

Summary of verbatim (or nearly verbatim) matches between the 00540 petition to the Houh Declaration Ex.1003

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
1.	<p>The '336 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:24-26.)</p> <p>540 Petition, p. 2</p>	<p>The '336 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:24-26.)</p> <p>Ex. 1003, ¶ 25</p>
2.	<p>The '336 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, 1:30-32.)</p> <p>540 Petition, p. 2</p>	<p>The '336 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, 1:30-32.)</p> <p>Ex. 1003, ¶ 26</p>
3.	<p>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, 3:46-50.)</p> <p>[image omitted]</p> <p>'336 Patent, Figure 1A</p> <p>540 Petition, p. 3</p>	<p>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 16 and a set of user terminals 18.” (EX-1001, 3:46-50.)</p> <p>[image omitted]</p> <p>'336 Patent, Figure 1A</p> <p>Ex. 1003, ¶ 26</p>
4.	<p>Such mobile sites may be associated with “a group comprising multiple members having a common interest” (EX-1001, 6:23-25), “an event” (EX-1001, 6:43-44), “a game,” (EX-1001, 7:24-25), or “a user of IM, SMS, MMS, email or other type of</p>	<p>Such mobile sites may be associated with “a group comprising multiple members having a common interest,” (EX-1001, 6:23-25), “an event,” (EX-1001, 6:43-44), “a game,” (EX-1001, 7:24-25), or “a user of IM, SMS, MMS, email or other type of</p>

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	<p>messaging service” (EX-1001, 7:36-38), among other associations. (EX-1001, 6:23-8:6.)</p> <p>540 Petition, p. 4</p>	<p>messaging service,” (EX-1001, 7:36-38), among other associations. (EX-1001, 6:23-8:6.)</p> <p>Ex. 1003, ¶ 28</p>
5.	<p>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 information over the Internet or communicating using the Web using wireless mobile devices.</p> <p>540 Petition, p. 4</p>	<p>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 for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices.”</p> <p>Ex. 1003, ¶ 92</p>
6.	<p>A person could also have qualified as a person of ordinary skill in the art with some combination of (1) more formal education (such as a master’s of science degree) and less technical experience, or (2) less formal education and more technical or professional experience.</p> <p>540 Petition, p. 4</p>	<p>A person could also have qualified as a POSITA with some combination of (1) more formal education (such as a master’s of science degree) and less technical experience, or (2) less formal education and more technical or professional experience.</p> <p>Ex. 1003, ¶ 33</p>
7.	<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, 4:30-33.) Petitioners apply the plain meaning which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions. (EX-1003, ¶40.)</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, 4:30-33.) I apply the plain meaning for the term which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions.</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	540 Petition, p. 6	Ex. 1003, ¶ 40
8.	In the Meta-MDT-IPR, the parties dispute the construction of “wireless network” primarily based on the inclusion of language that the wireless network is “separate from the internet” and “facilitates connection to the internet.” (See EX-1010, 28; EX-1011, 6-8.) While Petitioners also dispute PO’s construction, construction of the term is not needed because the prior art discloses this term under both constructions. (EX-1003, ¶42.)  540 Petition, p. 8	In the Meta-MDT-IPR, the parties dispute the construction primarily based on the inclusion of language that the wireless network is “separate from the internet” and “facilitates connection to the internet.” While I also dispute PO’s construction, the prior art discloses the term under both constructions.  Ex. 1003, ¶ 42
9.	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.)  540 Petition, p. 10	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.)  Ex. 1003, ¶ 65
10.	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.  540 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, ¶ 73
11.	Randall and Forsyth are also reasonably pertinent to problems addressed by the ’336 patent, namely “overcom[ing] one or more of the drawbacks of” conventional techniques for content sharing for	Randall and Forsyth are also reasonably pertinent to problems addressed by the ’ 336 patent, namely “overcom[ing] one or more of the drawbacks of” conventional techniques for content sharing for

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	mobile devices. (See, e.g, EX-1001, 2:1-4; EX-1003, ¶76.)  540 Petition, p. 14	mobile devices. (See, e.g, EX-1001, 2:1-4.)  Ex. 1003, ¶ 74
12.	Moreover, a POSITA, when considering Randall's Forums service, would have been motivated to search for references describing Forums and its enhancements, particularly those published by or associated with Symbian and would have been led to Forsyth. (EX-1003, ¶79.)  540 Petition, pp. 15-16	Additionally, a POSITA when considering Randall's Forums service, would have been motivated to search for other references directed to Forums and its enhancements.  Ex. 1003, ¶ 77
13.	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.)  540 Petition, p. 18	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, ¶ 78
14.	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 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	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 ' 336 patent. (See, e.g., EX-

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	'336 patent. ( <i>See, e.g.</i> , EX-1017; EX-1012, EX-1016, EX-1018.)  540 Petition, p. 16	1017; Allin, 4-6, 229-31; Jipping, 11-14.)  Ex. 1003, ¶ 79
15.	Forsyth describes Forums as “new approach to group communication ... designed specifically to allow current and very popular internet type services (e.g. chat/instant messaging between groups) to be handle[d] effectively between mobile devices and to enable a new generation of group based communication services.” (EX-1006, 2:40-47, 5:27-30.)  540 Petition, p. 17	Forsyth describes Forums as “new approach to group communication ... designed specifically to allow current and very popular internet type services (e.g. chat/instant messaging between groups) to be handle[d] effectively between mobile devices and to enable a new generation of group based communication services.”  Ex. 1003, ¶ 81
16.	Although Randall illustrates the database as a standalone server, a POSITA would have understood and been motivated to implement the database functionality on the Forums server both for ease of maintenance and to reduce equipment costs. (EX-1003, ¶83.)  540 Petition, p. 19	Although Randall illustrates the database as a standalone server, a POSITA would have understood and been motivated to implement the database functionality on the Forums server both for ease of maintenance and to reduce equipment costs.  Ex. 1003, ¶ 46
17.	The Randall-Forsyth combination discloses a server which is an “apparatus” [11P]. (EX-1003, ¶86.) As illustrated in Randall’s Figure 4, the Forums network infrastructure includes a server hosting Forums (e.g., a Private Forum server). In Forums, the server “handles contacting each group member, storing messages, allowing message to be read, sending, receiving and distributing messages.” (EX-1006, 3:28-33.) For this and the reasons discussed in §V.B.1, the	The combination of Randall and Forsyth discloses a server which is an “apparatus” [11P]. As illustrated in Randall’s Figure 4, the Forums network infrastructure includes a server hosting Forums (e.g., a Private Forum server). In Forums, the server “handles contacting each group member, storing messages, allowing message to be read, sending, receiving and distributing messages.” (Forsyth, 3:28-31, 3:31-33 (“The central server can also act as a store for resources

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	<p>“<i>apparatus</i>” (server) used to provide the Forums service is “<i>for use in managing information content in a network-based communication system.</i>” (EX-1003, ¶86.)</p> <p>540 Petition, pp. 19-20</p>	<p>which group-members may wish to discuss and share (e.g. personal information, personal photographs, music, web sites etc).”) For this and the reasons I discussed in §IV.B.1.a, the “<i>apparatus</i>” (server) used to provide the Forums service is “<i>for use in managing information content in a network-based communication system.</i>”</p> <p>Ex. 1003, ¶ 86</p>
18.	<p>Forsyth teaches the server “handles contacting each group member, storing messages, allowing message[s] to be read, sending, receiving and distributing messages.” (EX-1006, 3:28-31.) Randall specifically mentions “server side <b>software</b>” (EX-1005, 57:4) and “server side message handling <b>applications</b>” (EX-1005, 38:24.) A POSITA would have understood that software and applications execute on “<i>a processor</i>” within the “<i>processing element.</i>” (EX-1003, ¶90.)</p> <p>540 Petition, p. 20</p>	<p>For example, Forsyth explains the server “handles <b>contacting each group member</b>, storing messages, <b>allowing message to be read, sending, receiving and distributing messages.</b>” (Forsyth, 3:28-31.) And Randall specifically mentions “server side software” (Randall, 57:4) and “server side message handling <b>applications</b>” (Randall, 38:24). A POSITA would have understood that software and applications execute on “<i>a processor</i>” within the “<i>processing element.</i>”</p> <p>Ex. 1003, ¶ 90</p>
19.	<p>Specifically, the Forums server acts as “a store for resources which group-members may wish to discuss and share (e.g., personal information, personal photographs, music, web sites, etc.)” (EX-1006, 3:31-34.)</p> <p>540 Petition, p. 21</p>	<p>Forsyth similarly mentions that a central server “act[s] as a store for resources which group-members may wish to discuss and share (e.g., personal information, personal photographs, music, web sites etc).” (Forsyth, 3:31-34.)</p> <p>Ex. 1003, ¶ 83</p>
20.	<p>Should PO contend “<i>memory</i>” of the “<i>processing element</i>” must store</p>	<p>Should PO contend “<i>memory</i>” of the “<i>processing element</i>” must store</p>

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	<p>instructions executed by the processor, such memory would have been obvious, if not inherent in Randall and Forsyth which both teach software running on the server. Because the software/applications executing on a processor are stored in memory and also access information stored in memory, a POSITA would have understood Randall and Forsyth further disclose or suggest the “processor [is] coupled to a memory.” (EX-1003, ¶91; §V.B.2.)</p> <p>540 Petition, p. 21</p>	<p>instructions executed by the processor, such memory would have been obvious, if not inherent in Randall and Forsyth which both teach software running on the server. Because the software/applications executing on a processor are stored in memory and also access information stored locally in memory, a POSITA would have understood Randall and Forsyth further disclose or suggest the “processor [is] coupled to a memory.”</p> <p>Ex. 1003, ¶ 91</p>
21.	<p>The Randall-Forsyth combination discloses a “<i>network-based communication system</i>” comprises “<i>a plurality of servers configured to communicate over the network</i>” [15A].</p> <p>540 Petition, p. 22</p>	<p>The combination of Randall and Forsyth discloses a “<i>network-based communication system</i>” comprises “<i>a plurality of servers configured to communicate over the network</i>” [15A].</p> <p>Ex. 1003, ¶ 97</p>
22.	<p>A POSITA would have been motivated to implement the functionality associated with providing Forums and the functionality of hosting a database on a single server to obtain, e.g., the benefits of more efficient maintenance as well as cost savings of reduced amount of network equipment. (<i>Id.</i>) Therefore, one of these plurality of servers, e.g., the server hosting the Private Forum and the user extensible database, performs the processing steps of claim 15 and one or more servers hosts other forums (e.g., Public Forum server). (<i>Id.</i>)</p> <p>540 Petition, p. 22</p>	<p>A POSITA would have been motivated, e.g., to implement the functionality associated with providing Forums and the functionality of hosting a database on a single server to obtain the benefits of more efficient maintenance and cost savings of reduced amount of network equipment. Therefore, one of these plurality of servers, e.g., hosting the Private Forums and the user extensible database, performs the processing steps of claim 15. Other servers are also provided, e.g., to host other forums (e.g., the Public Forum server).</p> <p>Ex. 1003, ¶ 97</p>

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23.	<p>Randall describes that “a forum 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.” (EX-1005, 40:17-19; <i>see also</i> EX-1005, 82:5-83:5.)</p> <p>540 Petition, p. 23</p>	<p>Randall describes that “a forum 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)</p> <p>Ex. 1003, ¶ 100</p>
24.	<p>The Randall-Forsyth combination discloses “<i>providing [at least a portion of] a first web-based interface accessible to a first user.</i>” (EX-1003, ¶¶103-110.) The Forums service is based on a client-server model implemented on a network. (EX-1005, 40:15-41:2, Figure 4 (below).)</p> <p>540 Petition, p. 24</p>	<p>The combination of Randall and Forsyth discloses “<i>providing [at least a portion of] a first web-based interface accessible to a first user.</i>” The Forums service is based on a client-server model implemented on a network such as the network illustrated in Randall’s Figure 4 (below).</p> <p>Ex. 1003, ¶ 103</p>
25.	<p>As noted above (§§V.B.1-V.B.2), the Forums infrastructure includes “internet servers” hosting individual Private and Public Forums and “internet servers” hosting extensible databases. Both Randall and Forsyth disclose that wireless devices communicate with these servers “in any manner over any kind of network, such as GSM or UMTS, CDMA and WCDMA mobile radio, Bluetooth, 802.11, [and] IrDa etc.” (EX-1006, 1:16-25; <i>see</i> EX-1005, 1:11-13.) These servers use “existing transports” for client-server communication over these networks such as “WAP to access the services on the server side” from the wireless devices and</p>	<p>The Forums infrastructure includes “internet servers” hosting individual Private and Public Forums (as enhanced by Forsyth) and “internet servers” hosting extensible databases (as taught by Randall). I note that one or all of the illustrated servers could be provided as a single server by a Forums provider to achieve benefits of more efficient maintenance and reduced equipment costs. Both Randall and Forsyth disclose that the wireless information devices communicate with these servers “in any manner over any kind of network, such as GSM or UMTS, CDMA and WCDMA mobile radio, Bluetooth, 802.11, [and] IrDa etc.” (Forsyth,</p>

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	<p>“standard IP formats such as MIME, SMTP and HTTP” to “enable compatibility with Internet Messaging systems.” (See EX-1005, 58:23-27.) That is, the server includes a GSM/WAP interface for communicating with mobile devices over the wireless network and a different interface (e.g., SMTP or HTTP) for communicating with non-mobile devices over the Internet. (EX-1003, ¶103.)</p> <p>540 Petition, p9. 24-25</p>	<p>1:16-25; see Randall, 1:11-13.) Randall describes the use of “existing transports” (communication protocols) for client-server communication over these networks such as “WAP to access the services on the server side” from the wireless devices and “standard IP formats such as MIME, SMTP and HTTP” to “enable compatibility with Internet Messaging systems.” (See Randall, 58:23-27.) That is, the server includes a GSM/WAP interface for communicating with mobile devices over the wireless network and a different interface (e.g., SMTP or HTTP) for communicating with non-mobile devices over the Internet.</p> <p>Ex. 1003, ¶ 103</p>
26.	<p>The Forums servers, providing the server side processing for Forums (and the processing for each individual Forum created by users of Forums), are designed to be “web portals” and as such Forums is a web-based service. (EX-1003, ¶104.) Specifically, Forums “act[] in effect like a fully <b>personalised web 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.” (EX-1005, 13:22-24.) Forums establishes “web portals” architecture through (1) the use of “standard data transports such as WAP or http for data access”, which provide a “web-based” communication interface to the server</p>	<p>The Forums servers, providing the server side processing for Forums (and the processing for each individual Forum created by users of Forums), are designed to be “web portals” and as such Forums is a web-based service. Specifically, Forums “act[] in effect like a fully <b>personalised web 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 this “web portal” architecture through (1) the use of “standard data transports such as WAP or http for data access”, which provide a “web-based” communication interface to the server and (2) through</p>

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	<p>and (2) through “webpages” provided by the Forum server to mobile devices causing the display of Forums user interfaces on the mobile device. (EX-1003, ¶104.) The presence of these “webpage” downloads is confirmed by the use of Randall’s ADS naming scheme which uses web server addresses. (<i>See, e.g.</i>, EX-1005, 64:27-28.) Each of the user interfaces associated with the “webpage” download from the server is also a “<i>web-based interface.</i>” (EX-1003, ¶104.)</p> <p>540 Petition, pp. 25-26</p>	<p>“webpages” provided by the Forum server to mobile devices causing the display of Forums user interfaces on the mobile device. The presence of these “webpage” downloads is confirmed by the use of Randall’s ADS naming scheme which uses web server addresses. (<i>See, e.g.</i>, Randall, 64:27-28.) Each of the user interfaces associated with the “webpage” download from the server is also a “<i>web-based interface.</i>”</p> <p>Ex. 1003, ¶ 104</p>
27.	<p>In Randall, a “wireless information device (and 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>540 Petition, p. 27</p>	<p>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.” (Randall, 9:13-15.)</p> <p>Ex. 1003, ¶ 160</p>
28.	<p>Forsyth also confirms that Forums user interfaces are provided by the server via, e.g., webpages, 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.” (EX-1006, 11:23-31.)</p> <p>540 Petition, p. 27</p>	<p>Forsyth confirms that Forums user interfaces are provided by the server via, e.g., webpages, 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, ¶ 108</p>

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29.	<p>Thus, the Randall-Forsyth combination discloses the processing element of the server hosting Forums “<i>provid[es] a first web-based interface accessible to a first user</i>” either through (1) the communications interface of the server and/or (2) the user interfaces provided by server download (e.g., webpage downloads).</p> <p>540 Petition, p. 27</p>	<p>Thus, the combination of Randall and Forsyth discloses that the processing element of the server hosting Forums “<i>provid[es] a first web-based interface accessible to a first user</i>” either through (1) the communications interface of the server and/or (2) the user interfaces provided by server download (e.g., webpage downloads).</p> <p>Ex. 1003, ¶ 110</p>
30.	<p>Each of these mechanisms involves a user interface provided by the server and messages received from the mobile device via the server’s communication interface, described above. (EX-1003, ¶¶111-125.)</p> <p>540 Petition, p. 28</p>	<p>Each of these mechanisms involves a user interface provided by the server and messages received from the mobile device via the server’s communication interface, described above.</p> <p>Ex. 1003, ¶ 111</p>
31.	<p>After the creator selects participants, an initial message and the participant list are provided “to the message server” via the server’s communication interface (a “<i>web-based interface</i>”). (See EX-1006, 6:1-8.) The server stores “and forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (EX-1006, 6:9-14.) After the Forum is created, members can send new messages “to the server, which then forwards on the increment [i.e., the new Forum content] to all the people on the current (server-maintained) address list.” (EX-1005, 6:18-22.) That is, the Forum (“<i>mobile information channel</i>”) is “<i>activat[ed]</i>” to provide a platform through which</p>	<p>After the creator selects participants, an initial message and the participant list are provided “to the message server” via the server’s communication interface (a “<i>web-based interface</i>”). (See Forsyth, 6:1-8.) The server stores “and forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (Forsyth, 6:9-14.) After the Forum is created, members can send new messages “to the server, which then forwards on the increment [i.e., the new Forum content] to all the people on the current (server-maintained) address list.” (Randall, 6:18-22.) That is, the Forum (“<i>mobile information channel</i>”) is “<i>activat[ed]</i>” to provide a platform through which</p>

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	users share content by posting/sending the content to Forum via the server. (EX-1003, ¶113.)  540 Petition, p. 29	users share content by posting/sending the content to Forum via the server.  Ex. 1003, ¶ 113
32.	The New Forum webpage, provided by the processing element of the server, is therefore a “ <i>first web-based interface ... configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users</i> ” because it creates a Forum and provides initial content for the Forum. (EX-1003, ¶114.)  540 Petition, p. 30	The New Forum webpage, provided by the processing element of the server, is therefore a “ <i>first web-based interface ... configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users</i> ” because it creates a Forum and provides initial content for the Forum.  Ex. 1003, ¶ 114
33.	Randall explains that “[u]sers must be able to share any of their content or activities with individuals and groups with ease.” (EX-1005, 32:21-22.) Specifically, “[u]sers must be able to share content local to the device and have any [content] uploaded to a server handled automatically.” (EX-1005, 32:26-27.) As discussed above in §V.B.1, the user manages her content through the content management webpage provided by the Forums infrastructure. The user is therefore a “ <i>first user</i> ” and the members of the Forum designed for access to content are “ <i>one or more additional users</i> .” (EX-1003, ¶¶115-120.)  540 Petition, p. 30	Randall explains that “[u]sers must be able to share any of their content or activities with individuals and groups with ease.” (Randall, 32:21-22.) Specifically, “[u]sers must be able to share content local to the device and have any [content] uploaded to a server handled automatically.” (Randall, 32:26-27.) As I discussed in §IV.B.1.a.(b), the user manages her content through the content management webpage provided by the Forums infrastructure. The user is therefore a “ <i>first user</i> ” and the members of the Forum designed for access to content are “ <i>one or more additional users</i> .”  Ex. 1003, ¶ 115

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
34.	<p>Randall explains that the database is not limited to the tags (field/attribute) used in Alice’s record and the “application owning the category is free to invent whatever tags it chooses and to extend the database.” (EX-1005, 66:10-14.)</p> <p>540 Petition, p. 30</p>	<p>Randall explains that the database is not limited to the tags (field/attribute) used in Alice’s record and the “application owning the category is free to invent whatever tags it chooses and to extend the database.” (Randall, 66:10-14.)</p> <p>Ex. 1003, ¶ 84</p>
35.	<p>To share content, the client-server infrastructure allows the user to specify, via a web page, one or more groups that are permitted to access the data. (See Randall, 24:8-25:19.) Forums service provides a user access to their profile for management via a webpage associated with the ADS number of the user (e.g., www.indirect.com/Alice). Randall explains that the ADS number is “an <b>address on a web server</b>—for example <b>www.indirect.com/Alice</b>” and “is in effect a pointer to entity specific data held on the <b>web server</b>, in this case, Alice’s information.” (EX-1005, 64:25-28.) The content management webpage is therefore a “web-based interface” and the messages exchanged between the mobile device and server associated with this content management webpage are via the server’s communication interface (a “web-based interface”).</p> <p>540 Petition, p. 32</p>	<p>To share content, the client-server infrastructure allows the user to specify, via a web page, one or more groups that are permitted to access the data. (See Randall, 24:8-25:19.) Forums service provides a user access to their profile for management via a webpage associated with the ADS number of the user (e.g., www.indirect.com/Alice). Randall explains that the ADS number is “<b>an address on a web server</b>—for example <b>www.indirect.com/Alice</b>” and “is in effect a pointer to entity specific data held on the <b>web server</b>, in this case, Alice’s information.” (Randall, 64:25-28.) The content management webpage is therefore a “web-based interface” and the messages exchanged between the mobile device and server associated with this content management webpage are via the server’s communication interface (a “web-based interface”).</p> <p>Ex. 1003, ¶ 117</p>
36.	<p>When a user associates stored content with an i-Group (e.g, Forum), the user designates the content “<i>for sharing</i>” within the Forum. (EX-1003, ¶120.)</p>	<p>When a user associates stored content with an i-group (e.g, Forum), the user designates the content “<i>for sharing</i>” within the Forum. Thus, the user</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>Thus, the user interface provides a means for activating the Forum to share the designated content. 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 group “contacts the server” or the information “will be pushed to” member’s devices “if technology allows.” (EX-1005, 68:28-30.) Forsyth similarly discloses use of access rights associated with stored data to identify a group. In the “Discussion of Photos” Scenario, after uploading the photos to a remote storage area, the user “creates a Forum message based on the photographs and sends it to a group (as discussed above).” (EX-1006, 7:34-35.) The group members “receive (or are given access to) an object which incorporates or references the photographs.” (EX-1006, 7:37-38.)</p> <p>540 Petition, pp. 32-33</p>	<p>interface provides a means for activating the Forum to share the designated content. 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 group “contacts the server” or the information “will be pushed to” member’s devices “if technology allows.” (Randall, 68:28-30.) Forsyth similarly discloses use of access rights associated with stored data to identify a group. In the “Discussion of Photos” Scenario, after uploading the photos to a remote storage area, the user “creates a Forum message based on the photographs and sends it to a group (as discussed above).” (Forsyth, 7:34-35.) The group members “receive (or are given access to) an object which incorporates or references the photographs.” (Forsyth, 7:37-38.)</p> <p>Ex. 1003, ¶ 120</p>
37.	<p>The content management webpage, provided by the processing element of the server, is therefore a “<i>first web-based interface ... configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users</i>” by designating a stored content item for insertion into the Forum. (EX-1003, ¶115-121.)</p> <p>540 Petition, p. 33</p>	<p>The content management webpage, provided by the processing element of the server, is therefore a “<i>first web-based interface ... configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users</i>” by designating a stored content item for insertion into the Forum.</p> <p>Ex. 1003, ¶ 121</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
38.	<p>The process of posting a message into a pre-existing Forum (new or response) also “<i>activate[s] a given mobile information channel for sharing content.</i>” (EX-1003, ¶¶122-125.)</p> <p>540 Petition, p. 33</p>	<p>The process of posting a message into a pre-existing Forum (new or response) via the user interface provided on the mobile device also “<i>activate[s] a given mobile information channel for sharing content.</i>”</p> <p>Ex. 1003, ¶ 122</p>
39.	<p>Within Forums, a user (“first user”) is presented with a user interface displaying a list of his/her Forums. (EX-1006, Figure 6 (below).) The user selects one of these individual Forums causing a different user interface associated with the Forum to be displayed (e.g., Forsyth Figure 8) where the user can enter and post content. (See, e.g., EX-1006, 6:28-35.)</p> <p>540 Petition, pp. 33-34</p>	<p>Within Forums, a user (“first user”) is presented with a user interface displaying a list of his/her Forums on a screen such as the screen shown in Forsyth’s Figure 6 (reproduced below). The user selects one of these individual Forums which causes the user to navigate to a user interface associated with the Forum (e.g., Forsyth Figure 8) where the user can enter and post content. (See, e.g., Forsyth, 6:28-35.)</p> <p>Ex. 1003, ¶ 123</p>
40.	<p>As discussed above, the user interface displayed to the user is provided by the server (e.g., via a webpage download) and converted by the mobile device for display to the user. Thus, the user interface provided by information downloaded from the server (e.g., webpage) is a “<i>web-based interface</i>” and the messages are communicated via the server’s communication interface (a “<i>web-based interface</i>”). (EX-1003, ¶124.)</p> <p>540 Petition, p. 35</p>	<p>As I discussed above, the user interface displayed to the user is provided by the server (e.g., via a webpage download) and converted by the mobile device for display to the user. Thus, the user interface provided by information downloaded from the server (e.g., webpage) is a “<i>web-based interface</i>” and the messages are communicated via the server’s communication interface (a “<i>web-based interface</i>”).</p> <p>Ex. 1003, ¶ 124</p>
41.	<p>The Forum Reply webpage, provided by the processing element of the</p>	<p>The Forum Reply webpage, provided by the processing element of the</p>

	<b>‘540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>server, is therefore a “<i>first web-based interface ... configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users</i>” because it activates the server to insert new content into the Forum. (EX-1003, ¶¶124-125.)</p> <p>540 Petition, p. 35</p>	<p>server, is therefore a “<i>first web-based interface ... configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users</i>” because it activates the server to insert new content into the Forum.</p> <p>Ex. 1003, ¶ 125</p>
42.	<p>For example, in the group based messaging Scenario, the Forums server “forwards a copy of the [initial Forums] message to each of the people on the address list.” (EX-1006, 6:9-14.) And, when new messages are sent to the server, the server “forwards the increment to all the people on the current (server-maintained) address list.” (EX-1006, 6:1-22.) Thus, the server “<i>provides each of the one or more additional users access to at least a portion of the shared content via the given mobile information channel to thereby facilitate interaction between the first user and the one or more additional users</i>” by providing information allowing the creation of a user interface at the mobile device that displays the messages (and content) shared within a Forum (e.g., via a webpage download). (EX-1003, ¶126.)</p> <p>540 Petition, p. 36</p>	<p>Forsyth describes that the Forums server “forwards a copy of the [initial Forums] message to each of the people on the address list, along with an abstracted version of the address list.” (Forsyth, 6:9-14.) And, when new messages are sent to the server for posting/publishing within the Forum, the server “forwards the increment to all the people on the current (server-maintained) address list.” (Forsyth, 6:1-22.) Thus, the server “<i>provides each of the one or more additional users access to at least a portion of the shared content via the given mobile information channel to thereby facilitate interaction between the first user and the one or more additional users.</i>” The server provides such “access” by providing information allowing the creation of a user interface at the mobile device that displays the messages (and content) shared within a Forum (e.g., via a webpage download)</p> <p>Ex. 1003, ¶ 126</p>

	<b>‘540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
43.	<p>Forums provides a user interface within each Forum that displays the messages/discussions posted/published to the Forum (“<i>mobile information channel</i>”) and through this interface “<i>share[s] content</i>” with Forum members and facilitates further interaction through a context menu allowing a Reply and allowing other actions such as private chats. (See Forsyth, 6:36-49.) Forsyth’s Figure 7 (below) is an example of this user interface (Naked Chef). The user interface presented to the Forum members to display posted messages is “<i>a second interface.</i>” This user interface is different from the “<i>first web-based interface</i>” (e.g., the network communications interface, the content management user interface, the New Forum user interface, or the Forum Reply user interface). Therefore, the combination discuses “<i>a second web-based interface different than the first web-based interface.</i>” (EX-1003, ¶127.)</p> <p>[image omitted]</p> <p>Forums—Forsyth, Figure 7</p> <p>540 Petition, p. 37</p>	<p>Forums provides a user interface within each Forum that displays the messages/discussions posted/published to the Forum (“<i>mobile information channel</i>”) and through this interface “<i>share[s] content</i>” with Forum members and facilitates further interaction through a context menu allowing a Reply and allowing other actions such as private chats. (See Forsyth, 6:44-48.) Forsyth’s Figure 7, depicted again below, is an example of this user interface associated with the Naked Chef Forum. The user interface presented to the Forum members to display posted messages is “<i>a second interface.</i>” This user interface is different from the “<i>first web-based interface</i>” (e.g., the network communications interface, the content management user interface, the New Forum user interface, or the Forum Reply user interface). Therefore, the combination discuses “<i>a second web-based interface different than the first web-based interface.</i>”</p> <p>[image omitted]</p> <p>Forums—Forsyth, Figure 7</p> <p>Ex. 1003, ¶ 127</p>
44.	<p>As discussed in §V.B.6.a.(2), the Randall-Forsyth combination teaches or at least suggests user interfaces provided by Forums are web-based information generated by the server and provided to the wireless devices (e.g., via a website downloaded.)</p>	<p>As I discussed in §IV.B.4.a in my analysis of the “<i>providing a first web-based interface</i>” limitation, the combination of Randall and Forsyth teaches or at least suggests user interfaces provided by Forums are web-based information generated by</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>Because a Forum has multiple members, this user interface (e.g., webpage) is provided by the Forum to each Forum member, thereby allowing <i>“one or more additional users”</i> to access the content shared within the Forum.</p> <p>540 Petition, p. 38</p>	<p>the server and provided to the wireless devices (e.g., via a website downloaded.) Because a Forum has multiple members, this user interface (e.g., webpage) is provided by the Forum to each Forum member, thereby allowing <i>“one or more additional users”</i> to access the content shared within the Forum.</p> <p>Ex. 1003, ¶ 128</p>
45.	<p>Thus, processing element of the server <i>“generat[es] a second web-based interface different than the first web-based interface”</i> which <i>“provides each of the one or more additional users access to at least a portion of the shared content via the given mobile information channel to thereby facilitate interaction between the first user and the one or more additional users.”</i> (EX-1003, ¶¶128-129.)</p> <p>540 Petition, p. 38</p>	<p>Thus, processing element of the server <i>“generat[es] a second web-based interface different than the first web-based interface”</i> which <i>“provides each of the one or more additional users access to at least a portion of the shared content via the given mobile information channel to thereby facilitate interaction between the first user and the one or more additional users.”</i></p> <p>Ex. 1003, ¶ 129</p>
46.	<p>Thus, the Randall-Forsyth combination discloses <i>“the given mobile information channel supports messaging between the first user and the one or more additional users over a wireless network”</i> and <i>“the mobile information channel is configured to permit the first user to send messaging content to the one or more additional users and to receive messaging content from the one or more additional users.”</i> (EX-1003, ¶¶130-133.)</p> <p>540 Petition, pp. 39-40</p>	<p>Thus, the Randall-Forsyth combination discloses <i>“the given mobile information channel supports messaging between the first user and the one or more additional users over a wireless network”</i> and <i>“the mobile information channel is configured to permit the first user to send messaging content to the one or more additional users and to receive messaging content from the one or more additional users”</i></p> <p>Ex. 1003, ¶ 133</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
47.	<p>Although not explicit, a POSITA would have understood from these disclosures the server-side Forums program is “<i>executable code of one or more software programs</i>” which “<i>when executed by a processing element of the mobile device causes the mobile device to perform the</i>” recited actions. (EX-1003, ¶134.)</p> <p>540 Petition, p. 40</p>	<p>Although not explicit, a POSITA would have understood from these disclosures that the server-side Forums program is “<i>executable code of one or more software programs</i>” which “<i>when executed by a processing element of the communication system</i>” implements the steps of the method specified in claim 1.</p> <p>Ex. 1003, ¶ 134</p>
48.	<p>Users are provided access to the shared content of a Forum via the message (content) display page provided via the “<i>second web-page interface</i>” discussed in §V.B.6.b, disclosing limitation [27B]. Thus, for the reasons discussed in §§ V.B.6.a-V.B.6.b, the Randall-Forsyth combination renders claim 27 obvious.</p> <p>540 Petition, p. 41</p>	<p>Users are provided access to the shared content of a Forum via the message (content) display page provided via the “<i>second web-page interface</i>” discussed in §IV.B.4.a.(3).(b). Thus, for the reasons discussed in §IV.B.4, the combination of Randall and Forsyth renders claim 27 obvious.</p> <p>Ex. 1003, ¶ 141</p>
49.	<p>For example, in the “Discussion of Photos” Scenario, a “user is on holiday, and takes a few photographs of the beach with his digital camera.” (EX-1006, 7:30-31.) He then “uploads them to his remote storage area”, “creates a Forum message based on the photographs” and “sends it to a group.” (EX-1006, 7:32-35.)</p> <p>540 Petition, p. 42</p>	<p>In this example, a “user is on holiday, and takes a few photographs of the beach with his digital camera.” (Forsyth, 7:30-31.) He then “uploads them to his remote storage area”, “creates a Forum message based on the photographs” and “sends it to a group.”</p> <p>Ex. 1003, ¶ 143</p>
50.	<p>As discussed in §V.B.6.a, the Randall-Forsyth combination discloses the “<i>first web-based interface</i>” is a “<i>content management web site</i>” and as discussed in §V.B.6.b, the “<i>second web-based interface</i>” is (1) different</p>	<p>As discussed in § IV.B.4.a.(3).(b), the combination of Randall and Forsyth discloses that the “<i>first web-based interface</i>” is a “<i>content management web site</i>” and as discussed in §IV.B.4.b, the “<i>second web-based</i></p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>from the content management webpage and (2) a “<i>mobile web site</i>” accessible via mobile devices. As discussed below, the Randall-Forsyth combination discloses a “<i>mobile device</i>” under both Meta’s and PO’s construction.</p> <p>540 Petition, p. 43</p>	<p><i>interface</i>” is (1) different from the content management webpage and (2) a “<i>mobile web site</i>” accessible via one or more mobile devices. As I discuss below, the combination of Randall and Forsyth discloses a “<i>mobile device</i>” under both Meta’s and PO’s construction. Thus, for the reasons discussed here and in §IV.B.4, the combination renders claim 3 obvious</p> <p>Ex. 1003, ¶ 146</p>
51.	<p>Randall teaches a wireless 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.) Randall’s “ADS numbers are typically constructed using text strings and can be though[t] of as defining a namespace.” (EX-1005, 9:17-18.) The ADS number “in one implementation [is] <b>an address on a web server</b>—for example <b>www.indirect.com/Alice</b>” which “is in effect a pointer to entity specific data held on the web server, in this case, Alice’s information.” (EX-1005, 64:25-28.)</p> <p>540 Petition, p. 46</p>	<p>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 ‘ADS Number’) which is unique to that entity.” (Randall, 9:13-15.) Randall’s “ADS numbers are typically constructed using text strings and can be though[t] of as defining a namespace.” (Randall, 9:17-18.) The ADS number “in one implementation [is] <b>an address on a web server</b>—for example <b>www.indirect.com/Alice.</b>” (Randall, 64:25-26.)</p> <p>Ex. 1003, ¶ 106</p>
52.	<p>Although not explicit, a POSITA would have understood the webpages associated with displayed user interfaces each have different names (different ADS names/URLs.) provided to mobile devices for displaying the first interface and the</p>	<p>Although not explicit, a POSITA would have understood that the webpages associated with displayed user interfaces each have different names (different ADS names/URLs.) provided to mobile devices for displaying the first interface and the second interface used different URLs.</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>second interface used different URLs. (EX-1003, ¶¶161-162.)</p> <p>540 Petition, p. 46</p>	<p>Ex. 1003, ¶ 161</p>
53.	<p>For example, Forsyth describes an exemplary Forum where “[p]eople post MP3s of the kind of music played at each club.” (EX-1006, 9:21-22.) While not explicit, a POSITA would have understood the shared track/MP3 (music file) is captured in some manner on the user’s device, either by recording or via data transfer from another device, so that it can be uploaded to the server. (EX-1003, ¶¶169.)</p> <p>540 Petition, p. 48</p>	<p>Forsyth further describes an exemplary Forum (Scenario 4) where “[p]eople post MP3s of the kind of music played at each club.” (Forsyth, 9:21-22.) While not explicit, a POSITA would have understood the shared track/MP3 (music file) is captured in some manner on the user’s device, either by recording or via data transfer from another device, so that it can be uploaded to the server.</p> <p>Ex. 1003, ¶ 169</p>
54.	<p>When a Forum is created, the initial message and participant list are provided “to the message server” as a message/communication object and a group object respectively. (EX-1006, 6:1-8.) The server “forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (EX-1006, 6:9-14.) The invited participants can “decline to participate” and if so are then “removed from the address list on the server.” (EX-1006, 6:15-17.) Therefore, the Forum is created by “mutual consent” of the “first user” creating the Forum and the “one or more additional users” invited to the Forum that agree to participate. (EX-1003, ¶173.)</p>	<p>When a Forum is created, the initial message and participant list are provided “to the message server” as a message/communication object and a group object respectively. (See Forsyth, 6:1-8.) The server “forwards a copy of the message to each of the people on the address list, along with an abstracted version of the address list.” (Forsyth, 6:9-14.) The invited participants can “decline to participate” and if so are then “removed from the address list on the server.” (Forsyth, 6:15-17.) Therefore, the Forum is created by “mutual consent” of the “first user” creating the Forum and the “one or more additional users” invited to the Forum that agree to participate.</p> <p>Ex. 1003, ¶ 173</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	540 Petition, pp. 48-49	
55.	<p>The Randall-Forsyth combination discloses the server includes a “<i>processing element</i>” with “<i>at least one server</i>” [13] “<i>accessible over the Internet via a network interface</i>” [14]. As discussed in §§V.B.2, V.B.5, The network infrastructure implementing Forums includes “internet servers.” (EX-1005, 7:16-19.) These servers “use[] standard data transports such as WAP or http for data access.” (EX-1005, 45:14-15.) That is, as illustrated in Figure 4 below, Randall uses “existing transports” (communication means) for client-server communication such as “WAP to access the services on the server side” and “standard IP formats such as MIME, SMTP and HTTP” to “enable compatibility with Internet Messaging systems.” (EX-1005, 58:23-27.) As stressed by Randall, “the Internet and its servers can be used by a mobile device to deliver enchanting services that far surpass the present PC-Internet model.” (EX-1005, 46:8-10.)</p> <p>540 Petition, pp. 49-50</p>	<p>The combination of Randall and Forsyth discloses that the server includes a “<i>processing element</i>” with “<i>at least one server</i>” [13] “<i>accessible over the Internet via a network interface</i>” [14]. Randall explains that the Symbian infrastructure implementing Forums includes “internet servers.” (Randall, 7:16-19.) The servers used in the infrastructure “embrace[] existing standards and initiatives” and “use[] standard data transports such as WAP or http for data access.” (Randall, 45:14-15.) That is, as illustrated in Figure 4 below, Randall uses “existing transports” (communication means) for client-server communication such as “WAP to access the services on the server side” and “standard IP formats such as MIME, SMTP and HTTP” to “enable compatibility with Internet Messaging systems.” (Randall, 58:23-27.) As stressed by Randall, “the Internet and its servers can be used by a mobile device to deliver enchanting services that far surpass the present PC-Internet model.” (Randall, 46:8-10.)</p> <p>Ex. 1003, ¶ 177</p>
56.	<p>In Forums, after “the creator of the Forum finishes choosing participants,” an “address list” is created and “sent to the message server” which forwards “an abstracted version of the address list, (abstracted so that all the participants can see the nicknames of all other participants, but not</p>	<p>Forsyth discloses that after “the creator of the Forum finishes choosing participants,” “the initial message is created; an address list for that message is created; these two are sent to the message server,” which “stores these two objects and forwards a copy of the message to each of the people</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	necessarily see everything about their real world details)." (EX-1006, 6:1-14.) The server then maintains the address list for the Forum. (EX-1006, 6:21-22 (referring to "the current (server-maintained) address list").)  540 Petition, p. 51	on the address list, along with an abstracted version of the address list, (abstracted so that all the participants can see the nicknames of all other participants, but not necessarily see everything about their real world details)." (Forsyth, 6:1-14.) The server then maintains the address list for the Forum. (Forsyth, 6:21-22 (referring to "the current (server-maintained) address list").)  Ex. 1003, ¶ 183
57.	The Randall-Forsyth combination also discloses " <i>the messaging content comprises at least one of announcements, notes, surveys, promotions and contests</i> " [24]. (EX-1003, ¶199.) Randall teaches that a user can share a "InstaPoll" such as "AlbumOfTheWeek" as well as a "home note" and a "work note" with individuals or groups. (EX-1005, 67.) Randall also discusses use of its infrastructure to conduct "Opinion polls." (EX-1005, 74.  540 Petition, p. 52	The Randall-Forsyth combination also discloses that " <i>the messaging content comprises at least one of announcements, notes, surveys, promotions and contests</i> " [24]. Specifically, Randall teaches that a user can share a "InstaPoll" such as "AlbumOfTheWeek" as well as a "home note" and a "work note" with individuals or groups. (Randall, 67.) Randall also discusses the use of its infrastructure to conduct "Opinion polls." (Randall, 74.)  Ex. 1003, ¶ 199
58.	Forums "is designed specifically to allow current and very popular internet type services (e.g., <b>chat/instant messaging between groups</b> ) to be handle[d] effectively between mobile devices."  540 Petition, p. 52	Forums "is designed specifically to allow current and very popular internet type services (e.g., <b>chat/instant messaging between groups</b> ) to be handle[d] effectively between mobile devices." (  Ex. 1003, ¶ 185
59.	Forsyth provides a detailed discussion of Forums enhanced through the use of group objects and presents numerous	Forsyth provides a detailed discussion of Forums enhanced through the use of group objects and presents numerous

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	use scenarios of this enhanced version of Forums that can be used to share personalized content. ( <i>See, e.g.,</i> Forsyth, 7:18-57 (Discussion of Photos (Scenario 2)), 9:5-35 (Digital Memento from a User's Birthday (Scenario 4)).)  540 Petition, p. 53	use scenarios of this enhanced version of Forums that can be used to share personalized content. ( <i>See, e.g.,</i> Forsyth, 7:18-57 (Discussion of Photos (Scenario 2)), 9:5-35 (Digital Memento from a User's Birthday (Scenario 4)).)  Ex. 1003, ¶ 189
60.	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, ¶¶244-48.)  540 Petition, p. 58	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, ¶ 210
61.	Pelkey and Eck are also reasonably pertinent to problems addressed by the '336 patent, namely "optimizing" the sharing of information content on mobile devices. (EX-1001, 1:50-53; EX-1003, ¶245.)  540 Petition, p. 59	Pelkey and Eck are also reasonably pertinent to problems addressed by the '336 patent, namely "optimiz[ing]" the sharing of information content on mobile devices. ( <i>See, e.g.,</i> EX-1001, 1:50-55.)  Ex. 1003, ¶ 211
62.	Eck discloses PagerWorld features, including 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.	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.

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	540 Petition, p. 59	Ex. 1003, ¶ 212
63.	<p>Pelkey discloses use of a network server and message server to facilitate game play and exchanging messages amongst users. A POSITA would have been 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, ¶247.) In addition, a POSITA would have been 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.” (Id.; 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, ¶247.)</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 pager system infrastructure in Eck with the client-server architecture in Pelkey is the simple substitution of a one known element for another to</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	540 Petition, p.	achieve a predictable result (internet-based functionality).  Ex. 1003, ¶ 213
64.	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, ¶248.) 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, ¶248.)  540 Petition, p. 60	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.  Ex. 1003, ¶ 214
65.	The Pelkey-Eck combination discloses a server which is an “ <i>apparatus</i> ” in a “ <i>network-based communication system</i> ” as shown in Pelkey’s Figure 1B above in §VI.A.1. Pelkey’s server is “ <i>use[d] in managing information content in a network-based communication system.</i> ” For example, Pelkey discloses a “message service” provided on a “message service server” that “enables users of video game systems to communicate with each other over the Internet or some other wide or local area network.” (EX-1007, 1:37-42, 3:18-21, Fig. 1B.)	The combination of Pelkey and Eck discloses a server which is an “ <i>apparatus</i> ” in a “ <i>network-based communication system</i> ” as shown in Pelkey Figure 1B above. §V.A.1 Pelkey discloses a server that is “ <i>for use in managing information content in a network-based communication system.</i> ” For example, Pelkey discloses a “message service” provided on a “message service server” that “enables users of video game systems to communicate with each other over the Internet or some

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	540 Petition, p. 61	other wide or local area network.” (Pelkey, 1:37-42, 3:18-21, Fig. 1B.)  Ex. 1003, ¶ 218
66.	<p>Pelkey also 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 a “<i>processing element comprising a processor [processing system] coupled to a memory [storage device].</i>” While Pelkey does not discuss this structure in its 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. (See EX-1007, 12:43-45.)</p> <p>540 Petition, p. 61</p>	<p>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 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. (See Pelkey, 12:43-45.)</p> <p>Ex. 1003, ¶ 219</p>
67.	<p>The Pelkey-Eck combination discloses a “<i>network-based communication system</i>” [15P] comprising “<i>a plurality of servers configured to communicate over the network</i>” [15A]. For example, Figure 1B in Pelkey (below) discloses an embodiment that includes a “Messaging Service Server” 18 and a “Network Server” 14 that communicate over the internet (depicted as “WAN” 16). (EX-1003, ¶222-225.) The “Message Service Server” and “Network Server” together comprise a “<i>plurality of servers.</i>” (EX-1003, ¶226.)</p>	<p>The combination of Pelkey and Eck discloses a “<i>network-based communication system</i>” [15P] comprising “<i>a plurality of servers configured to communicate over the network</i>” [15A]. For example, Figure 1B in Pelkey (below) discloses an embodiment that includes a “Messaging Service Server” 18 and a “Network Server” 14 that communicate over the internet (depicted as “WAN” 16). The “Message Service Server” and “Network Server” together comprise a “<i>plurality of servers.</i>”</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>[image omitted]</p> <p>Pelkey, Figure 1B</p> <p>540 Petition, p.</p>	<p>[image omitted]</p> <p>Pelkey, Figure 1B</p> <p>Ex. 1003, ¶ 222</p>
68.	<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 its “present invention” may be “applied to other wireless technologies such as GSM ... and WAP...” (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. 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 via WAP.</p> <p>540 Petition, pp. 66-67</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 network (e.g., SMS) or messaging available via WAP.</p> <p>Ex. 1003, ¶ 228</p>
69.	<p>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.</p> <p>540 Petition, p. 67</p>	<p>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.</p> <p>Ex. 1003, ¶ 229</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
70.	<p>Also, use of WAP teaches or at least suggests that selection of a specific portal from the main PagerWorld screen constitutes selecting a web-based action. WAP is “based on the WWW communication protocols” and “WWW content formats.” (EX-1013, 13.) WAP “enables the supplying of advanced Internet services into digital mobile stations of wireless communication networks.” (EX-1020, 6:63-65.) The WAP proxy “allows content and applications to be hosted on standard WWW servers.” (EX-1013, 14.) For example, when a user of a WAP enabled terminal enters a URL, the WAP-enabled terminal transmits a wireless Internet service request to the WAP gateway server. (See, e.g., Park, 1:66-2:4.)</p> <p>540 Petition, pp. 67-68</p>	<p>Use of WAP teaches or at least suggests that selection of a specific portal from the main PagerWorld screen constitutes selecting a web-based action. WAP is “based on the WWW communication protocols” and “WWW content formats.” (WAP Architecture, 13.) WAP “enables the supplying of advanced Internet services into digital mobile stations of wireless communication networks.” (Salmi, 6:63-65.) The WAP proxy “allows content and applications to be hosted on standard WWW servers.” (WAP Architecture, 14.) For example, when a user of a WAP-enabled terminal enters a URL, the WAP-enabled terminal transmits a wireless Internet service request to the WAP gateway server. (See, e.g., Park, 1:66-2:4.)</p> <p>Ex. 1003, ¶ 231</p>
71.	<p>The WAP gateway may respond to the request if hosting the request web page or may convert the request into an HTTP request for a server on the Internet. (See, e.g., Park, 2:5-10.) The Internet web server responds and the WAP gateway converts the HTTP response into a WAP response for transmission to the WAP-enabled terminal. (See, e.g., Park, 2:15-25.)</p> <p>540 Petition, p. 68</p>	<p>The WAP gateway may respond to the request if hosting the request web page or may convert the request into an HTTP request for a server on the Internet. (See, e.g., Park, 2:5-10.) The Internet web server responds and the WAP gateway converts the HTTP response into a WAP response for transmission to the WAP-enabled terminal. (See, e.g., Park, 2:15-25.)</p> <p>Ex. 1003, ¶ 264</p>
72.	<p>Thus, where PagerWorld is implementing in a WAP environment, a POSITA would understand that selecting a specific portal from the</p>	<p>Thus, where PagerWorld is implemented in a WAP environment, a POSITA would understand that selecting a specific portal from the</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>main PagerWorld screen constitutes a web-based activity.</p> <p>540 Petition, p. 68</p>	<p>main PagerWorld screen constitutes a web-based activity.</p> <p>Ex. 1003, ¶ 231</p>
73.	<p>An exemplary MUD game described by Eck 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 via a WAP protocol. PagerWorld includes client software in the portable game machine (client program) and corresponding software in the server (server program). (See EX-1008, 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>mobile information channel</i>” under any of the proposed constructions in the MDT-Meta-Litigation or the Meta-MDT-IPR. For example PagerWorld is “a medium for transferring information that allows mobile device users to author content” under the construction proposed by Patent Owner in the MDT-Meta-Litigation and by Meta in the Meta-MDT-IPR.</p> <p>540 Petition, p. 69</p>	<p>An exemplary MUD game described by Eck is “PagerWorld, a virtual community for the network of all users having pager cartridges.” (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 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 “mobile information channel” under any of the proposed constructions in the MDT-Meta-Litigation or the Meta-MDT-IPR. For example PagerWorld is “a medium for transferring information that allows mobile device users to author content” under the construction proposed by Patent Owner in the MDT-Meta-Litigation and by Meta in the Meta-MDT-IPR.</p> <p>Ex. 1003, ¶ 235</p>
74.	<p>A variety of content can be shared amongst a “first user” and “one or</p>	<p>A variety of content can be shared amongst a first user and one or more</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>more additional users” in PagerWorld including messages, photos, and sound clips.</p> <p>540 Petition, p. 70</p>	<p>additional users in PagerWorld including messages, photos, and sound clips.</p> <p>Ex. 1003, ¶ 236</p>
75.	<p>Another way photos can be shared amongst a “first user and one or more additional users” in PagerWorld occurs when a user personalizes their persona character. Players in PagerWorld are represented “by a ‘persona character’ and it is this character that all other PagerWorld players will see.” (EX-1008, 10:23-25.)</p> <p>540 Petition, p. 71</p>	<p>Another way photos can be shared amongst a first user and one or more additional users in PagerWorld occurs when a user personalizes their persona character. Players in PagerWorld are represented “by a ‘persona character’ and it is this character that all other PagerWorld players will see.” (Eck, 10:23-25.)</p> <p>Ex. 1003, ¶ 239</p>
76.	<p>The user’s address book is a list of “other users by their handles,” and next to the user’s handle “is the persona character of the other user as it appeared on his/her last communication with the user.” (EX-1008, 12:16-19.)</p> <p>540 Petition, p. 71</p>	<p>The user’s address book is a list of “other users by their handles,” and next to the user’s handle “is the persona character of the other user as it appeared on his/her last communication with the user.” (Eck, 12:16-19.)</p> <p>Ex. 1003, ¶ 243</p>
77.	<p>The users may be “provided with the capability of including in their profiles customized faces (images) made up of various user-selected features” or “digital images of their own faces” to “enhance the ‘persona’ of the user.” (EX-1007, 7:20-27.) For example, in Eck, the “persona character” can be “customize[d] ... using image data obtained with a digital camera cartridge.” (EX-1008, 12:38-40.) The persona character, is stored, in the Pelkey-Eck combination, at the network server. In addition to</p>	<p>The users may be “provided with the capability of including in their profiles customized faces (images) made up of various user-selected features” or “digital images of their own faces” to “enhance the ‘persona’ of the user.” (Pelkey, 7:20-27.) For example, in Eck, the “persona character” can be “customize[d] ... using image data obtained with a digital camera cartridge.” (Eck, 12:38-40.) The persona character is stored, in the Pelkey-Eck combination at the network server. In addition to</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>including the persona character in messages, in the PagerWorld game universe, players “walk their persona characters in a world featuring attractions and sideshows.” (EX-1008, 10:38-40, 13:29-31 (during game play “the player may control his/her persona character to fight, flee or use some item in the player’s possession”).) (EX-1003, ¶240.)</p> <p>540 Petition, pp. 71-72</p>	<p>including the persona character in messages, in the PagerWorld game universe, players “walk their persona characters in a world featuring attractions and sideshows.” (Eck, 10:38-40, 13:29-31 (during game play “the player may control his/her persona character to fight, flee or use some item in the player’s possession”).)</p> <p>Ex. 1003, ¶ 240</p>
78.	<p>In the example above, the “<i>first web-based interface</i>” is the PagerWorld main screen. The main screen permits users to activate the content sharing features in PagerWorld (e.g., messages, customizing persona using photos) when the user selects such features from the mains screen. (EX-1008, 10:32-40 (“Players read and send messages from the main PagerWorld screen.”).) The Pelkey-Eck combination thus discloses “<i>the first web-based interface being configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users.</i>” (EX-1003, ¶¶234-241.)</p> <p>540 Petition, p. 72</p>	<p>In the example above, the “<i>first web-based interface</i>” is the PagerWorld main screen. The main screen permits users to activate the content sharing features in PagerWorld (e.g., messages, customizing persona using photos) when the user selects such features from the mains screen. The Pelkey-Eck combination thus discloses “<i>the first web-based interface being configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users.</i>”</p> <p>Ex. 1003, ¶ 241</p>
79.	<p>In this address book, content, such as photos, are integrated into a web-based shared information channel (PagerWorld) through, e.g., customization of a user’s persona, and</p>	<p>In the address book example in the Pelkey-Eck combination, content, such as photos, are integrated into a web-based shared information channel (PagerWorld) through, e.g., customization of a user’s persona, and</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>such images are made accessible to users in an address book.</p> <p>540 Petition, p. 73</p>	<p>such images are made accessible to users in an address book.</p> <p>Ex. 1003, ¶ 247</p>
80.	<p>Another example of a “second web-based interface” is a File Cabinet which “ displays a list of saved messages.” (EX-1008, 11:66-12:3) as shown in Figure 8E. The sent and received message and sender persona (e.g., when customized using a photo) are examples of shared content that is available in the file cabinet to users.</p> <p>540 Petition, p. 73</p>	<p>In addition, as noted above, PagerWorld users have access to a File Cabinet which “ displays a list of saved messages. In some implementations, the saved messages may be organized by topic” (Eck, 11:66-12:3) as shown in Figure 8E. The sent and received message and sender persona (e.g., when customized using a photo) are examples of shared content that is available in the file cabinet to users.</p> <p>Ex. 1003, ¶ 244</p>
81.	<p>And as noted above, the file cabinet provides a user access to messages sent by another user which may contain photos or sound clips. Sharing messages, photos or sound clips “<i>facilitate[s] interaction between the first user and the one or more additional users.</i>” (EX-1003, ¶¶246-247.)</p> <p>540 Petition, pp. 74-75</p>	<p>And as noted above, the file cabinet provides a user access to messages sent by another user which may or may not contain photos or sound clips. Sharing messages, photos or sound clips “<i>facilitate[s] interaction between the first user and the one or more additional users.</i>”</p> <p>Ex. 1003, ¶ 247</p>
82.	<p>While in the Message Center (e.g., Figure 8C (below-left)), a user activates the quill icon 236 to navigate to the “Compose Message screen 290” of Figure 8F. (EX-1008, 11:37-38.) The “send to” window 292 “allows the user to choose to whom the message will be sent.” (EX-1008, 12:10-11.) A user can opt to send the message to an individual or a pre-defined group (e.g.,</p>	<p>While in the Message Center (e.g., screen illustrated in Figure 8C (below-left)), a user activates the quill icon 236 to navigate to the “Compose Message screen 290” of Figure 8F. (Eck, 11:37-38.) The “send to” window 292 “allows the user to choose to whom the message will be sent.” (Eck, 12:10-11.) A user can opt to send the message to an individual,</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>a buddy list), (EX-1008, 20:9), or as a broadcast to all messaging devices in PagerWorld, (EX-1008, 20:8, 9:46-49.). For group messaging, Pelkey teaches that the messaging service client “allows the user to create a list (‘buddy list’) of other users (‘buddies’) with whom he/she wishes to remain in contact.” (EX-1007, 7:33-35.) The buddy list “is stored by the network server.” (EX-1007, 7:35-36.) (EX-1003, ¶249.)</p> <p>540 Petition, p. 75</p>	<p>to a pre-defined group (e.g., a buddy list), (Eck, 20:9), or as a broadcast to all messaging devices in PagerWorld, (Eck, 20:8, 9:46-49 (“messages from the paging system operator 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”). For group messaging, Pelkey teaches that the messaging service client “allows the user to create a list (‘buddy list’) of other users (‘buddies’) with whom he/she wishes to remain in contact.” (Pelkey, 7:33-35.) The buddy list “is stored by the network server.” (Pelkey, 7:35-36.)</p> <p>Ex. 1003, ¶ 249</p>
83.	<p>As noted above (§VI.B.4), Pelkey does not disclose details of the wireless network that provides wireless messaging from the game system to the server.</p> <p>540 Petition, p. 76</p>	<p>As noted above, Pelkey does not disclose details of the wireless network used to provide wireless messaging from the game system to the server.</p> <p>Ex. 1003, ¶ 252</p>
84.	<p>A POSITA would have been motivated to use GSM or WAP for the messaging service, rather than paging, to obtain the enhanced features of those protocols. Based on Eck’ 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 via WAP.</p> <p>540 Petition, pp. 76-77</p>	<p>A POSITA would have been motivated to use either GSM 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 network (e.g., SMS) or messaging available via WAP.</p> <p>Ex. 1003, ¶ 252</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
85.	The Pelkey-Eck combination thus discloses a network that allows a device to communicate wirelessly over a network under Meta's proposed construction in the Meta-MDT-IPR. (EX-1003, ¶¶248-254.)  540 Petition, p. 77	The Pelkey-Eck combination thus discloses a network that allows a device to communicate wirelessly over a network under Meta's proposed construction in the Meta-MDT-IPR.  Ex. 1003, ¶ 255
86.	GSM-SMS is implementable over a "wireless network" and as shown in Figure 1 of Pelkey, the GSM network is a network separate from the Internet that facilitates connection to the internet by a mobile device as required by Patent Owner's proposed construction in the Meta-MDT-IPR. (EX-1003, ¶253.)  540 Petition, p. 77	GSM-SMS is implementable over a "wireless network" and as shown in my modified Figure 1 of Pelkey, the GSM network is a network separate from the Internet that facilitates connection to the internet by a mobile device as required by Patent Owner's proposed construction in the Meta-MDT-IPR.  Ex. 1003, ¶ 253
87.	Messages are read, composed, and sent from PagerWorld's "Message Center." (EX-1008, 11:27-29.) "Message Center" includes an "Address Book" that "provides a listing of other users by their handles" and "the persona character of the other user as it appeared on his/her last communication with the user." (EX-1008, 11:32-35; see also EX-1008, 12:16-19.) "Messages from the paging system operator 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.)  540 Petition, p. 77	Messages are read, composed and sent from the "Message Center" inside PagerWorld. (Eck, 11:27-29.) "Message Center" includes an "Address Book" that "provides a listing of other users by their handles" and "the persona character of the other user as it appeared on his/her last communication with the user." (Eck, 11:32-35; see Eck 12:16-19.) "Messages from the paging system operator 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.)  Ex. 1003, ¶ 208
88.	Eck explains that a cartridge including messaging functionality (e.g., a pager	Eck explains that a cartridge including messaging functionality (e.g., a pager

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>cartridge) “is provided for use with a game machine having a game program executing processing system including a microprocessor.” (EX-1008, 1:61-63.) 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>540 Petition, pp. 78-79</p>	<p>cartridge) “is provided for use with a game machine having a game program executing processing system including a microprocessor.” (Eck, 1:61-63.) 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, ¶ 259</p>
89.	<p>The inserted messaging cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (<i>See, e.g.</i>, 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.) The game machine 10 then “automatically activates a display of messages on the display thereof in accordance with the operating</p>	<p>The inserted messaging cartridge includes ROM 42 which “contain[s] instructions” pertaining to, e.g., the messaging function. (<i>See, e.g.</i>, 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 thereof in accordance with the operating</p>

	<b>'540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	software stored in the memory of the pager.” (EX-1008, 22:10-14.)  540 Petition, p. 79	software stored in the memory of the pager.” (Eck, 22:10-14.)  Ex. 1003, ¶ 260
90.	Use of WAP teaches or at least suggests that selection of a specific portal from the main PagerWorld screen constitutes selecting a “ <i>first uniform resource locator</i> ” and a “ <i>second uniform resource locator</i> .”  540 Petition, p. 80	Use of WAP teaches or at least suggests that selection of a specific portal from the main PagerWorld screen constitutes selecting a “ <i>first uniform resource locator</i> ” and a “ <i>second uniform resource locator</i> .”  Ex. 1003, ¶ 264
91.	As discussed above in §VI.B.4, where PagerWorld is implemented in a WAP environment, a POSITA would understand that selecting a specific portal from the main PagerWorld screen constitutes selecting a “ <i>first uniform resource locator</i> ” and a “ <i>second uniform resource locator</i> .” (EX-1003, ¶¶263-264.)  540 Petition, p. 80	Thus, where PagerWorld is implemented in a WAP environment, a POSITA would understand that selecting a specific portal from the main PagerWorld screen constitutes selecting a “ <i>first uniform resource locator</i> ” and a “ <i>second uniform resource locator</i> .”  Ex. 1003, ¶ 264
92.	The portable game machine having an inserted messaging cartridge and an inserted camera cartridge “ <i>captur[es] content</i> .” Eck’s digital camera cartridge “is usable to <i>capture images</i> , which images may then be transmitted to others via an operation using” the messaging cartridge into which the camera cartridge is inserted. (EX-1008, 23:38-41; see also EX-1008, 2:15-18.) The “digital camera cartridge” may also be “configured to <b>capture sounds</b> [and] these captured sounds may be used by game machine 10 and/or transmitted as a message	The portable game machine having an inserted messaging cartridge and an inserted camera cartridge “ <i>captur[es] content</i> .” Eck’s digital camera cartridge “is usable to <b>capture images</b> , which images may then be transmitted to others via an operation using” the messaging cartridge into which the camera cartridge is inserted. (Eck, 23:38-41; see also Eck, 2:15-18 (“a game machine is provided with ... digital camera circuitry configured to capture an image”).) The “digital camera cartridge” may also be “configured to <b>capture sounds</b> [and] these captured sounds may be used by

	<b>‘540 Petition</b>	<b>Houh Decl. (Ex. 1003)</b>
	<p>using pager cartridge.” (EX-1008, 9:20-23.)</p> <p>540 Petition, pp. 81-82</p>	<p>game machine 10 and/or transmitted as a message using pager cartridge.” (Eck, 9:20-23.)</p> <p>Ex. 1003, ¶ 268</p>
93.	<p>Pelkey likewise discloses that a digital camera can be attached to its portable game machine. (EX-1007, 7:26-31.) Indeed, both Pelkey and Eck incorporate by reference the same Nintendo patent disclosure describing the camera in detail. (EX-1007, 7:26-31 <i>citing</i> U.S. Patent 6,435,969; EX-1008, 23:41-48 <i>citing</i> Ser. No. 09/430,169).</p> <p>540 Petition, p. 82</p>	<p>Pelkey likewise discloses that a digital camera can be attached to its portable game machine. (Pelkey, 7:26-31.) Indeed, both Pelkey and Eck incorporate by reference the same Nintendo patent disclosure describing the camera in detail. (Pelkey, 7:26-31 <i>citing</i> U.S. Patent 6,435,969; Eck, 23:41-48 <i>citing</i> Ser. No. 09/430,169.)</p> <p>Ex. 1003, ¶ 270</p>
94.	<p>The Pelkey-Eck combination also discloses “<i>wherein the second web-based interface provides said one or more additional users with access to said at least one uploaded information item in accordance with accessibility rules established by the first user via the first web-based interface.</i>” Both Eck (persona) and Pelkey (user profile) disclose ways a user presents themselves to other messaging users. (EX-1008, 11:53-57, 12:36-38.) (EX-1007, 7:8-30.) Pelkey discloses settings that permit a user to “determine whether (1) everyone can see his/her user profile, (2) only buddies can see his/her user profile, (3) or no one can see his/her user profile.” (EX-1007, 8:51-57.) Thus, in the Pelkey-Eck combination, a user would only be given access to a fellow user’s persona (which may be</p>	<p>The Pelkey-Eck combination also discloses “<i>wherein the second web-based interface provides said one or more additional users with access to said at least one uploaded information item in accordance with accessibility rules established by the first user via the first web-based interface.</i>” Both Eck (persona) and Pelkey (user profile) disclose ways a user presents themselves to other messaging users. (Eck, 11:53-57, 12:36-38.) (Pelkey, 7:8-30.) Pelkey discloses settings that permit a user to “determine whether (1) everyone can see his/her user profile, (2) only buddies can see his/her user profile, (3) or no one can see his/her user profile.” (Pelkey, 8:51-57.) Thus, in the Pelkey-Eck combination, a user would only be given access to a fellow user’s persona (which may be customized using a</p>

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	<p>customized using a photo taken with the portable game machine) if such access has been given by a first user. (EX-1003, ¶273.)</p> <p>540 Petition, p. 83</p>	<p>photo taken with the portable game machine) if such access has been given by a first user.</p> <p>Ex. 1003, ¶ 273</p>
95.	<p>The Pelke-Eck combination discloses “<i>wherein the one or more additional users comprise individuals that with the first user and by mutual consent collectively comprise a group of members that have access to at least a portion of said shared content via the second web-based interface.</i>” As noted above in §VI.B.6, an exemplary “<i>second web-based interface</i>” is an address book or filing cabinet in Eck. And as noted above, the Pelkey-Eck combination teaches the ability of a user to opt-out of a “buddy list” or address book (which, according to Eck, may contain photos used to customize persona images). (EX-1007, 8:35-45.) (EX-1003, ¶274.)</p> <p>540 Petition, pp. 83-84</p>	<p>The Pelke-Eck combination discloses “[t]he method of claim 1 wherein the one or more additional users comprise individuals that with the first user and by mutual consent collectively comprise a group of members that have access to at least a portion of said shared content via the second web-based interface.” As noted above, an exemplary “second web-based interface” is an address book or filing cabinet in Eck. (Supra §V.B.1.d.) And as noted above, the combination of Pelkey and Eck teaches the ability of a user to opt-out of a “buddy list” or address book (which, according to Eck, may contain photos used to customize persona images). (Pelkey, 8:35-45.)</p> <p>Ex. 1003, ¶ 274</p>
96.	<p>In addition, Eck discloses that the pager cartridge can “receive messages that turn off (disable) the cartridge and/or prohibit or limit access to certain features such as PagerWorld. Such messages may be sent for example, to problem users.” (EX-1008, 19:53-56.) A user shows their lack of consent to sharing a message or persona information, for example, when they report a problem user and</p>	<p>In addition, Eck discloses that the pager cartridge can “receive messages that turn off (disable) the cartridge and/or prohibit or limit access to certain features such as PagerWorld. Such messages may be sent for example, to problem users.” (Eck, 19:53-56.) A user shows their lack of consent to sharing a message or persona information, for example, when they report a problem user and their access to PagerWorld is shut off.</p>

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	<p>their access to PagerWorld is shut off. (EX-1003, ¶275.)</p> <p>540 Petition, p. 84</p>	<p>Ex. 1003, ¶ 275</p>
97.	<p>Figure 1B of Pelkey illustrates a network “in which the messaging service described herein may be implemented.” (EX-1007, 2:58-60.) The network “includes game systems 10 connected via communications circuits (e.g., modems, network interfaces, etc.) to a wide area network.” (EX-1007, 2:60-62.)</p> <p>540 Petition, p. 85</p>	<p>Figure 1B of Pelkey illustrates a network “in which the messaging service described herein may be implemented.” (Pelkey, 2:58-60.) The network “includes game systems 10 connected via communications circuits (e.g., modems, network interfaces, etc.) to a wide area network.” (Pelkey, 2:60-62.)</p> <p>Ex. 1003, ¶ 278</p>
98.	<p>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.” (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 “an antenna 130 connected to a conventional radio section 132 for receiving and sending messages.” (EX-1008, 6:34-36; see also EX-1008, 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 interface</i>.” (EX-1003, ¶277-279.)</p> <p>540 Petition, p. 86</p>	<p>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; see also Eck, 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 interface</i>.”</p> <p>Ex. 1003, ¶ 279</p>

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99.	<p>The Pelkey-Eck combination discloses “<i>maintaining a contact list for the given mobile information channel, the contact list comprising the one or more additional users.</i>” For example, Message Center includes an “Address Book” that “provides a listing of other users by their handles” and “the persona character of the other user as it appeared on his/her last communication with the user.” (EX-1008, 11:32-35; see EX-1008, 12:16-19.) (EX-1003, ¶280.)</p> <p>540 Petition, p. 86</p>	<p>The combination of Pelkey and Eck discloses “[t]he method of claim 1 further comprising maintaining a contact list for the given mobile information channel, the contact list comprising the one or more additional users.” For example, “Message Center” includes an “Address Book” that “provides a listing of other users by their handles” and “the persona character of the other user as it appeared on his/her last communication with the user.” (Eck, 11:32-35; see Eck, 12:16-19.)</p> <p>Ex. 1003, ¶ 280</p>
100.	<p>As with Forums in Ground 1, the Pelkey-Eck combination discloses “<i>wherein the messaging content comprises personalized messaging content for the first user</i>” because a user can personalize the content included in the message to another user. “Compose Message screen 290 is shown in FIG. 8F and permits a user to construct a message by choosing letters or by selecting symbols from his/her dictionary of lingo symbols using icons 222 and 224.” (EX-1008, 12:5-8.) These are each ways that the “messaging content” can “<i>comprise[] personalized messaging content for the first user.</i>” (EX-1003, ¶¶283-284.)</p> <p>540 Petition, p. 87</p>	<p>As with Forums in Ground 1, the Pelkey-Eck combination discloses “<i>wherein the messaging content comprises personalized messaging content for the first user</i>” because a user can personalize the content included in the message to another user. “Compose Message screen 290 is shown in FIG. 8F and permits a user to construct a message by choosing letters or by selecting symbols from his/her dictionary of lingo symbols using icons 222 and 224.” (EX-1008, 12:5-8.) These are each ways that the “messaging content” can “<i>comprise[] personalized messaging content for the first user.</i>”</p> <p>Ex. 1003, ¶ 283</p>
101.	<p>The Pelkey-Eck combination discloses “<i>wherein the messaging content comprises ... an image</i>” [23]. In Eck, “[t]he system also enables</p>	<p>The Pelkey-Eck combination discloses “[t]he method of claim 1 wherein the messaging content comprises ... an image.” In Eck, “[t]he system also</p>

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	<p>bidirectional 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)</p> <p>540 Petition, p. 88</p>	<p>enables bidirectional 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.)</p> <p>Ex. 1003, ¶ 285</p>
102.	<p>The Pelkey-Eck combination discloses “<i>wherein at least a portion of the shared content is authored by the first user.</i>” (EX-1003, ¶287.) As noted above in §VI.B.5, while in the Message Center (e.g., screen illustrated in Figure 8C), a user activates the quill icon 236 to navigate to the “Compose Message screen 290” of Figure 8F. (EX-1008, 11:37-38, 12:10-11, 20:8-9.)</p> <p>540 Petition, p. 89</p>	<p>The Pelkey-Eck combination discloses “[t]he method of claim 1 wherein at least a portion of the shared content is authored by the first user.” As noted above, while in the Message Center (e.g., screen illustrated in Figure 8C (below-left)), a user activates the quill icon 236 to navigate to the “Compose Message screen 290” of Figure 8F. (Eck, 11:37-38.)</p> <p>Ex. 1003, ¶ 287</p>