stored that when executed by the processor enable the mobile hand-held device to perform operations including,	Appendix C (IPR2013-00004) [30.c] a touch-sensitive display; Appendix D (90/009,995) [1.c] a touch-sensitive display; Appendix E (95/000,635) [79.c] touch-sensitive display means, to facilitate user input and display rendered content;	The touch screen being disposed in the top portion of the device is patentably indistinct from the broader limitation of the device having the display that receives touch inputs because the top portion could be in any location on the device.
[13] The method of claim 1, where the hand-held wireless device comprises a mobile phone. [27] The method of claim 15, wherein the device	[36.pre] A mobile hand-held device, comprising:	Appendix C (IPR2013-00004) [30.pre] A mobile phone, comprising: Appendix D (90/009,995)	The hand-held wireless device comprising a mobile phone is equivalent to the wireless device, mobile hand-held device, and hand-held wireless device including the wireless

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comprises a mobile phone. [32] The mobile device of claim 28, wherein the mobile device comprises a mobile phone.		[2] The mobile device of claim 1, wherein the device comprises a mobile phone. Appendix E (95/000,635) [53] The mobile device of claim 52, wherein the device comprises a mobile phone.	communications for communicating via the Internet, because that is a feature of a mobile phone.
[14] The method of claim 1, wherein the hand-held wireless device is configured to be held in the palm of a user. [26] The method of claim 24, wherein the hand-held device is configured to be held in the palm of a user. [33] The mobile device of claim 28, wherein the mobile device is configured to be held in the palm of a user.	[149.a] rendering a browser interface on a hand-held device 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;	Appendix C (IPR2013-00004) [52.pre] A mobile device, comprising: Appendix D (90/009,995) [3] The mobile device of claim 1, wherein the device comprises one of a hand-held device or a palm-held device. Appendix E (95/000,635) [54] The mobile device of claim 52, wherein the	The hand-held wireless device being held in the palm of the user is patentably indistinct from the hand-held wireless device being hand-held and able to receive tapping inputs on its display.

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		device comprises one of a Personal Digital Assistant (PDA) or pocket PC.	
[15.pre] A method to facilitate browsing of a Web page on a device employing a browser having a browser display area, comprising:	Claims [1.pre], [4.a], and [11.a]	Claims [1.pre], [4.a], and [11.a]	Claims [1.pre], [4.a], and [11.a]
[15.a] retrieving HTML-based content and cascading style sheet (CSS) content corresponding to the Web page defining layout information and attributes of content on the Web page comprising a plurality of objects including text objects, image objects, and layout objects;	<i>See</i> '628 Patent Limitations [1.pre], [4.a], and [11.b] [66] The mobile hand-held device of claim 36, wherein a portion of the HTML-based Web content comprises cascaded style sheet data defining aspects of the Web page design that are preserved at each zoom level and panned view.	<i>See</i> '628 Patent Limitations [1.pre], [4.a], and [11.b] Appendix C (IPR2013-00004) [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	<i>See</i> '628 Patent Limitations [1.pre], [4.a], and [11.b] The limitation is patentably indistinct from the unpatentable limitations because it requires retrieving and processing HTML-based content together with layout-defining information, and organizing Web page content into objects in a manner that preserves the

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		design of content on the Web page; Appendix D (90/009,995) [22.a] The mobile device of claim 21, wherein the page layout information defines a layout location for a plurality of objects, including text objects, graphic layout objects, and/or image objects included on the Web page, and wherein producing vector-based page layout information comprises: Appendix E (95/000,635) [68.a] The mobile device of claim 52, wherein the Web page includes text, layout attributes, and images, and wherein execution of the instructions performs	original page layout and design.

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		further operations comprising:	
[15.b] processing the HTML-based content with a Web browser rendering engine to generate page layout information defining a layout location for each of the plurality of objects included in the Web page as interpreted at a first scale,	<i>See</i> '628 Patent Limitation [1.a] [58.b] parsing HTML-based code corresponding to the retrieved Web page to determine the original page layout of the content on the Web page;	<i>See</i> '628 Patent Limitation [1.a] Appendix C (IPR2013-00004) [72.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content; Appendix D (90/009,995) [21.b] processing the HTML-based Web content with a rendering engine to generate page layout information corresponding to the original page layout as interpreted by the rendering engine; and Appendix E (95/000,635)	<i>See</i> '628 Patent Limitation [1.a] The limitation is patentably indistinct from the unpatentable limitations because it requires processing HTML-based content using a browser rendering mechanism to determine page layout information and define layout locations for individual objects as interpreted at a given scale.

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		[70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling	

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		within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[15.c] wherein generation of the page layout information includes, for each of the plurality of objects,	<i>See</i> ‘628 Patent Limitations [1.c.2], [1.c.2.a], [11.d] [58.c] logically grouping selected content into objects;	<i>See</i> ‘628 Patent Limitations [1.c.2], [1.c.2.a], [11.d] Appendix C (IPR2013-00004) [72.c] logically grouping selected content into objects; Appendix D (90/009,995) [18.b] parsing the HTML-based content to	<i>See</i> ‘628 Patent Limitations [1.c.2], [1.c.2.a], [11.d] The limitation is patentably indistinct from the unpatentable limitations because it requires that page layout information be generated on a per-object basis, with layout-related information determined individually for each object included in the Web page.

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		logically group content into objects; Appendix E (95/000,635) [73] The mobile device of claim 72, wherein execution of the instructions performs further operations comprising generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.	
[15.c.1] generating page layout information for the object including a bounding box;	<i>See</i> '628 Patent Limitations [1.c.2], [1.c.2.a], [11.d] [59] generating a bounding box for each object, the bounding box representing a portion of a rendered display page	<i>See</i> '628 Patent Limitations [1.c.2], [1.c.2.a], [11.d] Appendix C (IPR2013-00004)	<i>See</i> '628 Patent Limitations [1.c.2], [1.c.2.a], [11.d] The limitation is patentably indistinct from the unpatentable limitations because it requires generating per-object layout information that defines a

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	occupied by the object's associated group of content.	[72.c] logically grouping selected content into objects; Appendix D (90/009,995) [18.c] generating page layout information including a bounding box for each object, the bounding box defining width and height dimensions for the object; and Appendix E (95/000,635) [73] The mobile device of claim 72, wherein execution of the instructions performs further operations comprising generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's	bounded region occupied by an object's content on the rendered page, which corresponds to the disclosed generation of a bounding box for each object.

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		associated group of content.	
[15.c.2] generating information that links the object with its corresponding page layout information;	<i>See</i> '628 Patent Limitation [1.c.2.b] [58.e.3] creating a reference that links the object to the vector that is generated.	<i>See</i> '628 Patent Limitation [1.c.2.b] Appendix C (IPR2013-00004) [72.e.3] creating a reference that links the object to its corresponding vector. Appendix D (90/009,995) [18.d] storing information that links each object with its corresponding page layout information; Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a	The limitation is patentably indistinct from the unpatentable limitations because it requires generating linking information that associates each object with corresponding layout-related information used to determine the object's position on the rendered Web page.

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		first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content	

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		associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[15.d] wherein the page layout information further includes information from which a page layout location of each of the bounding boxes can be determined;	<i>See</i> '628 Patent Limitation [1.d] [58.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content;	<i>See</i> '628 Patent Limitation [1.d] Appendix C (IPR2013-00004) [72.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content; Appendix D (90/009,995) [18.e] wherein the page layout information further includes information from which a page layout location of	<i>See</i> '628 Patent Limitation [1.d] The limitation is patentably indistinct from the unpatentable limitations because it requires layout-related information that allows determination of the page location of each object's bounded region based on positional data associated with the object.

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		each of the bounding boxes can be determined. Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated	

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		with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[15.e] employing scaled page layout information and/or content derived therefrom to generate scaled Web page content at multiple scale factors;	<i>See</i> '628 Patent Limitation [1.b]	<i>See</i> '628 Patent Limitation [1.b]	<i>See</i> '628 Patent Limitation [1.b]

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[15.f.1] enabling a user of the mobile device to zoom in on an object via a user input to the touchscreen display and	<i>See</i> '628 Patent Limitations [1.c.1] and [4.b]	<i>See</i> '628 Patent Limitations [1.c.1] and [4.b]	<i>See</i> '628 Patent Limitations [1.c.1] and [4.b]
[15.f.2] wherein said scaled Web page content including one or more objects is generated by scaling bounding boxes corresponding to the one or more objects to produce scaled bounding boxes and,	<i>See</i> '628 Patent Limitation [1.c.2.a]	<i>See</i> '628 Patent Limitation [1.c.2.a]	<i>See</i> '628 Patent Limitation [1.c.2.a]
[15.f.3] for each of the one or more objects, scaling content associated with the object to produce a scaled object that fits within its corresponding scaled bounding box; and	<i>See</i> '628 Patent Limitation [1.c.2.b]	<i>See</i> '628 Patent Limitation [1.c.2.b]	<i>See</i> '628 Patent Limitation [1.c.2.b]

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[15.g] enabling zooming on objects on the Web page, wherein, in response to a user tapping on an object within a first Web page view, a zoom level, offset, and view of the Web page is updated based on page layout information corresponding to the object,	<i>See</i> ‘628 Patent Limitations [8.b]-[8.c], [9.c]-[9.d], [10.b]-[10.c] [52] The mobile hand-held device of claim 51, wherein the corresponding user input comprises tapping on the image via the display.	<i>See</i> ‘628 Patent Limitations [8.b]-[8.c], [9.c]-[9.d], [10.b]-[10.c] Appendix C (IPR2013-00004) [31] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display. Appendix D (90/009,995) [23.a] The mobile device of claim 22, wherein execution of the instructions performs further operations	<i>See</i> ‘628 Patent Limitations [8.b]-[8.c], [9.c]-[9.d], [10.b]-[10.c] The limitation is patentably indistinct from the unpatentable limitations because it requires updating the zoom level and view of a Web page in response to a user tapping on an object so that the page is re-rendered based on layout information associated with the selected object.

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		comprising effecting a zoom operation combined with a pan operation by, [23.b] for each of the plurality of display objects to be included in a panned view of the Web page to be rendered on the display, [23.b.1] scaling page layout information associated with the display object using a scale factor corresponding to a zoom level associated with the zoom operation to determine a scaled datum; [23.b.2] determining an offset corresponding to the pan operation and combining the scaled datum with the offset to	

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		produce a scaled and offset datum that defines a location where the display object is to be rendered on the panned view of the Web page; [23.b.3] scaling content associated with the display object using the scale factor; and [23.b.4] rendering the scaled content at the location defined by the scaled and offset datum to render the display object on the panned view of the Web page. Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a	

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		first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content	

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		associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display..	
[15.h.1] wherein the objects comprise a plurality of different types of objects, and	<i>See</i> '628 Patent Limitations [1.a], [1.c.1], [8.b], [10.b], [15.a]-[15.c]	<i>See</i> '628 Patent Limitations [1.a], [1.c.1], [8.b], [10.b], [15.a]-[15.c]	<i>See</i> '628 Patent Limitations [1.a], [1.c.1], [8.b], [10.b], [15.a]-[15.c]
[15.h.2] wherein under the updated zoom level and Web page view the layout locations of objects are retained relative to the layout location of the objects as interpreted at the first scale.	<i>See</i> '628 Patent Limitation [1.d]	<i>See</i> '628 Patent Limitation [1.d]	<i>See</i> '628 Patent Limitation [1.d]
[16.a] The method of claim 15, wherein one of the plurality of different types of objects	<i>See</i> '628 Patent Limitations [1.a], [8.b], [15.a]	<i>See</i> '628 Patent Limitations [1.a], [8.b], [15.a]	<i>See</i> '628 Patent Limitations [1.a], [8.b], [15.a]

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comprises a column, the method further comprising:			
[16.b.1] in response to a user tapping within an area on a view of the Web page occupied by at least a portion of a column, zooming the Web page view on the column to produce a zoomed view of the Web page,	<i>See</i> '628 Patent Limitations [8.b]-[8.c]	<i>See</i> '628 Patent Limitations [8.b]-[8.c]	<i>See</i> '628 Patent Limitations [8.b]-[8.c] The limitation is patentably indistinct from the unpatentable limitations because it requires zooming a Web page view on a column in response to a user tapping within the column area to produce a zoomed view focused on that column.
[16.b.2] wherein in the zoomed view of the Web page the column is enlarged and centered horizontally within the browser display area.	<i>See</i> '628 Patent Limitations [8.b]-[8.c]	<i>See</i> '628 Patent Limitations [8.b]-[8.c]	<i>See</i> '628 Patent Limitations [8.b]-[8.c] The limitation is patentably indistinct from the unpatentable limitations because enlarging a column and rendering it to fit across the display inherently

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			centers the column horizontally within the browser display area in the zoomed view.
[18.a] The method of claim 15, wherein one of the plurality of different types of objects comprises an image, the method further comprising:	<i>See</i> '628 Patent Limitations [1.c.1] and [9.c]	<i>See</i> '628 Patent Limitations [1.c.1] and [9.c]	<i>See</i> '628 Patent Limitations [1.c.1] and [9.c]
[18.b.1] in response to a user tapping on an image, zooming the Web page view on the image to produce a zoomed view of the Web page,	<i>See</i> '628 Patent Limitation [9.c]	<i>See</i> '628 Patent Limitation [9.c]	<i>See</i> '628 Patent Limitation [9.c]
[18.b.2] wherein in the zoomed view of the Web page the image is enlarged and centered horizontally within the browser display area.	<i>See</i> '628 Patent Limitation [9.d]	<i>See</i> '628 Patent Limitation [9.d]	<i>See</i> '628 Patent Limitation [9.d]

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[20.a] The method of claim 15, wherein one of the plurality of different types of objects comprises a paragraph, the method further comprising:	<i>See</i> '628 Patent Limitation [10.b]	<i>See</i> '628 Patent Limitation [10.b]	<i>See</i> '628 Patent Limitation [10.b]
[20.b.1] in response to a user tapping on a paragraph, zooming the Web page view on the paragraph to produce a zoomed view of the Web page,	<i>See</i> '628 Patent Limitation [10.b]	<i>See</i> '628 Patent Limitation [10.b]	<i>See</i> '628 Patent Limitation [10.b]
[20.b.2] wherein in the zoomed view of the Web page, the paragraph is enlarged and centered horizontally within the browser display area.	<i>See</i> '628 Patent Limitations [10.c] and [16.b.2]	<i>See</i> '628 Patent Limitations [10.c] and [16.b.2]	<i>See</i> '628 Patent Limitations [10.c] and [16.b.2]
[22.a] The method of claim 15, wherein the Web page comprises	<i>See</i> '628 Patent Limitations [1.pre], [1.a], and [15.a]	<i>See</i> '628 Patent Limitations [1.pre], [1.a], and [15.a]	<i>See</i> '628 Patent Limitations [1.pre], [1.a], and [15.a]

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Cascading Style Sheet (CSS) content defining page layout aspects of the Web page, and			
[22.b] wherein the page layout information is generated, at least in part, by processing the CSS content.	<i>See</i> '628 Patent Limitations [1.a] and [15.b]	<i>See</i> '628 Patent Limitations [1.a] and [15.b]	<i>See</i> '628 Patent Limitations [1.a] and [15.b]
[23.a] The method of claim 15, wherein the device comprises a hand-held wireless device and the Web page is designed to be viewed by a desktop Web browser, further comprising,	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]
[23.b] after zooming the Web page view on the object, enabling the user to browse an entirety of the HTML-based content at the updated zoom level	<i>See</i> '628 Patent Limitations [1.d], [4.a], [6], [11.c], and [15.g]	<i>See</i> '628 Patent Limitations [1.d], [4.a], [6], [11.c], and [15.g]	<i>See</i> '628 Patent Limitations [1.d], [4.a], [6], [11.c], and [15.g] The limitation is patentably indistinct from the unpatentable limitations

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by panning views of the Web page in response to corresponding user input,			because it requires that, after zooming, the user can pan the Web page at the updated zoom level to browse the entire HTML-based content in response to user input.
[23.c] wherein each panned view of the Web page comprises a magnified view of a corresponding portion of the Web page as would be rendered by a desktop Web browser employing the Web browser rendering engine at the first scale.	<i>See</i> '628 Patent Limitations [1.d], [6]	<i>See</i> '628 Patent Limitations [1.d], [6]	<i>See</i> '628 Patent Limitations [1.d], [6] The limitation is patentably indistinct from the unpatentable limitations because it requires that each panned view present a magnified, scaled rendering of a portion of the Web page that preserves layout, design, and functionality in a manner consistent with desktop browser rendering.
[24.a] The method of claim 15, further comprising, after zooming the Web page	<i>See</i> '628 Patent Limitation [23.b]	<i>See</i> '628 Patent Limitation [23.b]	<i>See</i> '628 Patent Limitation [23.b]

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view on the object, enabling the user to browse an entirety of the HTML-based content at the updated zoom level by panning views of the Web page,			
[24.b] wherein the layout of objects in each panned view is retained relative to the layout of the objects as interpreted by the Web browser rendering engine at the first scale.	<i>See</i> ‘628 Patent Limitations [1.d], [15.b], and [15.h.2]	<i>See</i> ‘628 Patent Limitations [1.d], [15.b], and [15.h.2]	<i>See</i> ‘628 Patent Limitations [1.d], [15.b], and [15.h.2] The limitation is patentably indistinct from the unpatentable limitations because it requires that object layout be preserved and retained when panning at a given scale, consistent with rendering and re-rendering scalable content while preserving the page layout as interpreted by a rendering engine.
[28.pre] A mobile device, comprising:	<i>See</i> ‘628 Patent Limitation [1.pre]	<i>See</i> ‘628 Patent Limitation [1.pre]	<i>See</i> ‘628 Patent Limitation [1.pre]

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[28.a] a processor;	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]
[28.b] a touchscreen display, operatively coupled to the processor;	<i>See</i> '628 Patent Limitation [1.c.1]	<i>See</i> '628 Patent Limitation [1.c.1]	<i>See</i> '628 Patent Limitation [1.c.1]
[28.c] a wireless communication interface, operatively coupled to the processor, to facilitate wireless communication with a network that supports access to the Internet; and	<i>See</i> '628 Patent Limitation [3]	<i>See</i> '628 Patent Limitation [3]	<i>See</i> '628 Patent Limitation [3]
[28.d] memory, operatively coupled to the processor, in which a plurality of instructions are stored including instructions comprising an operating system and a mobile browser having a Web browser rendering engine, wherein	<i>See</i> '628 Patent Limitation [1.a]	<i>See</i> '628 Patent Limitation [1.a]	<i>See</i> '628 Patent Limitation [1.a]

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execution of the plurality of instructions by the mobile device enable the mobile device to perform operations including,			
[28.e.1] enabling a user to perform full page browsing of a Web page on the mobile device in a manner that replicates browsing the Web page on a desktop Web browser,	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]
[28.e.2] wherein the Web page comprises HTML-based content and cascading style sheet (CSS) content defining a page layout and design of display content on the Web page, and	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]

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[28.e.3] enabling full page browsing of the Web page is implemented by,	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]	<i>See</i> '628 Patent Limitation [1.pre]
[28.e.3.a] in response to a user request to access the Web page, retrieving HTML-based content and CSS content corresponding to the Web page and processing the HTML-based content and CSS content with the Web browser rendering engine to interpret the page layout and design of the display content on the Web page at a first scale;	<i>See</i> '628 Patent Limitation [1.a]	<i>See</i> '628 Patent Limitation [1.a]	<i>See</i> '628 Patent Limitation [1.a]
[28.e.3.b] enabling scaled page layout information and/or content derived therefrom to generate scaled Web page content	<i>See</i> '628 Patent Limitation [1.b]	<i>See</i> '628 Patent Limitation [1.b]	<i>See</i> '628 Patent Limitation [1.b]

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at multiple scale factors; and			
[28.e.3.c.1] enabling a user of the mobile device to zoom in on an image via a user input to the touchscreen display and	<i>See</i> '628 Patent Limitation [1.c.1]	<i>See</i> '628 Patent Limitation [1.c.1]	<i>See</i> '628 Patent Limitation [1.c.1]
[28.e.3.c.2] wherein scaled Web page content including one or more images is generated by scaling bounding boxes corresponding to the one or more images to produce scaled bounding boxes and,	<i>See</i> '628 Patent Limitations [1.c.2] and [1.c.2.a]	<i>See</i> '628 Patent Limitations [1.c.2] and [1.c.2.a]	<i>See</i> '628 Patent Limitations [1.c.2] and [1.c.2.a]
[28.e.3.c.3] for each of the one or more images, scaling content associated with the image to produce a scaled image that fits within its corresponding scaled bounding box;	<i>See</i> '628 Patent Limitation [1.c.2.b]	<i>See</i> '628 Patent Limitation [1.c.2.b]	<i>See</i> '628 Patent Limitation [1.c.2.b]

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[28.f] wherein each of the Web browser rendering engine and a Web browser rendering engine employed by a desktop browser for which browsing is replicated are the same.	<i>See</i> '628 Patent Limitation [1.e]	<i>See</i> '628 Patent Limitation [1.e]	<i>See</i> '628 Patent Limitation [1.e]
[34.pre] A mobile device, comprising:	<i>See</i> '628 Patent Limitations [1.pre], [28.pre], and [28.a]	<i>See</i> '628 Patent Limitations [1.pre], [28.pre], and [28.a]	<i>See</i> '628 Patent Limitations [1.pre], [28.pre], and [28.a]
[34.a] a processor;	<i>See</i> '628 Patent Limitations [1.pre], [28.pre], and [28.a]	<i>See</i> '628 Patent Limitations [1.pre], [28.pre], and [28.a]	<i>See</i> '628 Patent Limitations [1.pre], [28.pre], and [28.a]
[34.b] a touchscreen display, operatively coupled to the processor;	<i>See</i> '628 Patent Limitations [1.c.1] and [28.b]	<i>See</i> '628 Patent Limitations [1.c.1] and [28.b]	<i>See</i> '628 Patent Limitations [1.c.1] and [28.b]
[34.c] a wireless communication interface, operatively coupled to the processor, to facilitate wireless communication	<i>See</i> '628 Patent Limitations [3] and [28.c]	<i>See</i> '628 Patent Limitations [3] and [28.c]	<i>See</i> '628 Patent Limitations [3] and [28.c]

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with a network that supports access to the Internet; and			
[34.d.1] memory, operatively coupled to the processor, in which a plurality of instructions are stored including instructions comprising an operating system and a browser having a Web browser rendering engine,	<i>See</i> '628 Patent Limitations [1.a] and [28.d]	<i>See</i> '628 Patent Limitations [1.a] and [28.d]	<i>See</i> '628 Patent Limitations [1.a] and [28.d]
[34.d.2] wherein execution of the plurality of instructions by the mobile device enable a user to perform full page browsing of a Web pages on the mobile device in a manner that replicates browsing the Web pages on a desktop Web	<i>See</i> '628 Patent Limitations [1.pre] and [28.e.1]	<i>See</i> '628 Patent Limitations [1.pre] and [28.e.1]	<i>See</i> '628 Patent Limitations [1.pre] and [28.e.1]

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browser by performing operations comprising,			
[34.e] in response to a user request to access each of a plurality of Web pages arbitrarily selected from among billions of Web pages accessible via the World Wide Web,	<i>See</i> '628 Patent Limitation [3]	<i>See</i> '628 Patent Limitation [3]	<i>See</i> '628 Patent Limitation [3]
[34.e.1] retrieving HTML-based content associated with the Web page and processing the HTML-based content with the Web browser rendering engine to interpret a page layout and design of display content on the Web page at a first scale and generate corresponding page layout information,	<i>See</i> '628 Patent Limitations [1.a] and [15.b]	<i>See</i> '628 Patent Limitations [1.a] and [15.b]	<i>See</i> '628 Patent Limitations [1.a] and [15.b]

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[34.e.2] wherein the page layout information defines a layout location for each of a plurality of objects included in the Web page as interpreted at the first scale and generation of the page layout information includes,	<i>See</i> ‘628 Patent Limitations [1.a], [1.c.2], [15.b], and [15.c]	<i>See</i> ‘628 Patent Limitations [1.a], [1.c.2], [15.b], and [15.c]	<i>See</i> ‘628 Patent Limitations [1.a], [1.c.2], [15.b], and [15.c]
[34.e.2.a] for each of the plurality of objects,	<i>See</i> ‘628 Patent Limitations [1.c.2], [11.c], [15.c], and [15.c.1]	<i>See</i> ‘628 Patent Limitations [1.c.2], [11.c], [15.c], and [15.c.1]	<i>See</i> ‘628 Patent Limitations [1.c.2], [11.c], [15.c], and [15.c.1]
[34.e.2.a.1] generating page layout information including a bounding box for the object; and	<i>See</i> ‘628 Patent Limitations [1.c.2], [11.c], [15.c], and [15.c.1]	<i>See</i> ‘628 Patent Limitations [1.c.2], [11.c], [15.c], and [15.c.1]	<i>See</i> ‘628 Patent Limitations [1.c.2], [11.c], [15.c], and [15.c.1]
[34.e.2.a.2] generating information that links the object with its corresponding page layout information;	<i>See</i> ‘628 Patent Limitations [1.c.2.b] and [15.c.2]	<i>See</i> ‘628 Patent Limitations [1.c.2.b] and [15.c.2]	<i>See</i> ‘628 Patent Limitations [1.c.2.b] and [15.c.2]

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[34.e.3] wherein the page layout information further includes information from which a page layout location of each of the bounding boxes can be determined;	<i>See</i> '628 Patent Limitations [1.d] and [15.d]	<i>See</i> '628 Patent Limitations [1.d] and [15.d]	<i>See</i> '628 Patent Limitations [1.d] and [15.d]
[34.f.1] enabling the user to perform zooming of the Web page at multiple zoom levels and pan views of the Web page at each of the multiple zoom levels by generating corresponding scaled views of the Web page,	<i>See</i> '628 Patent Limitations [1.b], [1.d], [11.b], and [23.b]	<i>See</i> '628 Patent Limitations [1.b], [1.d], [11.b], and [23.b]	<i>See</i> '628 Patent Limitations [1.b], [1.d], [11.b], and [23.b]
[34.f.2] wherein enabling the user to perform zooming operations includes performing zooming operations in response to tap-based user input, and	<i>See</i> '628 Patent Limitations [1.c.1] and [4.b]	<i>See</i> '628 Patent Limitations [1.c.1] and [4.b]	<i>See</i> '628 Patent Limitations [1.c.1] and [4.b]

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[34.f.3] wherein generation of a scaled view of the Web page is effected by, [34.f.3.a] for each text object to be included in scaled display content employed to generate the scaled view,	<i>See</i> ‘628 Patent Limitations [1.b], [1.c.2], [7], and [10.b] [1.c] in response to a user request to access the Web page, retrieving the Web page via the wireless communication means, and translating at least a portion of the HTML-based Web content from its original format into scalable content that supports a scalable resolution-independent representation of the Web page that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered; and	<i>See</i> ‘628 Patent Limitations [1.b], [1.c.2], [7], and [10.b] Appendix C (IPR2013-00004) [75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and Appendix D (90/009,995) [23.a] The mobile device of claim 22, wherein execution of the instructions performs further operations comprising effecting a zoom operation combined with a pan operation by, [23.b] for each of the plurality of display	<i>See</i> ‘628 Patent Limitations [1.b], [1.c.2], [7], and [10.b] The limitation is patentably indistinct from the unpatentable limitations because scalable HTML-based content is processed and rendered on a per-object basis to generate scaled views, which includes handling each text object included in the scaled display content.

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		objects to be included in a panned view of the Web page to be rendered on the display, [23.b.1] scaling page layout information associated with the display object using a scale factor corresponding to a zoom level associated with the zoom operation to determine a scaled datum; [23.b.2] determining an offset corresponding to the pan operation and combining the scaled datum with the offset to produce a scaled and offset datum that defines a location where the display object is to be rendered on the panned view of the Web page;	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		[23.b.3] scaling content associated with the display object using the scale factor; and [23.b.4] rendering the scaled content at the location defined by the scaled and offset datum to render the display object on the panned view of the Web page. [24.a] The mobile device of claim 23, wherein rendering scaled content associated with a text object comprises [24.b] retrieving presentation attributes for the text object, the presentation attributes including a font typeface, size and color; [24.c] employing a scalable font associated	

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		with the font typeface to render text associated with the text object in a color associated with the color attribute, wherein the text is rendered relative to a location associated with the scaled and offset datum for the text object, and wherein the scale applied to the scalable font is a function of the scale factor and the font size. Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a	

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		user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		to the content to render the display. [74] The mobile device of claim 52, wherein the scalable content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content.	
[34.f.3.a.1] scaling page layout information associated with the text object using a scale factor associated with the scaled display content to determine a scaled datum that defines a scaled page layout location of the text object;	<i>See</i> ‘628 Patent Limitations [1.b], [1.c.2.a], and [2] [58.e.1] defining an object datum corresponding to a layout location datum for the object’s associated display content;	<i>See</i> ‘628 Patent Limitations [1.b], [1.c.2.a], and [2] Appendix C (IPR2013-00004) [75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and	<i>See</i> ‘628 Patent Limitations [1.b], [1.c.2.a], and [2] The limitation is patentably indistinct from the unpatentable limitations because page layout location information for each object is scaled using a scale factor to determine a scaled position for rendering the object in the scaled display content.

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		Appendix D (90/009,995) [23.a] The mobile device of claim 22, wherein execution of the instructions performs further operations comprising effecting a zoom operation combined with a pan operation by, [23.b] for each of the plurality of display objects to be included in a panned view of the Web page to be rendered on the display, [23.b.1] scaling page layout information associated with the display object using a scale factor corresponding to a zoom level associated with the zoom operation to	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		determine a scaled datum; [23.b.2] determining an offset corresponding to the pan operation and combining the scaled datum with the offset to produce a scaled and offset datum that defines a location where the display object is to be rendered on the panned view of the Web page; [23.b.3] scaling content associated with the display object using the scale factor; and [23.b.4] rendering the scaled content at the location defined by the scaled and offset datum to render the display object on the panned view of the Web page.	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[34.f.3.a.2] determining display attributes for the text object, including a font typeface, font size and color attribute; and	<i>See</i> ‘628 Patent Limitation [1.a] [1.c] in response to a user request to access the Web page, retrieving the Web page via the wireless communication means, and translating at least a portion of the HTML-based Web content from its original format into scalable content that	<i>See</i> ‘628 Patent Limitation [1.a] Appendix C (IPR2013-00004) [30.h] translating at least a portion of the HTML-based content from its original format to produce translated content including scalable vector-based	<i>See</i> ‘628 Patent Limitation [1.a] The limitation is patentably indistinct from the unpatentable limitations because determining font typeface, font size, and color attributes is inherent in rendering HTML-based Web content whose design

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	supports a scalable resolution-independent representation of the Web page that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered; and	content that supports a scalable resolution-independent representation of the HTML-based content that preserves an original page layout, functionality and design of the at least a portion of the HTML-based content when scaled and rendered; and Appendix D (90/009,995) [24.a] The mobile device of claim 23, wherein rendering scaled content associated with a text object comprises [24.b] retrieving presentation attributes for the text object, the presentation attributes including a font typeface, size and color;	is defined by HTML and CSS.

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		[24.c] employing a scalable font associated with the font typeface to render text associated with the text object in a color associated with the color attribute, wherein the text is rendered relative to a location associated with the scaled and offset datum for the text object, and wherein the scale applied to the scalable font is a function of the scale factor and the font size. Appendix E (95/000,635) [74] The mobile device of claim 52, wherein the scalable content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		scalable font to render the scalable text content.	
[34.f.3.a.3.a] employing a scalable font associated with the font typeface to render text associated with the text object in a color associated with the color attribute,	<i>See</i> ‘628 Patent Limitation [7] [1.c] in response to a user request to access the Web page, retrieving the Web page via the wireless communication means, and translating at least a portion of the HTML-based Web content from its original format into scalable content that supports a scalable resolution-independent representation of the Web page that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered; and	<i>See</i> ‘628 Patent Limitation [7] Appendix C (IPR2013-00004) [30.h] translating at least a portion of the HTML-based content from its original format to produce translated content including scalable vector-based content that supports a scalable resolution-independent representation of the HTML-based content that preserves an original page layout, functionality and design of the at least a portion of the HTML-based content when scaled and rendered; and	<i>See</i> ‘628 Patent Limitation [7] The limitation is patentably indistinct from the unpatentable limitations because scalable/vector-based content is generated and rendered in a way that preserves CSS-defined design attributes, which encompasses rendering text with scalable font characteristics and the specified color attributes.

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		Appendix D (90/009,995) [24.a] The mobile device of claim 23, wherein rendering scaled content associated with a text object comprises [24.b] retrieving presentation attributes for the text object, the presentation attributes including a font typeface, size and color; [24.c] employing a scalable font associated with the font typeface to render text associated with the text object in a color associated with the color attribute, wherein the text is rendered relative to a location associated with the scaled and offset datum for the text object, and wherein the scale applied to the	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		scalable font is a function of the scale factor and the font size. Appendix E (95/000,635) [74] The mobile device of claim 52, wherein the scalable content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content.	
[34.f.3.a.3.b] wherein the text is rendered relative to a location associated with the scaled datum for the text object, and	<i>See</i> ‘628 Patent Limitation [1.d] [58.e.1] defining an object datum corresponding to a layout location datum for the object’s associated display content;	<i>See</i> ‘628 Patent Limitation [1.d] Appendix C (IPR2013-00004) [30.h] translating at least a portion of the HTML-based content from its original format to produce translated	<i>See</i> ‘628 Patent Limitation [1.d] The limitation is patentably indistinct from the unpatentable limitations because objects are assigned layout location data that is used (with scaling) to render content at positions determined by scaled

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		content including scalable vector-based content that supports a scalable resolution-independent representation of the HTML-based content that preserves an original page layout, functionality and design of the at least a portion of the HTML-based content when scaled and rendered; and Appendix D (90/009,995) [24.a] The mobile device of claim 23, wherein rendering scaled content associated with a text object comprises [24.b] retrieving presentation attributes for the text object, the presentation attributes	location information for the object.

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		including a font typeface, size and color; [24.c] employing a scalable font associated with the font typeface to render text associated with the text object in a color associated with the color attribute, wherein the text is rendered relative to a location associated with the scaled and offset datum for the text object, and wherein the scale applied to the scalable font is a function of the scale factor and the font size. Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content	

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		associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[34.f.3.a.3.c] wherein the scale applied to the scalable font is a function of the scale factor and the font size; and	<i>See</i> '628 Patent Limitation [7] [118.c] scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display.	<i>See</i> '628 Patent Limitation [7] Appendix C (IPR2013-00004) [75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and Appendix D (90/009,995) [24.a] The mobile device of claim 23, wherein rendering scaled content associated with a text object comprises	<i>See</i> '628 Patent Limitation [7] The limitation is patentably indistinct from the unpatentable limitations because scalable text rendering is performed using a scale factor applied to CSS-defined font sizes to determine how text is rendered at different zoom levels.

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		[24.b] retrieving presentation attributes for the text object, the presentation attributes including a font typeface, size and color; [24.c] employing a scalable font associated with the font typeface to render text associated with the text object in a color associated with the color attribute, wherein the text is rendered relative to a location associated with the scaled and offset datum for the text object, and wherein the scale applied to the scalable font is a function of the scale factor and the font size. Appendix E (95/000,635) [74] The mobile device of claim 52, wherein the	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		scalable content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content.	
[34.f.3.b] for each image object to be included in scaled display content employed to generate the scaled view,	<i>See</i> ‘628 Patent Limitation [1.c.2], [15.f.2], [15.f.3]	<i>See</i> ‘628 Patent Limitation [1.c.2], [15.f.2], [15.f.3]	<i>See</i> ‘628 Patent Limitation [1.c.2], [15.f.2], [15.f.3] The limitation is patentably indistinct from the unpatentable limitations because scalable HTML-based content is processed and rendered on a per-object basis, including image objects, to generate scaled display content for a scaled view.
[34.f.3.b.1] scaling page layout information associated with the image object using the scale	<i>See</i> ‘628 Patent Limitation [1.c.2.a] and [15.f.2]	<i>See</i> ‘628 Patent Limitation [1.c.2.a] and [15.f.2]	<i>See</i> ‘628 Patent Limitation [1.c.2.a] and [15.f.2]

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factor to determine a scaled datum that defines a scaled page layout location of the image object; and	[58.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content;	Appendix C (IPR2013-00004) [72.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content; Appendix D (90/009,995) [23.a] The mobile device of claim 22, wherein execution of the instructions performs further operations comprising effecting a zoom operation combined with a pan operation by, [23.b] for each of the plurality of display objects to be included in a panned view of the Web page to be rendered on the display,	The limitation is patentably indistinct from the unpatentable limitations because object location information is scaled using a scale factor to determine a scaled position for rendering the image object in a scaled view.

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		[23.b.1] scaling page layout information associated with the display object using a scale factor corresponding to a zoom level associated with the zoom operation to determine a scaled datum; [23.b.2] determining an offset corresponding to the pan operation and combining the scaled datum with the offset to produce a scaled and offset datum that defines a location where the display object is to be rendered on the panned view of the Web page; [23.b.3] scaling content associated with the display object using the scale factor; and	

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		[23.b.4] rendering the scaled content at the location defined by the scaled and offset datum to render the display object on the panned view of the Web page. Appendix E (95/000,635) [70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user;	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		[70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[34.f.3.b.2] scaling scalable image content corresponding to the image object to produce a	<i>See</i> '628 Patent Limitations [1.c.2.a] and [15.f.3]	<i>See</i> '628 Patent Limitations [1.c.2.a] and [15.f.3]	<i>See</i> '628 Patent Limitations [1.c.2.a] and [15.f.3]

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
scaled image having a size that is a function of the scale factor and the bounding box corresponding to the image object; and	[59] The mobile hand-held device of claim 58, wherein execution of the instructions performs further operations comprising: generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.	Appendix C (IPR2013-00004) [41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area of the touch-sensitive display. Appendix D (90/009,995)	The limitation is patentably indistinct from the unpatentable limitations because scalable image content is rendered by applying a scale factor to object-level layout information, resulting in an image size determined by both the scale factor and the object's layout bounds.

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		[23.a] The mobile device of claim 22, wherein execution of the instructions performs further operations comprising effecting a zoom operation combined with a pan operation by, [23.b] for each of the plurality of display objects to be included in a panned view of the Web page to be rendered on the display, [23.b.1] scaling page layout information associated with the display object using a scale factor corresponding to a zoom level associated with the zoom operation to determine a scaled datum;	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		[23.b.2] determining an offset corresponding to the pan operation and combining the scaled datum with the offset to produce a scaled and offset datum that defines a location where the display object is to be rendered on the panned view of the Web page; [23.b.3] scaling content associated with the display object using the scale factor; and [23.b.4] rendering the scaled content at the location defined by the scaled and offset datum to render the display object on the panned view of the Web page. Appendix E (95/000,635)	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		[70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user; [70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset; [70.c] identifying object bounding boxes having at least a portion falling	

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
		within the virtual display limit bounding box; and, [70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and [70.e] applying an appropriate scale factor to the content to render the display.	
[34.f.3.c] generating a scaled view of the Web page on the touchscreen display under which a width of the Web page is rendered to fit across a width of a content display area employed by the browser for displaying Web views.	<i>See</i> '628 Patent Limitation [5.b]	<i>See</i> '628 Patent Limitation [5.b]	<i>See</i> '628 Patent Limitation [5.b]

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
[35] The mobile device of claim 34, wherein each of the Web browser rendering engine and a Web browser rendering engine employed by a desktop browser for which browsing is replicated are the same.	<i>See</i> ‘628 Patent Limitations [1.pre], [1.e], and [28.f]	<i>See</i> ‘628 Patent Limitations [1.pre], [1.e], and [28.f]	<i>See</i> ‘628 Patent Limitations [1.pre], [1.e], and [28.f]
[36.a] The mobile device of claim 34, wherein a portion of the billions of Web pages comprise Web pages including Cascading Style Sheet (CSS) content defining aspects of the design of those Web pages, and wherein execution of the instructions performs further operations comprising: [36.b] in response to a user request to access a	<i>See</i> ‘628 Patent Limitations [1.pre], [1.a], and [22.a]-[22.b] [66] The mobile hand-held device of claim 36, wherein a portion of the HTML-based Web content comprises cascaded style sheet data defining aspects of the Web page design that are preserved at each zoom level and panned view.	<i>See</i> ‘628 Patent Limitations [1.pre], [1.a], and [22.a]-[22.b] Appendix C (IPR2013-00004) [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	<i>See</i> ‘628 Patent Limitations [1.pre], [1.a], and [22.a]-[22.b] The limitation is patentably indistinct from the unpatentable limitations because interpreting page layout and design in accordance with CSS is part of parsing and rendering HTML-based Web content so that the page’s layout and design are determined and preserved during rendering.

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
Web page including CSS content, employing the Web browser rendering engine to interpret the page layout and design of the display content on the Web page in accordance with the CSS content.		design of content on the Web page; Appendix D (90/009,995) [1.f] enabling a user 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; Appendix E (95/000,635) [29] The mobile device of claim 1, wherein the HTML-based Web content includes cascading style sheet content defining layout and presentation attributes for the Web page.	
[37.a] The mobile device of claim 34, wherein each	<i>See</i> '628 Patent Limitations [5.c] and [6]	<i>See</i> '628 Patent Limitations [5.c] and [6]	<i>See</i> '628 Patent Limitations [5.c] and [6]

U.S. Patent No. 8,533,628	U.S. Patent No. 7,461,353	U.S. Patent No. 7,831,926	Comparison
scaled view of the Web page comprises a magnified view of a corresponding portion of the Web page as interpreted at the first scale, and			
[37.b] wherein there is no degradation in quality of the presentation of text content when the zoom level is increased.	<i>See</i> '628 Patent Limitation [7]	<i>See</i> '628 Patent Limitation [7]	<i>See</i> '628 Patent Limitation [7]

Appendix B - Unpatentable '353 Patent Claims

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353
[1.pre] A wireless device, comprising:
[1.a] processing means; wireless communications means, to facilitate wireless communication with a network that supports access to the Internet; a display; memory; and storage means, in which a plurality of instructions are stored that when executed by the processing means enable the wireless device to perform operations including,
[1.b] rendering a browser interface via which a user is enabled to request access to an original Web page, the Web page comprising HTML-based Web content having an original format defining an original width and height of the Web page and an original page layout, functionality, and design of content on the Web page;
[1.c] in response to a user request to access the Web page, retrieving the Web page via the wireless communication means, and translating at least a portion of the HTML-based Web content from its original format into scalable content that supports a scalable resolution-independent representation of the Web page that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered; and
[1.d] scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display.
[33] The wireless device of claim 1, wherein a portion of the scalable content comprises vector-based content.
[36.pre] A mobile hand-held device, comprising:
[36.a] a processor, a wireless communications device, to facilitate wireless communication with a network that supports access to the Internet; a display; and flash memory, operatively coupled to the processor, in which a

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353

plurality of instructions are stored that when executed by the processor enable the mobile hand-held device to perform operations including,

[36.b] 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;

[36.c] retrieving the Web page via the wireless communications device, and processing HTML-based Web content to produce scalable content; and

[36.d] employing at least one of the scalable content or data derived therefrom to, render the Web page on the display; and

[36.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.

[43] The mobile hand-held device of claim 36, wherein at least a portion of the scalable content comprises scalable vector-based content.

[48] The mobile hand-held device of claim 36, wherein execution of the instructions performs further operations comprising enabling a user to zoom on a column of the Web content via a corresponding user input, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is rendered to fit across the display.

[51] The mobile hand-held device of claim 36, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to zoom on an image via a

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353

corresponding user input, wherein in response thereto, the display is re-rendered such that the image is rendered to fit across the display.

[52] The mobile hand-held device of claim 51, wherein the corresponding user input comprises tapping on the image via the display.

[58.a] The mobile hand-held device of claim 36, wherein execution of the instructions performs further operations comprising:

[58.b] parsing HTML-based code corresponding to the retrieved Web page to determine the original page layout of the content on the Web page;

[58.c] logically grouping selected content into objects;

[58.d] defining a primary datum corresponding to the original page layout; and,

[58.e] for each object,

[58.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content;

[58.e.2] generating a vector from the primary datum to the object datum for the object; and

[58.e.3] creating a reference that links the object to the vector that is generated.

[59] The mobile hand-held device of claim 58, wherein execution of the instructions performs further operations comprising: generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353

[66] The mobile hand-held device of claim 36, wherein a portion of the HTML-based Web content comprises cascaded style sheet data defining aspects of the Web page design that are preserved at each zoom level and panned view.

[118.pre] A method, comprising:

[118.a] rendering a browser interface on a display of a device via which a user is enabled to request access to a Web page, the Web page comprising HTML-based Web content having an original format defining an original width and height of the Web page and an original page layout, functionality, and design of content on the Web page;

[118.b] in response to a user request to access the Web page, retrieving the Web page via the device, and translating at least a portion of the HTML-based Web content from its original format into scalable content that supports a scalable resolution-independent representation of the Web page that preserves the original page layout, functionality and design of the content defined by its original format when scaled and rendered; and

[118.c] scaling the scalable content to render the Web page on the display such that a width of the Web page is rendered to fit across the display.

[138.a] The method of claim 118, further comprising:

[138.b] parsing markup language code corresponding to the retrieved Web page to determine the original page layout of the content on the Web page;

[138.c] logically grouping selected content into objects;

[138.d] defining a primary datum corresponding to the original page layout; and,

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353

[138.e] for each object,

[138.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content;

[138.e.2] generating a vector from the primary datum to the object datum for the object; and

[138.e.3] creating a reference that links the object to the vector that is generated.

[139] The method of claim 138, further comprising: generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.

[149.pre] A method, comprising:

[149.a] rendering a browser interface on a hand-held device 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;

[149.b] retrieving the Web page via the hand-held device, and processing HTML-based Web content to produce scalable content; and

[149.c] employing at least one of the scalable content or data derived therefrom to,

[149.d] render the Web page on a display of the hand-held device; and

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353

[149.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view.

[183] The method of claim 149, wherein a portion of the scalable content comprises vector-based content.

[252.pre] A machine-readable medium having a plurality of instructions comprising a Web browser tangibly stored thereon, which when executed enable a device to perform operations comprising:

[252.a] rendering a browser interface on a display associated with the device 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;

[252.b] retrieving the Web page and processing HTML-based Web content to produce scalable content; and

[252.c] employing at least one of the scalable content or data derived therefrom to, render the Web page on the display; and

[252.d] render the Web page on the display; and

[252.e] re-render the display in response to associated user inputs to enable the Web page to be browsed at various zoom levels and panned views while preserving the original page layout, functionality, and design of the Web page content at each zoom level and panned view of the Web page,

[252.f] wherein the Web browser enables a user of the device to browse, zoom, and pan billions of Web pages in a manner that preserves the original layout, functionality, and design of the HTML-based Web page content of each Web page at each zoom level and panned view.

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353

[283] The machine-readable medium of claim 252, wherein a portion of the scalable content comprises vector-based content.

[317.pre] A hand-held wireless device, comprising:

[317.a] a processor,

[317.b] a wireless communications interface, to facilitate wireless communication with a network that supports access to the Internet;

[317.c] a display; and

[317.d] non-volatile memory, operatively coupled to the processor, in which software comprising a browser is stored, the browser comprising a plurality of instructions that when executed by the processor enable the device to perform operations including,

[317.e] rendering a browser interface on the display via which a user is enabled to request access to a Web page including at least one image, at least one column, at least one hyperlink to an external reference and having a width and height;

[317.f] retrieving the Web page via the wireless communications interface;

[317.g] rendering the Web page on the display such that at least one of the width and height of the Web page is fully displayed; and

[317.h] enabling the user to, zoom and pan a view of the Web page;

Unpatentable claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 of U.S. Patent No. 7,461,353

[317.i] activate a currently displayed hyperlink to an external reference while at a given zoom level and panned view, wherein in response to an activation of a hyperlink to an external reference, Web content associated with the external reference is retrieved and rendered on the display;

[317.j] zoom in on an image of the Web page by tapping on the image via the display;

[317.k] zoom in on a column of the Web page by tapping on the column via the display; and

[317.l] zoom out to a previous view of the Web page.

Appendix C - Unpatentable '926 Patent Claims in IPR2013-00004

Unpatentable Claims 30, 31, 40, 41, 43, 52, 55, 59, 72, and 75 of U.S. Patent No. 7,831,926
[30.pre] A mobile phone, comprising:
[30.a] a processor,
[30.b] wireless communications means operatively coupled to the processor, to facilitate communication with a mobile service provider network via which Web content may be accessed;
[30.c] a touch-sensitive display;
[30.d] a memory, operatively coupled to the processor; and
[30.e] storage means, operatively coupled to the processor, in which a plurality of instructions are stored that when executed by the processor enable the mobile phone to perform operations including,
[30.f] rendering a browser interface via which a user is enabled to request to access to a Web page having an original format comprising HTML-based content defining an original page layout, functionality, and design of content on the Web page;
[30.g] retrieving HTML-based content associated with the Web page;
[30.h] translating at least a portion of the HTML-based content from its original format to produce translated content including scalable vector-based content that supports a scalable resolution-independent representation of the HTML-based content that preserves an original page layout, functionality and design of the at least a portion of the HTML-based content when scaled and rendered; and

Unpatentable Claims 30, 31, 40, 41, 43, 52, 55, 59, 72, and 75 of U.S. Patent No. 7,831,926

[30.i] employing the scalable vector-based content to render a view of at least a portion of the Web page on the display using a first scale factor,

[30.j] wherein preservation of the functionality defined by the HTML-based content includes preservation of hyperlink functionality.

[31] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display.

[40] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed to fit across the touch-sensitive display.

[41] The mobile phone of claim 30, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across at least one of a width and height of a display area of the touch-sensitive display.

[43.a] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising:

[43.b] generating a display list associated with the scalable vector-based content; and

[43.c] employing the display list to re-render the display at different scale factors to enable rapid zooming of the Web page.

Unpatentable Claims 30, 31, 40, 41, 43, 52, 55, 59, 72, and 75 of U.S. Patent No. 7,831,926

[52.pre] A mobile device, comprising:

[52.a] a processor,

[52.b] wireless communications means, to facilitate wireless communication with a network via which Web content may be accessed;

[52.c] a touch-sensitive display;

[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;

[52.f] retrieving and processing the HTML-based Web content to produce scalable content; and

[52.g] employing the scalable content and/or data derived therefrom to,

[52.h] render a view of the Web page on the touch-sensitive display; and

[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,

[52.j] wherein preservation of the functionality defined by the HTML-based Web content includes preservation of hyperlink functionality.

Unpatentable Claims 30, 31, 40, 41, 43, 52, 55, 59, 72, and 75 of U.S. Patent No. 7,831,926

[55] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display.

[59] The mobile device of claim 52, wherein at least a portion of the scalable content comprises scalable vector-based content.

[72.a] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising:

[72.b] parsing HTML-based code corresponding to the received Web content to identify content on the Web page;

[72.c] logically grouping selected content into objects;

[72.d] defining a primary datum corresponding to the original page layout; and,

[72.e] for each object,

[72.e.1] defining an object datum corresponding to a layout location datum for the object's associated display content;

[72.e.2] generating a vector from the primary datum to the object datum for the object; and

[72.e.3] creating a reference that links the object to its corresponding vector.

[75.a] The mobile device of claim 52, wherein the original format of the Web page defines a width for the Web page, and wherein execution of the instructions performs further operations comprising:

Unpatentable Claims 30, 31, 40, 41, 43, 52, 55, 59, 72, and 75 of U.S. Patent No. 7,831,926
[75.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and
[75.c] employing the scale factor to render the display area.

Appendix D - Unpatentable '926 Patent Claims in 90,009,995

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926	
[1.pre]	A mobile device, comprising:
[1.a]	a processor,
[1.b]	a wireless communications device operatively coupled to the processor, to facilitate communication with a network via which Web content may be accessed;
[1.c]	a touch-sensitive display;
[1.d]	a memory, operatively coupled to the processor; and
[1.e]	storage means, operatively coupled to the processor, in which a plurality of instructions are stored that when executed by the processor enable the mobile phone to perform operations including,
[1.f]	enabling a user 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;
[1.g]	retrieving HTML-based Web content associated with the Web page;
[1.h]	translating the HTML-based Web content to produce scalable vector-based page layout information;
[1.i]	employing the scalable vector-based page layout information and/or data derived therefrom to,
[1.i.1]	render a view of at least a portion of the Web page on the touch-sensitive display using a first scale factor; and

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926

[1.i.2.a] re-render the Web page in response to associated user inputs to enable a user to iteratively zoom in and out views of the Web page on the display while preserving the original page layout, functionality, and design of the content on the Web page defined by the HTML-based Web content,

[1.i.2.b] wherein preservation of the functionality defined by the HTML-based content includes preservation of hyperlink functionality.

[2] The mobile device of claim 1, wherein the device comprises a mobile phone.

[3] The mobile device of claim 1, wherein the device comprises one of a hand-held device or a palm-held device.

[4] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display.

[5] The mobile device of claim 1, wherein the display of the Web page is re-rendered in real-time to effect zooming operations.

[6.a] The mobile device of claim 1, wherein the Web content includes at least one hyperlink, and wherein execution of the instructions performs further operations comprising:

[6.b] enabling the user to select the hyperlink via the touch-sensitive display; and, in response thereto,

[6.c] retrieving and translating HTML-based Web content associated with the hyperlink to produce additional scalable vector-based page layout information; and

[6.d] employing the additional scalable vector-based page layout information and/or data derived therefrom to render the Web content associated with the hyperlink on the touch-sensitive display.

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926

[7] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling the Web content to be displayed at different resolutions by scaling the scalable vector-based page layout information to resize a view of the Web page on the display in response to associated user inputs.

[8] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising returning the display of the Web content to a previous view in response to a corresponding user input made via the touch-sensitive display.

[9] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to pan a display of the Web content in response to a corresponding user input made via the touch-sensitive display.

[10] The mobile device of claim 9, wherein execution of the instructions performs further operations comprising enabling the display of the Web content to be panned in real-time.

[11] The mobile device of claim 1, wherein the page layout of the Web page is defined to have an original aspect ratio, and wherein the scalable vector-based page layout information and/or data derived therefrom is scaled to render a display having a different aspect ratio.

[12] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed to fit across the touch-sensitive display.

[13] The mobile device of claim 1, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926

display is re-rendered such that the image is displayed to fit across a width of a display area of the touch-sensitive display.

[14] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising enabling a user to view a paragraph of the Web content at a higher resolution than a current resolution by tapping on the paragraph via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected paragraph is displayed to fit across a width of a display area of the touch-sensitive display.

[15.a] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising:

[15.b] generating a display list derived, at least in part, via use of the vector-based page layout information; and

[15.c] employing the display list to re-render the display of the Web page.

[16.a] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising:

[16.b] parsing HTML-based code corresponding to the received Web content to logically group content into objects, the objects including a plurality of display objects;

[16.c] defining a primary datum corresponding to a page layout; and,

[16.d] for each display object, defining an object datum corresponding to a layout location datum for the object's associated display content; generating a vector from the primary datum to the object datum for the object; and creating a reference that links the object to its corresponding vector.

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926

[17] The mobile device of claim 16, wherein execution of the instructions performs further operations comprising mapping the object vectors to a virtual display area in memory.

[18.a] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising:

[18.b] parsing the HTML-based content to logically group content into objects;

[18.c] generating page layout information including a bounding box for each object, the bounding box defining width and height dimensions for the object; and

[18.d] storing information that links each object with its corresponding page layout information;

[18.e] wherein the page layout information further includes information from which a page layout location of each of the bounding boxes can be determined.

[19] The mobile device of claim 1, wherein the scalable vector-based content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content.

[20] The mobile device of claim 1, wherein at least a portion of the instructions comprise Java-based instructions configured to be executed on a Java virtual machine.

[21.a] The mobile device of claim 1, wherein translating the HTML-based Web content to produce scalable vector-based page layout information comprises:

[21.b] processing the HTML-based Web content with a rendering engine to generate page layout information corresponding to the original page layout as interpreted by the rendering engine; and

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[21.c] employing the page layout information to produce scalable vector-based page layout information.

[22.a] The mobile device of claim 21, wherein the page layout information defines a layout location for a plurality of objects, including text objects, graphic layout objects, and/or image objects included on the Web page, and wherein producing vector-based page layout information comprises:

[22.b] defining a primary datum corresponding to a page layout; and

[22.c] for each object,

[22.c.1] defining an object datum corresponding to the layout location for the object on the page layout;

[22.c.2] generating a vector from the primary datum to the object datum for the object; and

[22.c.3] creating a reference that links the object to its corresponding vector.

[23.a] The mobile device of claim 22, wherein execution of the instructions performs further operations comprising effecting a zoom operation combined with a pan operation by,

[23.b] for each of the plurality of display objects to be included in a panned view of the Web page to be rendered on the display,

[23.b.1] scaling page layout information associated with the display object using a scale factor corresponding to a zoom level associated with the zoom operation to determine a scaled datum;

[23.b.2] determining an offset corresponding to the pan operation and combining the scaled datum with the offset to produce a scaled and offset datum that defines a location where the display object is to be rendered on the panned view of the Web page;

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926

[23.b.3] scaling content associated with the display object using the scale factor; and

[23.b.4] rendering the scaled content at the location defined by the scaled and offset datum to render the display object on the panned view of the Web page.

[24.a] The mobile device of claim 23, wherein rendering scaled content associated with a text object comprises

[24.b] retrieving presentation attributes for the text object, the presentation attributes including a font typeface, size and color;

[24.c] employing a scalable font associated with the font typeface to render text associated with the text object in a color associated with the color attribute, wherein the text is rendered relative to a location associated with the scaled and offset datum for the text object, and wherein the scale applied to the scalable font is a function of the scale factor and the font size.

[25.a] The mobile device of claim 21, wherein the original format of the Web page defines a width for the Web page, as interpreted by the rendering engine, and wherein execution of the instructions performs further operations comprising

[25.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and

[25.c] employing the scale factor that is determined as the first scale factor.

[26.a] The mobile device of claim 1, wherein zooming operations are effected by applying a mathematical transformation to a plurality of points in a two-dimensional coordinate system comprising X and Y axes, including points comprising datum points having corresponding vectors included in the scalable vector-based

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page layout information defining page layout locations of corresponding text and image objects mapped to the two-dimensional coordinate system, wherein the mathematical transformation comprises

[26.b] $X' = XSF$;

[26.c] $Y' = YSF$;

[26.d] wherein X, Y is the location of a point prior to transformation, X', Y' is the location of the point after transformation, and SF is the scale factor.

[27] The mobile device of claim 26, wherein the mathematical transformation is applied to points in a first coordinate system comprising a virtual coordinate system associated with a virtual display area onto which page layout information is mapped to a second coordinate system comprising a device coordinate system corresponding to a pixel resolution of the display of the mobile device, wherein points are mapped from the first coordinate system to the second coordinate system using the mathematical transformation.

[28] The mobile device of claim 1, wherein execution of the instructions performs further operations comprising maintaining at least one instance of the page layout information in a manner that is independent of the zoom levels used to view the web page on the display.

[32] The mobile phone of claim 31, wherein the display of the Web page is re-rendered in real-time to effect zooming operations.

[33.a] The mobile phone of claim 30, wherein the Web content includes at least one hyperlink, and wherein execution of the instructions performs further operations comprising:

[33.b] enabling the user to select the hyperlink via the touch-sensitive display; and, in response thereto,

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[33.c] retrieving and translating the Web content associated with the hyperlink to produce additional scalable vector-based content; and

[33.d] employing the additional scalable vector-based content to render the Web content associated with the hyperlink on the touch-sensitive display.

[34.a] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising:

[34.b] parsing and processing markup language code associated with the Web page to determine the original page layout of display content within the Web page, wherein the original page layout defines a layout location for a plurality of objects, including text objects, graphic layout objects, and/or graphic image objects included in the Web page;

[34.c] defining a primary datum corresponding to the original page layout; and,

[34.d] for each object,

[34.d.1] defining an object datum corresponding to the layout location for the object;

[34.d.2] generating a vector from the primary datum to the object datum for the object; and

[34.d.3] creating a reference that links the object to its corresponding vector.

[35] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling the Web content to be displayed at different resolutions by scaling the scalable vector-based content to re-render the display in response to associated user inputs.

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926

[36] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising returning the display of the Web content to a previous view in response to a corresponding user input made via the touch-sensitive display.

[37] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling a user to pan a display of the Web content in response to a corresponding user input made via the touch-sensitive display.

[38] The mobile phone of claim 37, wherein execution of the instructions performs further operations comprising enabling the display of the Web content to be panned in real-time.

[39] The mobile phone of claim 30, wherein the page layout of the Web page is defined to have an original aspect ratio, and wherein the scalable vector-based content is scaled when rendered so as to produce a display having a different aspect ratio.

[42] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising enabling a user to view a paragraph of the Web content at a higher resolution than a current resolution by tapping on the paragraph via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected paragraph is displayed across at least one of a width and height of a display area of the touch-sensitive display.

[44.a] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising:

[44.b] parsing and processing markup language code corresponding to the received Web content to determine page layout information corresponding to a page layout of the content on the Web page;

[44.c] logically grouping selected content into objects;

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926	
[44.d]	defining a primary datum corresponding to the page layout; and,
[44.e]	for each object,
[44.e.1]	defining an object datum corresponding to a layout location datum for the object's associated display content;
[44.e.2]	generating a vector from the primary datum to the object datum for the object; and
[44.e.3]	creating a reference that links the object to its corresponding vector.
[45]	The mobile phone of claim 44, wherein execution of the instructions performs further operations comprising: mapping the object vectors to a virtual display area in memory.
[46.a]	The mobile phone of claim 45, wherein execution of the instructions performs further operations comprising:
[46.b]	determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered view of the Web content desired by a user;
[46.c]	determining a virtual display limit bounding box for the virtual display area associated with the first scale factor and offset;
[46.d]	identifying objects having at least a portion of their content falling within the virtual display limit bounding box; and,
[46.e]	for each of such objects,

Unpatentable Claims 1-28, 32-39, 42, 44-51, and 69 of U.S. Patent No. 7,831,926

[46.e.1] retrieving content associated with that object; and

[46.e.2] applying an appropriate scale factor and offset to the content to render the view of the Web content.

[47.a] The mobile phone of claim 30, wherein execution of the instructions performs further operations comprising:

[47.b] parsing markup language code corresponding to the received Web content to logically group selected content into objects;

[47.c] generating page layout information including a bounding box for each object, the bounding box defining width and height dimensions for the object; and

[47.d] storing information that links each object with its corresponding page layout information;

[47.e] wherein the page layout information further includes information from which a page layout location of each of the bounding boxes can be determined.

[48.a] The mobile phone of claim 30, wherein the scalable vector-based content includes scalable text content, and

[48.b] wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content.

[49.a] The mobile phone of claim 30, wherein the original format of the Web page defines a width for the Web page, and wherein execution of the instructions performs further operations comprising:

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[49.b] determining an applicable scale factor to fit the width of the Web page across a display area of the touch-sensitive display; and

[49.c] employing the scale factor that is determined as the first scale factor.

[50] The mobile phone of claim 30, wherein at least a portion of the instructions comprise Java-based instructions configured to be executed on a Java virtual machine.

[51.a] The mobile device of claim 30, wherein the original format of the Web page comprises HTML-based Web content and the vector-based scalable content comprises scalable vector-based page layout information, and wherein execution of the instructions performs further operations comprising:

[51.b] processing the HTML-based Web content with a rendering engine to generate page layout information corresponding to the original page layout as interpreted by the rendering engine;

[51.c] employing the page layout information to generate the scalable vector-based page layout information.

[69.a] The mobile device of claim 68, further comprising dynamic memory having at least a portion employed for rendering purposes, wherein execution of the instructions performs further operations comprising:

[69.b] mapping the object vectors and associated bounding boxes to a virtual display area in the dynamic memory.

Appendix E - Unpatentable '926 Patent Claims in 95,000,635

Unpatentable Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of U.S. Patent No. 7,831,926
[29] The mobile device of claim 1, wherein the HTML-based Web content includes cascading style sheet content defining layout and presentation attributes for the Web page.
[53] The mobile device of claim 52, wherein the device comprises a mobile phone.
[54] The mobile device of claim 52, wherein the device comprises one of a Personal Digital Assistant (PDA) or pocket PC.
[56] The mobile device of claim 55, wherein the user interface input enables the user to define a window of a current view of the Web page on which to zoom in on.
[57] The mobile device of claim 52, wherein the display of the Web page is re-rendered in real-time to effect zooming operations.
[58.a] The mobile device of claim 52, wherein the Web page includes at least one hyperlink, and wherein execution of the instructions performs further operations comprising:
[58.b] enabling the user to select the hyperlink via the touch-sensitive display; and, in response thereto,
[58.c] retrieving and processing HTML-based Web content associated with the hyperlink to produce additional scalable content; and
[58.d] employing the additional scalable content and/or data derived therefrom to render the Web content associated with the hyperlink on the touch-sensitive display.

Unpatentable Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of U.S. Patent No. 7,831,926

[60] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising returning the display of the Web page to a previous view in response to a corresponding user input made via the touch-sensitive display.

[61] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a user to pan a display of the Web content in response to a corresponding user input made via the touch-sensitive display.

[62] The mobile device of claim 61, wherein execution of the instructions performs further operations comprising enabling the display of the Web content to be panned in real-time.

[63] The mobile device of claim 52, wherein the page layout of the Web page is defined to have an original aspect ratio, and wherein the scalable content and/or data derived therefrom is scaled to render a display having a different aspect ratio.

[64] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a user to view a column of the Web content at a higher resolution than a current resolution by tapping on the column via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected column is displayed across the touch-sensitive display.

[65] The mobile device of claim 52, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit a width of a display area of the touch-sensitive display.

[66] The mobile device of claim 52, wherein execution of the instructions performs further operations comprising enabling a user to view a paragraph of the Web content at a higher resolution than a current

Unpatentable Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of U.S. Patent No. 7,831,926

resolution by tapping on the paragraph via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that content corresponding to the selected paragraph is displayed across at least one of a width and height of a display area of the touch-sensitive display.

[67] The mobile device of claim 66, wherein the content of the paragraph is reformatted to fit characteristics of the display area when the display is re-rendered.

[68.a] The mobile device of claim 52, wherein the Web page includes text, layout attributes, and images, and wherein execution of the instructions performs further operations comprising:

[68.b] receiving content corresponding to the text and layout attributes via a first connection; and

[68.c] receiving content corresponding to at least one image via a second connection.

[70.a] The mobile device of claim 69, wherein execution of the instructions performs further operations comprising determining a first scale factor and offset in response to one or more corresponding user inputs defining a user-selectable zoom level and pan corresponding to a rendered display of the Web page desired by a user;

[70.b] determining a virtual display limit bounding box for the virtual display associated with the first scale factor and offset;

[70.c] identifying object bounding boxes having at least a portion falling within the virtual display limit bounding box; and,

[70.d] for each of such object bounding boxes, retrieving content associated with that object bounding box; and

[70.e] applying an appropriate scale factor to the content to render the display.

Unpatentable Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of U.S. Patent No. 7,831,926

[71.a] The mobile device of claim 52, further comprising dynamic memory having at least a portion employed for rendering purposes,

[71.b] wherein execution of the instructions performs further operations comprising building a display list via use of the scalable content and rendering the display list on a virtual display area in the dynamic memory; and

[71.c] scaling the display list to re-render the display of the Web page.

[73] The mobile device of claim 72, wherein execution of the instructions performs further operations comprising generating a bounding box for each object, the bounding box representing a portion of a rendered display page occupied by the object's associated group of content.

[74] The mobile device of claim 52, wherein the scalable content includes scalable text content, and wherein execution of the instructions performs further operations comprising scaling a scalable font to render the scalable text content.

[76] The mobile device of claim 52, wherein at least a portion of the instructions comprise Java-based instructions configured to be executed on a Java virtual machine.

[77] The mobile device of claim 52, wherein a portion of the HTML-based Web content comprises XML-based content.

[78] The mobile device of claim 52, wherein a portion of the HTML-based Web content comprises cascading style sheet data.

[79.pre] A mobile device, comprising:

[79.a] processing means;

Unpatentable Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of U.S. Patent No. 7,831,926

[79.b] wireless communications means, to facilitate wireless communication with a network via which Web content may be accessed;

[79.c] touch-sensitive display means, to facilitate user input and display rendered content;

[79.d] programmed circuit means; and

[79.e] storage means, in which a plurality of instructions are stored,

[79.f] wherein, upon execution of the instructions by at least one of the processing means and programmed circuit means, the mobile device is enabled to perform operations, including,

[79.g] rendering a browser interface via which a user is enabled to request to access to a Web page comprising HTML-based Web content defining an original page layout, functionality, and design of content on the Web page;

[79.h] retrieving and processing the HTML-based Web content to produce scalable content; and

[79.i] employing the scalable content and/or data derived therefrom to,

[79.i.1] render a view of the Web page on the touch-sensitive display; and

[79.i.2] re-render the Web page in response to associated user inputs made via the touch-sensitive display means 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,

[79.i.2.a] wherein preservation of the functionality defined by the HTML-based Web content includes preservation of hyperlink functionality.

Unpatentable Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of U.S. Patent No. 7,831,926

[80] The mobile device of claim 79, wherein the processing means includes a general-purpose processor.

[81] The mobile device of claim 79, wherein at least a portion of the programmed circuit means is embodied as a special-purpose processor.

[82] The mobile device of claim 79, wherein execution of the instructions performs further operations comprising enabling the user to zoom in on a user-selectable portion of a display of the Web page in response to a user interface input made via the touch-sensitive display.

[83] The mobile device of claim 82, wherein the user interface input enables the user to define a window of a current view of the Web page on which to zoom in on.

[84] The mobile device of claim 79, wherein the display of the Web page is re-rendered in real-time to effect zooming operations.

[85] The mobile device of claim 79, wherein execution of the instructions performs further operations comprising enabling a user to pan a display of the Web content in response to a corresponding user input made via the touch-sensitive display.

[86] The mobile device of claim 85, wherein execution of the instructions performs further operations comprising enabling the display of the Web content to be panned in real-time.

[87] The mobile device of claim 79, wherein the Web content includes at least one image, and wherein execution of the instructions performs further operations comprising enabling a user to view an image at a higher resolution than a current resolution by tapping on the image via the touch-sensitive display, wherein in response thereto, the display is re-rendered such that the image is displayed to fit across a width of a display area of the touch-sensitive display.

Unpatentable Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of U.S. Patent No. 7,831,926

[88.a] The mobile device of claim 79, further comprising dynamic memory having at least a portion employed for rendering purposes, wherein execution of the instructions performs further operations comprising

[88.b] building a display list of scalable content via use of the scalable content and rendering the display list on a virtual display area in the dynamic memory; and

[88.c] scaling the scalable content in the display list to re-render the display of the Web page.