

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

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,533,628**

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I. INTRODUCTION

Google LLC (“Petitioner”) respectfully requests *Inter Partes* Review of claims 1-37 (“the challenged claims”) of U.S. Patent No. 8,533,628 (“the ’628 patent”) (EX1001) assigned to SoftView LLC (“Patent Owner”). The ’628 patent never should have issued—its claims are all patentably indistinct from claims that have already been adjudicated by the USPTO to be invalid. Yet Patent Owner has begun to assert the ’628 patent and other patents containing patentably indistinct claims against Petitioner’s product (but not Petitioner), seeking to create protracted and complicated litigation. This Petition should thus be instituted to correct the Examiner’s error in allowing the ’628 patent.

II. MANDATORY NOTICES

Real Parties-in-Interest: Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner identifies Google LLC¹, Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc. as the real parties-in-interest.

Related Matters: The ’628 patent is asserted in *SoftView, LLC v. Samsung Electronics Co., Ltd. et al.*, No. 2-25-cv-00246 (E.D. Tex.).

¹ Google LLC is a subsidiary of XXVI Holdings Inc., which is a subsidiary of Alphabet Inc. XXVI Holdings Inc. and Alphabet Inc. are not real parties-in-interest to this proceeding.

The '628 patent originates from U.S. Patent Application No. 11/735,477, filed on April 15, 2007, which is a continuation of application No. 09/878,097, filed on June 8, 2001, now Pat. No. 7,210,099 ("the '099 patent"), which is a continuation-in-part of application No. 09/828,511, filed on April 7, 2001. Application No. 09/878,097 also claims priority to provisional application No. 60/217,345, filed on July 11, 2000, and provisional application No. 60/211,019, filed on June 12, 2000. (EX1001, Cover.) The '628 patent is also a divisional of the following: application No. 09/878,097, filed on June 8, 2001, now the '099 patent; application No. 11/045,757, filed on January 28, 2005, now Patent No. 7,461,353 ("the '353 patent"); and application No. 11/045,649, filed on January 28, 2005, now Pat. No. 7,584,423. (EX1001, Cover.)

The related U.S. Patent Nos. 10,083,154 ("154 patent"), 9,519,729 ("the '729 patent"), 7,844,889 ("the '889 patent"), and the '353 patent are all also at issue in *SoftView, LLC v. Samsung Electronics Co., Ltd. et al.*, No. 2-25-cv-00246 (E.D. Tex.).

The '099 patent is a parent of U.S. Patent No. 7,831,926 ("the '926 patent"). (EX1011, Cover.) All 88 issued claims of the '926 patent have been canceled in post-grant proceedings. (EX1011, 41-48; EX1014.) Claims 30, 31, 40, 41, 43, 52, 55, 59, 72, and 75 of the '926 patent were canceled in IPR2013-00004, which was joined by IPR2013-00257. (EX1011, 41-42.) Claims 1-28, 32-39, 42, 44-51, and

69 of the '926 patent were canceled in *Ex Parte* Reexamination No. 90/009,995. (EX1011, 43-45.) Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 of the '926 patent were canceled in *Inter Partes* Reexamination No. 95/000,635. (EX1011, 46-48.) *Inter Partes* Reexamination No. 95/002,126 was terminated after the previous proceedings had canceled all the claims. (EX1014.)

The '353 patent was subject to IPR2013-00007 (joined by IPR2013-00256), where claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 were found unpatentable. (EX1015, 51.) The '353 patent was subject to *Ex Parte* Reexamination No. 90/009,994, where claims 5, 23-27, 60, 61, 122, 137, 140, 141, 147, 156, 174-177, 238-242, 248, 259, and 274-277 were amended and claims 320-322 were added. (EX1015, 53.) The '353 patent is currently subject to *Inter Partes* Reexamination Nos. 95/000,634 and 95/002,132, during which the Federal Circuit clarified 37 C.F.R. § 42.73(d)(3)(i) “applies to new claims or amended claims, but not to previously issued claims.” (*SoftView LLC v. Apple Inc.*, 108 F.4th 1366, 1369 (Fed. Cir. 2024); EX1019-EX1021; EX1023-EX1025; EX1047; EX1048.)

The '353 and the '926 patents have previously been involved in district court litigations. On May 10, 2010, SoftView filed an assertion for patent infringement of the '353 patent against Apple and AT&T. *SoftView LLC v. Apple Inc. et al.*, No. 1:10-cv-00389-LPS, Dkt. No. 1 (D. Del. filed May 10, 2010). In December 2010,

SoftView filed an amended complaint to add the '926 patent, which had issued on November 9, 2010 (EX1011, 1). *SoftView LLC v. Apple Inc. et al.*, No. 1:10-cv-00389-LPS, Dkt. No. 27 (D. Del. filed Dec. 03, 2010). On September 30, 2011, SoftView filed an amended complaint to add more defendants. *SoftView LLC v. Apple Inc. et al.*, No. 1:10-cv-00389-LPS, Dkt. No. 108 (D. Del. filed Sep. 30, 2011). On July 26, 2012, the litigation was split into the following 9 cases:

- *SoftView LLC v. Apple Inc. et al.*, No. 1:10-cv-00389-LPS (D. Del.)
- *SoftView LLC v. HTC Corp. et al.*, No. 1:12-cv-00984-LPS (D. Del.)
- *SoftView LLC v. Huawei Technologies Co. Ltd. et al.*, No. 1:12-cv-00985-LPS (D. Del.)
- *SoftView LLC v. LG Electronics Inc. et al.*, No. 1:12-cv-00986-LPS (D. Del.)
- *SoftView LLC v. Samsung Electronics Co. Ltd. et al.*, No. 1:12-cv-00987-LPS (D. Del.)
- *SoftView LLC v. Dell Inc. et al.*, No. 1:12-cv-00988-LPS (D. Del.)
- *SoftView LLC v. Kyocera Corp. et al.*, No. 1:12-cv-00989-LPS (D. Del.)
- *SoftView LLC v. Motorola Mobility LLC et al.*, No. 1:12-cv-00990-LPS (D. Del.)

- *SoftView LLC v. Sony Ericsson Mobile Communications (USA) Inc. et al.*, No. 1:12-cv-00991-LPS (D. Del.)

SoftView LLC v. Apple Inc. et al., No. 1:10-cv-00389-LPS, Dkt. No. 440 (D. Del. filed Jul. 26, 2012). On September 4, 2013, the cases were stayed pending the Board's review of the '926 and '353 patents. *SoftView LLC v. Apple Inc. et al.*, No. 1:10-cv-00389-LPS, Dkt. No. 1105 (D. Del. filed Sep. 4, 2013). On October 29, 2015, after the Board found unpatentable various claims of the '926 and '353 patents, all the cases were dismissed; SoftView agreed to dismissal of the unpatentable claims with prejudice, and the remaining claims were dismissed without prejudice. *SoftView LLC v. Apple Inc. et al.*, No. 1:10-cv-00389-LPS, Dkt. No. 1128 (D. Del. filed Oct. 29, 2015).

Petitioner is simultaneously filing IPR petitions challenging the '729, '154, and '889 patents.

Counsel and Service Information: Lead counsel is Naveen Modi (Reg. No. 46,224). Backup counsel are Daniel Zeilberger (Reg. No. 65,349) and Maksim Mints (Reg. No. 78,507). Service information is Paul Hastings LLP, 2050 M Street NW, Washington, D.C. 20036, Tel.: 202.551.1700, Fax: 202.551.1705, email: PH-Google-SoftView-IPR@paulhastings.com. Petitioner consents to electronic service.

III. PAYMENT OF FEES UNDER 37 C.F.R. §§ 42.15 AND 42.103

The PTO is authorized to charge any fees due during this proceeding to Deposit Account No. 50-262.

IV. GROUNDS FOR STANDING

Petitioner certifies under 37 C.F.R. § 42.104(a) that the '628 patent is available for review and Petitioner is not barred or estopped from requesting review on the grounds identified herein.

V. PRECISE RELIEF REQUESTED AND GROUNDS RAISED

Petitioner respectfully requests review of claims 1-37 of the '628 patent and cancellation of these claims as unpatentable. The challenged claims should be found unpatentable on the following ground:

Ground 1: Claims 1-37 are unpatentable under pre-AIA 35 U.S.C. § 103 as being obvious in view of Zaurus (EX1004), Pad_1 (EX1005) and Pad_2 (EX1007) (collectively "Pad"), and SVG (EX1008).

The earliest possible priority date of the '628 patent is June 12, 2000 (EX1001, 1-2), and SoftView's contentions against Samsung assert that the '628 patent is entitled to a priority date of April 7, 2001 (EX1010, 5).² Regardless of which of the two dates is applied, the above references are prior art, and indeed the Board has

² Petitioner does not concede that the '628 patent is entitled to either of these dates.

previously credited that Zaurus, Pad, and SVG qualify as prior art to (i) the '926 patent that is a child of the '099 patent to which the '628 patent claims priority and (ii) the '353 patent that is a divisional of the '628 patent. (Section II; EX1013, 2-3; EX1017, 2-3.) For example, Zaurus was published in 1997, and thus qualifies as prior art under at least § 102(b). (EX1004, 3.) Pad_1 was published on October 2, 1996, and thus qualifies as prior art under at least § 102(b). (EX1005, 84.) Pad_2 was published in April 1997, and thus qualifies as prior art under at least § 102(b). (EX1007, 1.) SVG was published on October 29, 1998, or at least by November 3, 1998, and thus qualifies as prior art under at least § 102(b). (EX1008, 1, 16.)

VI. LEVEL OF ORDINARY SKILL

A person of ordinary skill in the art at the time of the alleged invention of the '628 patent ("POSITA") 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. (EX1002, ¶¶13-14.)³ More education can substitute for practical experience and vice versa. (*Id.*)

³ Petitioner submits the declaration of Dr. Benjamin Goldberg, an expert in the field of the '628 patent. (EX1002, ¶¶2-6; EX1006.)

VII. OVERVIEW OF THE '628 PATENT

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; EX1002, ¶¶15-19.)

VIII. RELATED PATENTS

A. The '926 patent

The '926 patent is a continuation of the '099 patent to which the '628 patent claims priority. (Section II.) In IPR2013-00004 challenging the '926 patent, the Board held claims 30, 31, 40, 41, 43, 52, 55, 59, 72, and 75 unpatentable over two grounds: Zaurus, Pad, and SVF; and Zaurus, Tsutsumitake, Hara, and SVG. (EX1013, 2-3.) The Board issued its decision on March 27, 2014 (EX1013), and the

certificate cancelling the claims issued on January 15, 2016 (EX1011, 41) after the Federal Circuit affirmed the Board's decision.

In *Ex Parte* Reexamination No. 90/009,995, the Office canceled Claims 1-28, 32-39, 42, 44-51, and 69 after raising rejections based on the Pad++ browser and SVF. (EX1033, 3, 22, 45.) In *Inter Partes* Reexamination No. 95/000,635, the Office canceled Claims 29, 53, 54, 56-58, 60-68, 70, 71, 73, 74, and 76-88 after raising rejections based on the Pad++ browser. (EX1034, 3, 9.) Accordingly, the PTO canceled all 88 issued claims of the '926 patent. (EX1011, 41-48; EX1014.)

B. The '353 patent

The '353 patent is a divisional of the '628 patent. (Section II.) In IPR2013-00007 challenging the '353 patent, the Board held claims 1, 33, 36, 43, 48, 51, 52, 58, 59, 66, 118, 138, 139, 149, 183, 252, 283, and 317 unpatentable over four grounds: (1) Zaurus and Pad; (2) Zaurus, Pad, and SVG; (3) Zaurus, Tsutsumitake, and Hara; and (4) Zaurus, Tsutsumitake, Hara, and SVG. (EX1017, 2-3.) The Board issued its decision on March 27, 2014 (EX1017), and the certificate cancelling the claims issued on January 12, 2016 (EX1015, 51) after the Federal Circuit affirmed the Board's decision.

In *Ex Parte* Reexamination No. 90/009,994, the Office raised rejections based on the Pad++ browser and SVF, after which SoftView amended and added claims. (EX1015, 53.) During *Inter Partes* Reexamination Nos. 95/000,634 and 95/002,132,

the Federal Circuit affirmed the Board’s finding that the claims amended and added during *Ex Parte* Reexamination No. 90/009,994 were patentably indistinct from the claims canceled during IPR2013-00007. (EX1019, 4-5; 15-16.)

IX. THE CHALLENGED CLAIMS SHOULD BE CANCELED BECAUSE THEY ARE PATENTABLY INDISTINCT FROM UNPATENTABLE CLAIMS

Issue preclusion bars re-litigation of patentability issues for claims that are patentably indistinct from those previously held unpatentable. *See, e.g., Google LLC v. Hammond Dev. Int’l, Inc.*, 54 F.4th 1377, 1381 (Fed. Cir. 2022). As the Federal Circuit recently explained in a similar posture, “[t]o conclude otherwise would allow a patentee to assert a claim substantially similar to a claim previously found unpatentable by the PTAB.” *Apple Inc. v. Smart Mobile Techs. LLC*, No. 2024-1352, at 9 (Fed. Cir. Jan. 21, 2026) (nonprecedential). Yet that is precisely what SoftView has done with the ’628 patent.

The claims of the ’628 patent are patentably indistinct from the unpatentable claims of the ’353 and ’926 patents, as reflected in the table below. The Office has already canceled all 88 claims of the ’926 patent across multiple proceedings. (EX1011, 41-48; EX1014.) As for the ’353 patent, the Office canceled 20 claims in an IPR (EX1015, 51), amended claims in an EPR (EX1015, 53), and intends to cancel many other claims in *Inter Partes* Reexaminations (EX1047; EX1048). And another petitioner specifically asserted the Zaurus, Pad, and SVG references against

claims of the '926 and '353 patents, which the Board found unpatentable in 2014, the Federal Circuit affirmed in 2015, and the USPTO canceled in January 2016. (EX1013; EX1017; EX1015, 51; EX1011, 41.) The '628 patent issued in September 2013 (EX1001, 1), well after challenges to the '353 and '926 patents began in 2012.

In this proceeding, Petitioner applies those same references to the challenged claims and shows, consistent with the prior cancellations, that the challenged claims, which are not patentably distinct, are likewise unpatentable. The table below shows how the challenged claims are disclosed and/or suggested by previously canceled claims of the related '353 and '926 patents. (*See also* EX1002, ¶20, Appendices A-E (Dr. Goldberg describing this same correspondence).)⁴

'628 Patent	'353 Patent (EX1002, Appendix B)	'926 Patent (EX1002, Appendices C-E)
[1.pre]	[66], [149.a], [252.f]	(IPR2013-00004) ⁵ [30.f] (90/009,995) [1.f], [3] (95/000,635) [29], [54]
[1.a]	[58.b]	(IPR2013-00004) [30.g], [72.b] (90/009,995)

⁴ The table below is exemplary and is not intended to be exhaustive.

⁵ For the '926 patent, Petitioner identifies the proceeding in which the limitation at issue was addressed.

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		[21.b] (95/000,635) [78]
[1.b]	[36.e]	(IPR2013-00004) [43.c] (90/009,995) [7] (95/000,635) [57]
[1.c.1]	[52]	(IPR2013-00004) [41] (90/009,995) [13] (95/000,635) [65]
[1.c.2]-[1.c.2.a]	[1.c], [59]	(IPR2013-00004) [41], [75.b] (90/009,995) [18.c] (95/000,635) [70.a]-[70.e], [73]
[1.c.2.b]	[51], [118.c]	(IPR2013-00004) [41], [43.c] (90/009,995) [13], [23.b.3] (95/000,635) [65], [70.a]-[70.e]
[1.d]	[36.e]	(IPR2013-00004) [52.i] (90/009,995) [1.i.2.a] (95/000,635) [79.i.2]
[1.e]	[36.e], [58.b]	(IPR2013-00004) [52.i] (90/009,995) [21.b] (95/000,635) [79.i.2]

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[2]	[1.d], [33]	(IPR2013-00004) [30.h], [30.i], [52.i] (90/009,995) [21.b], [1.h], [1.i.1] (95/000,635) [79.i.1], [79.i.2]
[3]	[252.f]	(IPR2013-00004) [30.f] (90/009,995) [1.f] (95/000,635) [79.g]
[4.a], [5.a], [8.a]	[317.e]	(IPR2013-00004) [30.f], [52.h] (90/009,995) [1.i.1] (95/000,635) [79.i.1]
[4.b]	[317.j]	(IPR2013-00004) [31] (90/009,995) [4] (95/000,635) [82]
[5.b]	[118.c]	(IPR2013-00004) [75.b] (90/009,995) [25.a]-[25.c] (95/000,635) [64]
[5.c]	[36.e]	(IPR2013-00004) [52.i] (90/009,995) [1.i.2.a] (95/000,635) [79.i.2]
[6]	[36.e]	(IPR2013-00004) [52.i] (90/009,995)

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		[9] (95/000,635) [61]
[7]	[1.c]	(IPR2013-00004) [30.h] (90/009,995) [19] (95/000,635) [74]
[8.b]	[317.k], [48]	(IPR2013-00004) [40] (90/009,995) [12] (95/000,635) [64]
[8.c]	[48]	(IPR2013-00004) [40] (90/009,995) [12] (95/000,635) [64], [70.a]-[70.e]
[9.a]	[51]	(IPR2013-00004) [41] (90/009,995) [13] (95/000,635) [65]
[9.c]	[317.j]	(IPR2013-00004) [41] (90/009,995) [13] (95/000,635) [65]
[9.d]	[51]	(IPR2013-00004) [41] (90/009,995) [13] (95/000,635) [65]

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[10.b]	[36.e]	(IPR2013-00004) [31] (90/009,995) [14] (95/000,635) [66]
[10.c]	[36.e]	(IPR2013-00004) [31] (90/009,995) [14] (95/000,635) [66]
[11.b]	[317.e]	(IPR2013-00004) [30.f] (90/009,995) [1.c] (95/000,635) [79.g]
[11.c]	[36.e]	(IPR2013-00004) [55] (90/009,995) [23.a]-[23.b.4] (95/000,635) [70.a]-[70.e]
[11.d]	[59]	(IPR2013-00004) [75.b] (90/009,995) [17] (95/000,635) [70.a]-[70.e]
[11.e]	[59], [1.d]	(IPR2013-00004) [75.b]-[75.c] (90/009,995) [27] (95/000,635) [70.a]-[70.e]
[12]	[36.a]	(IPR2013-00004) [30.c] (90/009,995)

		[1.c] (95/000,635) [79.c]
[13]	[36.pre]	(IPR2013-00004) [30.pre] (90/009,995) [2] (95/000,635) [53]
[14]	[149.a]	(IPR2013-00004) [52.pre] (90/009,995) [3] (95/000,635) [54]
[15.pre]	<i>See</i> [1.pre], [4.a], [11.b]	
[15.a]; <i>see supra</i> [1.a], [8.b], [9.a], [10.b] ⁶	[66]	(IPR2013-00004) [52.e] (90/009,995) [22.a] (95/000,635) [68.a]
[15.b]; <i>see supra</i> [1.a]	[58.b]	(IPR2013-00004) [72.e.1] (90/009,995) [21.b] (95/000,635) [70.a]-[70.e]
[15.c], [15.c.1]; <i>see supra</i> [1.c.2], [1.c.2.a], [11.d]	[58.c], [59]	(IPR2013-00004) [72.c] (90/009,995)

⁶ The claim limitations shown in the center and right-hand columns address unique aspects of this claim limitation of the '628 patent (e.g., limitations of [15.a] not already addressed by [1.a], [8.b], [9.a], and [10.b]).

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		[18.b]-[18.c] (95/000,635) [73]
[15.c.2]; <i>see supra</i> [1.c.2.b]	[58.e.3]	(IPR2013-00004) [72.e.3] (90/009,995) [18.d] (95/000,635) [70.a]-[70.e]
[15.d]; <i>see supra</i> [1.d]	[58.e.1]	(IPR2013-00004) [72.e.1] (90/009,995) [18.e] (95/000,635) [70.a]-[70.e]
[15.e]	<i>See</i> [1.b]	
[15.f.1]	<i>See</i> [1.c.1], [4.b]	
[15.f.2]	<i>See</i> [1.c.2.a]	
[15.f.3]	<i>See</i> [1.c.2.b]	
[15.g]; <i>see supra</i> [8.b]- [8.c], [9.c]-[9.d], [10.b]- [10.c]	[52]	(IPR2013-00004) [31] (90/009,995) [23.a]-[23.b.4] (95/000,635) [70.a]-[70.e]
[15.h.1]	<i>See</i> [1.a], [1.c.1], [8.b], [10.b], [15.a]-[15.c]	
[15.h.2]	<i>See</i> [1.d]	
[16.a]	<i>See</i> [1.a], [8.b], [15.a]	
[16.b.1]	<i>See</i> [8.b]-[8.c]	
[16.b.2]	<i>See</i> [8.b]-[8.c]	
[17]	<i>See</i> [8.c]	
[18.a]	<i>See</i> [1.c.1], [9.c]	
[18.b.1]	<i>See</i> [9.c]	
[18.b.2]	<i>See</i> [9.d]	
[19]	<i>See</i> [9.d]	
[20.a]	<i>See</i> [10.b]	
[20.b.1]	<i>See</i> [10.b]	
[20.b.2]	<i>See</i> [10.c], [16.b.2]	
[21]	<i>See</i> [10.c]	

[22.a]	<i>See</i> [1.pre], [1.a], [15.a]
[22.b]	<i>See</i> [1.a], [15.b]
[23.a]	<i>See</i> [1.pre]
[23.b]	<i>See</i> [1.d], [4.a], [6], [11.c], [15.g]
[23.c]	<i>See</i> [1.d], [6]
[24.a]	<i>See</i> [23.b]
[24.b]	<i>See</i> [1.d], [15.b], [15.h.2]
[25]	<i>See</i> [1.pre]
[26]	<i>See</i> [14]
[27]	<i>See</i> [13]
[28.pre], [28.a]	<i>See</i> [1.pre]
[28.b]	<i>See</i> [1.c.1]
[28.c]	<i>See</i> [3]
[28.d]	<i>See</i> [1.a]
[28.e.1]-[28.e.3]	<i>See</i> [1.pre]
[28.e.3.a]	<i>See</i> [1.a]
[28.e.3.b]	<i>See</i> [1.b]
[28.e.3.c.1]	<i>See</i> [1.c.1]
[28.e.3.c.2]	<i>See</i> [1.c.2], [1.c.2.a]
[28.e.3.c.3]	<i>See</i> [1.c.2.b]
[28.f]	<i>See</i> [1.e]
[29.a]-[29.b]	<i>See</i> [2]
[30]	<i>See</i> [3]
[31.a]-[31.b]	<i>See</i> [4.a]-[4.b]
[32]	<i>See</i> [13]
[33]	<i>See</i> [14]
[34.pre], [34.a]	<i>See</i> [1.pre], [28.pre], [28.a]
[34.b]	<i>See</i> [1.c.1], [28.b]
[34.c]	<i>See</i> [3], [28.c]
[34.d.1]	<i>See</i> [1.a], [28.d]
[34.d.2]	<i>See</i> [1.pre], [28.e.1]
[34.e]	<i>See</i> [3]
[34.e.1]	<i>See</i> [1.a], [15.b]
[34.e.2]	<i>See</i> [1.a], [1.c.2], [15.b], [15.c]
[34.e.2.a], [34.e.2.a.1]	<i>See</i> [1.c.2], [11.d], [15.c], [15.c.1]
[34.e.2.a.2]	<i>See</i> [1.c.2.b], [15.c.2]
[34.e.3]	<i>See</i> [1.d], [15.d]
[34.f.1]	<i>See</i> [1.b], [1.d], [11.c], [23.b]

[34.f.2]	See [1.c.1], [4.b]	
[34.f.3], [34.f.3.a]; <i>see supra</i> [1.b], [1.c.2], [7], [10.b]	[1.c]	(IPR2013-00004) [75.b] (90/009,995) [23.a]-[23.b.4], [24.a] (95/000,635) [70.a]-[70.e], [74]
[34.f.3.a.1]; <i>see supra</i> [1.b], [1.c.2.a], [2]	[58.e.1]	(IPR2013-00004) [75.b] (90/009,995) [23.a]-[23.b.1] (95/000,635) [70.a]-[70.e]
[34.f.3.a.2]; <i>see supra</i> [1.a]	[1.c]	(IPR2013-00004) [30.h] (90/009,995) [24.a] (95/000,635) [74]
[34.f.3.a.3.a]; <i>see supra</i> [7]	[1.c]	(IPR2013-00004) [30.h] (90/009,995) [24.a] (95/000,635) [74]
[34.f.3.a.3.b]; <i>see supra</i> [1.d]	[58.e.1]	(IPR2013-00004) [30.h] (90/009,995) [24.a] (95/000,635) [70.a]-[70.e]
[34.f.3.a.3.c]; <i>see supra</i> [7]	[118.c]	(IPR2013-00004) [75.b] (90/009,995) [24.a] (95/000,635) [74]
[34.f.3.b]	See [1.c.2], [15.f.2], [15.f.3]	

[34.f.3.b.1]; <i>see supra</i> [1.c.2.a], [15.f.2]	[58.e.1]	(IPR2013-00004) [72.e.1] (90/009,995) [23.a]-[23.b.4] (95/000,635) [70.a]-[70.e]
[34.f.3.b.2]; <i>see supra</i> [1.c.2.b], [15.f.3]	[59]	(IPR2013-00004) [41] (90/009,995) [23.a]-[23.b.4] (95/000,635) [70.a]-[70.e]
[34.f.3.c]	<i>See</i> [5.b]	
[35]	<i>See</i> [1.pre], [1.e], [28.f]	
[36.a]-[36.b]; <i>see supra</i> [1.pre]-[1.a], [22.a]- [22.b]	[66]	(IPR2013-00004) [52.e] (90/009,995) [1.f] (95/000,635) [29]
[37.a]	<i>See</i> [5.c], [6]	
[37.b]	<i>See</i> [7]	

X. CLAIM CONSTRUCTION

For IPR proceedings, the Board applies the claim construction standard set forth in *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005) (*en banc*). *See* 83 Fed. Reg. 51,340-59 (Oct. 11, 2018). Under *Phillips*, claim terms are typically given their ordinary and customary meanings, as would have been understood by a POSITA, at the time of the invention, having taken into consideration the language of the claims, the specification, and the prosecution history of record. *Phillips*, 415 F.3d at 1313; *see also id.* at 1312-16.

In *SoftView LLC v. Apple Inc. et al.*, No. 1:10-cv-00389-LPS, Dkt. No. 108 (D. Del. filed Sep. 30, 2011), the court and parties construed various terms of the '353 and '926 patents. (EX1023; EX1038; EX1049.) Likewise, during IPR2013-00004 and IPR2013-00007, the Board further construed certain terms of the '353 and '926 patents. (EX1013, 7-14; EX1017, 8-13.) In the parallel litigation, Samsung offered constructions “in a manner consistent with how they were construed” in the previous litigation. (EX1057, 2.) SoftView offered constructions that either correspond to Samsung’s or assert that no construction is necessary. (EX1009.)

In any event, the Board only construes the claims when necessary to resolve the underlying controversy. *Toyota Motor Corp. v. Cellport Sys., Inc.*, IPR2015-00633, Paper No. 11 at 16 (P.T.A.B. Aug. 14, 2015) (citing *Vivid Techs., Inc. v. Am. Sci. & Eng’g, Inc.*, 200 F.3d 795, 803 (Fed. Cir. 1999)). The analysis below is consistent with the prior constructions and those offered by Samsung and SoftView in the parallel litigation. Given the close correlation between the prior art references and the challenged claims of the '628 patent, the Board need not construe any terms of the challenged claims to resolve the underlying controversy, as any reasonable construction reads on the prior art. (EX1002, ¶¶24-26.)

XI. DETAILED EXPLANATION OF GROUNDS

A. Ground 1: Zaurus, Pad, and SVG Render Claims 1-37 Obvious

The Board has previously found (and been affirmed by the Federal Circuit) that there is motivation to combine and a reasonable expectation of success for a Zaurus-Pad-SVG combination. (EX1017, 2-3.)

1. Zaurus (EX1004)

Zaurus discloses a handheld device with an Internet/HTML browser that supports stylus/touch input and switching between reduced and magnified displays. (EX1004, 10-16, 20-21, 40, 46-47; EX1002, ¶21.)

2. Pad (EX1005 and EX1007)

Pad++ (“Pad”) discloses an HTML browser with zoom/pan capabilities, including fit-to-width zoom behavior and visible-object determination (e.g., R-tree). (EX1007, 86-96, 108, 141; EX1005, 30, 63.) Pad is designed for small-screen systems including handheld computers/PDAs. (EX1007, 139-141; EX1005, 81-82; EX1002, ¶22.)

3. SVG (EX1008)

SVG discloses standards-based vector graphics designed for devices including small mobile devices and requiring zoom/pan “with true scalability.” (EX1008, 1, 12-14; EX1002, ¶23.)

4. Motivation to Combine

A POSITA would have been motivated to combine Zaurus, Pad, and SVG to improve small-screen navigation using known zoomable browsing and scalable graphics techniques. (EX1035; EX1037; EX1043; EX1046; EX1002, ¶28.) Zaurus already supports browsing with pen/touch input and switching between a “reduced view” and “magnified view,” showing that small-screen viewing modes and zoom-related interaction were known and implemented on the handheld platform. (EX1004, 46-47; EX1002, ¶29.) Pad teaches a more flexible solution, including continuous zoom and pan that “allows users to zoom in and out of pages, enabling control of how much context is viewed at any time,” and Pad targets “small screens, such as handheld computers (i.e. PDA’s),” making it a natural enhancement to Zaurus’s magnify/reduce approach. (EX1017, 18-24; EX1013, 18-23; EX1007, 86-96, 136-142; EX1002, ¶¶29-30; *see also* EX1050, 1-2; EX1051, 1.) SVG further teaches a standard for zooming and panning with true scalability across devices including small mobile devices, providing an incentive to incorporate scalable vector graphics so zoomed content remains readable and functional as the user navigates at different scales. (EX1008, 1, 14; EX1002, ¶31.) Thus, the Zaurus-Pad-SVG combination would have predictably improved handheld browsing by pairing Zaurus’s handheld HTML browser with Pad’s zoomable navigation techniques and SVG’s scalable graphics standard. (EX1017, 23-24; EX1002, ¶31.)

5. Reasonable Expectation of Success

A POSITA would have had a reasonable expectation of success in combining these references, and the Board rejected arguments that technical difficulties would prevent porting Pad to Zaurus. (EX1017, 18-19; EX1013, 18-19; EX1002, ¶32.) Zaurus already demonstrates the relevant handheld hardware/UI capability (stylus/touch input and switching between reduced and magnified display states), supporting that integrating enhanced zooming behavior would have been a predictable adaptation to an existing handheld browsing platform. (EX1004, 15-16, 20-21, 46-47; EX1002, ¶33.) Pad discloses zoom and layout related mechanisms designed for interactive navigation (including smooth animated zooming) and identifies handheld computers/PDAs as a target environment, reinforcing that a POSITA would have expected Pad's techniques to function on PDA devices such as Zaurus. (EX1005, 22-23, 54-56, 71; EX1013, 18; EX1017, 18; EX1002, ¶¶33-34.) SVG likewise is directed to scalable zooming/panning techniques suitable for small/mobile devices and defines a vector-based model whose scaling behavior is predictable. (EX1008, 1, 13-15; EX1002, ¶¶33-34.) Together, the references describe compatible browser/graphics techniques suitable for small-screen devices, and a POSITA would have expected the Zaurus-Pad-SVG combination to function as intended. (EX1035; EX1037; EX1043; EX1046; EX1002, ¶¶32-34.)

6. 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:”**

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 POSITA 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; EX1002, ¶35.)

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; EX1002, ¶36.)

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; EX1002, ¶37.)

- 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”**

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 (“interpret...at a first scale”). (EX1004, 46; EX1002, ¶38.)

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). (EX1002, ¶39.)

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 POSITA 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. (EX1002, ¶40.)

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

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.”); EX1002, ¶41; *see also* EX1017, 15 (“there appears to be little dispute that [Pad’s inventor] Bederson discloses vectorized content”).)

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 POSITA 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). (EX1002, ¶42.)

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”

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 POSITA 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 POSITA 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 POSITA would have understood the “touch” to be the claimed “user input to a touchscreen display” to trigger the zoom. (EX1002, ¶43.)

- 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,”**

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 POSITA 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; EX1002, ¶44.)

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 POSITA 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”). (EX1002, ¶45.)

(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”

Pad discloses rendering pages containing multiple items including “in-line images.” (EX1005, 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 POSITA 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.” (EX1002, ¶46.)

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. (EX1002, ¶47.)

- 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,”**

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; EX1002, ¶48.)

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 POSITA 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; EX1002, ¶49.)

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 POSITA 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”).

(EX1002, ¶50.)

- 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.”**

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 POSITA 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; EX1002, ¶51.)

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 POSITA 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.” (EX1002, ¶52.)

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 POSITA 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 POSITA 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 POSITA 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. (EX1002, ¶53.)

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 POSITA would have known that Netscape is the predecessor to Mozilla. (EX1051, 1; EX1002, ¶54.)

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.)⁷ 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

⁷ 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.)

predecessor to the Mozilla engine cited by SoftView), Pad discloses using the desktop engine codebase on the mobile device. (EX1007, 86; EX1002, ¶55.)

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. (EX1002, ¶56.)

7. Claim 2⁸

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 POSITA would have understood that “x1 y1” represents the origin point and “x2 y2” represents the value relative to that origin, mathematically

⁸ The claim language associated with claims 2-37 can be found in Appendix A.

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”) EX1002, ¶57.)

Pad’s engine is designed to handle scalable content and includes “zoomaction” scripts that are “evaluated when an item grows or shrinks,” which a POSITA 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; EX1002, ¶58.)

As 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 XI.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”). (EX1002, ¶59.)

8. Claim 3

Zaurus is equipped with wireless communication adapters (e.g., “Digital Cellular Phone Adapter”) to “Connect to the Internet,” and instructs users to “Open another home page by specifying URL,” confirming the user may request arbitrary pages beyond the default Zaurus Plaza. (EX1004, 4, 7, 10, 12, 46.) A POSITA would have understood that enabling a user to specify a URL and access the Internet necessarily allows browsing arbitrary user-selected pages from among the vast number of pages available on the World Wide Web (i.e., “billions” of pages), subject only to network availability. (EX1004, 10, 46; EX1002, ¶60.)

Further, Zaurus's desktop-compatible HTML support (e.g., frames and common image formats) and Pad's "zooming version of Mosaic and Netscape" reinforce that the browsing experience is replicated for those arbitrary pages using desktop-browser style rendering and interaction patterns. (EX1004, 40; EX1007, 86, 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; EX1002, ¶61.)

9. Claim 4

i) [4.a]

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; EX1002, ¶62.)

ii) [4.b]

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; EX1002, ¶63; *see also* EX1039, 42:3-19.)

10. Claim 5

i) [5.a]

As explained above in limitation [4.a], the combined device implements a browser that satisfies the claimed “wherein Web page views are displayed within a content display area.” (Section XI.A.9; EX1002, ¶63.)

ii) [5.b]

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 POSITA 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 POSITA 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. (EX1002, ¶64.)

iii) [5.c]

As discussed in Claim 1, Pad/SVG scaling yields a magnified view of the “first scale” interpretation, consistent with Zaurus’s magnified display. (EX1004, 46.) 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 XI.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. (EX1008, 14; EX1002, ¶65.)

11. Claim 6⁹

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 “scaled view” is updated so that the object “fills the screen,” thereby presenting a “magnified view of the Web page” for that specific corresponding portion of the document. (EX1005, 22 (“largest dimension... fills the specified amount of screen”); EX1007, 54; EX1002, ¶66.) When the view is scaled, SVG discloses applying a mathematical transformation to the existing vector objects. (EX1008, 11; EX1002, ¶67; *see also* Section XI.A.6.ii.)

12. Claim 7

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

⁹ For the purposes of this Petition, “first” is being interpreted as the “first scale” introduced in claim 1.

POSITA 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 bitmaps, thereby ensuring no degradation in quality. (EX1002, ¶68.)

13. Claim 8

i) [8.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [4.a]. (EX1002, ¶69; Section XI.A.9.i.)

ii) [8.b]

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; 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”). (EX1002, ¶70.)

iii) [8.c]

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 POSITA 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. (EX1002, ¶71.) 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. (EX1002, ¶72.)

14. Claim 9

i) [9.a]

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; EX1002, ¶73.)

ii) [9.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [4.a]. (EX1002, ¶74; Section XI.A.9.i.)

iii) [9.c]

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; *see also* EX1005, 53.) Because Zaurus uses a “touch-sensitive display” where input is provided by “touching the screen,” a POSITA would have found it obvious to apply 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; EX1002, ¶75.)

iv) [9.d]

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, 17,

22, 30, 32, 54 (“Pad++ zooms in so that that text fills the screen horizontally.”).)

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. (EX1002, ¶76.)

15. Claim 10

i) [10.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [4.a]. (EX1002, ¶77; Section XI.A.9.i.)

ii) [10.b]

In a Web context, a POSITA would have understood that a “paragraph” is a discrete block of text. (EX1042, 1-3; EX1043, 10.) A POSITA 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 POSITA would have found it obvious to adapt this interaction for the Zaurus touchscreen environment because if Zaurus operations are performed by “touch[ing] the screen with a pen,” the mouse-click interaction of Pad can be replaced by tapping. (EX1004, 15.) Thus, the combination teaches allowing a user to tap on the text of a paragraph to initiate the zoom. (EX1002, ¶78.)

iii) [10.c]¹⁰

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”).) Pad’s “center” command confirms this mechanism, ensuring “the largest dimension of its bounding box fills the specified amount of screen.” (EX1005, 17, 22, 30, 32, 54; EX1002, ¶79.)

16. Claim 11

i) [11.a]

ii) [11.b]

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; EX1002, ¶80.)

iii) [11.c]

Pad operates by maintaining a “current view” defined by coordinates (“pan offset”) and magnification (“zoom level”). (EX1005, 11 (“fast pans”), 30 (“current view (x, y, z)”).) SVG mandates support for “zoom and pan on graphics, with true

¹⁰ For the purposes of this Petition, “paragraph” is being interpreted as the “paragraph” introduced in limitation [10.b].

scalability,” ensuring attributes “grow/shrink uniformly with the zoom level.” (EX1008, 14; EX1002, ¶81.)

iv) [11.d]

Pad discloses “Spatial Indexing” to “quickly determine which objects are visible in a given view” and limits rendering to those objects, which a POSITA would have understood requires comparing object bounds against the bounding box corresponding to the current view. (EX1007, 141.) 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. (EX1002, ¶82.)

v) [11.e]

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; EX1002, ¶83.) 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 POSITA 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"). (EX1002, ¶83.)

17. Claim 12

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, 15 ("touch the screen"); EX1002, ¶84.)

18. Claim 13

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 POSITA would have implemented the combination on "a mobile phone." (EX1002, ¶85.)

19. Claim 14

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)” (“configured to be held in the palm of a user”). (EX1004, 15, 20; EX1002, ¶86.)

20. Claim 15

i) [15.pre]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.pre], [4.a], and [11.b]. (EX1002, ¶87; Sections XI.A.6.i, XI.A.9.i, XI.A.16.ii.)

ii) [15.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.a], [8.b], [9.a], [10.b]. (EX1002, ¶88; Section XI.A.6.ii, XI.A.13.ii, XI.A.14.i, XI.A.15.ii.)

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. (EX1002, ¶89.)

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.) 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; EX1002, ¶90.)

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 POSITA 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."
(EX1002, ¶91.)

iii) [15.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.a].
(EX1002, ¶92; Section XI.A.6.ii.)

Zaurus and Pad process fetched HTML into renderable items with coordinate-based layout (including text/item coordinates, image bounding boxes, and grid placement), with the initial rendered view constituting the "first scale."
(EX1004, 40, 46-47; EX1005, 29-30, 54, 60, 64, 75; EX1008, 11; EX1002, ¶¶93-95.) 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. (EX1002, ¶95.)

iv) [15.c]

(1) [15.c.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as discussed for limitations [1.c.2], [1.c.2.a], [11.d]. (EX1002, ¶96; Sections XI.A.6.v, XI.A.16.iv.)

Zaurus discloses “boundaries,” Pad maintains bounding boxes for items (including grid/group/layout items) used for layout, visibility, and view-fitting, i.e., an outlined box/shape defining the region within which the item’s content (text/image) appears; and SVG similarly supports querying object bounds. (EX1004, 48; EX1005, 16-17, 22, 29, 33-34, 41, 54-55, 57, 59-60, 64; EX1007, 141; EX1008, 15; EX1002, ¶¶97-99.) 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, 59-60.) 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). (EX1002, ¶¶97-99.)

(2) [15.c.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.c.2.b]. (EX1002, ¶100; Section XI.A.6.v.2.)

In the Zaurus-Pad-SVG combination, Pad links items to their geometry via tags/identifiers and commands that query bounding boxes (including grid/group contexts), and SVG/DOM scripting likewise links elements to layout/bounds. (EX1005, 1, 15-17, 29-32, 54, 59, 60, 65; EX1008, 9, 14-15; EX1002, ¶¶101-102.) Given that Pad discloses per-object stored bounding boxes addressable by tags and identifiers (EX1005, 17 (“bbox”), 54 (“grid bbox”), 59 (“Groups”)), a POSITA would have “generat[ed] information that links the object with its corresponding page layout information” in the mobile browser. (EX1002, ¶102.)

v) [15.d]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.d] because maintaining the layout relative to the first scale requires determining the layout location of the bounding boxes. (EX1002, ¶103; Section XI.A.6.vi.)

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. 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’s per-item bounding box coordinates (and pad/window coordinate mappings) plus SVG coordinate systems/transformations provide the information from which each bounding box’s page-layout location is determined. (EX1005, 5, 34; EX1008, 11; EX1002, ¶104.)

vi) [15.e]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.b]. (EX1002, ¶105; Section XI.A.6.iii.)

vii) [15.f.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.1] and [4.b]. (EX1002, ¶106; Section XI.A.6.iv, XI.A.9.ii.)

viii) [15.f.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.c.2.a]. (EX1002, ¶107; Section XI.A.6.v.1.)

ix) [15.f.3]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.c.2.b]. (EX1002, ¶108; Section XI.A.6.v.2.)

x) [15.g]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [8.b]-[8.c], [9.c]-[9.d], [10.b]-[10.c]. (EX1002, ¶109; Sections XI.A.13.ii-iii, XI.A.14.iii-iv, XI.A.15.ii-iii.)

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.) This center and fill operation updates zoom and offset based on the object’s bounding box. (EX1005, 17, 22, 30, 32, 60; EX1007, 54; EX1002, ¶110.)

xi) [15.h.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.a], [1.c.1], [8.b], [10.b], [15.a]-[15.c]. (EX1002, ¶111; Sections XI.A.6.ii, iv, XI.A.13.ii, XI.A.15.ii, XI.A.20.ii.)

xii) [15.h.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.d]. (EX1002, ¶112; Section XI.A.6.vi.)

21. Claim 16

i) [16.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [1.a], [8.b], [15.a]. (EX1002, ¶113; Sections XI.A.6.ii, XI.A.13.ii, XI.A.20.ii.)

ii) [16.b.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [8.b]-[8.c]. (EX1002, ¶114; Sections XI.A.6.ii-iii.)

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.) 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. (EX1002, ¶115.)

iii) [16.b.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [8.b]-[8.c]. (EX1002, ¶116; Sections XI.A.6. ii-iii.)

Pad’s zoom command modifies the view scale such that the selected item “fills the specified amount of screen.” (EX1004, 10, 46-47; EX1005, 22, 30, 32; EX1005, 54.) A POSITA 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.” (EX1002, ¶117; *see also* EX1008, 14.)

22. Claim 17

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [8.c]. (EX1002, ¶118; Section XI.A.6.iii.)

23. Claim 18

i) [18.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [1.c.1] and [9.c]. (EX1002, ¶119; Sections XI.A.6.iv, XI.A.14.iii.)

ii) [18.b.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [9.c]. (EX1002, ¶120; Section XI.A.14.iii.)

iii) [18.b.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [9.d]. (EX1002, ¶121; Section XI.A.14.iv.)

24. Claim 19

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [9.d]. (EX1002, ¶122; Section XI.A.14.iv.)

25. Claim 20

i) [20.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [10.b]. (EX1002, ¶123; Section XI.A.15.ii.)

ii) [20.b.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [10.b]. (EX1002, ¶124; Section XI.A.15.ii.)

iii) [20.b.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [10.c] and [16.b.2]. (EX1002, ¶125; Sections XI.A.15.iii, XI.A.21.iii)

26. Claim 21

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [10.c]. (EX1002, ¶126; Section XI.A.15.iii.)

27. Claim 22

i) [22.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.pre], [1.a], and [15.a]. (EX1002, ¶127; Sections XI.A.6.i-ii, XI.A.20.ii.)

ii) [22.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.a] and [15.b]. (EX1002, ¶128; Section XI.A.6.ii, XI.A.20.iii.)

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.) Thus, CSS attributes (e.g., fonts/positioning) are processed to generate the bounding boxes (“page layout information”), “at least in part.” (EX1005, 29, 37, 54; EX1008, 4, 7, 11-14; EX1002, ¶129.)

28. Claim 23

i) [23.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.pre]. (EX1002, ¶130; Section XI.A.6.i.)

ii) [23.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.d], [4.a], [6], [11.c], and [15.g]. (EX1002, ¶131; Sections XI.A.6.vi, XI.A.9.ii, XI.A.16.iii, XI.A.20.x.)

As 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; EX1002, ¶132.) 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 POSITA 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 POSITA 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. (EX1002, ¶133.)

iii) [23.c]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.d] and [6]. (EX1002, ¶134; Section XI.A.6.vi, XI.A.11.)

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 POSITA 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; EX1002, ¶135.)

29. Claim 24

i) [24.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitation [23.b]. (EX1002, ¶136; Section XI.A.28.ii.)

ii) [24.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [1.d], [15.b], and [15.h.2]. (EX1002, ¶137; Sections XI.A.6.vi, XI.A.20.x, XI.A.20.xii.) 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, 40, 46-47; EX1005, 22, 30, 32; EX1007, 54, 97; EX1008, 14; EX1002, ¶138.)

30. Claim 25

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.pre]. (EX1002, ¶139; Section XI.A.6.i.)

31. Claim 26

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as discussed for claim 14. (EX1002, ¶140; Section XI.A.19.)

32. Claim 27

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for claim 13. (EX1002, ¶141; Section XI.A.18.)

33. Claim 28

i) [28.pre]

ii) [28.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as discussed for limitation [1.pre]. (Section XI.A.6.i.) Zaurus is powered by a “processor.” (EX1004, 18; EX1002, ¶142.)

iii) [28.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.c.1]. (Section XI.A.6.iv.) Zaurus includes a “display” and input from the touch panel is processed by the system software running on the processor. (EX1002, ¶143; EX1004, 18.)

iv) [28.c]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for claim 3. (Section XI.A.8.) Zaurus can connect to an “access point.” (EX1002, ¶144; EX1004, 38.)

v) [28.d]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as discussed for limitation [1.a]. (Section XI.A.6.ii.) Zaurus includes “memory” for running the functionality such as the browser. (EX1002, ¶145; EX1004, 18.)

vi) [28.e.1]

vii) [28.e.2]

viii) [28.e.3]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as discussed for limitation [1.pre]. (EX1002, ¶146; Section XI.A.6.i.)

(1) [28.e.3.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.a]. (EX1002, ¶147; Section XI.A.6.ii.)

(2) [28.e.3.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.b]. (EX1002, ¶148; Section XI.A.6.iii.)

(3) [28.e.3.c.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.c.1]. (EX1002, ¶149; Section XI.A.6.iv.)

(4) [28.e.3.c.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.2] and [1.c.2.a]. (EX1002, ¶150; Sections XI.A.6.v, XI.A.6.v.1.)

(5) [28.e.3.c.3]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.c.2.b]. (EX1002, ¶151; Section XI.A.6.v.2.)

ix) [28.f]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.e]. (EX1002, ¶152; Section XI.A.6.vii.)

34. Claim 29

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for claim 2. (EX1002, ¶153; Section XI.A.7.)

35. Claim 30

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for claim 3. (EX1002, ¶154; Section XI.A.8.)

36. Claim 31

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for claim 4. (EX1002, ¶155; Section XI.A.9.)

37. Claim 32

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for claim 13. (EX1002, ¶156; Section XI.A.18.)

38. Claim 33

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for claim 14. (EX1002, ¶157; Section XI.A.19.)

39. Claim 34

i) [34.pre]

ii) [34.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as discussed for limitations [1.pre], [28.pre], and [28.a]. (EX1002, ¶158; Sections XI.A.6.i, XI.A.33.i, XI.A.33.ii.)

iii) [34.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.1] and [28.b]. (EX1002, ¶159; Sections XI.A.6.iv, XI.A.33.iii.)

iv) [34.c]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for claim 3 and limitation [28.c]. (EX1002, ¶160; Section XI.A.8, XI.A.33.iv.)

v) [34.d.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.a] and [28.d]. (EX1002, ¶161; Sections XI.A.6.ii, XI.A.33.v.)

vi) [34.d.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.pre] and [28.e.1]. (EX1002, ¶162; Sections XI.A.6.i, XI.A.33.vi.)

vii) [34.e]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for claim 3. (EX1002, ¶163; Section XI.A.8.) Zaurus allows a user to specify a URL and open “other home pages” beyond the default page, which a POSITA 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; EX1002, ¶163.)

viii) [34.e.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.a] and [15.b]. (EX1002, ¶164; Sections XI.A.6.ii, XI.A.20.iii.)

ix) [34.e.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.a], [1.c.2], [15.b], and [15.c]. (EX1002, ¶165; Sections XI.A.6.ii, XI.A.6.v, XI.A.20.iii, XI.A.20.iv.)

x) [34.e.2.a]

(1) [34.e.2.a.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests these limitations for the same reasons as discussed for limitations [1.c.2], [11.d], [15.c], and [15.c.1]. (EX1002, ¶166; Sections XI.A.6.v, XI.A.16.iv, XI.A.20.iv, XI.A.20.iv.1.)

(2) [34.e.2.a.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.2.b] and [15.c.2]. (EX1002, ¶167; Sections XI.A.6.v.2, XI.A.20.iv.2.)

xi) [34.e.3]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.d] and [15.d]. (EX1002, ¶168; Sections XI.A.6.vi, XI.A.20.v.)

xii) [34.f.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.b], [1.d], [11.c], and [23.b]. (Sections XI.A.6.iii, XI.A.6.vi, XI.A.16.iii, XI.A.28.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; EX1002, ¶169.)

xiii) [34.f.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.1] and [4.b]. (EX1002, ¶170; Sections XI.A.6.iv, XI.A.9.ii.)

xiv) [34.f.3]

xv) [34.f.3.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.b], [1.c.2], [7], and [10.b]. (EX1002, ¶171; Sections XI.A.6.iii, XI.A.6.v, XI.A.12, XI.A.15.ii.)

Pad’s view transform (xview/yview/zoom) and per-item geometry (including bounding boxes) plus SVG true scalability/CSS honoring generate each scaled view by applying the zoom scale factor to visible text/image items and rendering them at the transformed locations and attributes. (EX1005, 29-30, 36, 64-65, 75; EX1007, 141; EX1008, 7, 11-14; EX1002, ¶172.) 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 POSITA would understand that this step determines which objects are “to be included” in the current “scaled display content.” (EX1002, ¶172.)

(1) [34.f.3.a.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.b], [1.c.2.a], and [2]. (EX1002, ¶173; Sections XI.A.6.iii, XI.A.6.v.1, XI.A.7.)

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 POSITA 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. (EX1002, ¶174.)

(2) [34.f.3.a.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.a]. (EX1002, ¶175; Section XI.A.6.ii)

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 POSITA 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. (EX1002, ¶176.)

(3) [34.f.3.a.3.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for claim 7. (EX1002, ¶177; Section XI.A.12.)

Pad supports scalable (Type 1) fonts and text-item scaling, and SVG requires scalable text and CSS attribute honoring, including color. (EX1005, 30, 37, 75, 78; EX1007, 54, 78; EX1008, 11, 13; EX1002, ¶178.) A POSITA would have understood that Pad’s “Adobe Type 1” are vector-based and therefore constitute the claimed “scalable font” and that rendering engines process the “color attribute” to render the text in the specific color associated with that attribute. (EX1005, 78; EX1002, ¶178.)

(4) [34.f.3.a.3.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [1.d]. (EX1002, ¶179; Section XI.A.6.vi.)

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 POSITA 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; EX1002, ¶180.)

(5) [34.f.3.a.3.c]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for claim 7. (EX1002, ¶181; Section XI.A.12.)

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 POSITA 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”). (EX1002, ¶181.)

xvi) [34.f.3.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.2], [15.f.2], [15.f.3]. (EX1002, ¶182; Section XI.A.6.v, XI.A.20.viii, XI.A.20.ix.) Pad’s R-Tree visibility selection and rendering loop apply to visible “Image Items,” consistent with Zaurus image display and SVG image scaling. (EX1005, 64; EX1007, 141; EX1004, 40; EX1005, 30, 60; EX1008, 12; EX1002, ¶183.) A POSITA 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. (EX1002, ¶183.)

(1) [34.f.3.b.1]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.2.a] and [15.f.2]. (EX1002, ¶184; Section XI.A.6.v.1, XI.A.20.viii.)

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 POSITA 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”). (EX1002, ¶185; *see also* EX1008, 11-14.)

(2) [34.f.3.b.2]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitations [1.c.2.b] and [15.f.3]. (EX1002, ¶186; Section XI.A.6.v.2, XI.A.20.ix.)

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 POSITA 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). (EX1002, ¶187.)

xvii) [34.f.3.c]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [5.b]. (EX1002, ¶188; Section XI.A.10.ii.)

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 POSITA 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." (EX1002, ¶189; *see also* EX1008, 11-14.)

40. Claim 35

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [1.pre], [1.e], and [28.f]. (EX1002, ¶190; Sections XI.A.6.i, XI.A.6.vii, XI.A.33.ix.)

41. Claim 36

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this claim for the same reasons as discussed for limitations [1.pre]-[1.a] and [22.a]-[22.b]. (EX1002, ¶191; Sections XI.A.6.i-ii, XI.A.27.)

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 POSITA 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”); EX1002, ¶192.)

42. Claim 37

i) [37.a]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for limitation [5.c] and claim 6. (EX1002, ¶193; Sections XI.A.10.iii, XI.A.11.)

ii) [37.b]

The USPTO canceled and the Zaurus-Pad-SVG combination discloses and/or suggests this limitation for the same reasons as discussed for claim 7. (EX1002, ¶194; Section XI.A.12.)

XII. DISCRETIONARY DENIAL IS NOT APPROPRIATE

In view of the Patent Office's interim process regarding discretionary denial, Petitioner will substantively address this issue during discretionary denial briefing.

XIII. CONCLUSION

Petitioner requests institution of IPR for claims 1-37 of the '628 patent based on the grounds specified in this petition.

Respectfully submitted,

Dated: March 5, 2026

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner

CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing Petition for *Inter Partes* Review of U.S. Patent No. 8,533,628 contains, as measured by the word-processing system used to prepare this paper, 13,990 words. This word count does not include the items excluded by 37 C.F.R. § 42.24 as not counting towards the word limit.

Respectfully submitted,

Dated: March 5, 2026

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2026, I caused a true and correct copy of the foregoing Petition for *Inter Partes* Review of U.S. Patent No. 8,533,628 and supporting exhibits to be served via express mail on the Patent Owner at the following correspondence address of record as listed on Patent Center:

LAW OFFICE OF R. ALAN BURNETT
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By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)

APPENDIX A (CLAIM LISTING)

[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:
[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
[1.b]	employing scaled page layout information and/or content derived therefrom to generate scaled Web page content at multiple scale factors; and
[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
[1.c.2]	wherein said scaled Web page content including one or more images is generated by
[1.c.2.a]	scaling bounding boxes corresponding to the one or more images to produce scaled bounding boxes and,
[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
[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,
[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.

[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.
[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.
[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,
[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.
[5.a]	The method of claim 1, wherein Web page views are displayed within a content display area, the method further comprising:
[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,
[5.c]	wherein the scaled view of the Web page comprises a magnified view of the Web page as interpreted at the first scale.
[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.
[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.
[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,
[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,
[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.

[9.a]	The method of claim 1, wherein the Web page includes at least one image, and
[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,
[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,
[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.
[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,
[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,
[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.
[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;
[11.c]	generating scaled display content in accordance with a current zoom level and pan offset; and
[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,
[11.e]	wherein a resolution of the display limit bounding box is the same as a resolution of the content display area.
[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.

[13]	The method of claim 1, where the hand-held wireless device comprises 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.
[15.pre]	A method to facilitate browsing of a Web page on a device employing a browser having a browser display area, comprising:
[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;
[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,
[15.c]	wherein generation of the page layout information includes, for each of the plurality of objects,
[15.c.1]	generating page layout information for the object including a bounding box;
[15.c.2]	generating information that links the object with its corresponding page layout information;
[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;
[15.e]	employing scaled page layout information and/or content derived therefrom to generate scaled Web page content at multiple scale factors;
[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
[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,
[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

[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,
[15.h.1]	wherein the objects comprise a plurality of different types of objects, and
[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.
[16.a]	The method of claim 15, wherein one of the plurality of different types of objects 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,
[16.b.2]	wherein in the zoomed view of the Web page the column is enlarged and centered horizontally within the browser display area.
[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.
[18.a]	The method of claim 15, wherein one of the plurality of different types of objects comprises an image, the method further comprising:
[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,
[18.b.2]	wherein in the zoomed view of the Web page the image is enlarged and centered horizontally within the browser display area.
[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.
[20.a]	The method of claim 15, wherein one of the plurality of different types of objects comprises a paragraph, the method further comprising:

[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,
[20.b.2]	wherein in the zoomed view of the Web page, the paragraph is enlarged and centered horizontally within the browser display area.
[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.
[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
[22.b]	wherein the page layout information is generated, at least in part, by processing the CSS content.
[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,
[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,
[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.
[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,
[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.
[25]	The method of claim 15, wherein the device comprises a hand-held device.
[26]	The method of claim 24, wherein the hand-held device is configured to be held in the palm of a user.

[27]	The method of claim 15, wherein the device comprises a mobile phone.
[28.pre]	A mobile device, comprising:
[28.a]	a processor;
[28.b]	a touchscreen display, operatively coupled to the processor;
[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
[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,
[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,
[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
[28.e.3]	enabling full page browsing of the Web page is implemented by,
[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;
[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
[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
[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,

[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;
[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.
[29.a]	The mobile device of claim 28, wherein the plurality of instructions further comprise instructions for 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.
[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.
[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
[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.
[32]	The mobile device of claim 28, wherein the mobile device comprises a mobile phone.
[33]	The mobile device of claim 28, wherein the mobile device is configured to be held in the palm of a user.
[34.pre]	A mobile device, comprising:
[34.a]	a processor;
[34.b]	a touchscreen display, operatively coupled to the processor;
[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

[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,
[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,
[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,
[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,
[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,
[34.e.2.a]	for each of the plurality of objects,
[34.e.2.a.1]	generating page layout information including a bounding box for the object; and
[34.e.2.a.2]	generating information that links the object with its corresponding page layout information;
[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;
[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,
[34.f.2]	wherein enabling the user to perform zooming operations includes performing zooming operations in response to tap-based user input, and

[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,
[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;
[34.f.3.a.2]	determining display attributes for the text object, including a font typeface, font size and color attribute; and
[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,
[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
[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
[34.f.3.b]	for each image object to be included in scaled display content employed to generate the scaled view,
[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
[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
[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.
[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.

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[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 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.
[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
[37.b]	wherein there is no degradation in quality of the presentation of text content when the zoom level is increased.