

Summary of verbatim (or nearly verbatim) matches between the 00536 petition to the Houh Declaration Ex.1003

	<b>'536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
1	The '039 patent, filed September 11, 2014, claims priority through 5 continuations to U.S. Patent 7,599,983, filed June 18, 2003, which claims priority to Provisional 60/389,430 filed June 18, 2002.  536 Petition, p. 1	The '039 patent, filed September 11, 2014, claims priority through five continuations to U.S. Patent 7,599,983, filed June 18, 2003, which claims priority to Provisional 60/389,430 filed June 18, 2002.  Ex.1003, ¶ 24
2	... each applied reference was filed or published before June 18, 2002.  536 Petition, p. 1	... each applied reference was filed or published before June 18, 2002.  Ex.1003, ¶ 24
3	The '039 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:28-30.)  536 Petition, p. 2	The '039 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:28-30.)  Ex.1003, ¶ 25
4	The '039 patent identifies “accessing of information content over wireless networks via web-enabled mobile devices” as among “the most rapidly expanding aspects of wireless networking.” (EX-1001, 1:34-36.)  536 Petition, p. 2	The '039 patent identifies “accessing of information content over wireless networks via web-enabled mobile devices” as among “the most rapidly expanding aspects of wireless networking.” (EX-1001, 1:34-36.)  Ex.1003, ¶ 26
5	Figure 1A (below) shows an example network-based communication system 10 including “wireless network 12 coupled to the Internet 14, a set of mobile devices 15, a set of servers 16 and a set of user terminals 18.” (EX-1001, 3:42-46.)	Figure 1A, reproduced below, “shows an example network-based communication system 10” including “wireless network 12 coupled to the Internet 14, a set of mobile devices 15, a set of servers

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, p. 3	16 and a set of user terminals 18.” (EX-1001, 3:42-46.)  Ex.1003, ¶ 26
6	System 10 “provides at least one content management site accessible to a system user” including “M-channels” which “allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site.” (EX-1001, 5:6-7, 8:5-10.) Such mobile sites may be associated with “a group comprising multiple members having a common interest” (EX-1001, 6:18-20), “an event” (EX-1001, 6: 38-43), “a game,” (EX-1001, 7:18-19), or “a user of IM, SMS, MMS, email or other type of messaging service” (EX-1001, 7:30-32), among other associations. (EX-1001, 6:18-7:67.)  536 Petition, pp. 3-4	The patent discloses that the system “provides at least one content management site accessible to a system user” including “M-channels” which “allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site.” (EX-1001, 5:6-7, 8:5-10.) Such mobile sites may be associated with “a group comprising multiple members having a common interest,” (EX-1001, 6:18-20), “an event,” (EX-1001, 6:38-43), “a game,” (EX-1001, 7:18-19), or “a user of IM, SMS, MMS, email or other type of messaging service,” (EX-1001, 7:30-32), among other associations. (EX-1001, 6:18-7:67.)  Ex.1003, ¶ 28
7	A person of ordinary skill in the art (“POSITA”) would have had a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving	As I discussed in §III.B, a POSITA has a “bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>information over the Internet or communicating using the Web using wireless mobile devices. Additional education might compensate for less experience and vice versa. (EX-1003, ¶¶32-33.)</p> <p>536 Petition, p. 4</p>	<p>for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices.”</p> <p>Ex.1003, ¶ 104</p>
8	<p>Applicant traversed the rejection arguing the combination failed to disclose “providing the content and determined information to at least one server for insertion into a specified application-based information channel.” (EX-1002, 233-34.)</p> <p>536 Petition, p. 5</p>	<p>In response, Applicants argued that Calder failed to disclose “<i>providing the content and determined information to at least one server for insertion into a specified application-based information channel.</i>” (EX-1002, 233-34.)</p> <p>Ex.1003, ¶ 34</p>
9	<p>Petitioners dispute PO’s narrow Meta-MDT-IPR construction which is contrary to the express definition in the specification. (<i>See, e.g.</i>, EX-1001, 4:26-29.) Petitioners apply the plain meaning which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions. (EX-1003, ¶39.)</p> <p>536 Petition, p. 6</p>	<p>I dispute PO’s narrow Meta-MDT-IPR construction because it is contrary to the express definition in the specification. (<i>See, e.g.</i>, EX-1001, 4:26-29 (“The term ‘mobile device’ as used herein is intended to include, without limitation, any type of portable information processing device capable of being configured for communication over a network.”).) I apply the plain meaning for the term which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions.</p> <p>Ex.1003, ¶ 39</p>
10	<p>Meta and PO agreed to the construction “computer program-based medium for transferring information” for the purpose of the Meta-MDT-IPR.</p>	<p>I understand that Meta and PO agreed to the construction “a computer program-based medium</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, p. 7	for transferring information” for the purpose of the Meta-MDT-IPR.  Ex.1003, ¶ 44
11	Forums at its most basic provides “chat rooms”, “allow[ing] several people to be part of a ‘channel’ or room, which is usually themed; for instance supporters of a football team may meet in a channel devoted to that team to discuss the team.” (EX-1005, 40:16-19.)  536 Petition, p. 8	Forums “allows several people to be part of a ‘channel’ or room, which is usually themed; for instance supporters of a football team may meet in a channel devoted to that team to discuss the team.” (Randall, 40:17-19.)  Ex.1003, ¶ 52
12	Randall’s extensible database “contains information from or relating to many different entities” and “is organised into information fields which an entity can complete or have completed.” (EX-1005, 8:26-28.) The database is structured so its information “can be readily shared with other entities: the database in effect represents a web page containing information specific to that entity.” (EX-1005, 8:29-31.)  536 Petition, pp. 10-11	The “database contains information from or relating to many different entities” and “is organised into information fields which an entity can complete or have completed.” (Randall, 8:26-28.) “Information is placed onto the database by an entity so that it can be readily shared with other entities: the database in effect represents a web page containing information specific to that entity.” (Randall, 8:29-31.)  Ex.1003, ¶ 67
13	A POSITA would have been motivated to combine Forsyth’s teachings regarding use of group objects and additional features and functions to enhance the Forums service taught by Randall which uses Randall’s network infrastructure with extensible database. (EX-1003, ¶¶75-81.)  536 Petition, p. 13	A POSITA would have been motivated to combine Forsyth’s teachings regarding the use of group objects and additional features and functions to enhance the Forums service taught by Randall.  Ex.1003, ¶ 75
14	Randall and Forsyth are also reasonably pertinent to problems addressed by the ’039	Randall and Forsyth are also reasonably pertinent to problems

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>patent, namely “overcom[ing] one or more of the drawbacks of” conventional techniques for content sharing for mobile devices. (<i>See, e.g.</i> EX-1001, 1:44-2:7; EX-1003, ¶76.)</p> <p>536 Petition, p. 14</p>	<p>addressed by the ’039 patent, namely “overcom[ing] one or more of the drawbacks of” conventional techniques for content sharing for mobile devices. (<i>See, e.g.</i> EX-1001, 1:44-2:7.)</p> <p>Ex.1003, ¶ 76</p>
15	<p>A POSITA would have been motivated to make the above combination because Forsyth explicitly motivates the combination. (EX-1003, ¶¶77-81.) Forsyth stresses the benefits of group objects noting that its “invention is founded on the insight of providing an object which defines solely the identities of members of a group.” (EX-1006, 2:24-27.) As such, “a group created in one application (e.g. for text based instant messaging) can immediately be used in other applications (e.g. a diary/agenda application could use that same group as the recipient list for an invitation to a meeting).” (EX-1006, 2:27-37.) Forsyth further describes “strengths” of a Forums application utilizing group objects “over conventional communications,” as summarized in Table 1 (below). (EX-1006, 2:54-57.)</p> <p>536 Petition, p. 14</p>	<p>A POSITA would have been motivated to make the above combination because Forsyth explicitly motivates the combination. Forsyth stresses the benefits of group objects noting that its “invention is founded on the insight of providing an object which defines solely the identities of members of a group” and “as such, it is application (and hence also content) independent.” (Forsyth, 2:24-27.) “This means that a group created in one application (e.g. for text based instant messaging) can immediately be used in other applications (e.g. a diary/agenda application could use that same group as the recipient list for an invitation to a meeting).” (Forsyth, 2:27-32.) “Similarly, data specifically created for one group and in one application can be re-used in a different application and the data viewed appropriately for that different application.” (Forsyth, 2:34-37.) Forsyth further describes the “strengths” of Forums application utilizing group objects “over conventional</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		communications.” (See Forsyth, 2:54-57.) These relative strengths are illustrated in Forsyth’s Figure 1 (reproduced below).  Ex.1003, ¶ 77
16	Finally, the combination is nothing more than the application of a known technique (Forsyth’s group objects, features and functions) to a known method/product (Randall’s Forums service implemented with extensible database infrastructure) which was ready for further improvement. (EX-1003, ¶80.)  536 Petition, p. 16	Finally, the combination is nothing more than the application of a known technique (Forsyth’s group objects, features and functions) to a known method/product (Randall’s Forums service implemented with extensible database infrastructure) which was ready for further improvement.  Ex.1003, ¶ 80
17	A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been predictable because both references are directed to the same service, Forums; are based on devices using the Symbian OS; and use features and functionality associated with Symbian. (EX-1003, ¶81.) The Symbian operating system was well-known and Symbian offered many technical developer resources prior to the earliest possible priority date of the ’039 patent. (See, e.g., EX-1017; EX-1012, EX-1016, EX-1018.)  536 Petition, p. 16	A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been predictable because both references are directed to the same service, Forums, are based on devices using the Symbian OS and use features and functionality associated with Symbian. The Symbian operating system was well-known and Symbian offered many technical developer resources prior to the earliest possible priority date of the ’039 patent. (See, e.g., EX-1017; Allin, 4-6, 229-31; Jipping, 11-14.)  Ex.1003, ¶ 81
18	The wireless information devices disclosed in both Randall and Forsyth encompass “any kind of device with one or two way	Randall and Forsyth both disclose that a wireless information device encompasses “any kind of device

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	wireless information capabilities [including] without limitation radio telephones, smart phones, communicators, personal computers, computers and application specific devices.” (EX-1005, 1:7-11; EX-1006, 1:16-22.)  536 Petition, p. 18	with one or two way wireless information capabilities [including] without limitation radio telephones, smart phones, communicators, personal computers, computers and application specific devices.” (Randall, 1:7-11; Forsyth, 1:16-22 (same).)  Ex.1003, ¶ 87
19	A POSITA would have understood a device’s OS and applications are software that execute on “ <i>a processor</i> ” within a “ <i>processing element</i> .” (EX-1003, ¶¶99-100.)  536 Petition, p. 21	A POSITA would have understood that a device’s OS and applications are software that execute on “ <i>a processor</i> ” within a “ <i>processing element</i> .”  Ex.1003, ¶ 100
20	Both Randall and Forsyth disclose the wireless devices are “able to communicate in any manner over any kind of network, such as GSM or UMTS, CDMA and WCDMA mobile radio, Bluetooth, IrDA etc.” (EX-1005, 1:11-13; EX-1006, 1:22-25.) To access these networks, the wireless device requires an interface to the network—a “ <i>network interface</i> .” (EX-1003, ¶103; <i>see also</i> , EX-1001, 4:64-65 (network interface “provide[s] an interface ... to the wireless network”).) Indeed, Randall specifically refers to the “GSM/GPRS interface.” (EX-1005, 40:1-2.)  536 Petition, pp.21-22	Both Randall and Forsyth disclose that the wireless information devices are “able to communicate in any manner over any kind of network, such as GSM or UMTS, CDMA and WCDMA mobile radio, Bluetooth, [802.11,] IrDA [(infrared)] etc.” (Randall, 1:11-13; Forsyth, 1:22-25 (same).) To access these networks, the wireless information device requires an interface to the network—a “ <i>network interface</i> .” Indeed, Randall specifically refers to the “GSM/GPRS interface.” (Randall, 40:1-2.)  Ex.1003, ¶ 103
21	<b>Capturing a Message:</b> Randall and Forsyth each discloses capturing a message at a wireless device. (EX-1003, ¶¶116-117.)	<b>(b) Capturing a Message</b> Randall and Forsyth each discloses capturing a message at a wireless

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, p.23	information device.  Ex.1003, ¶ 116
22	Within Forums, a user has the ability to create an individual Forum opened to members of a specified group (Private Forum) or to all (Public Forum). (EX-1006, Appendix 1, 13:60-18:18; EX-1005, 24:13-17.)  536 Petition, p.25	Within the Forums application, a user has the ability to create an individual Forum open to members of a specified group (a Private Forum) or to the public (a Public Forum). (Forsyth, Appendix 1, 13:60-18:18; Randall, 24:13-17.)  Ex.1003, ¶ 125
23	By selecting a Forum from the list, the user <i>“identif[ies] a previously established application-based information channel.”</i> (EX-1003, ¶137.)  536 Petition, p.28	By selecting a Forum from the list of available Forums, the user <i>“identif[ies] a previously established application-based information channel.”</i>  Ex.1003, ¶ 137
24	<b>Identification via Database Access Rights:</b> A user also identifies a Forum when the user specifies one or more groups allowed access to the user’s content stored in a record on the database. (EX-1003, ¶¶143-150.)  536 Petition, p.29	<b>(ii) Identification via Database Access Rights</b> A user also identifies a Forum when the user specifies one or more groups allowed access to his or her content stored in the user’s database record on the server.  Ex.1003, ¶ 143
25	By associating stored content with a group (e.g., Forum), the user identifies the Forum into which the content <i>“is to be inserted.”</i> As Randall explains, after a group is designated as having access rights, the information is provided when a group member “contacts the server” or the information “will be pushed to” a member’s device “if technology allows.”	When a user associates stored content with a group (e.g, Forum), the user identifies the Forum into which the content <i>“is to be inserted.”</i> As Randall explains, after a group or individual is designated as having access rights, the information can be provided when the individual or a member of the

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	(EX-1005, 68:28-30; <i>see also</i> EX-1006, 7:34-38; EX-1003, ¶150.)  536 Petition, p.30	group “contacts the server” or the information “will be pushed to” member’s devices “if technology allows.” (Randall, 68:28-30.)  Ex.1003, ¶ 150
26	Forsyth describes that Forums supports “group based text messaging” and “group based multi-media messaging.” (EX-1006, 3:35-58, 5:45-49.) Messaging is a functionality implementable by the mobile device via the wireless network, which as discussed above is separate from the Internet. The Randall-Forsyth combination therefore describes “ <i>at least one wireless networking functionality of the mobile device</i> ” under both constructions. (EX-1003, ¶157; EX-1001, 1:41-43, 1:59-61, 9:37-42 (identifying messaging as a wireless network functionality).)  536 Petition, pp.31-32	Forsyth describes that Forums supports “group based text messaging” and “group based multi-media messaging.” (EX-1006, 3:35-58, 5:45-49.) Messaging is a functionality implementable by the mobile device via the wireless network, which as discussed above is separate from the Internet. The Randall-Forsyth combination therefore describes “ <i>at least one wireless networking functionality of the mobile device</i> ” under both PO’s and Meta’s Meta-MDT-IPR constructions.  Ex.1003, ¶ 157
27	The scenarios/examples provided by Forsyth and Randall demonstrate the mobile device recognizes a “ <i>messaging action</i> ” that is “ <i>implementable over</i> ” the wireless network and is initiated by the user—e.g., posting/sending a message to the Forum. For example, in Scenario 1 of Forsyth, when the “Naked Chef” Forum is created, the user sends an initial message to the server. ( <i>See</i> EX-1006, 6:1-9.) Subsequent responses “are of the form that the new <b>message is sent to the server.</b> ” (EX-1006, 6:18-22.) “Discussion of Photos” Scenario 2 describes “creat[ing] a	The scenarios and examples provided by Randall and Forsyth demonstrate that the mobile device recognizes a “ <i>messaging action</i> ” initiated by the user—e.g., post/send a message to the Forum. For example, in the “group based text messaging” (Scenario 1) of Forsyth, when the “Naked Chef” Forum is created, the user sends an initial message to the message server. ( <i>See</i> Forsyth, 6:1-9.) Subsequent responses “are of the form that the new <b>message is sent to the server.</b> ” (Forsyth,

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>Forum <b>message</b> based on the photograph.” (EX-1006, 7:35-36.)</p> <p>536 Petition, p.32</p>	<p>6:18-22.) Similarly, “Discussion of Photos” (Scenario 2) describes “creat[ing] a Forum <b>message</b> based on the photograph.” (Forsyth, 7:35-36.)</p> <p>Ex.1003, ¶ 158</p>
28	<p>These scenarios/examples also demonstrate the mobile device “<i>determin[es] information specifying</i>” the “<i>messaging action</i>” (send a message). Specifically, the mobile device must create a Forums message by (1) determining the sender (i.e., identity of the user in the Forum (e.g., Steve)) and the Forum name (e.g., Naked Chef) and (2) combining that information with the text, image, etc. provided by the user (e.g., “Yeah mebees but he grinds his spices with his teeth and spits them into the food”).</p> <p>536 Petition, p.32</p>	<p>These scenarios/examples also demonstrate that the mobile device “<i>determin[es] information specifying</i>” the “<i>messaging action</i>” (sending a message). Specifically, the mobile device creates a Forums message by determining the sender (i.e., identity of the user in the Forum (e.g., Steve)) and the Forum name (e.g., Naked Chef) and combining that information with the text, image, etc. provided by the user (e.g., “Yeah mebees but he grinds his spices with his teeth and spits them into the food”).</p> <p>Ex.1003, ¶ 159</p>
29	<p>The mobile device must further encapsulate the generated Forums message into a protocol message (e.g., GSM-SMS or WAP) to be transmitted over wireless network. (EX-1003, ¶¶160-164.) The protocol message includes information associated with the action of sending a message determined by the mobile device such as message type and content type identifier. (EX-1003, ¶¶162-163, <i>citing</i> EX-1015, 42-43, 60, 63.) This is illustrated in Houh’s Figure B below. (EX-1003, ¶160.)</p> <p>536 Petition, pp.32-33</p>	<p>The mobile device must also encapsulate the generated Forums message into a protocol message to be transmitted by over wireless network, as I illustrate in my Figure B below. The protocol message includes information associated with the action of sending a message that must be determined by the mobile device.</p> <p>Ex.1003, ¶ 160</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
30	<p>The determination of the information (sender name and Forum name) and inclusion of this information with the user’s text message in a message distributed to Forum members is reflected in Forsyth’s Figure 7 which illustrates “messages posted to th[e] Forum.” (EX-1006, 6:36-40.) As shown, each message has the user name, date/time and are associated with the Forum name (“Naked Chef”).</p> <p>536 Petition, p.33</p>	<p>The determination of the sender name and Forum name and subsequent inclusion of this information in the sent message is reflected in the Forsyth’s Figure 7 which illustrates “messages posted to th[e] Forum.” (Forsyth, 6:36-40.) As shown, each message has the user name, date/time and are associated with the group name (“Naked Chef”).</p> <p>Ex.1003, ¶ 161</p>
31	<p>The mobile device “<i>determines information</i>” associated with wireless messaging that specifies the sending messaging action, including information associated with the Forums message (sender identity, date/time, and Forum name) and information associated with the protocol message implemented by the wireless network (e.g., message type, content type). Thus, the Randall-Forsyth combination discloses “<i>determin[ing]/[e] information associated with at least one wireless networking functionality of the mobile device</i>” [1C]/[18E] under both Meta’s and MDT’s IPR construction of “<i>wireless networking functionality of the mobile device.</i>” (EX-1003, ¶165.) The combination also discloses “<i>the information associated with said at least one wireless networking functionality of the mobile device comprises information specifying at least one messaging action implementable over said at least one wireless network</i>” [8] under both constructions. (<i>Id.</i>)</p> <p>536 Petition, pp.34-35</p>	<p>The mobile device “<i>determines information</i>” associated with wireless messaging that specifies the sending messaging action, the information including information associated with the Forums message (sender identity, date/time, and Forum name) and information associated with the protocol message implemented by the wireless network (e.g., message type, content type). Thus, the combination of Randall and Forsyth discloses “<i>determin[ing]/[e] information associated with at least one wireless networking functionality of the mobile device</i>” [1C]/[18E] under both Meta and PO’s Meta-MDT-IPR constructions of “<i>wireless networking functionality of the mobile device.</i>” The combination also discloses “<i>the information associated with said at least one wireless networking functionality of the mobile device</i></p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		<p><i>comprises information specifying at least one messaging action implementable over said at least one wireless network</i>” [8] under both constructions.</p> <p>Ex.1003, ¶ 165</p>
32	<p>The mobile device “<i>determines information</i>” associated with wireless messaging that specifies the collaboration actions (messages exchanged among Forum members to solve, e.g., the scheduling details for a cinema visit), including information associated with each posted Forum message (sender identity, date/time, and Forum name) and information associated with the protocol message implemented by the wireless network (e.g., message type, content type) used to send the message. Thus, the Randall-Forsyth combination discloses “<i>determin[ing]/[e] information associated with at least one wireless networking functionality of the mobile device</i>” [1C]/[18E] under both Meta’s and MDT’s IPR construction of “<i>wireless networking functionality of the mobile device.</i>” (EX-1003, ¶¶166-169.) The combination also discloses “<i>the information associated with said at least one wireless networking functionality of the mobile device comprises information specifying at least one collaboration action implementable over said at least one wireless network</i>” [9] under both constructions. (<i>Id.</i>)</p> <p>536 Petition, pp.35-36</p>	<p>The mobile device “<i>determines information</i>” associated with wireless messaging that specifies the collaboration actions (messaging among Forum members to solve, e.g., the scheduling details for a cinema visit), the information including information associated with each posted Forum message (sender identity, date/time, and Forum name) and information associated with the protocol message implemented by the wireless network (e.g., message type, content type) used to send the message. Thus, the combination of Randall and Forsyth discloses “<i>determin[ing]/[e] information associated with at least one wireless networking functionality of the mobile device</i>” [1C]/[18E] under both Meta and PO’s Meta-MDT-IPR constructions of “<i>wireless networking functionality of the mobile device.</i>”</p> <p>The combination also discloses “<i>the information associated with said at least one wireless networking functionality of the mobile device comprises information specifying at least one</i></p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		<p><i>collaboration action implementable over said at least one wireless network</i>” [9] under both constructions.</p> <p>Ex.1003, ¶ 169</p>
33	<p>Although not explicit, a POSITA would have understood the “<i>captured content</i>” is provided to the server over the wireless network and therefore is provided via a wireless device’s “<i>network interface.</i>” (EX-1003, ¶174.)</p> <p>536 Petition, p.37</p>	<p>Although not explicit, a POSITA would have understood that the “<i>captured content</i>” is provided to the server over the wireless network and therefore is provided to the wireless network “<i>via said at least one network interface.</i>”</p> <p>Ex.1003, ¶ 174</p>
34	<p>The “<i>determined information associated with</i>” the action of sending the Forums message (e.g., sender name, date/time, Forum name) is provided along with the text message entered by the user (captured content) in the protocol message sent to the server. (§V.B.1.b.3.) As shown by Forsyth’s Figure 7 above, this “<i>determined information</i>” (user identity, date/time, forum name) is inserted “<i>into the identified application-based information channel</i>” with the “<i>captured content</i>” and displayed on the Forum (Naked Chef) screen for each forum member. (EX-1003, ¶177.)</p> <p>536 Petition, pp.39-40</p>	<p>As I discussed in §IV.B.b.(c) for limitations [1C] and [18E], “<i>information associated with</i>” the action of the Forums message (e.g., sender name, date/time, Forum name) is determined and provided in the protocol message provided to the server. As shown by Forsyth’s Figure 7 (reproduced below), this “<i>determined information</i>” (user name, date/time, forum name) is inserted “<i>into the identified application-based information channel</i>” with the “<i>captured content</i>” and displayed on Forum (Naked Chef) screen for each forum member.</p> <p>Ex.1003, ¶ 177</p>
35	<p>Each of Forsyth’s Scenarios illustrates that a wireless device receives content (messages, photos, graphics, music files,</p>	<p>Each of the Scenarios presented by Forsyth illustrates that a mobile device receives content (messages,</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>etc.) through a Forum (“<i>application-based information channel</i>”) from other Forum members, i.e., from “<i>at least one of the additional users.</i>”</p> <p>536 Petition, p.40</p>	<p>photos, graphics, music files, etc.) associated with a Forum (“<i>application-based information channel</i>”) from other Forum members, i.e., from “<i>at least one of the additional users</i>” of the Forum.</p> <p>Ex.1003, ¶ 180</p>
36	<p>As discussed in §V.B.1.b.4, the content and the information associated with a wireless networking functionality are provided to the server so that they can be inserted into “<i>application-based information channel.</i>”</p> <p>536 Petition, p.46</p>	<p>That is, the content and the information associated with a wireless networking functionality are provided to the server so that they can be inserted into “<i>application-based information channel.</i>”</p> <p>Ex.1003, ¶ 204</p>
37	<p>As shown in this Figure, the captured content (message; “No way!”) and at least a portion of the determined information (poster identity (e.g., Lucy) and date/time (Jan 8th 10:30am) is integrated “<i>into the previously established application-based information channel.</i>” (EX-1003, ¶206.)</p> <p>536 Petition, p.46</p>	<p>As shown in Figure 7, the captured content (message; “No way!”) and at least a portion of the determined information (poster name (e.g., Lucy and Jan 8<sup>th</sup> 10:30 am) is integrated “<i>into the previously established application-based information channel.</i>”</p> <p>Ex.1003, ¶ 206</p>
38	<p>Neither Randall nor Forsyth explicitly states that the client-side program or server-side program is stored in a “<i>non-transitory computer-readable storage medium.</i>” Memory or another similar computer readable medium storing the software to be executed on the processor would necessarily be included in the mobile device. (EX-1003, ¶¶209, 216, <i>citing</i> EX-1026, 29-30, 37.)</p> <p>536 Petition, p.49</p>	<p>Neither Randall nor Forsyth explicitly states that the client-side program is stored of a “<i>non-transitory computer-readable storage medium.</i>” Memory or another similar computer readable medium storing the software to be executed on the processor would necessarily be included in the mobile device, as I discussed above for the mobile device. (<i>See</i> Silberschatz, 29-30, 37.)</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		Ex.1003, ¶ 216
	Forums is a “ <i>personalized content application</i> ” because a user manages her profile and can personalize her Forums experience. (EX-1003, ¶¶222-225.)  536 Petition, p.49	Forums is a “ <i>personalized content application</i> ” because a user manages his or her profile and can personalize his or her experience in a number of ways.  Ex.1003, ¶ 222
39	For example, through Forums, a user enters “basic identity data about themselves” including setting her current mood, hobbies, and preferences. (EX-1005, 23:14-17, Table 1; EX-1006, 7:20-25.)  536 Petition, p.49	Through the Forums infrastructure, a user enters “basic identity data about themselves” including “name, contact numbers, and addresses” in the database and accesses services to provide location, availability and mood information as well as to define an identity avatar which are associated with the user’s database entry. (Randall, 23:14-17.)  Ex.1003, ¶ 222
40	Forums further provides a user with the capability of creating a personalized Forum which is also a “ <i>personalized content application</i> ” operating within Forums. (EX-1003, ¶224.)  536 Petition, pp.49-50	Symbian Forums further provides a user with the capability of creating a personalized Forum which is also a “ <i>personalized content application</i> ” operating within the Forums application.  Ex.1003, ¶ 224
41	Thus, the Randall-Forsyth combination discloses “ <i>the identified application-based information channel [a Forum] comprises a personalized content application</i> ” [2] and “ <i>is accessible via a personalized content application [Forums] particularly configured to run on the mobile device</i> ” [29]. (EX-1003, ¶¶222-225.)	Thus, the combination of Randall and Forsyth discloses “ <i>the identified application-based information channel comprises a personalized content application</i> ” [2] and “ <i>the application-based information channel is accessible via a personalized content</i>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, p.50	<i>application particularly configured to run on the mobile device” [3].</i>  Ex.1003, ¶ 225
42	The Randall-Forsyth combination discloses claims 8-9 for the reasons discussed in §V.B.1.b.3. (EX-1003, ¶¶233-235.) And the Randall-Forsyth combination likewise discloses a “wireless network” under any proposed construction for the same reasons it discloses “wireless networking functionality” under either Patent Owner’s or Meta’s proposed construction. (EX-1003, ¶234.)  536 Petition, p.51	For the reasons discussed in that section (§IV.B.1.b.(3)), the combination of Randall and Forsyth discloses claim 8. And the combination of Randall and Forsyth likewise discloses a “wireless network” under any proposed construction for the same reasons it discloses “wireless networking functionality” under either Patent Owner’s or Meta’s proposed construction.  Ex.1003, ¶ 234
43	The “ <i>integrated content</i> ” is stored in a message/communication object at the server which contains the original Forum message (content + determined information) and “[a]ll linked (e.g. threaded) communications, such as replies and comments.” (EX-1006, 4:19-24; 3:20-24 (server “maintain[s] m[e]ssage threads and mak[es] the[m] readable to recipients etc.”).) Thus, the combination discloses “ <i>integrated content is stored by the at least one server, the integrated content comprising a combination of at least a portion of the captured content and at least a portion of the determined information</i> ” [25]. (EX-1003, ¶247.)  536 Petition, p.53	The “ <i>integrated content</i> ” is stored in a message/communication object at the server which contains the original Forum message (content + determined information) and “[a]ll linked (e.g. threaded) communications, such as replies and comments.” (Forsyth, 4:19-24; 3:20-24 (server “maintain[s] m[e]ssage threads and mak[es] the[m] readable to recipients etc.”).) Thus, the combination discloses “ <i>integrated content is stored by the at least one server, the integrated content comprising a combination of at least a portion of the captured content and at least a portion of the determined information</i> ” [25].  Ex.1003, ¶ 247

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
44	<p>The “<i>integrated content</i>” is accessed at the mobile device via the Forum (“<i>application-based information channel</i>”). For example, in Scenario 1, the server “forwards the increment [new message(s)] to all the people on the current (server-maintained) address list.” (EX-1006, 6:1-22.) Within the Forum (e.g., Naked Chef), “the user is shown the messages posted to that Forum.” (EX-1006, 6:38-40, Figure 7 (below).) “Messages appear in date order, i.e. newest messages appear at the bottom.” (EX-1006, 6:40-42.) As shown, captured content (message; “No way!”) and at least a portion of the determined information (poster identity (e.g., Lucy) and date/time (Jan 8th 10:30 am)) is “<i>access[ed] ... at the mobile device via the identified application-based information channel</i>” (Naked Chef Forum). (EX-1003, ¶248.)</p> <p>536 Petition, p.53</p>	<p>The “<i>integrated content</i>” is accessed at the mobile device via the Forum (“<i>application-based information channel</i>”). For example, in Scenario 1, the server “forwards the increment [new message(s)] to all the people on the current (servermaintained) address list.” (Forsyth, 6:1-22.) Within the Forum (e.g., Naked Chef), “the user is shown the messages posted to that Forum.” (Forsyth, 6:38-40, Figure 7 (below).) “Messages appear in date order, i.e. newest messages appear at the bottom.” (Forsyth, 6:40-42.) As shown, captured content (message; “No way!”) and at least a portion of the determined information (poster identity (e.g., Lucy) and date/time (Jan 8th 10:30 am)) is “<i>access[ed] ... at the mobile device via the identified application-based information channel</i>” (Naked Chef Forum).</p> <p>Ex.1003, ¶ 248</p>
45	<p>The Randall-Forsyth combination renders obvious “<i>the application-based information channel is accessible via a mobile website previously established for the user of the mobile device.</i>” (EX-1003, ¶¶250-256.)</p> <p>536 Petition, p.54</p>	<p>Thus, the combination of Randall and Forsyth renders obvious “<i>the application-based information channel is accessible via a mobile website previously established for the user of the mobile device.</i>”</p> <p>Ex.1003, ¶ 256</p>
46	<p>The Forums infrastructure, illustrated in Randall’s Figure 4 below, “acts in effect like a fully personalized <b>web portal</b>, yet with the information links not consolidated</p>	<p>The Symbian Forums infrastructure, illustrated in Randall’s Figure 4 below, “acts in effect like a fully personalized <b>web</b></p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>in one general area, but instead distributed to the domains in which they are most likely to be relevant to a user.” (EX-1005, 13:22-24.) Forums establishes “web portals” (websites) for users of wireless devices through the use of “standard data transports such as WAP or http for data access” to the server (EX-1005, 45:14-15) and through the use of Randall’s ADS naming scheme which uses web server addresses. (EX-1003, ¶250.)</p> <p>536 Petition, p.55</p>	<p><b>portal</b>, yet with the information links not consolidated in one general area, but instead distributed to the domains in which they are most likely to be relevant to a user.” (Randall, 13:22-24.) Forums establishes “web portals” (websites) for users of wireless devices through the use of “standard data transports such as WAP or http for data access” to the server (Randall, 45:14-15) and through the use of Randall’s ADS naming scheme which uses web server addresses.</p> <p>Ex.1003, ¶ 250</p>
47	<p>Indeed, Forsyth confirms that an individual Forum “<i>is accessible via a mobile website</i>”, explaining “Forums facilitates the situation where, to a degree, the other members of a group are ‘always there’ for a user” including “ensuring other interfaces—e.g., via the Web and PCs, and possibly via normal phones—are available.” (EX-1006, 11:23-31.)</p> <p>536 Petition, p.55</p>	<p>Forsyth confirms that an individual Forum “<i>is accessible via a mobile website</i>”, explaining “Forums facilitates the situation where, to a degree, the other members of a group are ‘always there’ for a user” including “ensuring other interfaces—e.g., <b>via the Web</b> and PCs, and possibly via normal phones—are available.” (Forsyth, 11:23-31.)</p> <p>Ex.1003, ¶ 254</p>
48	<p>Randall’s naming convention further underscores that Forums are designed to be mobile websites. (EX-1003, ¶252.) Randall teaches a “wireless information device (as well as web browsers) can access an entity’s database by sending to the server an unchanging pointer or key (an ‘ADS Number’) which is unique to that entity.” (EX-1005, 9:13-15.)</p>	<p>Randall’s naming convention further underscores that Forums are designed to be mobile websites. Randall teaches that a “wireless information device (as well as web browsers) can access an entity’s database by sending to the server an unchanging pointer or key (an</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, p.56	‘ADS Number’) which is unique to that entity.” (Randall, 9:13-15.)  Ex.1003, ¶ 252
49	<p>The Randall-Forsyth combination discloses “<i>the other content comprises at least one message relating to the captured content that is received at said at least one server and inserted by said at least one server into the application-based information channel.</i>” (EX-1003, ¶¶257-261.)</p> <p>As discussed in §V.B.1.b.5, “<i>the other content</i>” includes replies (messages) posted to a Forum. (See, e.g., EX-1006, 6:18-22, 7:36-43, 9:29-31, Figure 7 (below).) As discussed in §V.B.2.d.3, a Forum uses a “single communication object” to hold all communications linked to the initial message (such as replies and comments).” (EX-1006, 4:20-24, 3:19-24 (server “maintain[s] m[e]ssage threads and mak[es] them readable to recipients etc.”).) Because replies are associated with the Forum, the “<i>other content</i>” (e.g., “No way!”) is a “<i>message related to the captured content</i>” (“Yeah mebees, but he grinds his spices with his teeth and spits them into the food”) which is “<i>inserted by</i>” the server into the Naked Chef Forum (“<i>application-based information channel</i>”).</p> <p>536 Petition, p.57</p>	<p>The combination of Randall and Forsyth discloses that “<i>the other content comprises at least one message relating to the captured content.</i>” As I discussed in §IV.B.1.b.(5) for limitation [1E], “<i>the other content</i>” includes replies (messages) posted to a Forum. (See, e.g., Forsyth, 6:18-22 (replies are “new message[s]” posted to the Forum), 7:36-43, 9:29-31.) Because replies are associated with the Forum, the additional messages “<i>relat[e] to the captured content.</i>” As shown in Forsyth’s Figure 7 (reproduced below), for “group based text messaging scenario” (Scenario 1), the “<i>other content</i>” (“No way!”) is a “<i>message related to the captured content</i>” (“Yeah mebees, but he grinds his spices with his teeth and spits them into the food”) which is inserted into the Naked Chef Forum (“<i>application-based information channel</i>”).</p> <p>Ex.1003, ¶ 257</p>
50	A POSITA would have been motivated to combine Eck’s teachings regarding PagerWorld with the network and message server architecture taught in Pelkey. (EX-1003, ¶¶269-273.)	A POSITA would have been motivated to combine Eck’s teachings regarding PagerWorld with the network and message server architecture taught in Pelkey.

	<b>'536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, p.62	Ex.1003, ¶ 269
51	<p>Pelkey and Eck both disclose an enhanced version of the Nintendo GameBoy® in the same field as the '039 patent—"network-based communication systems." (EX-1001, 1:28-30; EX-1007, 1:37-42; EX-1008, Abstract.) Pelkey and Eck are also reasonably pertinent to problems addressed by the '039 patent, namely "optimizing" the sharing of information content on mobile devices. (EX-1001, 1:48-53; EX-1003, ¶270.)</p> <p>536 Petition, p.62</p>	<p>Pelkey and Eck both disclose an enhanced version of the Nintendo GameBoy ® that is in the same field as the '039 patent—"network-based communication systems." (See EX-1001, 1:28-30; Pelkey, 1:37-42; Eck, Abstract.) Pelkey and Eck are also reasonably pertinent to problems addressed by the '039 patent, namely "optimizing" the sharing of information content on mobile devices. (See, e.g, EX-1001, 1:48-53.)</p> <p>Ex.1003, ¶ 270</p>
52	<p>Eck discloses the features of a multi-player game, PagerWorld. Eck further discloses the ability to share photos and sound clips and exchange messages with other players. In the preferred embodiment, such information is exchanged using a "pager cartridge" where "message charges are generally based on the number of characters in the message." (EX-1008, 16:57-60.) While Eck discloses its "invention" can be applied to other technologies like WAP (EX-1008, 25:17-20), it does not specifically disclose a client-server structure as taught in Pelkey.</p> <p>536 Petition, pp.62-63</p>	<p>Eck discloses the features of a multi-player game, PagerWorld. Eck further discloses the ability to share photos and sound clips and exchange messages with other players. In the preferred embodiment, such information is exchanged using a "pager cartridge" where "message charges are generally based on the number of characters in the message." (Eck, 16:57-60.) While Eck discloses that its "invention" can be applied to other technologies like WAP (Eck, 25:17 20), it does not specifically disclose a client-server structure as taught in Pelkey.</p> <p>Ex.1003, ¶ 271</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
53	<p>Pelkey discloses use of a network server and message server to facilitate game play and exchanging messages amongst users. A POSITA would be motivated to apply the network and message server architecture in Pelkey to Eck in order to avoid the charge-based system for exchanging messages and photos via pager cartridge in Eck. (EX-1003, ¶272.) In addition, a POSITA would be motivated to modify the “pager cartridge” in Eck as necessary to use PagerWorld in Pelkey given the disclosed benefits of PagerWorld including “exploration and adventure,” “chat and community interaction,” and “character growth.” (<i>Id.</i>; EX-1008, 10:13-19.) Notably, Pelkey does not describe any game play that includes in-game messaging in conjunction with the aforementioned features. In addition, the combination is nothing more than the application of a known technique (Eck’s PagerWorld game) to a known method/product (Pelkey’s client-server based messaging server) which was ready for further improvement to achieve predictable results. Replacing the pager system infrastructure in Eck with the client-server architecture in Pelkey is the simple substitution of a one known element for another to achieve a predictable result (internet-based functionality). (EX-1003, ¶272.)</p> <p>536 Petition, p.63</p>	<p>Pelkey discloses the use of a network server and message server to facilitate game play and exchanging messages amongst users. But it does not specifically disclose the integration of messaging and sharing content like photos and sound clips with other users within its client-server environment. A POSITA would be motivated to apply the network and message server architecture in Pelkey to Eck in order to avoid the charge-based system for exchanging messages and photos via pager cartridge in Eck. In addition, a POSITA would be motivated to modify the “pager cartridge” in Eck as necessary to use PagerWorld in Pelkey given the disclosed benefits of PagerWorld including “exploration and adventure,” “chat and community interaction,” and “character growth.” (Eck, 10:13-19.) Notably, Pelkey does not describe any game play that includes in-game messaging in conjunction with the aforementioned features. In addition, the combination is nothing more than the application of a known technique (Eck’s PagerWorld game) to a known method/product (Pelkey’s client-server based messaging server) which was ready for further improvement to achieve predictable results. Replacing the</p>

	‘536 Petition	Houh Decl. (Ex. 1003)
		<p>pager system infrastructure in Eck with the client-server architecture in Pelkey is the simple substitution of a one known element for another to achieve a predictable result (internet-based functionality). As is using the PagerWorld “pager cartridge” in the Pelkey portable game machine.</p> <p>Ex.1003, ¶ 272</p>
54	<p>A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been predictable because both references are directed to the same product and activity (game play). (EX-1003, ¶273.) Both Pelkey and Eck disclose the desirability of combining messaging capabilities with game play in a portable gaming system. (EX-1007, 2:20-23; EX-1008, 10:32-44.) As explained below, the complimentary network architecture disclosed in Pelkey and Eck further demonstrates such a modification could be made with a reasonable expectation of success. (EX-1003, ¶273.)</p> <p>536 Petition, p.64</p>	<p>A POSITA would have had a reasonable expectation of success in the combination and the results of the combination would have been predictable because both references are directed to the same product and activity (game play). Both Pelkey and Eck disclose the desirability of combining messaging capabilities with game play in a portable gaming system. (Pelkey, 2:20-23; Eck, 10:32-44.) And as explained below, the complimentary network architecture disclosed in Pelkey and Eck further demonstrates that such a modification could be made with a reasonable expectation of success.</p> <p>Ex.1003, ¶ 273</p>
55	<p>Both Pelkey and Eck disclose a “portable game machine and, more particularly, to a <b>portable game machine</b> that is selectively configurable for one or more different operations such as <b>wireless communications</b>, global positioning, image capturing and combinations thereof.”</p>	<p>Specifically, both Pelkey and Eck disclose a “portable game machine and, more particularly, to a <b>portable game machine</b> that is selectively configurable for one or more different operations such as <b>wireless communications</b>, global</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	(EX-1008, 1:12-16, Figure 1B (below); EX-1007, 4:55-57.)  536 Petition, p.65	positioning, image capturing and combinations thereof.” (Eck, 1:12-16, Figure 1B (below); <i>see</i> Pelkey, 4:55-57 (“FIGS. 3A, 3B and 3C show a portable (hand-held) color-display game system 110”), Figure 3B.)  Ex.1003, ¶ 277
56	Furthermore, the “portable game machine” is “a portable device with limited display space and limited navigational capabilities that connects to a mobile site and/or mobile channel via a wireless network” under PO’s Meta-MDT-IPR construction. ( <i>Id.</i> )  536 Petition, p.65	Thus, the portable game machine is also a “ <i>mobile device</i> ” under PO’s Meta-MDT-IPR construction (“a portable device with limited display space and limited navigational capabilities that connects to a mobile site and/or mobile channel via a wireless network”).  Ex.1003, ¶ 278
57	“[G]ame machine 10” includes “a central processing unit (CPU) 26 [misabeled as 25 in Figure 2],” which “further includes a CPU core 30 [shaded blue] that is connected to an internal read only memory (ROM) 32 and an internal random access memory (RAM) 34.” (EX-1008, 3:42-46.) The “[i]nternal RAM 34 is used as a work memory of CPU core 30.” (EX-1008, 3:46-47.) For example, when executing a game program, “character data supplied from game cartridge 12 and the controller data from operating keys 48a–48e, CPU 26 executes data processing and writes display data into a display RAM 52, using an extended RAM 50 when necessary” in accordance with the game program. (EX-1008, 4:46-50.) CPU is the “ <i>processor</i> ” within the “ <i>processing element</i> ”; ROM 50	As shown above, the “game machine 10” includes “a central processing unit (CPU) 26 [misabeled as 25 in Fig. 2 above],” which “further includes a CPU core 30 [shaded blue] that is connected to an internal read only memory (ROM) 32 and an internal random access memory (RAM) 34.” (Eck, 3:42-46.) Eck explains that “[i]nternal RAM 34 is used as a work memory of CPU core 30.” (Eck, 3:46-47.) For example, when executing a game program, “character data supplied from game cartridge 12 and the controller data from operating keys 48a–48e, CPU 26 executes data processing and writes display data

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>and RAM 52 (shaded red) are “<i>memory</i>”; and as shown each of ROM and RAM is coupled to the processor. (EX-1003, ¶280.)</p> <p>536 Petition, p.67</p>	<p>into a display RAM 52, using an extended RAM 50 when necessary” in accordance with the game program. (Eck, 4:46-50.) CPU 26 is the “<i>processor</i>”; ROM 50 and RAM 52 (shaded red) are “<i>memory</i>”; and as shown each of ROM and RAM is coupled to the processor.</p> <p>Ex.1003, ¶ 280</p>
58	<p>The Pelkey-Eck combination discloses the “<i>processing element</i>” includes “<i>at least one network interface.</i>” (EX-1003, ¶282.) Pelkey discusses the network for implementing a “messaging service” includes a game system 10 (e.g., the portable game machine) “connected via communications circuits 12 (e.g., modems, network interfaces, etc.) to a wide area network 16 such as the Internet.” (EX-1007, 2:60-62.) Pelkey explains communication circuits 12 “may be provided internally to the game system or embodied as cartridges . . . removably attachable to a port or bay of the game systems.” (EX-1007, 2:65-3:2.) Eck discloses the embodiment of a network interface in a cartridge. As shown in Eck’s Figure 5A, the pager cartridge includes “antenna 130 connected to a conventional radio section 132 for receiving and sending messages.” (EX-1008, 6:34-36; 7:36-53 (describing a pager cartridge includes a codec/DSP section, bandpass filter, RF mixer and dual PLL section, crystal, transmitter, receiver and antenna).) The radio section and/or antenna is a “<i>network</i></p>	<p>The combination of Pelkey and Eck discloses “<i>at least one network interface.</i>” Pelkey discusses that the network for implementing a “messaging service” includes a game system 10 (e.g., the portable game machine) “connected via communications circuits 12 (e.g., modems, <b>network interfaces</b>, etc.) to a wide area network 16 such as the Internet.” (Pelkey, 2:60-62.) Pelkey explains that the communication circuits 12 “may be provided internally to the game system or embodied as cartridges . . . removably attachable to a port or bay of the game systems.” (Pelkey, 2:65-3:2.) Eck discloses the embodiment of a network interface in a cartridge. As shown in Eck’s Figure 5A, the pager cartridge includes “an antenna 130 connected to a conventional radio section 132 for receiving and sending messages.” (Eck, 6:34-36; <i>see also</i> Eck, 7:36-53 (describing a pager cartridge includes a codec/DSP section, bandpass filter,</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p><i>interface</i>” within the “<i>processing element.</i>” (EX-1003, ¶282.)</p> <p>536 Petition, pp.67-68</p>	<p>RF mixer and dual PLL section, crystal, transmitter, receiver and antenna.) The radio section and/or antenna is a “<i>network interface.</i>”</p> <p>Ex.1003, ¶ 282</p>
59	<p>Eck discloses the messaging cartridge includes a memory “storing software used” in the messaging (e.g., pager) operations and “one or more video game programs that are executable by CPU 26 of game machine 10.” (EX-1008, 7:7-22.) In addition to messaging (e.g., paging functions), the messaging cartridge “can be used in game playing.” (EX-1008, 9:60-61.) An example of a gaming application is “Multiple User Dungeon (MUD) games” which are “Internet-based on-line exploration and quest games in which an open-ended number of players simultaneously exist in the same game world, sharing experiences and adventures.” (EX-1008, 10:2-7.)</p> <p>536 Petition, p.70</p>	<p>Eck discloses that the messaging cartridge includes a memory “storing software used” in the messaging (e.g., pager) operations and “one or more video game programs that are executable by CPU 26 of game machine 10.” (Eck, 7:7-22.) In addition to messaging (e.g., paging functions), the messaging cartridge “can be used in game playing.” (Eck, 9:60-61.) An example of a gaming application is “Multiple User Dungeon (MUD) games” which are “Internet-based on-line exploration and quest games in which an open-ended number of players simultaneously exist in the same game world, sharing experiences and adventures.” (Eck, 10:2-7.)</p> <p>Ex.1003, ¶ 288</p>
60	<p>An exemplary MUD game is “PagerWorld, a virtual community for the network of all users having pager cartridges.” (EX-1008, 10:20-23.) Although Eck uses the word “PagerWorld” in the MUD title to reflect the communication means is paging, a POSITA would have understood that such a MUD is equally applicable when the communication means is another messaging type such as SMS or messaging</p>	<p>An exemplary MUD game described by Eck is “PagerWorld, a virtual community for the network of <b>all users having pager cartridges.</b>” (Eck, 10:20-23.) Although Eck uses the word “PagerWorld” in the MUD title to reflect the communication means is paging, a POSITA would have understood that such a MUD is</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>via WAP protocols. PagerWorld includes client software in the portable game machine (client program) and corresponding software in the server (server program). As such, PagerWorld is persistent—it remains in existence after individual users exit the world. PagerWorld is therefore a “<i>previously established application-based information channel</i>” under the agreed upon construction in the Meta-MDT-IPR because it is a “computer program-based medium for transferring information” among members of the PagerWorld community. (EX-1003, ¶289.)</p> <p>536 Petition, pp.70-71</p>	<p>equally applicable when the communication means is another messaging type such as SMS or messaging via a WAP protocol. PagerWorld includes client software in the portable game machine (client program) and corresponding software in the server (server program). (See Eck, 4:61-5:7, 9:40-59.) As such, PagerWorld is persistent—it remains in existence after individual users exit the world. PagerWorld is therefore a “<i>previously established application-based information channel</i>” under the agreed upon construction in the Meta-MDT-IPR because it is a “computer program-based medium for transferring information” among members of the PagerWorld community.</p> <p>Ex.1003, ¶ 289</p>
61	<p>A user “<i>identiffies]</i>” PagerWorld through the “main PagerWorld screen 200,” illustrated in Figure 7 (below-left), which is “the starting point for every user session.” (EX-1008, 10:57-60.) Figure 8A is “an illustrative, but non-limiting, implementation of the main screen 200.” (EX-1008, 10:65-66.) The main screen presents the user’s persona character, shown in Figure 8A as the character Mario, from the Mario Bros Nintendo game. (EX-1008, 10:60-61; Figure 8H.)</p> <p>536 Petition, p.71</p>	<p>A user “<i>identiffies]</i>” PagerWorld through the “main PagerWorld screen 200,” illustrated in Figure 7 (below-left), which is “the starting point for every user session.” (Eck, 10:57-60.) Figure 8A is “an illustrative, but non-limiting, implementation of the main screen 200.” (Eck, 10:65-66.) The main screen presents the user’s persona character, shown in Figure 8A as the character Mario, from the Mario Bros Nintendo game. (See Eck, 10:60-61.)</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		Ex.1003, ¶ 290
62	<p><b>Eck, Figure 7 (left), Figure 8A (right)</b>  PagerWorld “<i>permit[s] interaction between a user of the mobile device and one or more additional users</i>” of PagerWorld in a number of ways. (EX-1003, ¶291.) First, players “read and send messages from the main PagerWorld screen” which serves as ““communication central’.” (EX-1008, 10:32-34.) Second, players can select the PagerWorld icon 212 portal from the main screen and “step into a nation-wide or world-wide community of other PagerWorld players.” (EX-1008, 10:34-36.) Within the shared world, users interact by exchanging messages. PagerWorld is a communications hub, “becoming a central meeting place to find friends and share messages.” (EX-1008, 10:36-42.) For example, PagerWorld includes “The Hub” which is a place to “strike up a pen-pal communication,” (EX-1008, 12:57-58), and “The Gaming Center” which “permits players to meet and play games, view high scores, etc.”. (EX-1008, 12:62-63.)</p> <p>536 Petition, pp.72-73</p>	<p><b>Eck, Figure 7 (left), Figure 8A (right)</b>  PagerWorld “<i>permit[s] interaction between a user of the mobile device and one or more additional users</i>” of PagerWorld in a number of ways. First, players “read and send messages from the main PagerWorld screen” which serves as ““communication central.’” (Eck, 10:32-34.) Second, players can select the PagerWorld icon 212 portal from the main screen and “step into a nation-wide or world-wide community of other PagerWorld players.” (Eck, 10:34-36.) Within the shared world, users interact by exchanging messages. PagerWorld is a communications hub, “becoming a central meeting place to find friends and share messages.” (Eck, 10:36-42.) For example, PagerWorld includes “The Hub” which is a place to “strike up a pen-pal communication,” (Eck, 12:57-58), and “The Gaming Center” which “permits players to meet and play games, view high scores, etc.,” (Eck, 12:62-63.)</p> <p>Ex.1003, ¶ 291</p>
63	<p>In the Pelkey-Eck combination, the captured content (photos/images, sounds/audio files) “<i>is to be inserted</i>” into the “<i>previously established application-based information channel.</i>” (EX-1003, ¶292.) As noted above (<i>supra</i> §VI.A.2), a</p>	<p>In the combination of Pelkey and Eck, the captured content (photos/images, sounds/audio files) “<i>is to be inserted</i>” into the “<i>previously established application-based information</i></p>

	<b>'536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>user can customize their persona character using photos taken with their digital camera. Also, PagerWorld supports transmission of messages “with images and sound bytes to other pagers in the network using, for example, a digital camera cartridge in combination with a pager cartridge.” (EX-1008, 16:42-45, 24:30-36.)</p> <p>536 Petition, p.73</p>	<p><i>channel.</i>” PagerWorld supports transmission of messages “with images and sound bytes to other pagers in the network using, for example, a digital camera cartridge in combination with a pager cartridge.” (Eck, 16:42-45, 24:30-36 (“the images stored in the read/write memory of digital camera cartridge 300 may be transmitted to other [sic] using the radio circuitry of pager cartridge 100”), 2:15-23 (inputs “cause the image captured by the digital camera to be transmitted as part of a message”).)</p> <p>Ex.1003, ¶ 292</p>
64	<p>Messages can be sent through the Message Center accessed through an icon on the main screen. (EX-1008, 11:26-28.)</p> <p>536 Petition, p.73</p>	<p>Such a message can be sent through the Message Center accessed through an icon on the main screen. (Eck, 11:26-28.)</p> <p>Ex.1003, ¶ 293</p>
65	<p>The '039 patent refers to “messaging, distributed collaboration, and location-based services” as examples of “wireless networking functionality.” (EX-1001, 1:41-43, 1:59-61.) Both Pelkey and Eck are directed to a messaging service provided using a portable game machine as discussed above. Pelkey discloses a network “in which the messaging service” may be implemented. (EX-1007, 2:58-60.) The network “includes game systems 10 connected via communications circuits 12 (e.g., modems, network interfaces, etc.) to a wide area network 16 such as the Internet.”</p>	<p>The '039 patent refers to “messaging, distributed collaboration, and location-based services” as examples of “wireless networking functionality.” (EX-1001, 1:41-43, 1:59-61.) Both Pelkey and Eck are directed to a messaging service provided using a portable game machine as I have discussed above. Pelkey discloses a network “in which the messaging service” may be implemented. (Pelkey, 2:58-60.) The network “includes game systems 10</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>(EX-1007, 2:60-62, 3:38-48.) Game system 10 may be a video game console, such as the N64 or a portable game machine 110. (EX-1007, 4:55-57.)</p> <p>536 Petition, pp.74-75</p>	<p>connected via communications circuits 12 (e.g., modems, network interfaces, etc.) to a wide area network 16 such as the Internet.” (Pelkey, 2:60-62.) Pelkey explains that game system 10 may be a video game system, such as the N64 video game system, connected to a television. (See Pelkey, 3:38-48.) Game system 10 may also be the portable game machine 110. (Pelkey, 4:55-57.)</p> <p>Ex.1003, ¶ 299</p>
66	<p>Pelkey does not disclose details of the wireless network used to provide wireless messaging from the game system to the server. However, while Eck mentions use of a paging network for this functionality, Eck also explicitly discloses that its “present invention” may be “applied to other wireless technologies such a GSM (Global System for Mobile Communications) and WAP (Wireless Application Protocol).” (EX-1008, 25:17-20.) A POSITA would have been motivated to use either GSM-SMS or WAP for the messaging service, rather than paging, to obtain the enhanced features of those protocols. (EX-1003, ¶300.) Based on Eck’s disclosure, a POSITA would have understood that the portable game machine communicates with the server via messaging available via the GSM network (e.g., SMS) or messaging available via WAP. (<i>Id.</i>)</p> <p>536 Petition, p.75</p>	<p>Pelkey does not disclose details of the wireless network used to provide wireless messaging from the game system to the server. However, while Eck mentions use of a paging network for this functionality, Eck also explicitly discloses that its “present invention” may be “applied to other wireless technologies such a GSM (Global System for Mobile Communications) and WAP (Wireless Application Protocol).” (Eck, 25:17-20.) A POSITA would have been motivated to use either GSM-SMS or WAP for the messaging service, rather than paging, to obtain the enhanced features of those protocols. Based on Eck’s disclosure, a POSITA would have understood that the portable game machine communicates with the server via messaging available via the GSM</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		network (e.g., SMS) or messaging available via WAP.  Ex.1003, ¶ 300
67	GSM-SMS is “functionality implementable over a wireless network” (as required under Meta’s proposed construction), and, as shown in modified Pelkey Figure 1, the GSM network is separate from the Internet connecting the N64 game system to the server (as required under Patent Owner’s proposed construction). Thus, the Pelkey-Eck combination discloses “ <i>wireless networking functionality</i> ” under both constructions from the Meta-MDT-IPR proceeding. (EX-1003, ¶301.)  536 Petition, p.76	GSM-SMS is “functionality implementable over a wireless network” and as shown in Pelkey’s Figure 1, the GSM network is separate from the Internet connecting the N64 game system to the server. Thus, the combination of Pelkey and Eck discloses “ <i>wireless networking functionality</i> ” under both PO’s and Meta’s constructions from the Meta-MDT-IPR proceeding.  Ex.1003, ¶ 301
68	As discussed in §V.A.1, the WAP protocol stack transports data over GSM’s SMS. The SMS message includes a header with data fields indicating control and content details for the message. These fields, associated with the action of sending a message over the wireless network, are “ <i>information associated with at least one wireless networking functionality of the mobile device.</i> ” (EX-1003, ¶302.)  536 Petition, pp.76-77	As I discussed in §IV.A.1, the WAP protocol stack transports data over GSM’s SMS. I provided an overview of a mobile originated message in SMS in a GSM network in my analysis of this limitation in Ground 1. As discussed in that section, the SMS message includes a header with data fields indicating control and content details for the message. For the reasons I discussed in §IV.B.1.b.(3), these fields, associated with the action of sending a message over the wireless network, are “ <i>information associated with at least one wireless networking functionality of the mobile device.</i> ”  Ex.1003, ¶ 302

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
69	<p>Thus, to send a message, the portable game machine “<i>determin[es]</i>” this information to construct the GSM-SMS message. Figure 8C from Eck confirms this information is determined. Specifically, Figure 8C shows an interface screen which shows a list of unread received messages with each message including the sender’s name and associated persona image. (EX-1003, ¶303.)</p> <p>536 Petition, p.77</p>	<p>Thus, to send a message, the portable game machine “<i>determin[es]</i>” this information to construct the GSM-SMS message. Figure 8C from Eck confirms that this information is determined. Specifically, this figure depicts the Message Center user interface screen presented to the player which shows a list of unread received messages with each message including the sending user’s name and associated persona image.</p> <p>Ex.1003, ¶ 303</p>
70	<p>The Pelkey-Eck combination discloses “<i>providing the captured content from the mobile device to at least one server.</i>” (EX-1003, ¶¶304-308.) The network implementing the messaging service of Pelkey and Eck, illustrated in modified Pelkey Figure 1A, includes the game system (e.g., portable game machine) coupled via a network to a server. (EX-1007, 2:58-3:4.) The network server “provides the messaging service.” (EX-1007, 3:9-10.)</p> <p>536 Petition, pp.77-78</p>	<p>The combination of Pelkey and Eck discloses “<i>providing the captured content from the mobile device to at least one server.</i>” The network implementing the messaging service of Pelkey and Eck, illustrated in Pelkey’s Figure 1A (reproduced again below), includes the game system (e.g., portable game machine) coupled via a network to a <b>server</b>. (Pelkey, 2:58-3:4.) The network server “provides the messaging service.” (Pelkey, 3:9-10.)</p> <p>Ex.1003, ¶ 304</p>
71	<p>Messages sent and received in Eck discussed above are provided “<i>via said at least one network interface</i>” as shown in the Figure below. (EX-1008. 2:15-18 (“a game machine is provided with radio circuitry configured to transmit messages”); EX-1003, ¶305.) This is consistent with</p>	<p>The message is thus provided “<i>via said at least one network interface</i>” as shown in the Figure below. (See, e.g., Eck. 2:15-18 (“a game machine is provided with radio circuitry configured to transmit messages”).) This is consistent</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>Eck’s use of GSM-SMS which requires a server to act as a message service centre for storing and forwarding messages to recipients. (See §V.A.1.) This message flow is reflected in Pelkey’s Figure 1A below, showing a message from a portable game system being sent to the server.</p> <p>536 Petition, p.78</p>	<p>with Eck’s use of GSM-SMS which requires a server to act as a message service centre for storing and forwarding messages from originators to recipients. (See §IV.B.1.b.(3).(a).) I illustrate this message flow in Pelkey’s Figure 1 below, showing a message from a portable game system being sent to the server.</p> <p>Ex.1003, ¶ 305</p>
72	<p>A message “may be sent to all users in the paging system, to certain groups of users in the paging system or to a particular user in the paging system.” (EX-1008, 9:46-49, 20:8-9.) As noted above, the server forwards the message received from the portable game device to the intended recipients. The users of the messaging (paging) system are members of the PagerWorld community. Thus, the Pelkey-Eck combination discloses “<i>provid[ing] the captured content from the mobile device [portable game machine] to at least one server for insertion . . . into the identified application-based information channel.</i>”</p> <p>536 Petition, p.79</p>	<p>As I discussed in §V.B.1.d.(2), a message “may be sent to all users in the paging system, to certain groups of users in the paging system or to a particular user in the paging system.” (Eck, 9:46-49, 20:8-9.) As noted above, the server forwards the message received from the portable game device to the intended recipients (one or more (or all) messaging system users). The users of the messaging (paging) system are members of the PagerWorld community (i.e., “<i>the identified application-based information channel</i>”). Thus, the combination of Pelkey and Eck discloses “<i>provid[ing] the captured content from the mobile device [portable game machine] to at least one server for insertion ... into the identified application-based information channel.</i>”</p> <p>Ex.1003, ¶ 306</p>
73	<p>The “<i>captured content</i>” is provided to the server “<i>for insertion with the determined</i></p>	<p>The “<i>captured content</i>” is provided to the server “<i>for insertion with the</i></p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p><i>information</i>” into the “<i>identified application-based information channel.</i>” (EX-1003, ¶307.) The “<i>determined information,</i>” (§VI.B.1.b.3), includes the information provided in the GSM-SMS message header. When a message is forwarded to a recipient, the header information remains in the forwarded GSM-SMS message. This is again reflected in Eck’s Figure 8C (below-left) and Figure 8D (below-right). Figure 8C provides a list of unopened message and “[s]electing a message takes the user to a Read Message screen” shown in Figure 8D. (EX-1008, 11:26-32.) As shown in this figure, the message received at the user’s device includes the captured content and the determined information.</p> <p>536 Petition, pp.79-80</p>	<p><i>determined information</i>” into the “<i>identified application-based information channel.</i>” The “<i>determined information,</i>” (§V.B.1.d.(3)), includes the information provided in the GSM-SMS message header. When a message is forwarded to a recipient, the header information remains in the forwarded GSM-SMS message. This is again reflected in Eck’s Figure 8C (below-left) and Figure 8D (below-right). Figure 8C provides a list of unopened message and “[s]electing a message takes the user to a Read Message screen” shown in Figure 8D. (Eck, 11:26-32.) As shown in this figure, the message received at the user’s device includes the captured content and the determined information.</p> <p>Ex.1003, ¶ 307</p>
74	<p>This limitation adds nothing that was not already covered in the discussion of limitation [1D]. In the Pelkey-Eck combination, limitation [1E] occurs when a second PagerWorld user uses its own device (either another portable game machine or a fixed N64 console) to send a message including a photo/image or sound clip. Upon such action, a user receives content, at the portable game machine via the identified application-based information channel, from at least one of the additional users when receiving a message containing the other user’s customized persona avatar or accessing an address book listing other</p>	<p>This limitation adds nothing that was not already covered in the discussion of limitation [1D]. In the combination of Pelkey and Eck, limitation [1E] occurs when a second PagerWorld user uses its own device (either another portable game machine or a fixed N64 console) to send a message including a photo/image or sound clip. Upon such action, a user receives content, at the portable game machine via the identified application-based information channel, from at least one of the</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>users along with their customized persona avatars. This is reflected in Figure 8C below which depicts content received from other users within PagerWorld (“<i>the identified application-based information channel</i>”).</p> <p>536 Petition, p.81</p>	<p>additional users when receiving a message containing the other user’s customized persona avatar or accessing an address book listing other users along with their customized persona avatars. This is reflected in Figure 8C (reproduced below) which depicts content received from other users within PagerWorld (“<i>the identified application-based information channel</i>”).</p> <p>Ex.1003, ¶ 309</p>
75	<p><b>Eck, Figure 8C</b> Accordingly, the Pelkey-Eck combination discloses “<i>receiving other content, at the mobile device via the identified application-based information channel, from at least one of the additional users.</i>” (EX-1003, ¶¶309-310.)</p> <p>536 Petition, p.82</p>	<p><b>Eck, Figure 8C</b> Accordingly, the combination of Randall and Eck discloses “<i>receiving other content, at the mobile device via the identified application-based information channel, from at least one of the additional users.</i>”</p> <p>Ex.1003, ¶ 310</p>
76	<p>The Pelkey-Eck combination discloses a server having at least one “<i>processing element comprising a processor coupled to a memory</i>” and a “<i>network interface.</i>” (EX-1003, ¶314.) Pelkey recites, in its claim 18, a “server process for a game network server embodied on a storage device and comprising instructions executable by a server processing system.” (EX-1007, 16:44-46.) Thus, Pelkey discloses “<i>a processor [processing system] coupled to a memory [storage device].</i>” (EX-1003, ¶314.)</p>	<p>The combination of Pelkey and Eck discloses a server having “<i>processing element comprising a processor coupled to a memory</i>” and a “<i>network interface.</i>” Pelkey recites, in its claim 18, a “server process for a game network server embodied on a storage device and comprising instructions executable by a server processing system.” (Pelkey, 16:44-46.) Thus, Pelkey discloses “<i>a processor [processing system] coupled to a memory [storage device].</i>” While Pelkey does not discuss this structure in</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>While Pelkey does not discuss this structure, a POSITA would have understood that the hardware used for a server is a digital computing device such as a personal computer. Such a personal computer is the host 1201 shown in Pelkey’s Figure 6B below. (EX-1007, 12:43-45.) The host system includes processing unit 1203, system memory 1205, and network interface 1156. Thus, the server also includes “<i>at least one network interface.</i>” (EX-1003, ¶314.)</p> <p>536 Petition, p.83</p>	<p>the detailed description, a POSITA would have understood that the hardware used for a server is a digital computing device such as a personal computer. Such a personal computer is the host 1201 shown in Pelkey’s Figure 6B below. (<i>See Pelkey, 12:43-45.</i>) The host system includes a processing unit 1203, system memory 1205, and network interface 1156. Thus, the server also includes “<i>at least one network interface.</i>”</p> <p>Ex.1003, ¶ 314</p>
77	<p>Likewise, content for insertion into the identified application-based information channel in Eck (PagerWorld) is transmitted from the mobile device to the server. (§VI.B.1.b.4.) The corollary is also true—“<i>content for insertion into a previously established application-based information channel</i>” is received “<i>at a server from a mobile device.</i>” (EX-1003, ¶316.)</p> <p>536 Petition, pp.84-85</p>	<p>That is, content for insertion into identified application-based information channel is transmitted from the mobile device to the server. The corollary is also true—“<i>content for insertion into a previously established application-based information channel</i>” is received “<i>at a server from a mobile device</i>” [19A]/[23C].</p> <p>Ex.1003, ¶ 316</p>
78	<p>Likewise, information associated with a wireless networking functionality (e.g., GSM-SMS) is transmitted from the mobile device to the server. (§VI.B.1.b.4.) The corollary is also true for this limitation—the “<i>information associated with at least one wireless networking functionality of the mobile device</i>” is received “<i>at the server from the mobile device.</i>” (EX-1003, ¶318.)</p> <p>536 Petition, p.85</p>	<p>That is, the information associated with a wireless networking functionality is transmitted from the mobile device to the server. The corollary is also true for this limitation—the “<i>information associated with at least one wireless networking functionality of the mobile device</i>” is received “<i>at the server from the mobile device</i>” [19B]/[23D].</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		Ex.1003, ¶ 318
79	<p>As noted above, the Pelkey-Eck combination discloses “<i>providing the captured content from the mobile device to at least one server for insertion in association with the determined information into the identified application-based information channel.</i>” (§VI.B.1.b.4.) That is, the content and the information associated with a wireless networking functionality are provided to the server so that they can be inserted into “<i>application-based information channel.</i>” The Pelkey-Eck combination thus satisfies these limitations. (EX-1003, ¶320.)</p> <p>536 Petition, p.85</p>	<p>As I discussed in §V.B.1.d.(4) for limitations [1D] and [18E], the combination of Pelkey and Eck discloses “<i>providing the captured content from the mobile device to at least one server for insertion in association with the determined information into the identified application-based information channel.</i>” That is, the content and the information associated with a wireless networking functionality are provided to the server so that they can be inserted into “<i>application-based information channel.</i>”</p> <p>Ex.1003, ¶ 320</p>
80	<p>As noted above, the Pelkey-Eck combination discloses “<i>other content</i>” is received “<i>at the mobile device via the identified application-based information channel, from at least one of the additional users.</i>” (§IV.B.1.b.5.) For the same reasons, the Pelkey-Eck combination discloses “<i>insert[ing] other content from at least one of the additional users into the previously established application-based information channel.</i>” (EX-1003, ¶321.)</p> <p>536 Petition, pp.85-86</p>	<p>As I discussed in §V.B.1.d.(5) for limitations [1E] and [18G], the combination of Pelkey and Eck discloses that “<i>other content</i>” is received “<i>at the mobile device via the identified application-based information channel, from at least one of the additional users.</i>” For the same reasons, the combination of Pelkey and Eck discloses “<i>insert[ing] other content from at least one of the additional users into the previously established application-based information channel</i>” [19D]/[23F].</p> <p>Ex.1003, ¶ 321</p>
81	<p>Eck explains that a cartridge including messaging functionality (e.g., a pager cartridge) “is provided for use with a game</p>	<p>Eck explains that a cartridge including messaging functionality (e.g., a pager cartridge) “is</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>machine having a game program executing processing system including a microprocessor.” (EX-1008, 1:60-65.) The messaging cartridge “includes a memory 145 for storing software used in the pager operations.” (EX-1008, 7:7-9.) Pelkey similarly discloses “[a] messaging service client is implemented by program code contained in an application (e.g., a video game, a web browser) executed by the game system.” (EX-1007, 1:42-44.)</p> <p>536 Petition, p.86</p>	<p>provided for use with a game machine having a game program executing processing system including a microprocessor.” (Eck, 1:60-65.) The messaging cartridge “includes a memory 145 for storing software used in the pager operations.” (Eck, 7:7-9.) Pelkey similarly discloses “[a] messaging service client is implemented by program code contained in an application (e.g., a video game, a web browser) executed by the game system.” (Pelkey, 1:42-44.)</p> <p>Ex.1003, ¶ 322</p>
82	<p>As discussed in §VI.B.1.a.3, the inserted messaging cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (EX-1008, 4:5-6, 7:7-12 (“[p]ager cartridge 100 includes a memory 145 for storing software used in the pager operations . . . [i]t is of course possible to store the software for implementing at least some of these operations in the memory of game machine 10”).) When inserted, the “game machine circuitry [] access[es] information contained with ROM 42 (and read/write memory 46), which information controls the game machine . . . under control of the ROM game program information.” (EX-1008, 4:9-20.) Game machine 10 then “automatically activates a display of messages on the display thereof in accordance with the operating software stored in the memory of the pager.” (EX-1008 22:10-14.)</p>	<p>As I discussed in §V.B.1.c, the inserted messaging cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (See, e.g., Eck, 4:5-6, 7:7-12 (“[p]ager cartridge 100 includes a memory 145 for storing software used in the pager operations . . . [i]t is of course possible to store the software for implementing at least some of these operations in the memory of game machine 10”).) When inserted, the “game machine circuitry [] access[es] information contained with ROM 42 (and read/write memory 46), which information controls the game machine . . . under control of the ROM game program information.” (Eck, 4:9-20.) The game machine 10 then “automatically activates a display of messages on the display</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, pp.86-87	thereof in accordance with the operating software stored in the memory of the pager.” (Eck, 22:10-14.)  Ex.1003, ¶ 323
83	Therefore, the Pelkey-Eck combination discloses “ <i>non-transitory computer-readable storage medium having embodied therein executable code of one or more software programs, wherein said executable program code when executed by a processing element of the mobile device causes the mobile device to perform the method of claim 1.</i> ” (EX-1003, ¶¶322-324.)  536 Petition, p.87	Therefore, the combination of Pelkey and Eck discloses “ <i>nontransitory computer-readable storage medium having embodied therein executable code of one or more software programs, wherein said executable program code when executed by a processing element of the mobile device causes the mobile device to perform the method of claim 1.</i> ”  Ex.1003, ¶ 324
84	Pelkey discloses the server includes a storage medium storing executable code that when executed performs the server-side actions of the messaging service. Specifically, Pelkey discloses, in its claim 18, a “server process for a game network server embodied on a storage device and comprising instructions executable by the server processing system” for providing steps of a messaging service method. (EX-1007, 16:44-18:8.)  536 Petition, p.87	Pelkey discloses that the server includes a storage medium storing executable code that when executed performs the server-side actions of the messaging service. Specifically, Pelkey discloses, in its claim 18, a “server process for a game network server embodied on a storage device and comprising instructions executable by the server processing system” for providing steps of a messaging service method. (See Pelkey, 16:44-18:8.)  Ex.1003, ¶ 325
85	Thus, the Pelkey-Eck combination discloses a “ <i>non-transitory computer-readable storage medium having embodied therein executable code of one or more</i>	Thus, the combination of Pelkey and Eck discloses a “ <i>non-transitory computer-readable storage medium having embodied</i>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p><i>software programs, wherein said executable program code when executed by a processing element of the server causes the server to perform the method of claim 19.” (EX-1003, ¶¶325-326.)</i></p> <p>536 Petition, pp.87-88</p>	<p><i>therein executable code of one or more software programs, wherein said executable program code when executed by a processing element of the server causes the server to perform the method of claim 19.”</i></p> <p>Ex.1003, ¶ 326</p>
86	<p>The Pelkey-Eck combination discloses these limitation because PagerWorld, i.e., the “<i>application-based information channel</i>” discussed above in connection with claim 1, is a “<i>personalized content application.</i>” By allowing a user to access personalized content, PagerWorld “<i>comprises a personalized content application.</i>” For example, Eck discloses “[t]he Newscenter—This building permits a player to view news from the Service provider and to customize the amount and/or type of news downloaded to the pager cartridge by the System operator for example, each night.” (EX-1008, 12:52-56.)</p> <p>536 Petition, p.88</p>	<p>The combination of Pelkey and Eck discloses these limitation because PagerWorld, i.e., the “<i>application-based information channel</i>” discussed above in connection with claim 1, is a “<i>personalized content application.</i>” By allowing a user to access personalized content, PagerWorld “<i>comprises a personalized content application.</i>” For example, Eck discloses “[t]he Newscenter—This building permits a player to view news from the Service provider and to customize the amount and/or type of news downloaded to the pager cartridge by the System operator for example, each night.” (Eck, 12:52-56.)</p> <p>Ex.1003, ¶ 327</p>
87	<p>Both Pelkey and Eck disclose that the user may personalize its messaging (e.g., PagerWorld) account. For example, Pelkey teaches that the “messaging service client provides the user with an opportunity to create a user profile.” (EX-1007, 7:9-11.) The user can specify, e.g., the user’s alias, “favorite game, favorite food, favorite sport, [and] hobbies.” (EX-1007, 7:12-16.)</p>	<p>Both Pelkey and Eck disclose that the user may personalize its messaging (e.g., PagerWorld) account. For example, Pelkey teaches that the “messaging service client provides the user with an opportunity to create a user profile.” (Pelkey, 7:9-11.) The user can specify, e.g., the user’s alias,</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>Users are also provided with the capability of customizing their persona. (EX-1007, 7:20-30.) Eck explains that a Player’s “persona character” is the character all other PagerWorld players will see, for example when messages are received.” (EX-1008, 10:20-31, 12:20-23 (“user may customize his/her persona character to his/her liking” via PagerWorld’s “My Persona” screen).)</p> <p>536 Petition, pp.88-89</p>	<p>“favorite game, favorite food, favorite sport, [and] hobbies.” (Pelkey, 7:12-16.) Users are also provided with the capability of customizing their persona. (Pelkey, 7:20-30.) Eck explains that a Player’s “persona character” is the character all other PagerWorld players will see, for example when messages are received.” (Eck, 10:20-31, 12:20-23 (“user may customize his/her persona character to his/her liking” via PagerWorld’s “My Persona” screen).)</p> <p>Ex.1003, ¶ 328</p>
88	<p>As noted with respect to claim 17, the “<i>application-based information channel . . . is configured to run on the mobile device.</i>” Because the “<i>personalized content application</i>” contains the “<i>application-based information channel,</i>” it is also “<i>configured to run on the mobile device.</i>” (EX-1003, ¶¶327-329.)</p> <p>536 Petition, p.89</p>	<p>As I discussed in §V.B.3 for claim 17, the “<i>application-based information channel ... is configured to run on the mobile device.</i>” Because the “<i>personalized content application</i>” contains the “<i>application-based information channel,</i>” it is also “<i>configured to run on the mobile device.</i>”</p> <p>Ex.1003, ¶ 329</p>
89	<p>PagerWorld “<i>comprises a collaborative workspace,</i>” as claimed because these features allow Forum group members to communicate and collaborate on topics of interest, <i>e.g.</i>, by allowing each group member to post or send messages and/or photos, and respond to the messages and/or photos posted or sent by other group members. For example, Eck discloses that “[a]s players interact with other players in PagerWorld (<i>e.g.</i>, by sending messages and</p>	<p>PagerWorld “<i>comprises a collaborative workspace,</i>” as claimed because these features allow Forum group members to communicate and collaborate on topics of interest, <i>e.g.</i>, by allowing each group member to post or send messages and/or photos, and respond to the messages and/or photos posted or sent by other group members. For example, Eck</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>playing games), players will share the fun and excitement of discovering new items, skills and appearances as their persona characters gain experience.” (EX-1008, 10:27-31.)</p> <p>536 Petition, p.89</p>	<p>discloses that “[a]s players interact with other players in PagerWorld (e.g., by sending messages and playing games), players will share the fun and excitement of discovering new items, skills and appearances as their persona characters gain experience.” (Eck, 10:27-31.)</p> <p>Ex.1003, ¶ 330</p>
90	<p>In addition, among the types of games that can be played in PagerWorld are “[t]eamwork-based adventures requiring input from multiple players with complementary skills.” (EX-1008, 13:40-45.) For example, a user can solicit an intervention from another user by sending a message “requesting help from a friend playing the same game. A player could, for example, request a ladder to climb a wall to gain a prize or level or request more ammunition to fight enemies.” (EX-1008, 14:11-26.)</p> <p>536 Petition, pp.89-90</p>	<p>In addition, among the types of games that can be played in PagerWorld are “[t]eamwork-based adventures requiring input from multiple players with complementary skills.” (Eck, 13:40-45.) For example, a user can solicit an intervention from another user by sending a message “requesting help from a friend playing the same game. A player could, for example, request a ladder to climb a wall to gain a prize or level or request more ammunition to fight enemies.” (Eck, 14:11-26.)</p> <p>Ex.1003, ¶ 331</p>
91	<p>The Pelkey-Eck combination discloses “<i>identified application-based information channel [PagerWorld] comprises a collaborative workspace.</i>” (EX-1003, ¶¶330-332.)</p> <p>536 Petition, p.90</p>	<p>Accordingly, the combination of Pelkey and Eck discloses “<i>identified application-based information channel [PagerWorld] comprises a collaborative workspace.</i>”</p> <p>Ex.1003, ¶ 332</p>
92	<p>The Pelkey-Eck combination discloses “<i>the identified application-based information</i></p>	<p>The combination of Pelkey and Eck discloses “<i>the identified</i></p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p><i>channel comprises a chat channel.</i>” (EX-1003, ¶¶333-334.) Eck discloses that multiple user games, such as PagerWorld, include the feature of “Chat and community interaction.” (EX-1008, 10:15-19, <i>see also</i> EX-1008, 16:55-63, Figs. 11A-B (disclosing chat codes to “reduce[] the number of characters in a message, thereby reducing message charges”).) Pelkey similarly discloses that the server “set[s] up text-based chat sessions between two or more logged-in players.” (EX-1007, 17:6-10.)</p> <p>536 Petition, p.90</p>	<p><i>application-based information channel comprises a chat channel.</i>” Eck discloses that multiple user games, such as PagerWorld, include the feature of “Chat and community interaction.” (Eck, 10:15-19, <i>see also</i> Eck, 16:55-63, Figs. 11A-B (disclosing chat codes to “reduce[] the number of characters in a message, thereby reducing message charges”).) Pelkey similarly discloses that the server “set[s] up text-based chat sessions between two or more logged-in players.” (Pelkey, 17:6-10.)</p> <p>Ex.1003, ¶ 333</p>
93	<p>One feature provided within PagerWorld is the ability to “view message boards.” (EX-1007, 10:40-42.) A POSITA would have understood that message boards provide another avenue for members of the PagerWorld community to chat. (EX-1003, ¶334.)</p> <p>536 Petition, p.90</p>	<p>One feature provided within PagerWorld is the ability to “view message boards.” (Eck, 10:40-42.) A POSITA would have understood that message boards provide another avenue for members of the PagerWorld community to chat.</p> <p>Ex.1003, ¶ 334</p>
94	<p>The Pelkey-Eck combination also discloses that the “<i>mobile device comprises a global positioning system (GPS)-based navigational device.</i>” (EX-1003, ¶¶343-344.) Eck discloses that “a global positioning system (GPS) cartridge is also selectively insertable into the slot of game machine 10 or into the slot of pager cartridge 100.” (EX-1008, 22:28-30, 5:39-43.) Eck explains that “GPS is a satellite-based radio navigation system [that] ... permits users to determine their three-</p>	<p>The combination of Pelkey and Eck also discloses that the “<i>mobile device comprises a global positioning system (GPS)-based navigational device.</i>” Eck discloses that “a global positioning system (GPS) cartridge is also selectively insertable into the slot of game machine 10 or into the slot of pager cartridge 100.” (Eck, 22:28-30, 5:39-43.) Eck explains that “GPS is a satellite-based radio navigation</p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>dimensional position velocity, and time.” (EX-1008, 22:30-34.) The GPS cartridge “is provided for use with a game machine having a game program executing processing system including a microprocessor to execute a video game program.” (EX-1008, 2:3-8.)</p> <p>536 Petition, pp.91-92</p>	<p>system developed and operated by the U.S. Department of Defense (DOD) and permits users to determine their three-dimensional position velocity, and time.” (Eck, 22:30-34.) The GPS cartridge “is provided for use with a game machine having a game program executing processing system including a microprocessor to execute a video game program and player controls operable by a player to generate video game control signals.” (Eck, 2:3-8.)</p> <p>Ex.1003, ¶ 343</p>
95	<p>Eck discloses that GPS capability, the ability to send and receive messages (pages), and the ability to send and receive photos and audio files can be integrated into the portable gaming system without the need for cartridges. (EX-1008, 25:35-40 (“In addition, while the pager cartridge, GPS cartridge, and digital camera cartridge are shown as add-on devices to an existing game machine, it is possible to incorporate some or all of the circuitry needed to implement the above-described operations in the game machine itself (portable or otherwise”).).)</p> <p>536 Petition, p.92</p>	<p>Eck discloses that GPS capability, the ability to send and receive messages (pages), and the ability to send and receive photos and audio files can be integrated into the portable gaming system without the need for cartridges. (Eck, 25:35-40 (“In addition, while the pager cartridge, GPS cartridge, and digital camera cartridge are shown as add-on devices to an existing game machine, it is possible to incorporate some or all of the circuitry needed to implement the above-described operations in the game machine itself (portable or otherwise”).).)</p> <p>Ex.1003, ¶ 344</p>
96	<p>As explained above in §§VI.B.1.b.4-5, the Pelkey-Eck combination discloses “<i>providing the captured content from the mobile device to at least one server for</i></p>	<p>As explained above with respect to claim limitations [1D] and [1E], the combination of Pelkey and Eck discloses “<i>providing the captured</i></p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p><i>insertion in association with the determined information into the identified application-based information channel” and “receiving other content, at the mobile device via the application-based information channel.”</i></p> <p>For these same reasons, the Pelkey-Eck combination discloses that “<i>accessing integrated content at the mobile device via the identified application-based information channel, the integrated content comprising a combination of a least a portion of the captured content and at least a portion of the determined information” is “stored by the at least one server,”</i> recited in claim 24.</p> <p>536 Petition, pp.92-93</p>	<p><i>content from the mobile device to at least one server for insertion in association with the determined information into the identified application-based information channel” and “receiving other content, at the mobile device via the application-based information channel.”</i> (§§V.B.1.d.(4)-(5).) For these same reasons, the combination of Pelkey and Eck discloses that “<i>accessing integrated content at the mobile device via the identified application-based information channel, the integrated content comprising a combination of a least a portion of the captured content and at least a portion of the determined information” is “stored by the at least one server,”</i> recited in claim 24.</p> <p>Ex.1003, ¶ 345</p>
97	<p>As explained above in §VI.B.1.b.4, the Pelkey-Eck combination discloses “<i>providing the captured content from the mobile device to at least one server for insertion in association with the determined information into the identified application-based information channel.”</i> For these same reasons, the Pelkey-Eck combination discloses that “<i>integrated content comprising a combination of a least a portion of the captured content and at least a portion of the determined information” is “stored by the at least one server.”</i>”</p> <p>536 Petition, p.93</p>	<p>As explained above with respect to limitation [1D], the combination of Pelkey and Eck discloses “<i>providing the captured content from the mobile device to at least one server for insertion in association with the determined information into the identified application-based information channel.”</i> (§V.B.1.d.(4).) For these same reasons, the combination of Pelkey and Eck discloses that “<i>integrated content comprising a combination of a least a portion of the captured content and at least a</i></p>

	<b>‘536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
		<p><i>portion of the determined information” is “stored by the at least one server.”</i></p> <p>Ex.1003, ¶ 346</p>
98	<p>Pelkey teaches that a “messaging system includes a web server computer and at least two video game systems.” (EX-1007, Abstract.) For example, the video game console system (N64 system) “is configured to connect to the web server computer via the Internet.” (EX-1007, Abstract.) Eck meanwhile discloses the use of WAP for messaging via the portable game machine. (cross reference above) WAP makes it possible to access the Internet via wireless devices. The figure below illustrates a WAP-enabled client accessing a web server through a WAP gateway. In the Pelkey-Eck combination, the messaging server is a mobile website accessible via the WAP gateway.</p> <p>536 Petition, pp.93-94</p>	<p>Pelkey teaches that a “messaging system includes a web server computer and at least two video game systems.” (Pelkey, Abstract.) For example, the fixed game system (N64 system) “is configured to connect to the web server computer via the Internet.” (Pelkey, Abstract.) Eck discloses the use of WAP for messaging via the portable game machine, as I discussed above. WAP makes it possible to access the Internet via wireless devices. The figure below illustrates a WAP-enabled client accessing a web server through a WAP gateway. In the combination of Pelkey and Eck, the messaging server is a mobile website accessible via the WAP gateway.</p> <p>Ex.1003, ¶ 347</p>
99	<p>The Pelkey-Eck combination discloses “<i>the other content comprises at least one message relating to the captured content that is received at said at least one server and inserted by said at least one server into the application-based information channel.</i>” (EX-1003, ¶348.) When a user sends a message, their persona character, which may be customized using photos taken with the attached digital camera, is part of the message along with the sender’s “handle.” (See, Eck, 10:23-26 11:53-57.)</p>	<p>The combination of Pelkey and Eck discloses “<i>the other content comprises at least one message relating to the captured content that is received at said at least one server and inserted by said at least one server into the application-based information channel.</i>” When a user sends a message, their persona character is part of the message. (See, e.g., Eck, 10:23-26 (“Players are represented in</p>

	<b>'536 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	536 Petition, p.94	<p>PagerWorld by a 'persona character' and it is this character that all other PagerWorld players will see, for example when messages are received.”), 11:53-57 (“When a message is selected from Message Center screen, the contents of the message appear, along with the user's persona character and “handle” of the person that sent the message.”).)</p> <p>Ex.1003, ¶ 348</p>