

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BRANCH BANKING AND TRUST COMPANY
Petitioner

v.

EMG Technology, LLC
Patent Owner

U.S. Patent No. 7,441,196

Issue Date: October 21, 2008

Title: APPARATUS AND METHOD OF MANIPULATING A REGION ON A
WIRELESS DEVICE SCREEN FOR VIEWING, ZOOMING AND SCROLLING
INTERNET CONTENT

Covered Business Method Patent Review No. Unassigned

DECLARATION OF ROBERT J. SHERWOOD

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A.	The prior art discloses or suggests “[a] method of navigating the Internet”, “[a] method”, and “[a] machine readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.	45

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- B. The prior art discloses or suggests “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site,” and “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface,” and “displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 46
- C. The prior art discloses or suggests “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a/the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 50
- D. The prior art discloses or suggests “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells,” “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells,” and “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the simplified navigation interface displayed in a form of a two-dimensional layer of cells from the plurality of layers and the plurality of cells,” and “the first content displayed in one or more of the plurality of cells,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 52
- E. The prior art discloses or suggests that “the two-dimensional layer in a form of a navigation matrix,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 56
- F. The prior art discloses or suggests that “each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input,” and “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 58
- G. The prior art discloses or suggests that “the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,” and “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 60
- H. The prior art discloses or suggests that “navigation options to change between layers of the simplified navigation interface from general to more

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specific in each deeper layer” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 63

I. The prior art discloses or suggests that “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 65

J. The prior art discloses or suggests that “receiving a user selection of one of the navigation options” and “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 71

K. The prior art discloses or suggests that “forwarding the selected navigation option across the internet to a server providing the simplified navigation interface” and “forwarding the first input across the internet to a server providing the simplified navigation interface;” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 74

L. The prior art discloses or suggests that “receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option” and “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 77

M. The prior art discloses or suggests that “manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content” and “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent. 79

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I. INTRODUCTION AND BACKGROUND

I, Robert J. Sherwood, hereby declare as follows.

1. I am over the age of eighteen (18) and otherwise competent to make this declaration.

2. I have been retained as an expert witness on behalf of Branch Banking And Trust Company for a Petition for covered business method patent review.

3. I am being compensated for my time in connection with this covered business method review at my standard consulting rate, which is \$450 per hour. I understand that the petition for covered business review involves U.S. Patent No. 7,441,196 (“the ’196 patent”, Ex. 1001), which resulted from U.S. Application No. 11/373,324 (“the ’324 application”), filed on March 13, 2006, naming Elliot A. Gottfurcht, Grant E. Gottfurcht, and Albert-Michael C. Long as the inventors. The ’196 patent issued on October 21, 2008, from the ’324 application. I further understand that, according to USPTO records, the ’196 patent is currently assigned to EMG Technology, LLC (“EMG” or “Patent Owner”).

4. I have been asked to provide my opinions on the following matters: (1) the field of art pertinent to the ’196 Patent; (2) the level of ordinary skill in that field of art as of approximately the filing date of the application that yielded the ’196 Patent; (3) how a person having such ordinary skill in the art of the ’196 Patent would understand certain terms that are used in the claims of that patent;

(4) how a person of ordinary skill in the art of the '196 Patent would understand the contents of various patents and other art that was publicly available prior to the priority date of the '196 Patent; and (5) whether any of those documents or prior art devices—alone or in combination with each other and/or the general knowledge of a person of ordinary skill in the art—disclose each and every element of any of Claims 1-76 of the '196 Patent. I was also asked to consider whether the claims of the '196 Patent would be obvious to one of ordinary skill in the art in light of any combination of the references that I considered.

5. I understand that a patent claim must be nonobvious to be valid. I understand obviousness is determined from the perspective of one of ordinary skill in the art at the time of the invention.

6. I understand that a patent claim is obvious if, although not identically disclosed or described, any differences between the patent's subject matter and the prior art are such that the subject matter as a whole would have been obvious to a skilled artisan at the time the invention was made. I understand that this determination is made after weighing the following factors: (1) the level of ordinary skill in the pertinent art, (2) the scope and content of the prior art, (3) the differences between the prior art as a whole and the claim at issue, and (4) as appropriate, secondary considerations of non-obviousness.

7. I understand that the knowledge and understanding of a person of ordinary skill in the art provides a reference point from which the prior art and claimed invention should be viewed. This reference point prevents one from using his or her own insight or hindsight in deciding whether a claim is obvious, but I further understand that if a person of ordinary skill in the art can implement the claimed invention as a predictable variation of a known product, then the claim may be rendered obvious. I further understand that a person of ordinary skill in the art is presumed to have knowledge of the relevant prior art at the time of the claimed invention, and the scope of the prior art comprises any prior art that was reasonably pertinent to the particular problems the inventor faced.

8. I understand that an obviousness determination can be made from a single reference or from a combination of multiple prior art references. I understand that a proper obviousness analysis as to two or more references generally requires a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements of multiple prior art references in the way the claimed new invention does. I understand that the prior art references themselves may provide a suggestion, motivation, or reason to combine, but other times the nexus linking two or more prior art references may be simple common sense. I further understand that obviousness analysis recognizes that market demand, rather than scientific literature, often drives innovation, and that a

motivation to combine references may be supplied by the direction of the marketplace.

9. I understand that a particular combination may be proven obvious merely by showing that it was obvious to try the combination. For example, when there is a design need or market pressure to solve a problem and there are a finite number of identified, predictable solutions, a person of ordinary skill has good reason to pursue the known options within his or her technical grasp because the result is likely the product not of innovation but of ordinary skill and common sense.

10. I further understand that a proper obviousness analysis focuses on what was known or obvious to a person of ordinary skill in the art, not just to the patentee. Accordingly, I understand that any need or problem known in the field of endeavor at the time of invention and addressed by the patent can provide a reason for combining the elements in the manner claimed.

11. In sum, my understanding is that prior art teachings are properly combined where a person of ordinary skill in the art having the understanding and knowledge reflected in the prior art and motivated by the general problem facing the inventor, would have been led to make the combination of elements recited in the claims. Under this analysis, the prior art references themselves, or any need or problem known in the field of endeavor at the time of the invention, can provide a

reason for combining the elements of multiple prior art references in the claimed manner.

12. I understand that at least the following rationales may support a finding of obviousness:

- i) Combining prior art elements according to known methods to yield predictable results;
- ii) Simple substitution of one known element for another to obtain predictable results;
- iii) Use of a known technique to improve similar devices (methods, or products) in the same way;
- iv) Applying a known technique to a known device (method, or product) ready for improvement to yield predictable results;
- v) “Obvious to try”—choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success;
- vi) A predictable variation of work in the same or a different field of endeavor if a person of ordinary skill would be able to implement the variation;
- vii) If, at the time of the alleged invention, there existed a known problem for which there was an obvious solution encompassed by the patent’s claims
- viii) Known work in one field of endeavor may prompt variations of it for use in either the same field or a different one based on design incentives or other market forces if the variations would have been predictable to one of ordinary skill in the art; and

ix) Some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention.

13. I have been informed and understand that secondary considerations of non-obviousness may include: (1) whether the invention proceeded in a direction contrary to accepted wisdom in the field; (2) whether there was a long felt but unresolved need in the art that was satisfied by the invention; (3) whether others had tried but failed to make the invention; (4) whether others copied the invention; (5) whether the invention achieved unexpected results; (6) whether the invention was praised by others; (7) whether others have taken licenses to use the invention; (8) whether experts or those skilled in the art at the making of the invention expressed surprise or disbelief regarding the invention; (9) whether products incorporating the invention have achieved commercial success that is attributable to the invention; and (10) whether or not others having ordinary skill in the field independently made the claimed invention at about the same time the inventor made the invention.

14. I also understand that for any such secondary consideration to be relevant, the patentee must establish a connection or nexus between the secondary consideration and the claimed invention. For example, commercial success is relevant to obviousness only if the success of the product is related to a feature of the patent claims. If, however, commercial success is due to advertising,

promotion, salesmanship or the like, or is due to features of the product other than the claimed invention, then any commercial success should not be considered an indication of non-obviousness. My opinions expressed in this Declaration rely to a great extent on my own personal knowledge and recollection. However, to the extent I considered specific documents or data in formulating the opinions expressed in this Declaration, all such items are expressly referred to in this Declaration. This includes, but is not limited to, the '196 Patent and its prosecution history.

15. In preparing this Declaration, I have reviewed the '196 patent and considered each of the documents cited herein, in light of general knowledge in the art. In formulating my opinions, I have relied upon my experience in the relevant art. In formulating my opinions, I have also considered the viewpoint of a person of ordinary skill in the art prior to November 15, 1999 and March 3, 2000, as defined below in Section IV.B. I am familiar with the technology at issue as of the earliest possible priority date of the '196 patent, November 15, 1999, and as of the entitled priority date of the '196 patent, March 3, 2000. I am also familiar with the level of a person of ordinary skill in the art with respect to the technology at issue as of the earliest possible priority date of the '196 patent, November 15, 1999, and as the entitled priority date of the '196 patent, March 3, 2000.

16. I reserve the right to supplement this Declaration.

A. Educational Background

17. I earned an M.S. from the University of Kansas in 1966 and a M.B.A. in 1972 with a major in operations research from California State College, Hayward.

B. Career History

18. I am an expert in the field of Internet browser technology, and I have been an expert in this field since prior to 1999. Throughout the remainder of this declaration, I will refer to the field of Internet browser technology as the relevant field or the relevant art. In formulating my opinions, I have relied upon my training, knowledge, and experience in the relevant art. A copy of my current *curriculum vitae* is provided as Appendix 1.

19. As an expert in the field of Internet browser technology since prior to 1999, I am qualified to provide an opinion as to what a person of ordinary skill in the art would have understood, known, or concluded as of 1999. Since 1970, I have accumulated significant training and experience in the computer industry. I have extensive knowledge and experience relating to techniques and reasoning used in the field of Internet browser technology.

20. Currently, I am president of SmartText Corporation. SmartText develops software and provides consulting services to private and Fortune 500 public corporations, law firms, venture capital firms, and government institutions. I

personally wrote HTML for more than 400 webpages of commercial websites prior to the period when templates were used for webpage development.

21. I have worked in the computer industry since 1970. I have been professionally involved with the Internet, modems, and file servers for more than 35 years. To my knowledge, I was the first professional to access a mainframe computer in Mountain View, CA from an office in London, England, with an acoustic coupler, a standard telephone line via transatlantic cable, and a standard telephone handset plugged into the back of a remote portable computer terminal to download computer files from computer file servers. Additionally, my experience includes electronic bulletin boards, dial-up adapters, 56K modems, HTML, XML, browsers, website development, ad placement, fat clients, thin clients, mainframe computers and laptops.

22. I also have extensive experience in regard to computer hardware. For example, I have purchased computer parts from around the world and have personally designed, assembled and sold more than 200 customized computer systems to defense contractors, law firms and other commercial businesses in Silicon Valley. In the course of my career, I also have disassembled several computers and examined the details of random access memory, display technologies, operating systems, and file storage. Furthermore, I have been an

early adopter, user and developer of computer hardware and software for Apple and Windows-based computers.

23. During the period 1967 to 1974, I was the 28th employee at Envirotech Corporation, a Silicon Valley company that grew to more than 5,000 employees in less than 5 years. One of my first assignments at Envirotech Corporation was to develop an on-line computer model that integrated complex engineering product designs from more than 30 different companies. I designed and directed the computer program development of more than 50 products into a single system that incorporated more than 2,700 computer-aided design variables using the FORTRAN programming language.

24. From 1975 to 1982, I was also president and co-founder of EDC, Inc., a company backed by Kleiner Perkins, a leading San Francisco Bay Area venture capital firm. The company licensed products from European countries, embedded computer technology in these products, and manufactured and sold them in North America. The company was highlighted in Business Week and Fortune Magazine and was selected as one of the ten most innovative companies in California. After that company was acquired, I took a year sabbatical and learned additional software development skills.

25. In 1986, I co-founded RasterOps, a company that developed the hardware and software that enables display monitors to display 16.7 million colors.

Because of the wide adoption of this technology, when people watch television, or view truecolor images on a computer screen, it is likely that the software and hardware used to do that is a derivative of the technology RasterOps developed. I was a certified Apple software developer and subject to extensive security checks for development projects.

26. Prior to the introduction of programs such as PayPal, I conceived, designed and developed electronic commerce systems for tracking software sales at multiple websites with secure servers for credit card acceptance and a confidential administrative Declarationing system for secure sales transaction Declarationing to individual electronic dealers. This included implementation of the complete financial transaction from card insertion, authentication, authorization, batching, clearing, chargebacks, and tests for fraudulent use. I also conceived and managed the development of extensive Java-scripted interactive Internet-based software sales commerce websites, including the development of proprietary video files with embedded video readers and decompression algorithms located on websites and downloaded for individual use.

27. From 1991 to 1997, I was president of The Center for Business Innovation, Inc. and president of a subsidiary, Capital for Entrepreneurs, Inc., a venture capital firm financed by the Ewing Marion Kauffman Foundation. I was a senior advisor or board member for approximately 20 technology firms. These

firms were developing wireless telecommunications products, analytical medical devices, educational software training programs, and Internet-based networking services.

28. From 1994 to 2000 I was also Distinguished Lecturer and Professor at the University of Kansas and University of Missouri, where I taught various courses in Entrepreneurship and Strategic Management of Technology.

29. Between 1997 and 2000, I was engaged by the founders of Zap Video to purchase ads from AOL and other on-line portals on a cost per thousand basis, to purchase keywords that included click-throughs to publisher's websites, to use available analytics to analyze visitor traffic and also to assess the ability of the Internet to handle large video and graphic files from servers with low and high bandwidth capabilities. I was one of the early adopters of website commerce applications. In 1997, I purchased more than 30 million ad impressions for a video mail company based in Saratoga, California. Zap produced large-file-size videos that served as sales presentations or business cards to introduce users to new products or introduce customers to the services they could provide.

30. Between 2001 and 2003, I developed subject matter content for the American Management Association for a two-day seminar on Internet advertising and commerce and presented the seminar to more than 2,500 participants from more than 50 different companies. Advertising approaches such as pay per click

and impression based advertising methods were included in the seminar subject matter.

31. From 1997 to 1998, I designed and directed an 18-person programmer development team in the introduction of an on-line method to process large business document files that were manipulated by and eventually supplied to users. The software program was called Kiplinger Home Legal Advisor and was supplied with large video and sound files on a CD, as well as delivered to users by an online version over the Internet. The software program development dealt with the period challenges of delivering large files to users over the Internet at both low and high bandwidths.

32. In 1998, Kansas Governor William Graves appointed me chairman of a four member task force to examine the status of technology development of more than \$100-million of federally sponsored technology research at the University of Kansas, Kansas State University, Pittsburg State University and Wichita State University. As task force chairman and principal author of the final Declaration, I presented the findings to the Governor's representatives and officials of the Kansas State Legislature.

33. Between 2002 and 2006, I was an active user of AdWords, purchasing keywords for ads to be displayed on third party web-publisher properties in the Google content network. Further, I was engaged by organizations such as Ingersol

Rand Corporation, Construction Industry Manufacturer's Association, and the IBM Credit Union to provide consulting assistance with their Internet advertising programs. Between 2003 and 2007, I was an active user of Google AdSense for Content for several websites.

34. In 2009, I hosted approximately 40 one-hour radio programs focused on the Internet. The program was broadcast live over the Internet at www.1510.com and on radio at KCTE AM 1510.

35. I have been active in developing systems for integrating ads with websites for my own software development and deployment, as well as acting as a consultant to other firms. I have evaluated complex algorithms for the real-time selection and placement of ads for both impressions and pay-per-click ad placement on numerous websites.

36. In addition to gaining expertise via my academic training, professional experiences, and accomplishments described above, I have kept abreast of the field of Internet browser technology by reading technical literature, and attending and presenting at seminars. I have reviewed manuscripts submitted by other browser experts relating to Internet browser technology.

37. Furthermore, I have collaborated with or have communicated with many of the industry professionals in the field of Internet browser technology. Additional contributions of mine to the field are set forth in my current *curriculum*

vita. See Appendix 1. Accordingly, I am an expert in the field of Internet browser technology and I have been since prior to 1999.

C. Materials Considered

38. My opinions, as set forth in this Declaration, are based on information that was available to me as of the date of this Declaration. I have reviewed the '196 patent, including its specification and drawings. I also have reviewed the file history of the '196 patent, including the prior art documents identified therein. I further have reviewed each of the prior art references I discuss in this Declaration, the pleadings and court documents submitted by the Parties in the related litigation, deposition testimony, trial testimony, and other documents. I may, if appropriate, cite to these documents as additional support for any of my opinions beyond those expressly cited in this Declaration. I have reviewed at least the following materials in preparing this Declaration:

Exhibit 1001	U.S. Patent No. 7,441,196 ("the '196 patent")
Exhibit 1007	Original Prosecution History of the '196 patent
Exhibit 1008	Ex Parte Reexamination Prosecution History for the '196 patent
Exhibit 1009	U.S. Patent No. 6,660,497, filed November 15, 1999.
Exhibit 1010	EMG Technology Group, LLC v. Vanguard Group, Inc. et al., 6:12-cv-00543, Memorandum Opinion and Order, 2013 WL 6354154 (E.D.Tex.).
Exhibit 1011	EMG Technology Group, LLC v. Chrysler Group, LL, 6:12-cv-00259, Memorandum Opinion and Order, 2013 WL 3753562 (E.D.Tex.).
Exhibit 1012	Reformulating HTML in XML, W3C, Dec. 5, 1998, <i>available at</i> http://www.w3.org/TR/1998/WD-html-in-xml-19981205/ ("Reformulating HTML")
Exhibit 1013	"HTML 4.0 Specification", <i>available at</i> http://www.w3.org/TR/

	1998?REC-html40-19980424/html40.txt, April 24, 1998 ("HTML 4.0").
Exhibit 1014	"Cascading Style Sheets, level 2 CSS2 Specification", <i>available at</i> http://www.w3.org/TR/1998/REC-CSS2-19980512 , May 12, 1998 ("CSS2").
Exhibit 1015	Steinberg, Gene, Special Edition Using America Online, Second Edition, copyright 1996 by Que Corporation ("AOL")
Exhibit 1016	European Patent Application EP 0822535A2 to Apte, filed 1/8/1997, published 4/2/1998 ("Apte")
Exhibit 1017	International Publication No. WO 98/43381 to Leak et al., filed 3/26/1998, published 10/1/1998 ("Leak")
Exhibit 1019	W3C, A Little History of the World Wide Web, created circa 1995 by Robert Cailliau
Exhibit 1020	Bederson, et al. Pad++: A Zoomable Graphical Sketchpad for Exploring Alternate Interface Physics, September 19, 1995 ("Pad++")
Exhibit 1021	Londergan, Steve, The Lotus Domino Server, Integrating Lotus Notes 4.5 With the Internet (1 st ed. 1997) ("Domino")
Exhibit 1022	Dragon Systems, Dragon NaturallySpeaking Creating Voice Commands, Version 3.0, August 1998.
Exhibit 1023	Wireless Application Protocol – Wireless Markup Specification Version 30, April 1998, produced by the WAP Forum ("WAP WML")
Exhibit 1024	Wireless Application Protocol – Wireless Application Environment Overview Version 30, April 1998, produced by the WAP Forum ("WAP WAE")
Exhibit 1025	Wireless Application Protocol Architecture Specification Version 30, April 1998, produced by the WAP Forum ("WAP Architecture")
Exhibit 1026	U.S. Patent No. 5,602,596 to Claussen et al., filed on April 8, 1994, issued on February 11, 1997 ("Claussen")

II. TECHNICAL BACKGROUND AND STATE OF THE ART

39. The '196 patent is directed to e-commerce. '196 patent, 1:18-22. Using the World Wide Web to display advertisements and accept user inputs to navigate commercial web sites involved well-known components such as

hyperlinks, mark-up languages, navigation interfaces, and selectable inputs. The World Wide Web was invented by Tim Berners-Lee who later went on to found the World Wide Web Consortium (W3C), an organization that develops and publishes standards for the World Wide Web. Ex. 1023, p. 1-2, 5. W3C has published many documents that provide useful background for understanding the state of technology prior to the alleged priority date of the '196 patent. Displaying hyperlinks that, when selected,¹ navigated to other media was well-known *in the 1960s*, pre-dating the rise of the Internet by many decades. Id. Also, since its inception, the World Wide Web has allowed for content – commercial or otherwise – to be displayed and navigated on devices having a range of display and input capabilities.

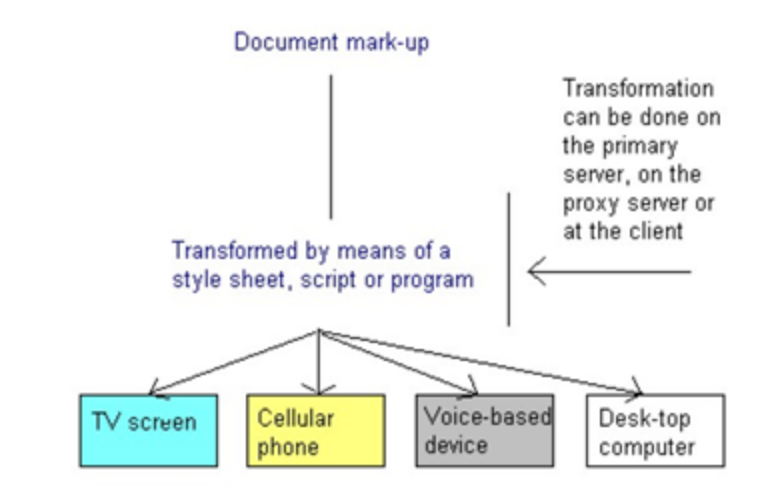
40. The publication *Reformulating HTML in XML* by the W3C explains that Hypertext Markup Language (HTML), the markup language of the World Wide Web, was designed to be a common hypertext language into which documents could be reformatted if the client and server did not otherwise support

¹ One such publication is *Reformulating HTML in XML*, published on December 5, 1998. See Ex. 1012. *Reformulating HTML in XML* by the W3C refers to the HTML 4.0 Specification published on April 24, 1998, the Extensible Markup Language (XML) 1.0 Specification published on February 10, 1998, and the CSS2 Specification published on May 12, 1998. Ex. 1012, 20.

the same format. HTML was derived in the early 1990s from the standardized generalized markup language (SGML) that had existed since the 1980s. Ex. 1019, 3.

41. By the time *Reformulating HTML in XML* was published in 1999, it was apparent that extensible markup language (XML) had practically supplanted SGML. Ex. 1012, 3-4. XML was regarded as having all the power and flexibility of SGML without its complexity. XML was observed to possess a simplified subset of SGML that retained SGML's most commonly used features without those that were complex and costly to implement. Ex. 1012, 4.

42. By 1999, the W3C and other standards organizations had already published documents and device profiles to facilitate the display of content on a range of popular consumer electronic and fast emerging communication devices:



(Ex. 1012, 8).

Figure 1. W3C diagram.

43. Specifically, *Reformulating HTML in XML* notes that there was activity to move HTML onto a range of devices, from mobile devices such as handheld computers, and portable phones to televisions such as digital TV and TV-based web browsers, and even to appliances (i.e., fixed function devices). Ex. 1012, 8.

44. Product developers and advertisers were also interested in a variety of consumer electronic devices, including voice-based devices, personal digital assistants, and even watches. As explained in *Reformulating HTML in XML*, XML was regarded as particularly well-suited for connecting such a heterogeneous mix of display- and input-limited devices to the Web. See Exhibit 1012, 3. This was a task well-defined by the publication date of W3C and reformatting web content from HTML to XML was well-known in the 1990s. In fact, by the late 1990s,

XML would have been a preferred markup language for reformatting. Ex. 1012, p. 3-4.

45. All of this was occurring during the height of the dotcom boom in tandem with the expansion of “e-commerce” and web advertising throughout the mid-1990s. It was well-known prior to the alleged priority date of the '196 patent that the Web could be used as a channel for disseminating commercial information, including advertisements, as well as effectuating buying and selling on the Web. (European Patent Application No. EP0822535 to Apte 1:35-54, attached as Ex. 1016). During this period, Internet capable devices came into focus.

46. One market focus was getting the World Wide Web onto cell phones. For example, the Wireless Markup Language (WML) is an XML markup language for mobile devices. *Wireless Application Protocol Wireless Markup Language Specification Version 1.1* explains that WML is XML made useful for specifying content and user interfaces for narrowband devices such as cellular phones, pagers, and handheld devices etc. WML was specifically designed with the constraints of mobile devices in mind. These well-recognized constraints included small displays and *limited user input facilities*. Ex. 1023, 5. It was a well-known problem that mobile devices, such as wireless telephones, typically had a keypad equipped with far fewer buttons than a keyboard on a conventional personal computer, which made data entry laborious. Ex. 1023, 9.

47. Regardless, interactive two-way communication devices such as two-way pagers, cell phones, palm-sized computing devices, personal digital assistant (PDA), and other such devices, were among *the fastest emerging communication devices* during the late 1990s. Companies such as Openwave Systems Inc. of Redwood, CA obtained multiple patents directed to solving such problems.

48. Yet another market focus was getting the World Wide Web onto the television screen.² In this endeavor, technology commercially known as WebTV™, developed by Web TV Networks Inc., allowed viewers to navigate the World Wide Web using an ordinary television set and a remote control. (WIPO Publication No. WO 98/43381 to Leak, p. 1, ll. 26-32, attached as Ex. 1017). WebTV™ was designed so that a person could use a remote control to navigate between hyper-text objects on the Web “with little effort or thought, so that a person feels more as if he is simply changing the channels on a television set.” Ex. 1017, p. 1, ll. 31-35. Yet the remote control had the same input limitations as the phone keypad and related design solutions were developed for mobile phone and TV navigation interfaces alike.

49. By the late 1990s, XML was a preferred mark-up language for reformatting. Ex. 1012, p. 3-4. For example, when diverse interests in the telecom industry assembled to develop a mark-up language for displaying web content on

² Patents originally assigned to WebTV date to at least the mid-1990s.

the fastest emerging interactive devices at the time (Internet capable mobile phones), the Wireless Application Protocol Forum chose XML. The result was adoption of the Wireless Markup Language (WML). Ex. 1023, 5.

50. WML was designed with the constraints of mobile devices in mind. These constraints included small displays and limited user input facilities. Ex. 1023, 5. It was a well-defined and solvable problem that mobile phones, having keypads equipped with far fewer buttons than a keyboard on a PC, made data entry laborious. Ex. 1023, 9. This same well-defined and solvable problem faced developers of web-TV, focused on simplifying web navigation on TVs. Because the remote control had the same input limits as the typical cell phone keypad, a common solution could be used. One solution was to use a grid or matrix to partition the screen into individual regions that could be accessed with corresponding inputs. Ex. 1026, 1:54-58. Such a format could be adapted to reflect inputs available on a specific device. In the case of a cellular phone or TV remote control, those inputs were the standard 3-by-3 arrangement of buttons available on any alpha-numeric keypad, as well as buttons for scrolling up or down to navigate between items on a menu or list. Ex. 1026, Fig. 2a.

51. Underlying such implementations was the mature server architecture that allowed the web to reach the devices that it did. Proxy server architecture and the role it played in transcoding content from one format to another were

commonly implemented and well-understood long before the late 1990s. WebTV's server functioned as a proxy that provided Internet access for its client. Transcoding was a common way to modify pages written in HTML for display on various devices, whether TVs or phones. Ex. 1024, pp. 7-8, 11. Not only was it well-known that servers could be used to perform reformatting, but W3C actually encouraged product developers to use proxy-based transformational software to reformat HTML to XML. Ex. 1012, pp. 8, 17.

52. With the rise of Internet-enabled devices and the growing availability of content specifically adapted to the small or big screen, enabling linking between HTML and XML documents was a key concern of standards-setting organizations such as the W3C. To enable XML processors to recognize encoded hypertext links, the "a" tag was directly incorporated into the XML specification to be declared with the `xml:link` attribute. Ex. 1012, p. 12. XML Linking Language (XLink) syntax also created structures capable of describing both simple unidirectional hyperlinks in HTML as well as more sophisticated multi-ended and typed links in XML. Ex. 1012, pp. 20-21. A significant objective of this synergy was to keep HTML content connected to its XML counterparts and vice versa. The W3C in the 1990s recognized that standards were needed to facilitate transforming HTML into XML and to make their links compatible. Ex. 1012, pp. 1, 5, 6, 9, 10, 13.

53. Giving the user the option to navigate between two versions of a web site – one version simplified for display on a device with limited capabilities and another version in the full, rich, or original format – was not new. Indeed, several prior art references cited in the Petition and in my declaration show examples of displaying hyperlinks to navigate from an original version of a web site to a simplified version. *See e.g.*, Ex. 1015, Appendix 2, Appendix 3.

III. SUMMARY OF OPINIONS

54. In my opinion, claims 1-76 of the '196 Patent are invalid. In particular, I am of the opinion that claims of the '196 patent are invalid as obvious over one or more of Reformulating HTML, HTML 4.0, CSS2, AOL, Apte, Leak, and the knowledge of a person of ordinary skill in the art at the relevant time, as shown below:

- Claims 1-76 of the '196 Patent are Rendered Obvious By Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art; and/or
- Claims 1-76 of the '196 Patent are Rendered Obvious By Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art.

IV. BACKGROUND

A. Explanation of the Claimed Subject Matter

55. I understand that this declaration is being submitted together with a petition for covered business method patent review of claims 1-76 of the '196 patent. The '196 patent is not entitled to the earliest possible priority date of November 15, 1999 because a person of ordinary skill in the art would have found that U.S. Application No. 09/440,214, to which it claims continuation-in-part priority benefit, does not contain an enabling disclosure or adequate written description to support at least the “displaying a hyperlink” limitation added during the prior reexamination in an attempt to distinguish over the prior art.

56. I have considered the disclosure of the '196 patent in light of the knowledge of a POSITA as of March 3, 2000. However, I have also considered the disclosure of the '196 patent in light of the knowledge of a POSITA as of November 15, 1999. Regardless of whether the knowledge of a POSITA as of March 3, 2000 or whether the knowledge of a POSITA as of November 15, 1999 is used, my opinions and conclusions with respect to the invalidity of claims 1-76 of the '196 patent are the same.

57. The claims of the '196 patent are directed to e-commerce methods for displaying web pages reformatted from HTML into XML for display on a television, cell phone, or other device. The reformatted web pages provide “a

simplified navigation interface” comprising a “two-dimensional layer of cells.” The prior art cited in the petition disclosed these limitations, and all others, at least before November 15, 1999.

58. At least before November 15, 1999, such technology was widely known and in use. Both the discussion in the specification of the '196 patent as well as the claimed subject matter were well-known in the art as of the claimed priority date of the '196 patent. This is evidenced by at least the prior art references that will be discussed in relation to the claims below. Given the widespread knowledge and implementation of Internet browser technology, the claims of the '196 patent are directed to nothing more than a well-known concept. This can be demonstrated by the references to be discussed as well as what is acknowledged in the background section of the '196 patent. Furthermore, by the claimed priority date of the '196 patent, a person of ordinary skill in the art would have had reason to combine and/or modify one or more of the references discussed below as will be described in detail.

59. The dependent claims of the '196 patent add nothing more than other well-known limitations, also identified in the prior art. All these limitations were common and well-known to a person of ordinary skill in the art, at least as of November 15, 1999, because the field of art was mature and well adapted to

implement variations to known and commonplace Internet browser technology, as evidenced by the prior art.

60. The references teach or suggest every limitation of claims 1-76 as will be described in detail below.

61. All four independent claims of the '196 patent (1, 9, 25, and 58) recite the following limitations, provided by way of summary and not of construction.

62. Content reformatted from HTML to XML to generate a “sister site”:
the content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site

63. The “sister site” has a simplified user interface for navigation on a television, cell phone, or other device:

the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable by unique inputs through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone

64. The interface is in the form of a “matrix” or “layer” of “cells”:

the simplified navigation interface further displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells, the two-dimensional layer in a form of a navigation matrix. Each cell is a division of a screen and exclusive to a separate single navigation option

65. The content (and/or advertisements) is displayed in the cells, and navigation between “layers” is hierarchical:

[content/advertisement] formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs, navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer

66. A “hyperlink” is displayed either on the sister site to navigate to the web page, or vice versa:

displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site

67. The user selects a “navigation option” to browse another “layer” provided by a server:

receiving a user selection of one of the navigation options; forwarding the selected navigation option across the internet to a server providing the simplified navigation interface; receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option

68. “Layers” can be scrolled or zoomed:

manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content

B. Person of Ordinary Skill in the Art and Claim Construction

69. I understand that a person of ordinary skill in the art (“POSITA”) is one who is presumed to be aware of all pertinent art, thinks along conventional wisdom in the art, and is a person of ordinary creativity. Considering these factors in the context of the claims of the ‘196 patent, I am of the opinion that a POSITA in the 1999 or 2000 time frame would have had a bachelor’s degree in computer science or commensurate industry experience of at least two years of experience with HTML programming and general knowledge of Internet browser technology or a similar field.

70. I understand that in a covered business method review, claim terms are interpreted under a “broadest reasonable construction” standard. I also understand that “claim terms are presumed to take on their ordinary and customary meaning.” See Ex. 1005, p. 31. In *EMG v. Apple, et al.*, the patent owner produced claim charts provided by its technical expert that provided the patent owner’s proposed construction for certain terms. See Ex. 1008, pp. 4657-64.

71. I am of the opinion that the broadest reasonable interpretation of “displaying on-line content via the Internet”, “the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site”, “HTML”, “XML”, “a simplified navigation interface”, “displayed in a form of a two-dimensional layer

of cells”, “from a plurality of layers and a plurality of cells”, “being received”, “navigation matrix”, “the two-dimensional layer in a form of a navigation matrix, each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input”, “the online-content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs”, “exclusive to a separate single navigation option”, “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer”, “receiving a user selection of one or the navigation options”, and “specific unique input” is at least as broad as that patent owner’s proposed construction. *See* Ex. 1008, pp. 4658- 64.

72. I also understand that in prior litigations involving the ‘196 patent, the District Court in the Eastern District of Texas decided the construction of certain claim terms of the ‘196 patent. *See* Ex. 1010, 1011. I am of the opinion that the broadest reasonable interpretation is at least as broad as the Court’s Claim Construction Rulings. I am of the opinion that the broadest reasonable interpretation for “purchasing interface”, “exclusive to a separate single navigation option”, “unique input”, “to navigate to the web page”, “to navigate to the sister site”, “to generate a sister site”, “the two-dimensional layer in a form of a

navigation matrix”, “webpage”, “web page” in the ‘196 patent are at least as broad as the Court’s constructions. *See* Ex. 1010, p. 32; Ex. 1011, p. 19.

73. According to the specification, “[a]s used herein, ‘sister site’ is deemed to mean a site that provides for navigation of the site using a simplified navigation system, such as matrix navigation described in more detail below.” Ex. 1001, 2:49-53. Although the “sister site” is described using idiosyncratic terminology (e.g., “matrix navigation,” “matrix layers”) the specification explains that in the preferred embodiment, these “matrix layers” are simply XHTML web pages reformatted in one possible alternative with Cascading Style Sheets (CSS), displayable and navigable on a prior art browser. Ex. 1001, 3:23-37. The specification explains that such pages may exist on a web site or be generated on the fly. “Content partners may maintain a database of sister site web pages corresponding to the pages in the general use site. Alternatively, content partners may provide a facility for converting web pages on the fly to the sister site format.” Ex. 1001, 2:56-59. Therefore, I am of the opinion that a sister site is reasonably construed to mean “one or more web pages that provide for navigation of the web page(s) using a simplified navigation interface.”

74. The specification explains that cells are “navigation options.” Ex. 1001, 7:65-8:3. As would be expected for a browser, a mouse or other pointer device can be used to select “navigation options.” Ex. 1001, 8:14-15. Navigation

also works like ordinary web page navigation — selecting a link or “navigation option” brings up a new XHTML “layer.” Ex. 1001, 8:39-41, FIGs. 10a-10b. As the descriptions show, the specification indicates that, as shown in Figures 3, 8, and 10A-G, the “matrix layers” are XHTML pages displayed in a browser, navigated by selecting links with a mouse or other input device. The specification notes, “[t]he additional cells represent navigation paths that have not reached their maximum depth. For example, by pressing a 3, one would get to a features (sic) of the Technics product content layer.” Ex. 1001, 9:11-16. As such, I am of the opinion that “navigation options” is reasonably construed to mean “a link a user may select to access a layer of content.”

75. The ‘196 specification states that “[p]rimary navigation options’ as used herein are those navigation options that necessarily change between successive matrix layers, changing from general to more specific with increases in depth in the matrix” and thus I am of the opinion that the broadest reasonable interpretation is at least as broad. Ex. 1001, 7:46-49.

C. The Specification

76. The claims of the ‘196 patent are directed to displaying web pages reformatted from HTML into XML for display on a television, cell phone, or other device. The reformatted web pages provide “a simplified navigation interface” comprising a “two-dimensional layer of cells.”

77. According to the specification, “[a]s used herein, ‘sister site’ is deemed to mean a site that provides for navigation of the site using a simplified navigation system, such as matrix navigation described in more detail below.” (Ex. 1001, 2:49-53). Although the “sister site” is described using idiosyncratic terminology including “matrix navigation” and “matrix layers,” the specification explains that in the preferred embodiment, these “matrix layers” are simply XHTML Web pages reformatted in one alternative with Cascading Style Sheets (CSS), displayable and navigable on a prior art browser:

A hypertext markup language (HTML) page 40 is transcoded by a transcoder 30 to yield, for example, an XML page 42 . . . The XML page is then reformatted using extensible style language (XSL) 34 to corresponding format data 32 . . . Thus, after formatting, the XML document is translated to an extensible hypertext markup language (XHTML) document for subsequent display by a client side browser on display 52. Alternatively, the XML page may have a cascading style sheet (CSS) applied to achieve the desired format. One advantage of the CSS is that it is supported by standard browsers. After application of the CSS, the resulting formatted page can be displayed by the client browser on display 52.

Ex. 1001, 3:23-37.

78. The numeric references are to Figure 3, which the specification says “is a flow diagram of conversion of standard HTML pages to a sister site format in

one embodiment of the invention.” As shown below, Figure 3 is a flow diagram of conversion of standard HTML pages to a sister site format. Ex. 1001, FIG. 3.

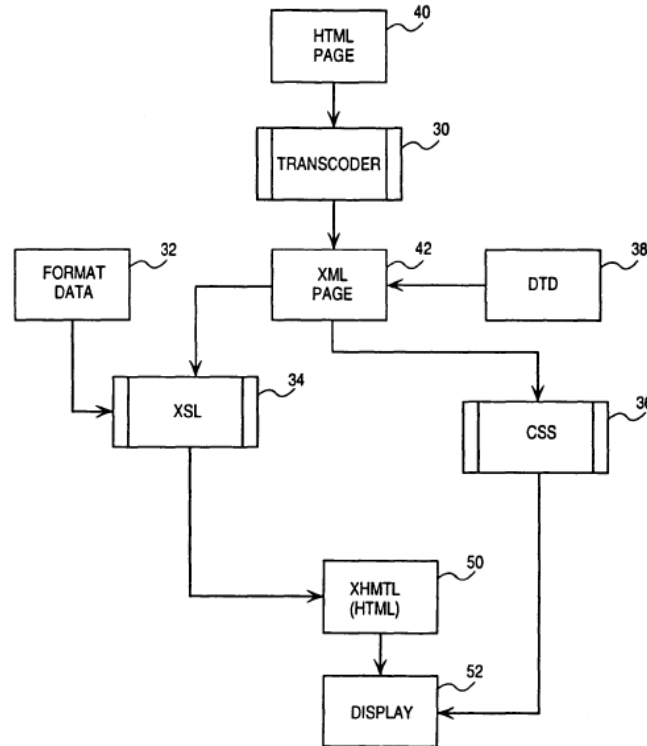


FIG. 3

79. Figure 8, captioned below, shows a “matrix” of “cells” that makes up the navigation interface. Ex. 1001, FIG. 8.

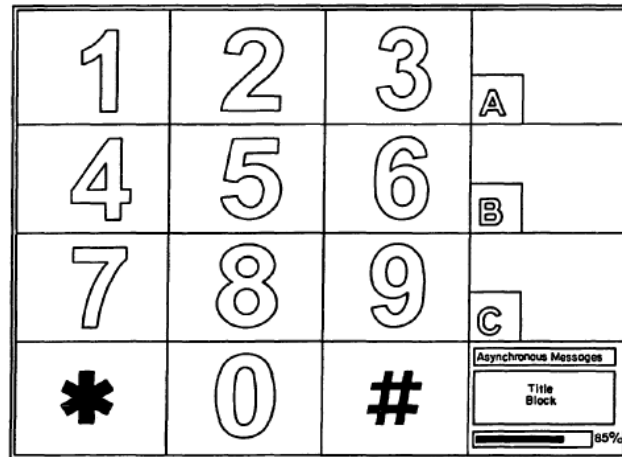


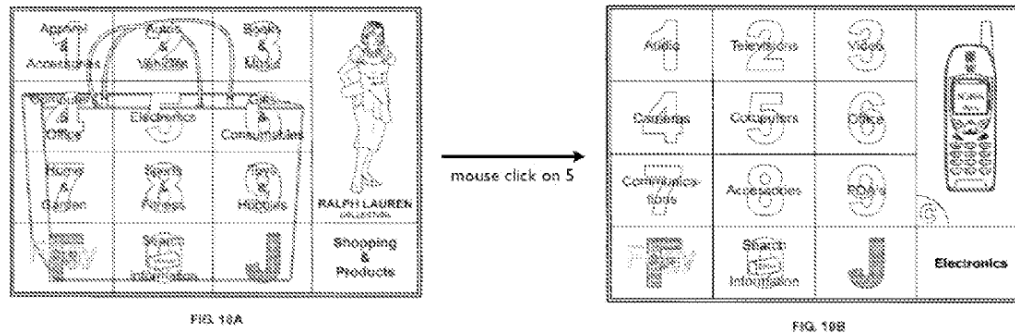
FIG. 8

“FIG. 8 is a diagram of the display of a graphical user interface of one embodiment of the invention. The screen is divided into a plurality of cells. In this embodiment, there are fifteen cells that represent navigation options and one messaging cell for displaying messages from the hub, the progress or status bar, and a title block.” Ex. 1001, 7:65-8:3.

80. As would be expected for a browser, the specification explains that a mouse or other pointer device can be used to select “navigation options”: “While the interface is designed to be fully accessible with minimal key strokes from a key pad, it is also within the scope and contemplation of the invention to permit selection with a mouse or other pointer device.” Ex. 1001, 8:14-15.

81. Navigation also works like ordinary web page navigation—selecting a link or “navigation option” brings up a new XHTML “layer”: “A selection of 5 on

the 10a matrix layer yields an Electronics matrix layer shown in FIG. 1-b.” Ex. 1001, 8:39-41; *see* annotated Figures 10a and 10b below.



82. As the foregoing descriptions show, the specification indicates that in the embodiment of Figures 3, 8, and 10a-g, the “matrix layers” are XHTML Web pages displayed in a browser, navigated by selecting links with a mouse.

D. Prosecution History

83. I understand that the following underlined sections of the independent claims were given by the Examiner as the reason for allowance during original prosecution:

A method of navigating the Internet, comprising: displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site, the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone, the simplified navigation interface displayed in a form of a two-

dimensional layer of cells from a plurality of layers and a plurality of cells, the two-dimensional layer in a form of a navigation matrix, each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input, the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs, navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer; receiving a user selection of one of the navigation options; forwarding the selected navigation option across the internet to a server providing the simplified navigation interface; receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option; and manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.

Ex. 1007, p. 132.

84. I understand that the Patent Owner had previously reached an agreement with the Examiner that the subject matter amended into the claims and underlined above was potentially allowable. Ex. 1007, p. 231.

E. The Reexamination

85. It is my understanding that all of the independent claims, 1, 9, 25, and 58, of the '196 patent were amended during reexamination. During reexamination, WAP WML, WAP WAE, WAP Architecture, and Claussen were found to qualify

as prior art under 35 U.S.C. § 102(a) and to raise a substantial new question of patentability. Ex. 1008, pp. 1399-1401, 1405.

86. As stated in the Right of Appeal Notice:

The prior art cited by the Requester teaches methods of converting HTML documents to XML type documents to allow non-standard devices (typically mobile devices) to more easily navigate web content. The prior art cited by the Requester further teaches simplified navigation interfaces such as two-dimensional navigation interfaces that are more easily used by a mobile device.

Ex. 1008, pp. 42-43.

87. The Examiner indicated as the sole reason for allowance during reexamination the following underlined section of the independent claims:

A method of navigating the Internet, comprising: displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site, the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone, the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells, the two-dimensional layer in a form of a navigation matrix, each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input, the on-line

content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs, navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer; displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site; receiving a user selection of one of the navigation options; forwarding the selected navigation option across the internet to a server providing the simplified navigation interface; receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option; and manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.

See Ex. 1008, pp. 42-43.

88. Thus, apparently the only reason for allowing the claims was the addition of a particular hyperlink to an HTML web page.

F. Priority Date of the ‘196 Patent

89. I understand that the application leading to the ‘196 patent was filed on March 13, 2006 and is a continuation of application no. 09/518,015, filed on March 3, 2000, and a continuation-in-part of application no. 09/440,214, filed on November 15, 1999, now U.S. Patent No. 6,600,497. See Ex. 1001. I also understand that each of the independent claims of the ‘196 patent recites “content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site” and

“displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” *See* Ex. 1001. It is my opinion that the ‘214 application does not provide support for these limitations at least because it does not disclose the claimed sister site. *See* Ex. 1009. Therefore, I am of the opinion that the ‘196 patent is entitled to a priority date no earlier than March 3, 2000.

V. Summary of Prior Art Relied Upon

A. Reformulating HTML in XML, W3C Working Draft (December 5, 1998) (“Reformulating HTML”)

90. Reformulating HTML was published to provide a means for product developers to overcome some the limitations of HTML when used across multiple platforms. More specifically, since the invention of HTML, the proliferation of new HTML tags created compatibility problems across different HTML-viewing platforms.³ The World Wide Web Consortium determined that one way to overcome these limitations was to transition to the use of Extensible Markup Language (XML) for the next generation of HTML specifications.⁴

91. Reformulating HTML describes the reformulation of web content published in HTML as an application of XML. It further describes the means by which this reformulation may occur, either by a style sheet, a script, or a program

³ Reformulating HTML, 3-4.

⁴ Reformulating HTML, 3.

that can be done anywhere of either the primary web server providing the content, a proxy server, or at the client.

92. Reformulating HTML was published on December 5, 1998, before the earliest possible priority date of November 15, 1999 for the '196 patent. Given these dates, I understand that Reformulating HTML is prior art under § 18(a)(1)(C).

B. HTML 4.0 Specification, (April 28, 1998) (“HTML 4.0”)

93. HTML 4.0 defines the HyperText Markup Language, version 4.0, which was the publishing language of the World Wide Web. In addition to the text, multimedia, and hyperlink features of previous versions of HTML, HTML 4.0 disclosed better support for multimedia options, scripting languages, style sheets, better printing facilities, and documents that are more accessible to users with disabilities.⁵

94. HTML 4.0 was incorporated by reference into Reformulating HTML.⁶

95. HTML 4.0 was published on April 24, 1998, before the earliest possible priority date of November 15, 1999 for the '196 patent. Given these dates, I understand that HTML 4.0 is prior art under § 18(a)(1)(C).

⁵ HTML 4.0, Abstract.

⁶ Reformulating HTML, 20.

C. Cascading Style Sheets, Level 2 Specification (May 12, 1998) (“CSS2”)

96. CSS2 defines Cascading Style Sheets, Level 2. CSS2 is a style sheet language that allows authors and users to attach style (e.g., fonts, spacing, and aural cues) to structured documents (e.g. HTML documents and XML applications). By separating the presentation style of documents from the content of documents, CSS2 simplifies Web authoring and site maintenance.⁷

97. CSS2 built upon its predecessor CSS1. CSS2 supported media-specific style sheets so that authors may tailor the presentation of their documents to visual browsers, aural devices, printers, braille devices, handheld devices, etc. The specification also supports content positioning, downloadable fonts, table layout, features for internationalization, and automatic counters and numbering.⁸

98. CSS2 was incorporated by reference in Reformulating HTML.⁹

99. CSS2 was published on May 12, 1998, before the earliest possible priority date of November 15, 1999 for the '196 patent. Given these dates, I am of the opinion that CSS2 is prior art under § 18(a)(1)(C).

⁷ CSS2, Abstract.

⁸ CSS2, Abstract.

⁹ Reformulating HTML, 20.

D. European Patent Application No. EP 0822535A2 to Apte, *et al.* (“Apte”)

100. Apte discloses a system and method for providing targeted, interactive, multimedia advertisements and electronic commerce capability on a hypertext network.¹⁰ Advertising software from a server is loaded on a user’s client computer through a browser at the user’s request.¹¹ The display screen of the client computer is partitioned into a browser area, which retains the full functionality of the underlying browser, and advertising area.¹² Controls affecting the presentation and content of the advertisements streamed from the server to the client computer are available to the user in the advertising area, as are secure purchase and electronic coupon controls.¹³ Apte further discloses the controls are arranged in the form of an array, with each control corresponding to a unique input and/or navigational option in the advertising content.¹⁴

101. Apte was published on April 2, 1998, before the earliest possible priority date of November 15, 1999 for the ’196 patent. Given these dates, I am of the opinion that Apte is prior art under § 18(a)(1)(C).

¹⁰ Apte, Abstract.

¹¹ Apte, Abstract.

¹² Apte, Abstract.

¹³ Apte, Abstract.

¹⁴ Apte, Figs. 5-11.

E. International Patent Application No. WO 98/43381 to Leak, *et al.* (“Leak”)

102. Leak discloses a method of displaying World Wide Web pages on a display device.¹⁵ The display device could be a standard television set used in conjunction with the WebTV system connected to the Internet.¹⁶ A user can navigate the WebTV system using input devices including a keyboard or a pointing device.¹⁷ Leak also discloses the server providing content to the client from a database of web sites.¹⁸

103. Leak was published on October 1, 1998, before the earliest possible priority date of November 15, 1999 for the '196 patent. Given these dates, I am of the opinion that Leak is prior art under § 18(a)(1)(C).

F. Gene Steinberg, Using America Online (2d. ed. 1996) (“AOL”)

104. AOL discloses the features and functionality of the America Online proprietary network. AOL allowed users to access content via the World Wide Web such as images, video, audio, and advertising. AOL further allowed users to make purchases online and communicate via chat, email, and bulletin boards.

¹⁵ Leak, Abstract.

¹⁶ Leak, 3:33-36.

¹⁷ Leak, 7:9-11.

¹⁸ Leak, 10:24-31.

105. AOL was published in 1996, before the earliest possible priority date of November 15, 1999 for the '196 patent. Given these dates, I am of the opinion that AOL is prior art under § 18(a)(1)(C).

VI. CLAIMS 1-76 OF THE '196 PATENT ARE INVALID

A. The prior art discloses or suggests “[a] method of navigating the Internet”, “[a] method”, and “[a] machine readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations” as recited in claims 1, 9, 25, and/or 58 of the '196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

106. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “[a] method of navigating the Internet”, “[a] method”, and “[a] machine readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations.” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

107. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “[a] method of navigating the Internet”, “[a] method”, and “[a] machine readable medium having instructions stored therein, which when executed cause a machine

to perform a set of operations.” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

B. The prior art discloses or suggests “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site,” and “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface,” and “displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

108. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site,” and “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface,” and “displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site

to be displayed and navigable through the simplified navigation interface.” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

109. For example, I am of the opinion that HTML 4.0 discloses or suggests displaying on-line content accessed via the Internet on a mobile device, such “web-enabled pagers and phones.” *See, e.g.*, Ex. 1013, p. 49. I am also of the opinion that Reformulating HTML discloses or suggests that on-line content can be reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format thereby generating sister sites for display on a TV screen, cellular phone, voice-based device, or desk-top computer, at either the server, proxy server, or client device. *See, e.g.*, Ex. 1012, pp. 7-8. Thus, Reformulating HTML discloses or it would have been obvious to a person of ordinary skill in the art at the relevant time to reformat content from a web page in an HTML format into an XML format to generate a sister site. Ex. 1012, pp. 4, 9, 13. I am of the opinion that doing so could “give[] product developers the tools with which they can extend or subset HTML to address the perceived needs of their customers.” Ex. 1012, p. 4. I am further of the opinion that doing so could also allow content to efficiently be moved from “HTML onto mobile devices (handheld computers, portable phones, etc.), television devices (digital televisions, tv-based web browsers, etc.), and appliances (fixed function devices)” thereby

providing greater convenience to users of various devices and reduced development costs. Ex. 1012, p. 4.

110. For example, I am of the opinion AOL discloses the display of an advertisement by AutoByTel and content from America Online in a web browser. Ex. 1015, p. 665. Furthermore, I am of the opinion AOL discloses or it would have been obvious to a person of skill in the art that the content and advertisement could be accessed via the Internet as indicated by the URL “http://www.blue.aol.com” displayed in the web browser. *See, e.g.*, Ex. 1015, p. 665.

111. I am also of the opinion that HTML 4.0 and AOL disclose or suggest displaying advertisements via the Internet through a simplified navigation device. *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

112. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site,” and “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface,” and “displaying a first content via the internet and through the simplified navigation interface, the first

content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface.” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58. Furthermore, I am of the opinion that it would have been obvious to one of skill in the art that the teachings of Apte and/or Leak could be used to create sister sites for web pages that comprise some or all of the content of the original pages.

113. I am also of the opinion that Reformulating HTML discloses or suggests that on-line content can be reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format thereby generating sister sites for display on a TV screen, cellular phone, voice-based device, or desk-top computer, at either the server, proxy server, or client device. *See, e.g.*, Ex. 1012, pp. 7-8; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

114. I am also of the opinion that Apte and AOL disclose displaying advertisements via the Internet through a simplified navigation interface. *See, e.g.*, Ex. 1016, Abstract; Ex. 1015, pp. 82, 83, 91; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

C. The prior art discloses or suggests “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a/the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

115. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a/the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” *See e.g.*, Ex. 1008, pp. 1549-1630, 2641-2735; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

116. I am also of the opinion that Reformulating HTML discloses or suggests that on-line content can be reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format thereby generating sister sites for display on a TV screen, cellular phone, voice-based device, or desk-top computer, at either the server, proxy server, or client device by stripping out scripts, style sheets, images, etc. *See, e.g.*, Ex. 1012, pp. 4, 7-8; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. I am further of the opinion that it thus is implied and/or would have been obvious that

those items not stripped out would remain to be displayed and navigable through a simplified navigation interface on various devices.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

117. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a/the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone,” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

118. I am also of the opinion that Reformulating HTML discloses or suggests that on-line content can be reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format thereby generating sister sites for display on a TV screen, cellular phone, voice-based device, or desk-top computer, at either the server, proxy server, or client device. *See, e.g.*, Ex. 1012, pp. 7-8; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

119. I am also of the opinion that Leak discloses a system for viewing reformatted web content through a simplified navigation interface on a television. *See, e.g.*, Ex. 1017, Fig. 2 and associated disclosure; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

D. The prior art discloses or suggests “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells,” “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells,” and “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the simplified navigation interface displayed in a form of a two-dimensional layer of cells from the plurality of layers and the plurality of cells,” and “the first content displayed in one or more of the plurality of cells,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

120. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells,” “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells,” and “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the simplified navigation interface displayed in a form of a two-dimensional layer of cells from the plurality of layers and the plurality of cells,” and “the first content displayed in one or more of the plurality of cells.” *See, e.g.*, Ex. 1008, pp. 1549-1630, 2641-2735; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

121. I am of the opinion that HTML 4.0, CSS2, and AOL disclose or suggest that the simplified navigation interface can have a two-dimensional layer of cells. *See, e.g.*, Ex. 1013, pp. 49-50, 58-59; Ex. 1014, pp. 95, 245, 253, 255; Ex. 1015, pp. 120, 121, 129; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

122. I understand that in *EMG v. Apple et al.*, the patent owner proposed that “displayed in a form of a two-dimensional layer of cells” be construed to mean “cells on a single virtual plane”, “displayed in a form of a two-dimensional layer of cells” be construed to mean “cells on a single virtual plane”, and “from a plurality of layers and a plurality of cells” be construed to mean “cells in any shape or arrangement on multiple virtual levels.” *See* Ex. 1008, p. 4660. Given patent owner’s own proposed construction, I am of the opinion that Reformulating HTML 4.0, CSS2, and AOL disclose a simplified navigation interface to be displayed in the form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells and for content and/or advertisements to be displayed in one or more of the plurality of cells and/or one or more of the plurality of layers.

123. I am further of the opinion that a person of skill in the art would have known that content and/or advertisements can be in the form of text or an image and thus it would have been obvious for content and/or advertisement(s) to be displayed in one or more cells of a table. *See, e.g.*, Ex. 1013, p. 46; Ex. 1015, pp.

665, 699. In addition, I am of the opinion that a person of skill in the art at the time would have known that text or images in one or more cells of a table could be linked to another document, image, etc., thereby providing navigation capabilities. Ex. 1013, pp. 8, 49, 58-59.

124. I am further of the opinion that Reformulating HTML also discloses that a CSS Style Sheet “provides the means to control the rendering of HTML documents as well as the means for transforming documents,” and CSS2 discloses, “[i]n the [CSS] visual formatting model, each element in the document tree generates zero or more boxes according to the box model.” Ex. 1012, p. 14; Ex. 1014, p. 95. I am of the opinion that elements that do not generate boxes have no effect on the formatting structure and are not displayed. *See* Ex. 1014, pp. 101-102, 149-151. Furthermore, I am of the opinion that CSS2 discloses that each box has a horizontal, vertical, and z-axis position such that each box overlays the boxes below it, and that content can be hidden or displayed. *See* Ex. 1014, pp. 101, 102, 125-127, 149-151.

125. Therefore, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, and AOL disclose or it would have been obvious for a simplified navigation interface to have a two-dimensional layer of cells from a plurality of layers and a plurality of cells. As one example, a nested table (e.g., a table within a cell of another table) as disclosed by HTML 4.0 could have multiple cells and multiple

layers. *See* Ex. 1013, pp. 49, 58-59; Ex. 1014, pp. 101, 102, 125-127, 149-151, 253-256. As another example, CSS2 discloses code for two boxes having the same size and position. Ex. 1014, pp. 149-151. In this example, when a user presses a button, one of the boxes becomes visible and the other becomes hidden such that the effect is that one box replaces the other box. Ex. 1014, pp. 149-151.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

126. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells,” “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells,” and “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the simplified navigation interface displayed in a form of a two-dimensional layer of cells from the plurality of layers and the plurality of cells,” and “the first content displayed in one or more of the plurality of cells,” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

127. I am of the opinion that Apte and AOL disclose navigation interfaces displaying advertisements and content through a plurality of layers and cells. Apte discloses a navigation interface composed an advertisement area comprising a

plurality of cells that correspond to controls such as a help button, pause button, step back button, and step forward button. *See, e.g.*, Ex. 1016, 7:26-53; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. Apte further discloses that a plurality of layers can comprise the navigation interface in the advertisement area. *See, e.g.*, Ex. 1016, Figs. 5-11 and associated disclosure; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. AOL discloses an interface of navigation options wherein a user can select from a plurality of channels, each cell in the interface corresponding to a particular channel. *See, e.g.*, Ex. 1015, p. 120; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. AOL further discloses that the navigation interface is comprised of a plurality of layers, such as a “Welcome” page, a “Channels” page, and a “Marketplace” page. *See, e.g.*, Ex. 1015, pp. 120, 121, 129; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

E. The prior art discloses or suggests that “the two-dimensional layer in a form of a navigation matrix,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

128. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the two-dimensional layer in a form of a navigation matrix.” *See, e.g.*, Appendix

2, support cited for claims 1, 9, 25, and 58; *see also* Ex. 1008, pp. 1549-1630, 2641-2735.

129. In my opinion, HTML 4.0, CSS2, and AOL disclose or suggest that the two-dimensional layer is in the form of a navigation matrix. *See, e.g.*, Ex. 1013, pp. 49-50, 58-59; Ex. 1014, pp. 95, 245, 253, 255; Ex. 1015, pp. 120, 121, 129; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. Moreover, I understand that in *EMG v. Apple et al.*, the patent owner proposed that “navigation matrix” be construed to mean “cells in any shape or arrangement on a single virtual level” *See* Ex. 1008, p. 4660. Given the patent owner’s own proposed construction, I am of the opinion that HTML 4.0, CSS2 and AOL disclose the two-dimensional layer to have the form of a navigation matrix.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

130. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the two-dimensional layer in a form of a navigation matrix.” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

131. In my opinion, Apte and AOL disclose or suggest that the two-dimensional layer is in the form of a navigation matrix. *See, e.g.*, Ex. 1016, Figs. 5-11, 7:26-53; Ex. 1015, pp. 120, 121, 129; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. Moreover, I understand that in *EMG v. Apple et al.*, the

patent owner proposed that “navigation matrix” be construed to mean “cells in any shape or arrangement on a single virtual level” *See* Ex. 1008, p. 4660. Given the patent owner’s own proposed construction, I am of the opinion that Apte and AOL disclose the two-dimensional layer to have the form of a navigation matrix.

F. The prior art discloses or suggests that “each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input,” and “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

132. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input,” and “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option,” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

133. I am of the opinion that HTML 4.0 discloses that a table composed of cells can contain links in each cell, and that links are navigation options. *See, e.g.*, Ex. 1013, pp. 49-50; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

These cells are divisions of the screen and associated with specific unique inputs. *See, e.g.*, Ex. 1013, pp. 58-59; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. I am further of the opinion that AOL discloses that each cell is a division of the screen and exclusive to a single separate navigation option associated with a specific input. *See, e.g.*, Ex. 1015, pp. 120, 121, 129; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

134. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input,” and “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option,” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

135. I am of the opinion that Apte and AOL disclose cells as divisions of a screen and exclusive to unique inputs. Apte discloses a navigation interface composed an advertisement area comprising a plurality of cells that correspond to controls such as a help button, pause button, step back button, and step forward button, as unique inputs. *See, e.g.*, Ex. 1016, 7:26-53; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. AOL discloses an interface of navigation options

wherein a user can select from a plurality of channels, each cell in the interface corresponding to a particular channel as a unique input. *See, e.g.*, Ex. 1015, p. 120.

G. The prior art discloses or suggests that “the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,” and “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs,” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

136. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,” and “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs,” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

137. I am of the opinion that HTML 4.0 and AOL disclose online content and advertisements formatted to be displayed in one or more of the plurality of cells. *See, e.g.*, Ex. 1013, pp. 48-50; Ex. 1015, pp. 120, 121, 129; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

138. I am further of the opinion that HTML 4.0 and AOL disclose that the online content and advertisements are formatted to be selected for navigation by one of the unique inputs. *See, e.g.*, Ex. 1013, p. 8, 66; Ex. 1015, pp. 120, 121, 129; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

139. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,” and “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs.” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

140. I am of the opinion that Apte, Leak, and AOL disclose online content that is formatted to be displayed in one or more cells and selected for navigation by a unique input. Apte discloses an interface with an advertising area that contains a display area for displaying advertisements and online content. *See, e.g.*, Ex. 1016, 7:26-53; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. The display area cell presents content to the user that is selectable by one of a plurality of unique control inputs, such as a help button, a pause button, a step back button, and a step forward button. *See, e.g.*, Ex. 1016, 7:26-53; *see also* Appendix 3, support

cited for claims 1, 9, 25, and 58. I am therefore of the opinion that Apte discloses online content and advertisements formatted for display in one of a plurality of cells and formatted to be selected for navigation by one of the unique inputs.

141. I am further of the opinion that Leak discloses a matrix of cells containing reduced size images of web pages that have been formatted for display in the cells and are selectable by the user for navigation using one of the unique input links. *See, e.g.*, Ex. 1017, 13:22-14:2; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. The images can be made selectable objects, and selecting one of the objects by using the directional buttons and Enter button on a remote control will cause the selected web page content to be displayed. *See* Ex. 1017, 13:22-14:2; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. I am therefore of the opinion that Leak discloses online content and advertisements formatted for display in one of a plurality of cells and formatted to be selected for navigation by one of the unique inputs.

142. I am further of the opinion that AOL discloses online content and advertisements formatted to be displayed in one or more cells and to be selected for navigation. AOL discloses an interface of navigation options wherein a user can select from a plurality of channels, each cell in the interface corresponding to a particular channel as a unique input. *See, e.g.*, Ex. 1015, p. 120; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. One channel, the “Marketplace”

channel, contains a matrix of cells wherein advertisements are formatted for display and selectable by the user. *See* Ex. 1015, p. 129; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

H. The prior art discloses or suggests that “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

143. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

144. I am of the opinion that HTML 4.0 and AOL disclose navigation options that change from general to more specific. *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. HTML 4.0 discloses that “visual user agents may allow users to select from option groups through a hierarchical menu or some other mechanism that reflects the structure of choices.” Ex. 1013, p. 109. AOL discloses a visual interface wherein a user begins at the “Welcome” window (containing general navigation options like “channels” or “What’s Hot”). Ex. 1015, p. 120. The user may select the “channels” navigation option and be presented with a matrix of

available channels (more specific). Ex. 1015, p. 121. The “Marketplace” channel navigation option (most specific), for example, presents the user with advertisements and purchasing interfaces. Ex. 1015, p. 129.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

145. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

146. I am of the opinion that AOL and Leak disclose changing navigation options from general to more specific options in each layer. AOL discloses a visual interface wherein a user begins at the “Welcome” window (containing general navigation options like “channels” or “What’s Hot”). Ex. 1015, p. 120. The user may select the “channels” navigation option and be presented with a matrix of available channels (more specific). Ex. 1015, p. 121. The “Marketplace” channel navigation option (most specific), for example, presents the user with advertisements and purchasing interfaces. Ex. 1015, p. 129.

147. Leak discloses web sites arranged “in a logical hierarchy” of first, second, third, and fourth levels. Ex. 1017, 8:25-9:5 Each page in the hierarchy contains hypertext links to pages in the next lower hierarchy, allowing a user to

receive a more specific navigation option at each deeper layer in the navigation interface. *See, e.g.*, Ex. 1017, 8:25-9:5; Fig. 8 and associated disclosure; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

I. The prior art discloses or suggests that “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

148. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

149. I am of the opinion that AOL discloses web pages with hyperlinks to sister sites and sister sites with hyperlinks to the original web pages. *See, e.g.*, Ex. 1015, pp. 662, 678, 688; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. I am of the further opinion that AOL discloses that graphically intensive web pages had hyperlinks to text-only sister sites, and those text-only sister sites had hyperlinks to the original graphic web pages. *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. I am of the opinion that AOL discloses the official web

site for the United States White House containing a link to a “text version.” Ex. 1015, p. 662. I am of the further opinion that AOL discloses the “[s]ome Web sites offer the ability to display material in text or graphic form.” Ex. 1015, p. 688.

150. Moreover, it is my opinion that displaying a hyperlink on a page of a website to navigate to another web page within the same website and/or displaying a hyperlink on a page of a website to navigate to another web page in a different website would have been well-known to a person of ordinary skill in the art. Further, in my opinion, displaying a hyperlink on a web page of a more advanced version of a website that would navigate to a less advanced version of a website, and/or vice versa, would have been well-known to a person of ordinary skill in the art. For example, it would have been well-known to have a hyperlink on a page in high bandwidth version of a website that could be selected to navigate to a page in a low bandwidth version of the website. It would have also been well-known to have a hyperlink on page of a graphics version of a website that would navigate to a text-only version of the website, or vice versa. *See, e.g.*, Internet 1996 World Exposition – park.org/bandwidth.cgi (November 3, 1996) (landing page); park.org/main.html (November 3, 1996) (high bandwidth version); www.park.org/main.text.html (November 3, 1996) (low bandwidth version) (collectively, “Internet 96”); White House Website – www3.whitehouse.gov (October 23, 1997) (graphic version); www3.whitehouse.gov/index-plain.html

(October 23, 1997) (text-only version) (collectively, “White House”); Jerry Teplitz Enterprises Website – www.teplitz.com/main.htm (June 26, 1998) (graphic version); www.teplitz.com/text/main.htm (June 26, 1998) (text-only version) (collectively, “Teplitz”); Sun Microsystems, Inc. Website – www.sun.com (August 3, 1997) (graphic version); www.sun.com/index.textonly.html (August 3, 1997) (text-only version); www.sun.com/index.java.html (August 3, 1997) (Java version) (collectively, “Sun”); Berliss, et. al, “Design of Accessible Web Pages”, copyright 1996 (dated May, 1996) by InfoUse (“InfoUse”); Yahoo.com – www.yahoo.com (Oct. 13, 1999) (main page); mobile.yahoo.com/wireless/home (Oct. 12, 1999) (mobile version) (collectively, “Yahoo”); NASA Website – www.nasa.gov (Apr. 30, 1999) (main page); www.nasa.gov/siteindex (Apr. 27, 1999) (site map); www.nasa.gov/textonly.html (Apr. 28, 1999) (collectively, “NASA”).

151. It is my opinion that it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the ‘196 patent to display a hyperlink on a sister site that allowed a user to navigate to a web page. It is also my opinion that it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the ‘196 patent to display a hyperlink on a web page that allowed a user to navigate to a sister site. In my opinion, doing so would have allowed the user to switch between the web page and the sister site, and/or vice versa, thereby providing ease of access to the web page and/or the

sister site and providing the user with the option of selecting a more or less advanced version of the website.

152. Therefore, I am also of the opinion that it would have been obvious to display a hyperlink on the sister site of Reformulating HTML, HTML 4.0, CSS2, and AOL to navigate to the web page and/or to display a hyperlink on the web page of Reformulating HTML, HTML 4.0, CSS2, and AOL to navigate to the sister site.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

153. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

154. I am of the opinion that AOL discloses web pages with hyperlinks to sister sites and sister sites with hyperlinks to the original web pages. *See, e.g.*, Ex. 1015, pp. 662, 678, 688; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. I am of the further opinion that AOL discloses that graphically intensive web pages had hyperlinks to text-only sister sites, and those text-only sister sites had hyperlinks to the original graphic web pages. I am of the opinion that AOL discloses the official web site for the United States White House containing a link

to a “text version.” Ex. 1015, p. 662. I am of the further opinion that AOL discloses the “[s]ome Web sites offer the ability to display material in text or graphic form.” Ex. 1015, p. 688.

155. Moreover, it is my opinion that displaying a hyperlink on a page of a website to navigate to another web page within the same website and/or displaying a hyperlink on a page of a website to navigate to another web page in a different website would have been well-known to a person of ordinary skill in the art. Further, in my opinion, displaying a hyperlink on a web page of a more advanced version of a website that would navigate to a less advanced version of a website, and/or vice versa, would have been well-known to a person of ordinary skill in the art. For example, it would have been well-known to have a hyperlink on a page in high bandwidth version of a website that could be selected to navigate to a page in a low bandwidth version of the website. It would have also been well-known to have a hyperlink on page of a graphics version of a website that would navigate to a text-only version of the website, or vice versa. *See, e.g.*, Internet 1996 World Exposition – park.org/bandwidth.cgi (November 3, 1996) (landing page); park.org/main.html (November 3, 1996) (high bandwidth version); www.park.org/main.text.html (November 3, 1996) (low bandwidth version) (collectively, “Internet 96”); White House Website – www3.whitehouse.gov (October 23, 1997) (graphic version); www3.whitehouse.gov/index-plain.html

(October 23, 1997) (text-only version) (collectively, “White House”); Jerry Teplitz Enterprises Website – www.teplitz.com/main.htm (June 26, 1998) (graphic version); www.teplitz.com/text/main.htm (June 26, 1998) (text-only version) (collectively, “Teplitz”); Sun Microsystems, Inc. Website – www.sun.com (August 3, 1997) (graphic version); www.sun.com/index.textonly.html (August 3, 1997) (text-only version); www.sun.com/index.java.html (August 3, 1997) (Java version) (collectively, “Sun”); Berliss, et. al, “Design of Accessible Web Pages”, copyright 1996 (dated May, 1996) by InfoUse (“InfoUse”); Yahoo.com – www.yahoo.com (Oct. 13, 1999) (main page); mobile.yahoo.com/wireless/home (Oct. 12, 1999) (mobile version) (collectively, “Yahoo”); NASA Website – www.nasa.gov (Apr. 30, 1999) (main page); www.nasa.gov/siteindex (Apr. 27, 1999) (site map); www.nasa.gov/textonly.html (Apr. 28, 1999) (collectively, “NASA”).

156. It is my opinion that it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the ‘196 patent to display a hyperlink on a sister site that allowed a user to navigate to a web page. It is also my opinion that it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the ‘196 patent to display a hyperlink on a web page that allowed a user to navigate to a sister site. In my opinion, doing so would have allowed the user to switch between the web page and the sister site, and/or vice versa, thereby providing ease of access to the web page and/or the

sister site and providing the user with the option of selecting a more or less advanced version of the website. Furthermore, it would be obvious to a person of ordinary skill in the art to display a hyperlink on a web page to a sister site encoded in a different format to improve the interoperability of the web page across different platforms and accommodate users who have slower internet connections

157. Therefore, I am also of the opinion that it would have been obvious to display a hyperlink on the sister site of Reformulating HTML, Apte, Leak, and AOL to navigate to the web page and/or to display a hyperlink on the web page of Reformulating HTML, Apte, Leak, and AOL to navigate to the sister site.

J. The prior art discloses or suggests that “receiving a user selection of one of the navigation options” and “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

158. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “receiving a user selection of one of the navigation options” and “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix” See, *e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. See *also* Ex. 1008, pp. 1549-1630, 2641-2735.

159. I am of the opinion that HTML 4.0 discloses receiving a selection or input from the user corresponding to a specific unique input coupled with a cell in the associated matrix. *See, e.g.,* Ex. 1013, pp. 8-9, 67, 80; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. HTML 4.0 discloses that links may be located in cells of a table, and that “by activating these links (by clicking with the mouse, through keyboard input, voice commands, etc.), users may visit these resources.” *See, e.g.,* Ex. 1013, pp. 48-50, 67; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. I am therefore of the opinion that HTML 4.0 discloses or suggests receiving user selections of navigation options that are associated with unique inputs and coupled to cells of the navigation matrix. *See, e.g.,* Appendix 2, support cited for claims 1, 9, 25, and 58.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

160. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “receiving a user selection of one of the navigation options” and “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix” *See, e.g.,* Appendix 3, support cited for claims 1, 9, 25, and 58.

161. I am of the opinion that Apte discloses or suggests receiving user input corresponding with a user selection of one of the navigation options (e.g.

“stepping back to previously displayed advertisements by selecting the step back button”). *See, e.g.*, Ex. 1016, 7:54-8:5; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. I am further of the opinion that Apte discloses or suggests that the input received is uniquely coupled to an associated cell in the navigation matrix, since “[e]ach button acts as a link” and directly affects the content displayed in the presentation cell of the navigation interface. *See, e.g.*, Ex. 1016, 7:26-53; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

162. I am of the opinion that Leak discloses or suggests receiving user input corresponding with a user selection of one of the navigation options (e.g. “the images 251-258 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images”). *See, e.g.*, Ex. 1017, 13:22-14:2; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. I am further of the opinion that Leak discloses or suggests that the input received is uniquely coupled to an associated cell in the navigation interface since each individual image can be made a “selectable object.” *See, e.g.*, Ex. 1017, 13:22-14:2; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

163. I am of the opinion that AOL discloses or suggests receiving a user selection of a navigation option that is coupled to a unique input (e.g. “Finding the right place to visit on AOL is similar to selecting a channel on your TV set, except you click an icon rather than push a button.”). *See, e.g.*, Ex. 1015, p. 120; *see also*

Appendix 3, support cited for claims 1, 9, 25, and 58. I am further of the opinion that AOL discloses or suggests that the user selection is uniquely coupled to an associated cell in the matrix, since AOL discloses individual channels that may be selected by clicking the related icon. *See, e.g.*, Ex. 1015, p. 121; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

K. The prior art discloses or suggests that “forwarding the selected navigation option across the internet to a server providing the simplified navigation interface” and “forwarding the first input across the internet to a server providing the simplified navigation interface;” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

164. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “forwarding the selected navigation option across the internet to a server providing the simplified navigation interface” and “forwarding the first input across the internet to a server providing the simplified navigation interface.” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

165. I am of the opinion that AOL discloses forwarding a navigation option across the internet to AOL’s servers providing the AOL navigation interface. *See, e.g.*, Ex. 1015, p. 45; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

AOL discloses that “America Online’s computers are built on the client-server model” and that a user may “interact with that community from [the user’s] own computer and modem, using America Online’s unique graphical interface. *See, e.g.,* Ex. 1015, p. 45; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. I am of the opinion that AOL discloses the forwarding of user selections across the internet to a server providing the interface. *See, e.g.,* Appendix 2, support cited for claims 1, 9, 25, and 58.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

166. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “forwarding the selected navigation option across the internet to a server providing the simplified navigation interface” and “forwarding the first input across the internet to a server providing the simplified navigation interface;” *See, e.g.,* Appendix 3, support cited for claims 1, 9, 25, and 58.

167. I am of the opinion that Apte discloses or suggests forwarding selected navigation options and inputs across the internet to a server providing the simplified navigation interface (e.g. “[a]dvertising software on the server is downloaded to the client computer and executes to act as an overlay to the browser”). *See, e.g.,* Ex. 1016, 6:23-41, Figures 3 and 4 and associated disclosure; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

168. I am further of the opinion that Leak discloses or suggests forwarding selected navigation options and inputs across the internet to a server providing the simplified navigation interface. Leak discloses or suggests an embodiment of the WebTV network where a client is connected to a WebTV server providing the interface via the Internet. *See, e.g.*, Ex. 1017, 4:8-23, Figures 1 and 5 and associated disclosure; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

169. I am further of the opinion that AOL discloses or suggests forwarding selected navigation options and inputs across the internet to a server providing the simplified navigation interface. *See, e.g.*, Ex. 1015, p. 45; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. AOL discloses that “America Online’s computers are built on the client-server model” and that a user may “interact with that community from [the user’s] own computer and modem, using America Online’s unique graphical interface.” *See, e.g.*, Ex. 1015, p. 45; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. I am of the opinion that AOL discloses the forwarding of user selections across the internet to a server providing the interface. *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

L. The prior art discloses or suggests that “receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option” and “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

170. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option” and “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input.” *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

171. I am of the opinion that HTML 4.0 and AOL disclose navigation options that change from general to more specific. HTML 4.0 discloses that “visual user agents may allow users to select from option groups through a hierarchical menu or some other mechanism that reflects the structure of choices.” *See, e.g.*, Ex. 1013, p. 109; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. AOL discloses a visual interface wherein a user begins at the “Welcome” window (containing general navigation options like “channels” or “What’s Hot”). *See, e.g.*, Ex. 1015, p. 120; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58.

The user may select the “channels” navigation option and be presented with a matrix of available channels (more specific). *See, e.g.*, Ex. 1015, p. 121; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. The “Marketplace” channel navigation option (most specific), for example, presents the user with advertisements and purchasing interfaces. *See, e.g.*, Ex. 1015, p. 129; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

172. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option” and “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input.” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

173. I am of the opinion that AOL and Leak disclose or suggest receiving deeper layers of the navigation interface. AOL discloses a visual interface wherein a user begins at the “Welcome” window (containing general navigation options like “channels” or “What’s Hot”). *See, e.g.*, Ex. 1015, p. 120; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. The user may select the “channels” navigation option and be presented with a matrix of available channels (more specific). *See, e.g.*, Ex. 1015, p. 121; *see also* Appendix 3, support cited for claims

1, 9, 25, and 58. The “Marketplace” channel navigation option (most specific), for example, presents the user with advertisements and purchasing interfaces. *See, e.g.*, Ex. 1015, p. 129; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

174. Leak discloses web sites arranged “in a logical hierarchy” of first, second, third, and fourth levels. *See, e.g.*, Ex. 1017, 8:25-9:5; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. Each page in the hierarchy contains hypertext links to pages in the next lower hierarchy, allowing a user to receive a more specific navigation option at each deeper layer in the navigation interface. *See, e.g.*, Ex. 1017, 8:25-9:5; Figure 8 and associated disclosure; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58

M. The prior art discloses or suggests that “manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content” and “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content” as recited in claims 1, 9, 25, and/or 58 of the ‘196 Patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

175. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content” and “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” *See*,

e.g., Appendix 2, support cited for claims 1, 9, 25, and 58. *See also* Ex. 1008, pp. 1549-1630, 2641-2735.

176. I am of the opinion that CSS2, HTML 4.0, and AOL disclose scrolling and/or zooming. *See, e.g.*, Appendix 2, support cited for claims 1, 9, 25, and 58. CSS2 discloses that “[w]hen magnifying a page, [user agents] should preserve the relationships between positioned elements.” *See, e.g.*, Ex. 1014, p. 276; *see also* Appendix 2, support cited for claims 1, 9, 25, and 58. I am of the opinion that this disclosure of magnifying is analogous to zooming. HTML 4.0 discloses that different table sections “enable[] user agents to support scrolling of table bodies independent of the table head and foot.” *See, e.g.*, Ex. 1013, p. 52; Appendix 2, support cited for claims 1, 9, 25, and 58. AOL discloses scrollbars for scrolling of the displayed online content. *See, e.g.*, Ex. 1015, p. 140; Appendix 2, support cited for claims 1, 9, 25, and 58. I am therefore of the opinion that CSS2, HTML 4.0, and AOL disclose zooming and/or scrolling. I am further of the opinion that HTML 4.0 discloses FRAMES and IFRAMES, and a person of skill in the art at the time would have known that a frame can allow a user to manipulate a selected region of the screen for viewing and/or scrolling of content. Ex. 1013, p. 95.

177. I am further of the opinion that manipulating a region of a screen for viewing and zooming and/or scrolling content was well-known in the art. *See, e.g.*, Steve Londergan, *The Lotus Domino Server* (1st ed. 1997) (“DOMINO”); *B.B.*

Bederson et al., Pad++: A Zoomable Graphical Sketchpad for Exploring Alternative Interface Physics (Sept. 19, 1995) (“Pad++”). Pad++ and DOMINO both disclose zoomable and scrollable browsers that would have been well-known to a person of ordinary skill in the art. *See also* Appendix 2, support cited for claims 1, 9, 25, and 58

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

178. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest “manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content” and “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” *See, e.g.*, Appendix 3, support cited for claims 1, 9, 25, and 58.

179. I am of the opinion that AOL discloses scrollbars for the scrolling of online content. *See, e.g.*, Ex. 1015, p. 140; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58. I am further of the opinion that Apte discloses scrollbars for the scrolling of online content. *See, e.g.*, Ex. 1016, Fig. 10; *see also* Appendix 3, support cited for claims 1, 9, 25, and 58.

180. I am further of the opinion that manipulating a region of a screen for viewing and zooming and/or scrolling content was well-known in the art. *See, e.g.*, Steve Londergan, *The Lotus Domino Server* (1st ed. 1997) (“DOMINO”); *B.B.*

Bederson et al., Pad++: A Zoomable Graphical Sketchpad for Exploring Alternative Interface Physics (Sept. 19, 1995) (“Pad++”). Pad++ and DOMINO both disclose zoomable and scrollable browsers that would have been well-known to a person of ordinary skill in the art. *See also* Appendix 3, support cited for claims 1, 9, 25, and 58.

N. Motivation to Combine

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

181. As discussed above, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest each of the independent claims of the ’196 patent and I am also of the opinion that it would have been obvious to combine Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art.

182. As discussed above, Reformulating HTML, HTML 4.0, and CSS2 were all published by the World Wide Web Consortium as a means to standardize the way in which content is published on the World Wide Web. *See, e.g.*, W3C Mission Statement, *available at* <http://www.w3.org/Consortium/mission>. Furthermore, Reformulating HTML incorporates HTML 4.0 and CSS2 by reference. *See, e.g.*, Ex. 1012, p. 20. Reformulating HTML was published in order to show how content published in HTML could be converted into XML for the purpose of being viewed on a wide variety of platforms. HTML 4.0 and CSS2

were sets of standard programming conventions by which the content and structure of web documents and the style through which web documents were presented to the user could be implemented. I am of the opinion it would have been obvious to a person of ordinary skill in the art combine HTML 4.0 and CSS2 in order to create and publish content on the World Wide Web that could be viewed uniformly across a variety of devices, and I am of the further opinion it would have been obvious to combine HTML 4.0 and CSS2 and Reformulating HTML in order to transcode documents from HTML to XML in order to improve compatibility across different web platforms. I am further of the opinion a person of ordinary skill in the art would recognize that this combination of references would provide significant cost savings to publishers of web content by permitting content providers to repurpose web pages encoded in HTML for display on other devices and platforms that were only supported XML.

183. I am further of the opinion that it would have been obvious to combine the simplified user interface of AOL with content published through the combination of Reformulating HTML, HTML 4.0, and CSS2. As discussed above, AOL discloses or suggests a graphical user interface consisting of a matrix of navigational options selectable by the user as icons. Ex. 1015, pp. 120, 121, 129. As discussed above, HTML 4.0 discloses or suggests tables which can be composed of cells in rows and columns comprising links, images, text, and other

arranged data. Ex. 1013, pp. 49-50. I am of the opinion that it would have been obvious to a person of ordinary skill in the art to combine the visual navigational interface of AOL with a table implemented in HTML. In my opinion, the nature of the problem to be solved in both AOL and HTML 4.0 (presenting information in a simplified manner and processing user requests for information), as well as the need to implement the solution to this problem on a wide variety of devices such as web appliances, televisions, or mobile phones, would have led one of ordinary skill in the art to implement the simplified navigation interface of AOL as a table in HTML. Ex. 1015, pp. 120, 121, 129; Ex. 1013, pp. 49-50. Furthermore, I am of the opinion that AOL itself teaches toward this combination because AOL discloses or suggests displaying HTML encoded tables through AOL's visual interface. *See, e.g.*, Ex. 1015, Figs. 36.12, 36.17, 36.25, 36.27.

184. It is my opinion that it would have been obvious to combine the simplified navigation interface of AOL with the means of encoding web content in Reformulating HTML, HTML 4.0, and CSS2. In my opinion, doing so would allow information such as content and advertisements to be presented to a user easily and efficiently. In my opinion, this would improve the user's experience in navigating through said content and advertisements, which would in turn encourage users to spend more time experiencing content and advertisements. Increased user exposure would make advertisements more effective by generating

more impressions per advertisement, and there is an obvious financial incentive for merchants and content providers to make advertisements more effective.

185. For at least the foregoing reasons, I am of the opinion that independent claims 1, 9, 25, and 58 would have been obvious to a person of ordinary skill in the art in view of the disclosure of Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art. Moreover, for at least the reasons discussed herein, I am of the opinion that it would have been obvious to combine the teachings of Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and that such a combination discloses or suggests claims 1-76 of the '196 patent.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

186. As discussed above, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest each of the independent claims of the '196 patent and I am also of the opinion that it would have been obvious to combine Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art.

187. I am of the opinion that it would have been obvious for a person of ordinary skill in the art at the relevant time to combine aspects of Reformulating HTML with Apte, Leak, and AOL at least because these references are in the same field of endeavor (the presentation of information via the Internet).

188. I am of the opinion that it would have been obvious to a person of ordinary skill in the art to combine the reformulation of HTML into XML taught by Reformulating HTML to the simplified navigational interface of Leak. Leak discloses a transcoder that “automatically modifies certain Web pages and other files retrieved from remote servers.” Ex. 1017, 7:27-28. Reformulating HTML discloses transformational software that converts HTML content into XML content suitable for viewing on a wide variety of other devices, including a television screen. Ex. 1012, p. 8. In my opinion, it would have been obvious to configure the transcoder of Leak to convert HTML to XML as taught by Reformulating HTML in order to allow HTML documents to be presented on a television screen encoded in XML, at least because both references teach the display of content via a television.

189. I am further of the opinion that it would have been obvious to combine Apte to Reformulating HTML and Leak as described above. Apte discloses the presentation of advertisements to a user through a simplified navigation interface. Ex. 1016, Abstract. It was well-known to a person of ordinary skill in the art that advertisements could be transmitted via the Internet and that advertisements could be displayed on a television. Furthermore, as discussed above, I am of the opinion that Apte and Leak disclose simplified navigation interfaces for online content and advertisements. I am of the opinion that it would

be obvious to one of ordinary skill in the art to combine the targeted advertisements of Apte with the simplified navigational interface of Leak and that the benefits of combining these teachings would be obvious to one of ordinary skill in the art. One of ordinary skill in the art would recognize that this would allow for greater exposure of advertisements to users which would present a financial incentive for merchants and content providers. Furthermore, in my opinion it would be obvious that combining Reformulating HTML, Apte, and Leak would improve a user's experience in viewing and navigating online content over the World Wide Web.

190. I am further of the opinion that it would have been obvious to combine the simplified user interface of AOL with content published through the combination of Reformulating HTML, Apte, and Leak. As discussed above, AOL discloses or suggests a graphical user interface consisting of a matrix of navigational options selectable by the user as icons. Ex. 1015, pp. 120, 121, 129. Furthermore, as discussed above, I am of the opinion that Apte and Leak disclose simplified navigation interfaces for online content and advertisements, and that these interfaces are composed of matrices consisting of cells arranged in rows and columns. I am of the opinion that it would have been obvious to a person of ordinary skill in the art to combine the visual navigational interface of AOL with the matrices of Apte and Leak. In my opinion, the nature of the problem to be

solved in AOL, Apte, and Leak (presenting information in a simplified manner and processing user requests for information), as well as the need to implement the solution to this problem on a wide variety of devices such as web appliances, televisions, or mobile phones, would have led one of ordinary skill in the art to implement the simplified navigation interface of AOL on other devices, such as a television as taught by Leak. Ex. 1015, pp. 120, 121, 129; Ex. 1017, Fig. 12. I am of the opinion this combination would provide a consistent presentation of information in a format easy for a user to view and navigate thereby providing greater convenience and ease of use to a user, thereby motivating one of ordinary skill in the art to combine these references.

191. It is my opinion that it would have been obvious to combine the simplified navigation interface of AOL with the means of encoding web content in Reformulating HTML, Apte, and Leak. In my opinion, doing so would allow information such as content and advertisements to be presented to a user easily and efficiently on a range of devices, including televisions. In my opinion, this would improve the user's experience in navigating through said content and advertisements, which would in turn encourage users to spend more time experiencing content and advertisements. Increased user exposure would make advertisements more effective by generating more impressions per advertisement,

and there is an obvious financial incentive for merchants and content providers to make advertisements more effective.

192. For at least the foregoing reasons, I am of the opinion that independent claims 1, 9, 25, and 58 would have been obvious to a person of ordinary skill in the art in view of the disclosure of Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art. Moreover, for at least the reasons discussed herein, I am of the opinion that it would have been obvious to combine the teachings of Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art and that such a combination discloses or suggests claims 1-76 of the '196 patent.

O. Dependent Claims 2, 12, 14, 15, 16, 24, 28, 30, 31, 32, 39, 43, 44, 59, 68, 69, 75, and 76

193. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest

dependent claims 2, 12, 14, 15, 16, 24, 28, 30, 31, 32, 39, 43, 44, 59, 68, 69, 75, and 76 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art

194. As discussed above, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art discloses or suggests displaying content and/or advertisements accessed via the Internet on a screen of a user device. As discussed above, I am also of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that text and/or images could be linked to other content using a hyperlink and, when the hyperlink was selected by a user, that the other content could be retrieved via the Internet and may be related to the text and/or image having the hyperlink. As further discussed above, it is my opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that a document could be converted from one format into another format so that it could be easily viewable, navigable, and accessible. In my opinion, it thus would have been obvious to display one or more hyperlinked advertisements on a screen and, when a user selected the advertisement, displaying additional content accessed via the Internet that is associated with the selected advertisement and that is formatted for navigation with the unique inputs. See, e.g., Appendix 2, support cited for

claims 2 and 59. I am further of the opinion that it would have been obvious to a person of skill in the art for the content to be formatted for navigation with the unique inputs to provide consistency and ease of use to a user.

195. I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest displaying content at the same time as one or more advertisements, such as on a web page. HTML 4.0 discloses “within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” Ex. 1013, p. 95. *See, e.g.*, Appendix 2, support cited for claims 12, 28, 43, and 68.

196. It is my opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that particular content could be displayed in-line with other content, displayed outside of other content (e.g., outside of a table), and/or displayed as an overlay over other content. It thus, in my opinion, would have been obvious for a second advertisement to be displayed outside of a cell (e.g., a frame not part of a table comprising a static banner). *See, e.g.*, Appendix 2, support cited for claims 14, 15, 30, 31, 44, and 69. Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the simplified navigation interface to be displayed as an overlay over an advertisement, in my

opinion. *See, e.g.*, Appendix 2, support cited for claims 15, 31, 44, and 69. CSS2 discloses transparency where “each box transparently overlays the boxes below it.” Ex. 1014, p. 127. In my opinion, it would be obvious to make the simplified navigation interface an overlay on an advertisement. It is my opinion that doing so could provide greater flexibility regarding where advertisements are displayed and may allow advertisements to be displayed in a location convenient for a user and/or a developer of a website. Moreover, it is my opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest an advertisement embedded within the on-line content with the advertisement corresponding to a navigation option. *See, e.g.*, Appendix 2, support for claims 24 and 39. HTML 4.0 discloses that an “embedded document is entirely independent of the document in which it is embedded.” Ex. 1013, p. 80. HTML 4.0 further discloses “rather than linking to a document, an author may want to embed it directly into a primary HTML document.” Ex. 1013, p. 80. As discussed above, elements in an HTML document may be links to other documents. In my opinion, it would be obvious to embed an advertisement in an HTML document as a link to other content. In my opinion, doing so may allow a user to select the navigation option corresponding to the advertisement to access additional information about a product being advertised.

197. In addition, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that content accessed via the Internet could include text, audio, and/or video. *See, e.g.*, Appendix 2, support cited for claims 16, 32, 75, and 76. HTML 4.0 discloses that content providers may “[i]nclude spread-sheets, video clips, sound clips, and other applications directly in their documents.” Ex. 1013, p. 8-9. I am further of the opinion that doing so may provide an enhanced viewing experience for a user.

198. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest claims 2, 12, 14, 15, 16, 24, 28, 30, 31, 32, 39, 43, 44, 59, 68, 69, 75, and 76 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 2, 12, 14, 15, 16, 24, 28, 30, 31, 32, 39, 43, 44, 59, 68, 69, 75, and 76.

Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art

199. As discussed above, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art discloses or suggests displaying content and/or advertisements accessed via the Internet on a screen of a user device. As discussed above, I am also of the opinion

that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that text and/or images could be linked to other content using a hyperlink and, when the hyperlink was selected by a user, that the other content could be retrieved via the Internet and may be related to the text and/or image having the hyperlink. As further discussed above, it is my opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that a document could be converted from one format into another format so that it could be easily viewable, navigable, and accessible. In my further opinion, Apte discloses or suggests displaying one or more hyperlinked advertisements on a screen and, when a user selected the advertisement, displaying additional content accessed via the Internet that is associated with the selected advertisement and that is formatted for navigation with the unique inputs. *See, e.g.,* Ex. 1016, 4:43-55; Appendix 3, support cited for claims 2 and 59.

200. I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest displaying content at the same time as one or more advertisements, such as on a web page. Apte and AOL disclose or suggest the display of content at the same time as one or more advertisements. *See, e.g.,* Ex. 1016, 4:56-5:2, Figs. 6-10; Ex. 1015, pp. 120, 121, 129; Appendix 3, support cited for claims 12, 28, 43, and 68.

201. It is my opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that particular content could be displayed in-line with other content, displayed outside of other content (e.g., outside of a table), and/or displayed as an overlay over other content. It thus, in my opinion, would have been obvious for a second advertisement to be displayed outside of a cell (e.g., a frame not part of a table comprising a static banner). *See, e.g.*, Appendix 3, support cited for claims 14, 15, 30, 31, 44, and 69. Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the simplified navigation interface to be displayed as an overlay over an advertisement, in my opinion. *See, e.g.*, Appendix 2, support cited for claims 15, 31, 44, and 69. Apte discloses “[t]he advertising software operates as an overlay to a conventional, known browser.” Ex. 1016, 4:7-10, Figs. 6-10. Moreover, it is my opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest an advertisement embedded within the on-line content with the advertisement corresponding to a navigation option. *See, e.g.*, Appendix 3, support cited for claims 24 and 39. Apte and AOL disclose advertisements embedded in content that correspond to navigation options. *See, e.g.*, Ex. 1016, 7:7-10, 8:28-33 (“The advertisements shown in the display area 37 may be links, may contain links,

and/or may function as image maps with selectable areas”), Figs. 6-10; Ex. 1015, pp. 120, 121, 129.

202. In addition, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest that content accessed via the Internet could include text, audio, and/or video. *See, e.g.*, Appendix 3, support cited for claims 16, 32, 75, and 76. Apte discloses “[t]he advertisements comprise at least one of textual, graphic, animation, video, audio and virtual object media.” Ex. 1016, 8:28-33.

203. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest claims 2, 12, 14, 15, 16, 24, 28, 30, 31, 32, 39, 43, 44, 59, 68, 69, 75, and 76 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 2, 12, 14, 15, 16, 24, 28, 30, 31, 32, 39, 43, 44, 59, 68, 69, 75, and 76.

P. Dependent Claims 3, 10, 26, and 60

204. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the

‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 3, 10, 26, and 60 of the ‘196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art

205. It is my opinion that HTML 4.0 and AOL disclose or suggest that the online content can be selected and the display customized based at least in part on a navigation path of a user. *See, e.g.*, Appendix 2, support cited for claims 3, 10, 26, and 60. HTML 4.0 discloses that every resource on the web has a Universal Resource Identifier, which is an address to which a user may navigate to access said content. Ex. 1013, p. 8. HTML 4.0 further discloses that the “[v]isual user agents may allow users to select from option groups through a hierarchical menu or some other mechanism that reflects the structure of choices.” Ex. 1013, pp. 109. AOL further discloses that “[u]sing hypertext links, you are able to click a topic and jump right to the material related to that subject.” Ex. 1015, p. 141. AOL discloses a visual interface which is customized based on the channel a user selects. Ex. 1015, pp. 120, 121, 129. I am of the opinion that the selection and display of the simplified navigation interface can be customized based on links or buttons selected by user to navigate to other web pages having a customized

navigation interface. Ex. 1013, p. 8. As another example, the selection and display of the simplified navigation interface can be customized based on links or buttons selected by user to display or hide certain content displayed in the simplified navigation interface. Ex. 1014, pp. 149-151. Furthermore, HTML 4.0 discloses FRAMES and IFRAMES, and a person of skill in the art at the time would have known that a frame may allow a user to change content in another frame by selecting a link displayed within the frame. Ex. 1013, p. 95.

206. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 3, 10, 26, and 60 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 3, 10, 26, and 60.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

207. I am of the opinion that Apte and AOL disclose or suggest that the online content can be selected and the display customized based on a navigation path of a user. *See, e.g.*, Appendix 3, support cited for claims 3, 10, 26, and 60. Apte discloses “the present invention can make choices about which advertisements to display to the user that are responsive to the user's current viewing habits.” Ex. 1016, 8:34-51. AOL discloses that “[u]sing hypertext links,

you are able to click a topic and jump right to the material related to that subject.” Ex. 1015, p. 141. AOL further discloses a visual interface which is customized based on the channel a user selects. Ex. 1015, pp. 120, 121, 129.

208. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 3, 10, 26, and 60 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 3, 10, 26, and 60.

Q. Dependent Claims 4, 13, 29, 41, 53, 57, 61, and 67

209. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 4, 13, 29, 41, 53, 57, 61, and 67 of the ‘196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

210. It is my opinion that HTML 4.0, CSS2, and AOL disclose or suggest that the user selection or first input of one of the navigation options is received on any one of a remote control, a pointer device, a keypad, and a keyboard, and using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen. *See, e.g.*, Appendix 2, support cited for claim claims 4, 13, 29, 41, 53, 57, 61, and 67. HTML 4.0 discloses that links can be activated “by clicking with the mouse, through keyboard input, voice commands, etc.” Ex. 1013, p. 67. CSS2 discloses accepting input through pointing devices, pen devices, and keyboard events. Ex. 1014, p. 63-64. AOL discloses that navigating the Internet can be accomplished by “a single click of the mouse.” Ex. 1015, p. 46. I am of the opinion that a person of skill in the art would at the time have understood that a mouse is a pointer device that could be used to select a cell or manipulate the screen. *See, e.g.*, Ex. 1013, pp. 9, 80, 126, 113; Ex. 1015, p. 46, 665, 678.

211. I am further of the opinion that it thus would have been obvious to a person of skill in the art at the relevant time for a user selection of a navigation option or an input to be received from a remote control, a pointer, a keypad, and/or a keyboard. Likewise, it would have been obvious to use a pointer device to select one or more cells and/or to manipulate the screen.

212. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of

ordinary skill in the art, disclose or suggest claims 4, 13, 29, 41, 53, 57, 61, and 67 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 4, 13, 29, 41, 53, 57, 61, and 67.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

213. I am of the opinion that Apte, Leak, and AOL disclose or suggest that the user selection or first input of one of the navigation options is received on any one of a remote control, a pointer device, a keypad, and a keyboard, and using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen. *See, e.g.*, Appendix 3, support cited for claim claims 4, 13, 29, 41, 53, 57, 61, and 67. Apte discloses a “client computer 52 comprises a microprocessor, a display device such as a screen, storage devices such as a hard disk drive and random access memory, and input devices such as a keyboard and mouse.” Ex. 1016, c. 6 ll. 15-22, Fig. 3. Apte further discloses that the mouse pointer is used to manipulate the cells in the navigation interface (e.g., clicking control buttons). Ex. 1016, 7:26-53. AOL discloses that navigating the Internet can be accomplished by “a single click of the mouse” by selecting cells within the navigation interface for navigation. Ex. 1015, p. 46.

214. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of

ordinary skill in the art, disclose or suggest claims 4, 13, 29, 41, 53, 57, 61, and 67 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 4, 13, 29, 41, 53, 57, 61, and 67.

R. Dependent Claims 5, 13, 29, and 62

215. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 5, 13, 29, 62 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

216. It is my opinion that HTML 4.0 and AOL disclose or suggest receiving one or more navigation input selections through the voice recognition system. *See, e.g.*, Appendix 2, support cited for claims 5, 13, 29, 62 . HTML 4.0 discloses that links can be activated “by clicking with the mouse, through keyboard input, voice commands, etc.” Ex. 1013, p. 67. CSS2 discloses accepting input

through pointing devices, pen devices, and keyboard events. Ex. 1014, p. 63-64. AOL discloses “PlainTalk speech recognition software.” Ex. 1015, p. 80.

217. I am further of the opinion that voice recognition systems were well-known at the time of the alleged invention. *See, e.g.*, Ex. 1022. Dragon NaturallySpeaking, for example, allowed navigation input selections to made verbally by a user. Ex. 1022, pp. 12, 26, 28. I am of the opinion that it would have been obvious to combine a voice recognition system such as Dragon NaturallySpeaking to select navigation options in a simplified navigation interface, at least because such a combination would have made the interface more accessible to disabled users who were unable to operate pointing devices. Such a combination would have had an obvious financial incentive to one of ordinary skill in the art because it would have allowed more users to utilize the interface. It thus would have been obvious to a person of skill in the art at the time for a wireless Internet application to have a voice recognition system through which navigation input selections for a simplified navigation interface could be received.

218. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 5, 13, 29, and 62 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at

the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 5, 13, 29, and 62.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

219. I am of the opinion that AOL discloses or suggests receiving one or more navigation input selections through the voice recognition system. *See, e.g.*, Appendix 3, support cited for claims 5, 13, 29, 62. AOL discloses “PlainTalk speech recognition software.” Ex. 1015, p. 80.

220. I am further of the opinion that voice recognition systems were well-known at the time of the alleged invention. *See, e.g.*, Ex. 1022. The Dragon NaturallySpeaking system, for example, allowed navigation input selections to made verbally by a user. Ex. 1022, pp. 12, 26, 28. I am of the opinion that it would have been obvious to combine a voice recognition system such as Dragon NaturallySpeaking to select navigation options in a simplified navigation interface, at least because such a combination would have made the interface more accessible to disabled users who were unable to operate pointing devices. Such a combination would have had an obvious financial incentive to one of ordinary skill in the art because it would have allowed more users to utilize the interface. It thus would have been obvious to a person of skill in the art at the time for a wireless Internet application to have a voice recognition system through which navigation input selections for a simplified navigation interface could be received.

221. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 5, 13, 29, and 62 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 5, 13, 29, and 62.

S. Dependent Claims 6, 50, 54, and 63

222. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 6, 50, 54, and 63 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

223. It is my opinion that HTML 4.0 and AOL disclose or suggest a screen that includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of

the regions. *See, e.g.*, Appendix 2, support cited for claims 6, 50, 54, and 63. HTML 4.0 discloses “[e]lements that may receive focus” and a “main document that can be scrolled through or replaced.” Ex. 1013, pp. 95, 113. For example, form fields within a particular cell of a table and/or an IFRAME could be selected and manipulated by a user. Ex. 1013, p. 49, 101-102. AOL discloses icons and content within its interface that can be brought into focus and manipulated through the use of a mouse or scrollbars and that constitute individual regions of the screen. Ex. 1015, pp. 120, 121, 129. In addition, I am of the opinion that a person of skill in the art would have known that HTML, JavaScript, and/or CSS could be used to change the background color, magnification of font-size, etc. for a focused region. Ex. 1013, p. 31; Ex. 1014, pp. 149-151, 204, 275-276.

224. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 6, 50, 54, and 63 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 6, 50, 54, and 63.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

225. I am of the opinion that Apte and AOL disclose or suggest a screen that includes individual regions adapted to be brought into focus and further

adapted such that the on-line content can be manipulated within a selected one of the regions. *See, e.g.*, Appendix 3, support cited for claims 6, 50, 54, and 63. Apte discloses the “browser area and the advertising area [which] operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area.” Ex. 1016, 7:9-34. AOL discloses icons and content within its interface that can be brought into focus and manipulated through the use of a mouse or scrollbars and that constitute individual regions of the screen. Ex. 1015, pp. 120, 121, 129.

226. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 6, 50, 54, and 63 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 6, 50, 54, and 63.

T. Dependent Claims 7, 51, 55, and 64

227. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the

art at the time of the '196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 7, 51, 55, and 64 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

228. It is my opinion that HTML 4.0 and AOL disclose or suggest tabbing to focus on different one of the regions. *See, e.g.*, Appendix 2, support cited for claims 7, 51, 55, and 64. HTML 4.0 discloses that the “tabbing order defines the order in which elements will receive focus when navigated by the user via the keyboard.” Ex. 1013, pp. 113. AOL discloses that pressing the “Tab” key moves focus to the next button or data-entry point in the simplified navigational interface. Ex. 1015, pp. 101, 853.

229. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 7, 51, 55, 64 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 7, 51, 55, and 64.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

230. I am of the opinion that AOL discloses or suggests tabbing to focus on different one of the regions. *See, e.g.*, Appendix 3, support cited for claims 7, 51, 55, and 64. AOL discloses that pressing the “Tab” key moves focus to the next button or data-entry point in the simplified navigational interface. Ex. 1015, pp. 101, 853.

231. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 7, 51, 55, and 64 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 7, 51, 55, and 64.

U. Dependent Claims 8, 52, 56, and 65

232. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to

combine these references and the combinations listed above disclose or suggest dependent claims 8, 52, 56, and 65 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

233. It is my opinion that HTML 4.0 and AOL disclose or suggest a focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions. *See, e.g.*, Appendix 2, support cited for 8, 52, 56, and 65. HTML 4.0 discloses that the “user agents [] support scrolling of table bodies independently of the table head and foot.,” and that “within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” Ex. 1013, pp. 52, 95. AOL discloses scrollbars for the scrolling of online content. Ex. 1015, p 140.

234. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 8, 52, 56, and 65 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 8, 52, 56, and 65.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

235. I am of the opinion that Apte and AOL discloses or suggests a focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions. *See, e.g.*, Appendix 3, support cited for 8, 52, 56, and 65. Apte discloses that “[t]he browser area retains the original functionality of the underlying browser and operates independently of the advertising area.” Ex. 1016, 4:20-31. AOL discloses scrollbars for the scrolling of online content. Ex. 1015, p 140.

236. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 8, 52, 56, and 65 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 8, 52, 56, and 65.

V. Dependent Claims 11, 27, 40, and 66

237. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. For at least the same

reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 11, 27, 40, and 66 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

238. It is my opinion that HTML 4.0 and AOL disclose or suggest that the first input selects a primary navigation option. *See, e.g.*, Appendix 2, support cited for claims 11, 27, 40, and 66. HTML 4.0 discloses that access keys can be assigned to navigation options in a navigation interface, and when the access key is pressed navigation option is selected ("For example, when a user activates a link defined by the A element, the user agent generally follows the link"). Ex. 1013, pp. 113-114. AOL discloses a visual interface where user input determines which navigation option is selected within the navigation interface. Ex. 1015, pp. 120, 121, 129.

239. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 10 and 26 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 11, 27, 40, and 66.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

240. I am of the opinion that Apte and AOL discloses or suggests that the first input selects a primary navigation option. *See, e.g.*, Appendix 3, support cited for claims 11, 27, 40, and 66. Apte discloses that the navigation interface has control buttons (e.g., help, pause, step forward, step back) and that when the user makes a first input, one of these primary navigation options is selected (e.g., “When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31”). Ex. 1016, 7:26-53. AOL discloses a visual interface where user input determines which navigation option is selected within the navigation interface. Ex. 1015, pp. 120, 121, 129.

241. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 10 and 26 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 11, 27, 40, and 66.

W. Dependent Claims 18 and 42

242. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a

person of ordinary skill in the art disclose or suggest the independent claims of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 18 and 42 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

243. It is my opinion that HTML 4.0 and AOL disclose or suggest maintaining a database of sister site web pages by a content partner. *See, e.g.*, Appendix 2, support cited for claims 18 and 42. HTML 4.0 discloses that “[a]uthors and Web site managers may share style sheets across a number of documents (and sites).” Ex. 1013, pp. 88. AOL discloses a content partner (the “Cowles/SIMBA Media Information Network”) which maintains a database of content pages. Ex. 1015, pp. 469. Thus, it is my opinion that HTML 4.0 and AOL disclose or it would have been obvious to maintain a database of sister site web pages by a content partner.

244. I am further of the opinion that maintaining a database of sister site web pages by a content partner was well-known at the time. Moreover, in my opinion, databases were well-known at the time and used to store content for

display on the World Wide Web, including storing the addresses of sites and sister sites maintained by content partners.

245. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 18 and 42 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 18 and 42.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

246. I am of the opinion that Leak and AOL disclose or suggest maintaining a database of sister site web pages by a content partner. *See, e.g.*, Appendix 3, support cited for claims 18 and 42. Leak discloses “the server system 5 may provide a list of URIs to the client system, which the client system 1 then displays based on sequence information within the list. Alternatively, the server system 5 may download each page to the client system based on its own list.” Ex. 1017, 10:24-31. AOL discloses a content partner (the “Cowles/SIMBA Media Information Network”) which maintains a database of content pages. Ex. 1015, pp. 469. Thus, it is my opinion that Leak and AOL disclose or it would have been obvious to maintain a database of sister site web pages by a content partner.

247. I am further of the opinion that maintaining a database of sister site web pages by a content partner was well-known at the time. Moreover, in my opinion, databases were well-known at the time and used to store content for display on the World Wide Web, including storing the addresses of sites and sister sites maintained by content partners.

248. I am further of the opinion that Leak maintains a database of sister site web pages by a content partner. WebTV server 5 includes a proxy cache 65 and a transcoder 66, functionally coupled to the Internet 3. Ex. 1017, 7:22-28. The proxy cache 65 provides storage web documents, images, and other information requested frequently by the WebTV client 1 or server 5. Ex. 1017, 7:22-28. Transcoder 66 modifies certain pages and other files retrieved from remote servers 4. Ex. 1017, 7:22-28. I am of the opinion that one of ordinary skill in the art would have understood that modification using transcoder 66 generates a sister site. I am further of the opinion that one of ordinary skill in the art would also have understood that where cache 65 stores content requested frequently, that this would have been maintained in a database of sister site pages. Ex. 1017, 7:22-28. A content partner is reasonably construed as Company XYZ, the provider of the content. Ex. 1017, Fig. 7.

249. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of

ordinary skill in the art, disclose or suggest claims 18 and 42 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 18 and 42.

X. Dependent Claims 19, 34, 45, and 70

250. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 19, 34, 45, and 70 of the '196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

251. It is my opinion that HTML 4.0 and AOL disclose or suggest accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value. *See, e.g.*, Appendix 2, support cited for claims 19, 34, 45, and 70. HTML 4.0

discloses that access keys, from the document character set, may be assigned to particular elements in the navigation interface and pressed to give focus (i.e. activate that element, such as following a link) to that element, such as a link defined by the A element. Ex. 1013, pp. 113-114. Ex. 1013, pp. 113-114. HTML 4.0 further discloses that content providers should “include the access key in label text” on the navigation interface. Ex. 1013, pp. 113-114. AOL discloses a navigation interface called its “Go To Menu” which allows a user to assign alphanumeric characters to primary navigation options, and then press those characters on a keyboard to select those options. Ex. 1015, p. 875.

252. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 19, 34, 45, and 70 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 19, 34, 45, and 70.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

253. I am of the opinion that Apte and AOL disclose or suggest maintaining a database of sister site web pages by a content partner. *See, e.g.*, Appendix 3, support cited for claims 19, 34, 45, and 70. Apte discloses using keyword searching, wherein “[k]eywords are obtained by noting words that appear

between TITLE headers in HTML documents” and correspond to primary navigation options which are keyed in by a user. Ex. 1016, 11:42-12:9. AOL discloses a navigation interface called its “Go To Menu” which allows a user to assign alphanumeric characters to primary navigation options, and then press those characters on a keyboard to select those options. Ex. 1015, p. 875. I am further of the opinion that it would be obvious to one of ordinary skill in the art to combine the alphanumeric navigation option selection functionality of Reformulating HTML to the interface of Apte and Leak in order to allow a user to more quickly access desired content.

254. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 19, 34, 45, and 70 of the ‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 19, 34, 45, and 70.

Y. Dependent Claims 20, 21, 22, 23, 35, 36, 37, 38, 46, 47, 48, 49, 71, 72, 73, and 74

255. As discussed above, I am of the opinion that (1) Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art and (2) Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art disclose or suggest the independent claims of the

‘196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the ‘196 patent to combine these references. For at least the same reasons discussed above, I am of the opinion that it would have been obvious to combine these references and the combinations listed above disclose or suggest dependent claims 20, 21, 22, 23, 35, 36, 37, 38, 46, 47, 48, 49, 71, 72, 73, and 74 of the ‘196 patent.

Reformulating HTML, HTML 4.0, CSS2, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

256. It is my opinion that HTML 4.0 and AOL disclose or suggest that a simplified navigation interface can have a search form (e.g., a form with a field used for a search engine) and/or an email form (e.g., a short form for emails with To:, subject and message fields), and further display a purchase interface in response to input. *See, e.g.*, Appendix 2, support cited for claims 20, 21, 22, 35, 36, 37, 46, 47, 48, 71, 72, and 73. HTML 4.0 discloses submitting forms via email, search forms, and purchasing interfaces. *See, e.g.*, Ex. 1013, pp. 8-9, 71, 104. AOL discloses email forms, search forms, and purchasing interfaces. Ex. 1015, pp. 531-533, 874, 877. I am further of the opinion that search forms, email forms, and purchasing interfaces to assist customers with making purchases were well-known. *See, e.g.*, Ex. 1013, p. 9. It thus would have been obvious to display a purchasing interface in response to receiving a first navigation option, such as selecting “Buy”

for a hyperlinked image or text associated with a product. *See, e.g.*, Ex. 1015, pp. 531-532.

257. It is also my opinion that Reformulating HTML, HTML 4.0, CSS2, and AOL disclose not presenting the simplified interface through a standard web browser. *See, e.g.*, Appendix 2, support cited for claims 23, 38, 49, and 74. Reformulating HTML discloses HTML on mobile devices (handheld computers, portable phones) and televisions. Ex. 1012, p. 4. HTML 4.0 discloses Web-enabled cellular telephones and handheld devices. Ex. 1013, p. 9. CSS2 discloses non-standard (e.g. non-conforming) user agents (browsers). Ex. 1014, p. 32. AOL discloses using either its own non-standard browser or a standard web browser, such as Internet Explorer. Ex. 1015, pp. 664, 674. I am of the opinion that a person of ordinary skill in the art would recognize all of these disclosures as presenting a simplified navigation interface not through a standard web browser.

258. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 20, 21, 22, 23, 35, 36, 37, 38, 46, 47, 48, 49, 71, 72, 73, and 74 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 2, support cited for claims 20, 21, 22, 23, 35, 36, 37, 38, 46, 47, 48, 49, 71, 72, 73, and 74.

Reformulating HTML, Apte, Leak, AOL, and the Knowledge of a Person of Ordinary Skill in the Art

259. It is my opinion that Apte, Leak, and AOL disclose or suggest that a simplified navigation interface can have a search form (e.g., a form with a field used for a search engine) and/or an email form (e.g., a short form for emails with To:, subject and message fields) and further display a purchase interface in response to input. *See, e.g.*, Appendix 3, support cited for claims 20, 21, 22, 35, 36, 37, 46, 47, 48, 71, 72, and 73. Apte discloses a searchable index, an email form, and a purchasing interface. Ex. 1016, 7:35-43, 10:54-57, Figure 10 and associated disclosure, 9:54-10:20, Figure 9 and associated disclosure. Leak discloses a search engine and sending email via WebTV . Ex. 1017, 10:3-8, 4:25-31. AOL discloses email forms, search forms, and purchasing interfaces. Ex. 1015, pp. 531-533, 874, 877.

260. It is also my opinion that Reformulating HTML, Leak, and AOL disclose not presenting the simplified interface through a standard web browser. *See, e.g.*, Appendix 2, support cited for claims 23, 38, 49, and 74. Reformulating HTML discloses HTML on mobile devices (handheld computers, portable phones) and televisions. Ex. 1012, p. 4. Leak discloses displaying the simplified navigation interface through a television. Ex. 1017, 3:33-36, Figure 2 and associated disclosure. AOL discloses using either its own non-standard browser or a standard web browser, such as Internet Explorer. Ex. 1015, pp. 664- 674. I am of the

opinion that a person of ordinary skill in the art would recognize all of these disclosures as presenting a simplified navigation interface through something other than a standard web browser.

261. For at least the reasons discussed herein, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art, disclose or suggest claims 20, 21, 22, 23, 35, 36, 37, 38, 46, 47, 48, 49, 71, 72, 73, and 74 of the '196 patent and that it would have been obvious to a person of ordinary skill in the art at the time of the '196 patent to combine these references. *See, e.g.*, Appendix 3, support cited for claims 20, 21, 22, 23, 35, 36, 37, 38, 46, 47, 48, 49, 71, 72, 73, and 74.

VII. CONCLUSION

262. In view of the foregoing, I am of the opinion that Reformulating HTML, HTML 4.0, CSS2, AOL, and the knowledge of a person of ordinary skill in the art invalidate claims 1-76 of the '196 patent. Moreover, I am of the opinion that Reformulating HTML, Apte, Leak, AOL, and the knowledge of a person of ordinary skill in the art invalidate claims 1-76 of the '196 patent.

Respectfully submitted,

Robert J. Sherwood

Date: June 12, 2014

Robert J. Sherwood

Appendix 1
To the Declaration of Robert J. Sherwood

Curriculum Vitae of Robert J. Sherwood

Robert J. Sherwood

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Kansas 66209 - 913-269-6589 - webtalkwithbob@gmail.com

Technology Experience

Mr. Sherwood is a consultant and expert witness to the legal community on matters relating to computing devices, software applications and Internet advertising.

Mr. Sherwood has testified, and is qualified by education, training, experience or occupation, as an expert, on the following matters: IP address server analysis and extraction, search engine ranking methods, HTML and XML code analysis, robot analysis, subscription based user and affiliate systems, subscription based systems for social networking, CPM advertising, venture capital portfolio analysis, click thru rates, key word selection techniques, co-branding, merchant selection and analysis for mobile and desktop devices, database development and population, Google Local or Places, SEM campaigns, exclusivity content sharing agreements, mobile device applications, click thru conversion rates, affiliate agreements, revenue sharing and tracking analytics, application software with any text to speech or speech to text software, unauthorized use of names, false advertising, unfair competition, business valuation, intellectual property, term sheets and patent value, trade secret misappropriation, breach of employment contracts, Internet advertising, lead generation, affiliate tracking, website development and deployment, software developer kit license interpretation, software development best practices, software deployment methods, runtime analysis, derivative product issues, intellectual property valuation based on patents, Website analysis, valuation of custom designed software, custom and practice issues associated with intellectual property licensing fees, source code and object code license agreements, investment letters of intent, secondary considerations for establishing patent validity, software best practices for enterprise software development, methods of measuring license use, measurement data, verification of software use, functionality and conformance with contract development specifications, derivative product rights, best practices with respect to derivative products, conformance to license agreement specifications for software development, use and distribution.

Employment History

July 1996 to Present: SmartText Corporation, President.

The company provides litigation support to the legal community. The company also develops and licenses specialized software applications.

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**October 1991 to July 1997: The Center for Business Innovation (CBI),
President.**

CBI was a minority shareholder in 53 emerging growth companies including computer, communications and software businesses. President of a CBI subsidiary, Capital for Entrepreneurs, Inc. a venture capital fund financed by the Ewing Marion Kauffman Foundation.

September 1994 to 2000: Distinguished Lecturer, University of Kansas.

Taught multi-campus courses in Entrepreneurship & Strategic Management of Technology.

December 1986 to October 1989: RasterOps, Inc. Vice President.

Company was engaged in the development, manufacture and sales of software for personal computer display devices.

January 1983 to December 1986:

Personal sabbatical and as a sole proprietor provided consulting services to technology firms.

February 1975 to December 1982: EDC, Inc. President.

Co-Founder of a Kleiner & Perkins venture capital backed company engaged in combining computer software technology with environmental improvement devices.

February 1967 to May 1974: Envirotech, Inc. Director Europe.

A start-up company that grew to \$500 million in sales and 5,000 employees in 6 years. Managed patent portfolio and computer engineering design modeling.

February 1966 to February 1967: Dorr Oliver, Inc.

A product development position.

Education

University of Kansas BS Civil Engineering 1960-1964

University of Kansas MS Environmental Engineering 1964-1966

California State College Hayward MBA 1968-1972

Graduate Fellowship Research Award Grant

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University of Connecticut Business School graduate courses
Berlitz French Immersion School Graduate
Babson College 10th Symposium for Entrepreneurship Educators
Center for Creative Leadership Graduate University of North Carolina
Web Developers Boot Camp-Java Scripting and HTML
Association of Information Technology Professionals

Arent Fox

Tre Milano, LLC vs. Amazon.com., Inc., Case No.: BC 460511, Superior Court of the State of California County of Los Angeles, Central District. Engaged by Amazon to opine on issues surrounding the impact of customer reviews on retail and on-line sales of a consumer product.

Girard Gibbs LLP

Engaged as a consultant on an invasion of privacy class action matter. Yahoo!, Inc. was the defendant. Examined terms of service, wiretapping issues, user profiling related patents, targeted advertising methods, user interest mathematical modeling techniques and email delivery technologies.

Sterne, Kessler, Goldstein and Fox P.L.L.C.

A Google Petition for a Covered Business Method proceeding before the United States Patent and Trademark Office involving U.S. Patent No. 7,003,792 owned by Rovi, Inc.. Engaged to provide a declaration and deposition in support of Google's Petition.

Cooley LLP

B.E.Technology, LLC v. Facebook, Inc. Patent No. 6,628,314 Computer Interface Method and Apparatus with Targeted Advertising. Engaged to provide declaration in support of Facebook, Inc. Petition for IPR, invalidity report and non-infringement report.

Sterne, Kessler, Goldstein and Fox P.L.L.C.

A Google Petition for a Covered Business Method proceeding before the United States Patent and Trademark Office involving U.S. Patent No. 7,441,196

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owned by EMG Technologies. Engaged to provide a declaration and deposition in support of Google's Petition.

Foley & Lardner LLP

Robocast, Inc. v. Apple, Inc. (1:11-cv-00235; USDC DE); Robocast, Inc. v. Microsoft, Corporation (1:10-cv-01055; USDC - DE). Engaged by Robocast to provide expert report on advertising methods and measurement analytics, deposition and trial testimony.

Keker & Van Nest, LLP

Suffolk Technologies, Inc. v. AOL Inc. and Google, Inc. patent #6,081,835, An Internet Server and a Method of Controlling an Internet Server, issued June 27, 2000. Case No. 1:12-CV-625-TSE-IDD, In the United States District Court for the Eastern District of Virginia Alexandria Division. Engaged to provide infringement rebuttal report, deposition and trial.

Wilson Sonsini Goodrich & Rosati, P.C.

General Electric Company vs. Kontera Technologies, Inc. Case No. 1:12-cv-00525-LPS. Patent No. 6,902,074 and Patent No. 6,581,065, Dynamic Insertion and Updating of Hypertext Links for Internet Servers. Engaged to provide declaration in support of Kontera Technologies, Inc. Petition for IPR, invalidity report and non-infringement report.

Heller Ehrman White & McAuliffe

Overture Services, Inc. (Yahoo!) v. FindWhat.com. Case No. SACV 03-00685 (CJC) (EX). The lawsuit charged FindWhat.com with infringement of Yahoo! U.S. Patent No. 6,269,361, System and Method for Influencing a Position on a Search Result List Generated by a Computer Network Search Engine (the '361 Patent). The '361 Patent covers various advertising methods relating to bid-for-placement product and pay-per-click performance technologies. Engaged by Yahoo!, Inc. to provide expert report on Secondary Considerations, deposition and trial testimony.

Vinson & Elkins, McDermott Will & Emery, Fulbright and Jaworski

Orion IP, LLC v. Staples et al (Harley Davidson, Toyota, and Home Depot) Civil Action NO. 2:04-CV-297 (LED). Orion IP asserted U.S. Patent No. 5,367,627 Computer Assisted Parts Sales Method (the '627 Patent) and U.S. Patent No. 5,615,342, Electronic Proposal Preparation System.

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Engaged to examine intellectual property valuation based on two patents, alternative cost issues surrounding the implementation of non-infringing substitute computer-based methods for the '342 and '627 patent, estimating non-infringing substitutes, estimate hypothetical negotiation licensee fees, examine patent invalidity based on prior art, Website analysis, valuation of custom designed software and custom and practice issues associated with intellectual property licensing fees. Engaged by Defendants to provide expert report and deposition.

Shughart Thomson & Kilroy

Emergis Technologies, Inc., f/k/a BCE Emergis Technologies, Inc. v. Kansas City Power & Light CO., In the United States District Court for the Western District of Missouri Kansas City Division, Civil Action No. 06-0201-CV-W-REL.

Emergis filed suit against KCP&L alleging infringement of a patent, entitled "Electronic Invoicing and Payment System" No. 6,044,362 ("the '362 Patent") and seeking unspecified monetary damages and injunctive relief. This patent relates to automated electronic bill presentment and payment systems, particularly those involving Internet billing and collection. Engaged to estimate a non-infringing substitute, establish a license fee based on hypothetical negotiation, examine license agreement for conformance to specifications and software distribution rights. Engaged by defendant. Prepared expert report.

Arnold & Porter LLP and Norris Keplinger & Logan LLP

CSU, Inc. v. Xerox, Inc. In 1994, CSU filed suit against Xerox, alleging that Xerox violated the Sherman Antitrust Act by monopolizing the market for high speed copiers. The central issue was whether a unilateral refusal to license or sell intellectual property protected by patent or copyright is absolutely immune from a claim of monopolization and attempted monopolization under Section 2 of the Sherman Antitrust Act. Xerox counter claimed for patent and copyright infringement.

Engaged to analyze the CSU \$20 million business and determine if CSU would have grown to \$100 million, but for Xerox's refusal to sell CSU a patented product. Examined all documents such as financials, bank loans, management, business plans, capital formation documents and board decisions. Expert report, trial preparation and deposition for defendant.

Durie Tangri LLP

Mobile Commerce Framework, Inc. v. Yelp! Inc. Case No, 11CV2589MMAMDD United States District Court Southern District of California.

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MCF claims that Yelp! infringed on MCF patent #7,693,752 an invention entitled "Mobile Commerce Framework." Engaged to provide expert report, deposition and trial.

Allen Dell, P.A.

Accusoft Corporation f/k/a Pegasus Imaging Corporation v. John P. Reinhart, Jeffrey D. Amrein, Allscripts-Misys Healthcare Solutions, Inc. f/k/a Allscripts Healthcare Solutions, Inc. and AllscriptsMisys, LLC f/k/a Misys Healthcare Systems, LLC and successor by merger to Allscripts, LLC. In the Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida Complex Business Litigation Division, Case No. 10-CA-018238 Division L. Engaged to provide expert report, deposition and trial.

Farella Braun + Martel LLP

Brandgenuity LLC Plaintiff v. Zynga Inc., f/k/a Zynga Game Network, Inc. In the Superior Court of the State of California in and for the County of San Francisco, Case No. CGC-12-520738 Engaged on behalf of Zynga. Plaintiff claims they supplied services to Zynga, for which Zynga refuses to pay Plaintiff a \$18 million commission for a licensing agreement for the use of Zynga brand names, such as Farmville. Provided analysis and examination on custom and practices in the brand licensing industry including agency fee schedules, royalty rates, license agreements, integration clauses and agency agreements. Engaged to provide expert report, deposition and trial.

Law Office of Mick Lerner, PA and Stinson, Mag & Fizzell

4th Trimester v. Reed Publishing, et al. Determine the value of a technology business. Expert report, deposition and testify at Arbitration for defendant.

Thelen Reid & Priest LLP

DJ&J Software Corporation dba Egghead Software and Elecom Corporation v. Casahl Technology, Inc. Examine sales of software from a reseller, but for developer's refusal to supply current versions, ability of distributor to manage software through normal sales channels, value of software and quantity that would have been sold, but for software developer's actions. Expert report and deposition for plaintiff.

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Ascano & Campo LLP

Silicon Valley IPO Network et al. v. Kevin Von Poppen et al. Determine business value of video compression software had venture capital firm invested in startup and provided initial funding. Expert report for plaintiff.

Morrison & Hecker LLP

Universal Business Computing Company, Inc. and Ken Garen v. Global Enterprise Solutions, Inc. and Brian Unger. Determine value of founders equity share in the business had the founders had an agreement in writing for equity ownership, determine share price and actual total share ownership under premature departure of one of the cofounders. Expert report, deposition and testify at Arbitration for defendant.

Steeffel Levitt & Weiss

Examine license agreement and software for conformance to contract specifications for functionality and use. Expert report and deposition.

Grey Cary Friedenrich

Examine license agreement for computer hardware and software for conformance to contract specifications for functionality and use. Consultant for plaintiff.

Cooley Godward LLP

Examine license agreement and software for conformance to contract specifications for functionality and use. Consultant.

Michael Best & Friedrich

Examine websites for duplication of code and ownership of various software website commerce and affiliate development components. Expert report for defendant.

Cotton & Gundzik LLP

Digital Insight v. HNC Software. Examine co-branding, OEM relationship, software customization, licensing of website and business loss due to inappropriate distribution of website software. Examine license agreement for conformance to specifications and software distribution rights. Expert report for plaintiff.

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Crosby Heafey Roach & Smith

Raytheon Company vs. Webgear, Inc. & Ted Cooper, Case No. V-020232-9
Superior Court of California County of Alameda. Examine license agreement for
conformance to specifications, verification of computer hardware and software
documentation instructions, verification of software and wireless computer product
use and determine value of software. Expert report for plaintiff.

Howrey Simon Arnold & White LLP

Business Management Systems Corporation v. Cable & Wireless USA, Inc.
Civil Action No. 00-B-1069 United States District Court. Examine software best
practices of enterprise software developer and methods of measuring license
requirements, measurement data, and verification of software use, functionality and
conformance with contract purchase development specifications. Examine license
agreement for conformance to specifications and software distribution rights. Expert
report, deposition and testified at trial for defendant.

Mannatt Phelps & Phillips LLC

Verity, Inc. v. Broadvision, Inc. Case No. C01-20501 RMW (PVT) ADR United
States District Court for the Northern District of California San Jose Division,
Examine license agreement and software for conformance to specifications, analyze
customer software purchase levels for various levels of product upgrades, determine
the number of customers that would have upgraded, but for the licensee's
inappropriate software distribution. Expert report, deposition and testified at
Arbitration for plaintiff.

Schlagel Damore & Gordon

Determine value of enterprise software to licensor where licensee had
developed a derivative product, examine business history, development and
reproduction costs. Expert report and deposition for plaintiff. Examine license
agreement for conformance to specifications and software distribution rights.

Crosby Heafey Roach & Smith

Examine license agreement for conformance to specifications and software
distribution rights. Expert report for defendant.

America On-Line Corporate Counsel

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Investigate the methods that might be used to establish comparative market values for email addresses and to indicate possible economic benchmarks. Civil suit regarding stolen email addresses and damages resulting from spamming. Consultant to AOL.

Boies, Schiller & Flexner LLP

The SCO Group Inc. vs. International Business Machines Corporation United States District Court, District of Utah, Case No. 03-CV-0294. Examine license agreements for derivative product rights, best practices with respect to derivative products, conformance to license agreement specifications for software development, use and distribution. Expert report for plaintiff.

Law Offices of Jeffery P. Widman

SunLan Corporation vs. Zenith Infotech, Inc. Case No. 04CC02648 Superior Court of California, County of Orange Examine issues relating to sale of goods, distributor revenue sharing and pricing with respect to industry practices for computer hardware and software, OEM licensing and distribution agreements. Examine license agreement for conformance to specifications and software copy distribution rights. Expert report and deposition for defendant.

Chan Law Group

Perfumbay.Com, Inc. vs. EBAY, Inc., Case No.: CV04-1358 WDK (SSx) United States District Court for the Central District of California, Examine issue surrounding the use of trade names in a domain name including search return listings. Expert report for plaintiff.

Latham & Watkins LLP

Itech Group, Inc. v. National Semiconductor Corporation. Case No. CV 810872 Superior Court of the State of California County of Santa Clara, Examine source code and object code license agreements and investment letters of intent surrounding a software licensing dispute. Expert report, deposition and testified at jury trial for defendant.

Latham & Watkins LLP

GR Match LLC v. Market Range LLC, et al. AAA Case Number 75-181-Y-00067-06 Examine issues relating to Website tracking methodologies for sponsored

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ads, natural search returns, advertising, customer life time value and affiliate tracking. Expert report and deposition for plaintiff.

CAPOBIANCO AND BRAM, LLP

Dovebid, Inc. v. eBay Inc., United States District Court for the Central District of California. Consultant for plaintiff.

Orrick, Herrington & Sutcliffe LLP

Viewsonic Corporation vs. AmTran Technology Co., Ltd. United States District Court, Central District of California Case No. CV 05-5864 GAF (RZx). Expert report for defendant.

Mayer, Brown, Rowe & Maw LLP

Positive Ions, Inc. v. ION Media Networks, Inc. United States District Court Central District of California Case No. CV 06-4296 ABC (FFMx). Expert reports for defendant and counter claimant.

Needham, Davis, Kepner & Young, LLP

Ecompare v. Priceline.com. Engaged as a consultant for plaintiff in trade secret matter.

Farella Braun + Martel LLP

Securities and Exchange Commission v. Mark Leslie, United States District Court Northern District of California San Jose Division, Civil Action No. Action No. C 07-3444 JF. Engaged as expert witness for defendant. Expert report and deposition.

Allen Dell, P.A.

Pegasus Imaging Corporation v. Northrop Grumman Corporation et al., In the United States District Court, Middle District of Florida, Tampa Division Case No. 8:07-cv-01937. Engaged by Plaintiff. Examine license agreement for conformance to specifications and software copy distribution rights. Provided Expert report, deposition, trial assistance. The matter concerned a software developer kit license interpretation, software development best practices, software deployment methods, runtime analysis, and derivative product issues.

Nelson& Weinkauf

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Trancos, Inc. dba Coregmedia vs. Brain Harley, Tallac Ventures, Inc., dba Tallacmedia.com and dba Leadshot, Superior Court of California, County of San Mateo-Case No. CIV-492361. Engaged by Plaintiff. Provided expert analysis and deposition assistance. The matter concerned trade secret misappropriation, breach of employment contract, Internet advertising, lead generation, affiliate tracking, and website development and deployment.

Nixon Peabody LLP

Serena Software, Inc. v. Con-Way Inc. Case No. CIV 491585. Engaged by Defendant. Expert report. Examine license agreement for conformance to specifications and software copy distribution rights. Plaintiff contends that defendant breached a license agreement. Further that because of this breach, Plaintiff also contends that Defendant should be compelled to pay additional license fees for the total capacity of all the CPUs in the network.

The Law Office of Ilona Antonyan, APC.

Avalon RF, Inc. vs. WIFI, Pacifitek Systems, Inc. et al. Case No. 868507
Superior Court of the State of California for the County of San Diego.

Evolution Software, Inc.

Evolution vs. SunTrust Bank, Case No. 01-2409-JWL, United States District Court For The District of Kansas. Provided an expert report on the valuation of Data Base Management Software programs used in the Premium Finance Industry.

Dempsey & Johnson P.C.

Connie Chein M.D. v. Michele Hakakha et al., Case No. SC112820, Superior Court for the State of California for the County of Los Angeles., Complaint for unauthorized use of Plaintiff's name, false advertising, unfair competition. Engaged as consultant to examine Google Places, mobile device merchant selection, Website development techniques, traffic redirect from competitive Websites.

Equal Employment Opportunity Commission

EEOC v. Dolgencorp, LLC, Case No. 1:11-CV-0755-SEB-DKL, in the United States District Court for the Southern District of Indiana Indianapolis Division. Engaged by EEOC to determine the compatibility of Defendant's hardware, operating systems and application software with any text to speech or speech to text software including providing an expert report, deposition and trial testimony.

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Shaub & Williams LLP

Pricegrabber.com, Inc. v. Unister GMBH, United States District Court Central District of California Case No. CV 10-09580 SJO(MANx). Engaged by Unister to provide expert report, deposition and trial testimony. Dispute involves items such as, CPM for advertising, merchant analysis, click thru rates, key word selection techniques, co-branding, SEM campaigns, exclusivity content agreements, click thru conversion rates, affiliate agreements with Amazon, Overture and ShopZilla, Google AdWords, revenue sharing and tracking analytics.

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Testimony 2009 – 2014.

The following is a list of my expert witness engagements in the last five years for which I have testified at trial or by deposition:

1. 2009: Civil Action No. C 07-3444 JF, SEC vs. Mark Leslie et al., United States District Court Northern District of California, San Jose Division.
2. 2010: Case No. 8:07-cv-01937, Pegasus Imaging Corporation v. Northrop Grumman Corporation et al., United States District Court, Middle District of Florida, Tampa Division.
3. 2012: Civil Action No. 1:11-cv-0755-SEB-DKL, Equal Employment Opportunity Commission vs. Dolgencorp, LLC, d/b/a Dollar General Store, United States District Court for the Southern District of Indiana, Indianapolis Division.
4. 2012: Case No. 1:12-CV-625-TSE-IDD Suffolk Technologies, Inc. v. AOL Inc. and Google, Inc. patent #6,081,835, In the United States District Court for the Eastern District of Virginia Alexandria Division.
5. 2013, October 2: Robocast, Inc. v. Apple, Inc. Case No.: 1:11-cv-00235;USDC DE.
6. 2013, October 3: Robocast, Inc. v. Microsoft Corporation Case No.:1:10-cv-01055;USDC DE.
7. 2013, November 26: Pegasus Imaging Corporation v. Allscripts Healthcare Solutions, Inc. et. al Case No. 10-CA-018238; Division L.

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Publications

Non-Fiction - Digital Format only.

A Basic Guide to Finances
A Basic Guide to Investing in Private Companies
A Basic Guide to Management
A Basic Guide to Legal Issues
A Basic Guide to Public Speaking
A Basic Guide to Key Business Terms
A Basic Guide to Job Hunting
A Basic Guide to Marketing Strategies
A Basic Guide to Employee Policies
A Basic Guide to Making Money on Your Idea

Non-Fiction - Print and Digital Format

Success Keys From Silicon Valley - 59 Must Know Terms for Entrepreneurs,
Silverbear Graphics, Stahlstown, PA 15687, 2010.
Personal and Business Forms for Most Every Important Situation, Silverbear
Graphics, Stahlstown, PA 15687, 2011.
Editor: *Entrepreneurs: You Can't Afford the School of Hard Knocks*, Center for
Business Innovation, 1995.
Contributing author: *Growing New Ventures, Creating New Jobs, Entrepreneurship:
Principles and Practices*, Quorum Books, Westport, Connecticut-London, 1995.

Fiction - Print and Digital Format - Novels inspired by expert witness engagements.

In My Opinion: The PM Note, Silverbear Graphics, Stahlstown, PA 15687, 2010.
The Brain Brokers, Silverbear Graphics, Stahlstown, PA 15687, 2011.
Pandora's Prisoner, Silverbear Graphics, Stahlstown, PA 15687, 2011.

Appendix 2

To the Declaration of Robert J. Sherwood

Claim Chart for HTML 4.0, CSS2,
Reformulating HTML, AOL, and Knowledge

Appendix 2 to the Declaration of Robert J. Sherwood
‘196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

“HTML 4.0 Specification” (“HTML 4.0”), *available at* <http://www.w3.org/TR/1998?REC-html40-19980424/html40.txt>, was published on April 24, 1998 and thus is prior art under at least §§ 102(a) and 102(b).

“Cascading Style Sheets, level 2 CSS2 Specification” (“CSS2”), *available at* <http://www.w3.org/TR/1998/REC-CSS2-19980512>, was published on May 12, 1998 and thus is prior art under at least §§ 102(a) and 102(b).

“Reformulating HTML in XML” (“Reformulating HTML”), *available at* <http://www.w3.org/TR/1998/WD-html-in-xml-19981205/>, was published on December 5, 1998 and thus is prior art under at least §§ 102(a). In addition, because the ‘196 patent is entitled to a priority date no earlier than March 3, 2000, Reformulating HTML is also prior art under at least § 102(b).

GENE STEINBERG, USING AMERICA ONLINE (2d Ed. 1996) (“AOL”). AOL was published in 1996 and thus is prior art under at least §§ 102(a) and 102(b).

<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
<u>Claim 1, Preamble</u>	
1. A method of navigating the Internet, comprising:	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “A method of navigating the Internet.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating

Appendix 2 to the Declaration of Robert J. Sherwood
‘196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.:</i> "Over the last couple of years, many specialized markets have begun looking to HTML as a content language. There is a great movement afoot for using HTML across increasingly diverse computing platforms. Currently there is activity to move HTML onto mobile devices (handheld computers, portable phones, etc.), television devices (digital televisions, tv-based web browsers, etc.), and appliances (fixed function devices. Each of these devices has different requirements and constraints. Reformulating HTML in XML gives product developers the tools with which they can extend or subset HTML to address the perceived needs of their customers." Reformulating HTML, § 1.2, p. 4. "Voyager is the code name for HTML reformulated as an application of XML . . . Voyager must be easy and straightforward to use over the Internet." Reformulating HTML, pp. 8-9. "The World Wide Web (Web) is a network of information resources. The Web relies on three mechanisms to make these resources readily available to the widest possible audience: 1. A uniform naming scheme for locating resources on the Web (e.g., URIs). 2. Protocols, for access to named resources over the Web (e.g., HTTP). 3. Hypertext, for easy navigation among

Appendix 2 to the Declaration of Robert J. Sherwood
‘196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	resources (e.g., HTML).The ties between the three mechanisms are apparent throughout this specification.” HTML 4.0., § 2.1, p. 8. Every resource available on the Web -- HTML document, image, video clip, program, etc. -- has an address that may be encoded by a Universal Resource Identifier, or "URI".“URIs typically consist of three pieces: 1. The naming scheme of the mechanism used to access the resource. 2. The name of the machine hosting the resource. 3. The name of the resource itself, given as a path. Consider the URI that designates the current HTML specification: http://www.w3.org/TR/REC-html40/ This URI may be read as follows: There is a document available via the HTTP protocol (see [RFC2068]), residing on the machine www.w3.org, accessible via the path "/TR/REC-html4/". Other schemes you may see in HTML documents include "mailto" for email and "ftp" for FTP.” HTML 4.0, § 2.1.1, p. 8. “HTML was originally developed by Tim Berners-Lee while at CERN, and popularized by the Mosaic browser developed at NCSA. During the course of the 1990s it has blossomed with the explosive growth of the Web. During this time, HTML has been extended in a number of ways. The Web depends on Web page authors and vendors sharing the same conventions for HTML. This has motivated joint work on specifications for HTML. HTML 2.0 (November 1995, see [RFC1866]) was developed under the aegis of the Internet Engineering Task Force (IETF) to codify common practice in late 1994. HTML+ (1993) and HTML 3.0 (1995, see [HTML30]) proposed much richer versions of HTML. Despite never receiving consensus in standards discussions, these drafts led to the adoption of a range of new features. The efforts of the World

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Wide Web Consortium's HTML Working Group to codify common practice in 1996 resulted in HTML 3.2 (January 1997, see [HTML32]). Changes from HTML 3.2 are summarized in Appendix A. Most people agree that HTML documents should work well across different browsers and platforms. Achieving interoperability lowers costs to content providers since they must develop only one version of a document. If the effort is not made, there is much greater risk that the Web will devolve into a proprietary world of incompatible formats, ultimately reducing the Web's commercial potential for all participants. Each version of HTML has attempted to reflect greater consensus among industry players so that the investment made by content providers will not be wasted and that their documents will not become unreadable in a short period of time. HTML has been developed with the vision that all manner of devices should be able to use information on the Web: PCs with graphics displays of varying resolution and color depths, cellular telephones, hand held devices, devices for speech for output and input, computers with high or low bandwidth, and so on.” HTML 4.0, § 2.2.1, p. 9. “CSS style sheets that exist in separate files are sent over the Internet as a sequence of bytes accompanied by encoding information (see [HTML40], chapter 5). The structure of the transmission, termed a message entity, is defined by RFC 2045 and RFC 2068 (see [RFC2045] and [RFC2068]). A message entity with a content type of "text/css" represents an independent CSS document. The "text/css" content type has been registered by RFC 2138 ([RFC2318]).” CSS2, § 3.4, p. 33.

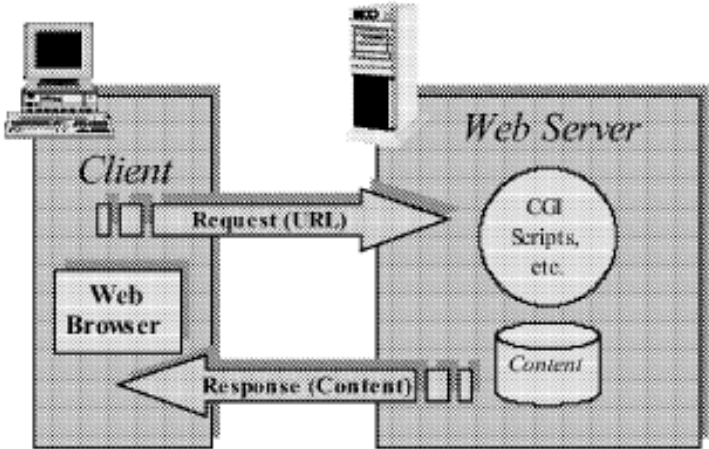
Appendix 2 to the Declaration of Robert J. Sherwood
 '196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Today America Online is a publicly owned company that offers an online community for over five million members (with millions more joining each year). The service offers online shopping, information services such as daily newspapers and magazines, and even virtual reference books such as encyclopedias. In addition, America Online lets you reach out beyond the borders of its service, by providing a direct gateway to the Internet, which serves tens of millions of computer users across the world. AOL, p. 2. “This version of Windows AOL software was released in the spring of 1995. The software includes . . . [a] World Wide Web Browser . . . This feature, integrated into your AOL software, enables you to access World Wide Web pages on the Internet.” AOL, p. 24.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 679. Moreover, navigating the Internet was well-known at the time of the alleged invention. <i>See, e.g.</i>, WAP Forum, Wireless Application Protocol Architecture Specification Version 30-April-1998 (“WAP”).

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  Figure 1. World-Wide Web Programming Model WAP, p. 11.
<u>Claim 1, Element A</u>	
displaying on-line content	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site,	(HTML) format into an extensible markup language (XML) format to generate a sister site.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble. <i>See, e.g.</i>: “Modularizing HTML is the notion of specifying well-defined sets of HTML tags that can be mixed and matched by product designers. For example, a "table module" would contain the elements and attributes necessary to support tables and a "list module" would contain the elements and attributes necessary to support lists. The reason for modularizing HTML is to make it economically feasible for content developers to delivery content on a greater number and diversity of platforms. Over the last couple of years, many specialized markets have begun looking to HTML as a content language. There is a great movement afoot for using HTML across increasingly diverse computing platforms. Currently there is activity to move HTML onto mobile

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	devices (handheld computers, portable phones, etc.), television devices (digital televisions, tv-based web browsers, etc.), and appliances (fixed function devices). Each of these devices has different requirements and constraints. Reformulating HTML in XML gives product developers the tools with which they can extend or subset HTML to address the perceived needs of their customers. However, this does not solve the needs of the content community for conformance. Modularizing HTML provides a means for product designers to specify which elements are supported by a device using standard building blocks and standard methods for specifying which building blocks are used. These modules serve as "points of conformance" for the content community. The content community can now target the installed base that supports a certain collection of modules, rather than worry about the installed base that supports this permutation of HTML elements or that permutation of HTML elements. The use of standards is critical for modularized HTML to be successful on a large scale. It is not economically feasible for content developers (authors) to tailor content to each and every permutation of HTML elements. By specifying a standard, either software processes can autonomously tailor content to a device, or the device can automatically load the software required to process a module. XML provides the tools necessary for defining a modularized HTML language and for specifying how modules are defined, declared, and combined into meaningful systems.” Reformulating HTML, §1.2, pp. 4-5. “1.5 Transforming mark-up to make it suitable for different devices Document profiles and device profiles should greatly simplify tuning mark-up to match the needs of different devices. When the set of HTML features supported by a class of devices can be precisely anticipated, transformational software can re-purpose the markup in a simple and reliable fashion. For example, consider a mobile phone that doesn't support scripts, style sheets or images. The server

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 ‘196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	strips these out of documents before sending them to the phone, speeding page display and reducing connection charges. The server can do this by comparing the device profile and the document profile for the documents in question, to determine what to strip out. Transformations may be applied by the author working on the website, at a proxy server under the control of an ISP, or in the browser itself. Work on the next generation of HTML will seek to encourage the development of authoring an related management tools that reduce the cost of creating content that may be easily re-purposed for different user agents operating on different devices.” Reformulating HTML, pp. 7-8. <pre> graph TD A[Document mark-up] --> B[Transformed by means of a style sheet, script or program] B --> C[TV screen] B --> D[Cellular phone] B --> E[Voice-based device] B --> F[Desk-top computer] G[Transformation can be done on the primary server, on the proxy server or at the client] --> B </pre> Reformulating HTML, p. 8. “Voyager is the code name for HTML reformulated as an application of XML. Voyager specifies

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	document profiles as XML namespaces each with their own web address (URI). The HTML Working Group will specify a set of Voyager Document Profiles for use in particular domains (such as mobile and television). For example, the "HTML Strict" Profile would contain the modules that, in general, correspond to the HTML 4 Strict DTD. The profile specifies the syntax of conforming documents in terms of a combination of syntax modules. For example, the "Table" module would contain the elements and attributes associated with HTML tables. It is expected that non-W3C entities (companies, consortiums, other standards organizations) will specify Platforms. Platforms consist of Voyager Profiles, platform-specific technologies, constraints, and usage requirements. For example, a digital television standards organization might specify a "DTV" Platform that contains the Television Profile, Java virtual machine, and a constrained set of allowable plug-ins.” Reformulating HTML, § 2.1, pp. 8-9. “HTML Tidy is W3C sample code providing a means to automatically convert existing web content to Voyager. It can cope with a wide range of markup errors, and offers a means to help realize a smooth transition for HTML.” Reformulating HTML, § 2.6, p. 13. “For general purpose processing by user agents (e.g. for identifying fields when extracting data from HTML pages into a database, translating HTML documents into other formats, etc.).” HTML 4.0, p. 31. Moreover, reformatting HTML into XML was well-known at the time of the alleged invention. See, e.g., HTML TIDY, WAP.

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	“Tidy's Options To get a list of available options use: tidy -help You should see something like this: options for tidy vers: 14th April 1999 -config <i>file</i> read config <i>file</i> -indent <i>or</i> -i indent element content -omit <i>or</i> -o omit optional endtags -wrap 72 wrap text at column 72 (default is 68) -upper <i>or</i> -u force tags to upper case (default is lower) -clean <i>or</i> -c replace font, nobr & center tags by CSS -raw don't o/p entities for chars 128 to 255 -ascii use ASCII for output, Latin-1 for input -latin1 use Latin-1 for both input and output -utf8 use UTF-8 for both input and output -iso2022 use ISO2022 for both input and output -numeric <i>or</i> -n output numeric rather than named entities -modify <i>or</i> -m to modify original files -errors <i>or</i> -e show only error messages -f <i>file</i> write errors to <i>file</i> -xml use this when input is in XML -asxml to convert HTML to XML -slides to burst into slides on h2 elements

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	-help list command line option” HTML TIDY, at p. 10. HTML TIDY discloses an option “-asxml” to “convert HTML to XML.” <pre> graph LR WS[Web Server] -- WML --> WP[WAP Proxy] WS -- HTML --> HF[HTML Filter] HF -- WML --> WP WP <--> WN((Wireless Network)) WN <--> WTS[WTA Server] WN -- Binary WML --> C[Client] </pre> Figure 3. Example WAP Network WAP, at p. 13. “In the example, the WAP client communicates with two servers in the wireless network. The WAP proxy translates WAP requests to WWW requests thereby allowing the WAP client to submit requests to the web server. The proxy also encodes the responses from the web server into the compact binary format understood by the client. If the web server provides WAP content (e.g. WML), the WAP proxy retrieves it directly from the web server. However, if the web server

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	provides WWW content (such as HTML), a filter is used to translate the WWW content into WAP content. For example, the HTML filter would translate HTML into WML.” WAP, at p. 13.
<u>Claim 1,</u> <u>Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Element A. “Document profiles and device profiles should greatly simplify tuning mark-up to match the needs of different devices. When the set of HTML features supported by a class of devices can be precisely anticipated, transformational software can re-purpose the markup in a simple and

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
phone,	reliable fashion. For example, consider a mobile phone that doesn't support scripts, style sheets or images. The server strips these out of documents before sending them to the phone, speeding page display and reducing connection charges. The server can do this by comparing the device profile and the document profile for the documents in question, to determine what to strip out. Transformations may be applied by the author working on the website, at a proxy server under the control of an ISP, or in the browser itself. Work on the next generation of HTML will seek to encourage the development of authoring related management tools that reduce the cost of creating content that may be easily re-purposed for different user agents operating on different devices.” Reformulating HTML, § 1.5, pp. 7-8.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<pre> graph TD A[Document mark-up] --> B[Transformed by means of a style sheet, script or program] C[Transformation can be done on the primary server, on the proxy server or at the client] --> B B --> D[TV screen] B --> E[Cellular phone] B --> F[Voice-based device] B --> G[Desk-top computer] </pre> Reformulating HTML, p. 8. “Style Sheets (CSS and XSL) These provide the means to control the rendering of HTML documents as well as a means for transforming documents. Document profiles will provide the

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	means to specify which style sheet features can be relied on for user agents conforming to the profile.” Reformulating HTML, p. 14. “The reason for modularizing HTML is to make it economically feasible for content developers to delivery content on a greater number and diversity of platforms. Over the last couple of years, many specialized markets have begun looking to HTML as a content language. There is a great movement afoot for using HTML across increasingly diverse computing platforms. Currently there is activity to move HTML onto mobile devices (handheld computers, portable phones, etc.), television devices (digital televisions, tv-based web browsers, etc.), and appliances (fixed function devices). Each of these devices has different requirements and constraints. Reformulating HTML in XML gives product developers the tools with which they can extend or subset HTML to address the perceived needs of their customers. However, this does not solve the needs of the content community for conformance.” Reformulating HTML, p. 4. “The HTML 4.0 table model allows authors to label each cell so that non-visual user agents may more easily communicate heading information about the cell to the user. Not only do these mechanisms greatly assist users with visual disabilities, they make it possible for multi-modal wireless browsers with limited display capabilities (e.g., Web-enabled pagers and phones) to handle tables.” HTML 4.0, § 11.1, p. 49. “HTML allows authors to specify documents in a media-independent way. This allows users to access Web pages using a wide variety of devices and media, e.g., graphical displays for

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
	computers running Windows, Macintosh OS, and X11, devices for television sets, specially adapted phones and PDA-based portable devices, speech-based browsers, and braille-based tactile devices.” HTML 4.0, § 14.1, p. 85. “HTML has been developed with the vision that all manner of devices should be able to use information on the Web: PCs with graphics displays of varying resolution and color depths, cellular telephones, hand held devices, devices for speech for output and input, computers with high or low bandwidth, and so on.” HTML 4.0, § 2.2.1, p. 9. “Relative URIs are resolved to full URIs using a base URI. As an example of relative URI resolution, assume we have the base URI "http://www.acme.com/support/intro.html". The relative URI in the following markup for a hypertext link: Suppliers would expand to the full URI "http://www.acme. com/support/suppliers.html", while the relative URI in the following markup for an image would expand to the full URI "http://www.acme.com/icons/logo.gif". HTML 4.0, p. 8. “In HTML, URIs are used to: [1] Link to another document or resource, (see the A and LINK elements). [2] Link to an external style sheet or script (see the LINK and SCRIPT elements). [3] Include an image, object, applets in a page, (see the IMG, OBJECT, APPLET and INPUT elements) . [4] Create an image map (see the MAP and AREA elements) . . .” HTML 4.0, p. 8. “HTML has been developed with the vision that all manner of devices should be able to use information on the Web: PCs with graphics displays of varying resolution and color depths,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	cellular telephones, hand held devices, devices for speech for output and input, computers with high or low bandwidth, and so on.” HTML 4.0, p. 9. — World Wide Web Browser This feature, integrated into your AOL software, enables you to access World Wide Web pages on the Internet. AOL, p. 24. Moreover, a sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone was well known at the time of the alleged invention. <i>See, e.g.</i>, WAP. “The objectives of the WAP Forum are: To bring Internet content and advanced data services to digital cellular phones and other wireless terminals.” WAP, p. 3.
<u>Claim 1,</u> <u>Element C</u>	
the simplified navigation interface displayed in a form of a two-dimensional	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
layer of cells from a plurality of layers and a plurality of cells,	CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claim 1, preamble and Elements A-B. “The HTML table model allows authors to arrange data -- text, preformatted text, images, links, forms, form fields, other tables, etc. -- into rows and columns of cells. Each table may have an associated caption (see the CAPTION element) that provides a short description of the table's purpose. A longer description may also be provided (via the summary attribute) for the benefit of people using speech or Braille-based user agents. Table rows may be grouped into a head, foot, and body sections, (via the THEAD, TFOOT and TBODY elements, respectively). Row groups convey additional structural information and may be rendered by user agents in ways that emphasize this structure. User agents may exploit the head/body/foot division to support scrolling of body sections independently of the head and foot sections. When long tables are printed, the head and foot information may be repeated on each page that contains table data. Authors may also group columns to provide additional structural information that may be exploited by user agents. Furthermore, authors may declare column properties at the start of a table definition (via the COLGROUP and COL elements) in a way that enables user agents to render the table incrementally rather than having to wait for all the table data to arrive before rendering. Table

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	cells may either contain "header" information (see the TH element) or "data" (see the TD element). Cells may span multiple rows and columns. The HTML 4.0 table model allows authors to label each cell so that non-visual user agents may more easily communicate heading information about the cell to the user. Not only do these mechanisms greatly assist users with visual disabilities, they make it possible for multi-modal wireless browsers with limited display capabilities (e.g., Web-enabled pagers and phones) to handle tables.” HTML 4.0, § 11.1, pp. 49-50. A test table with merged cells <pre> /-----\ Average Red ----- eyes height weight ----- Males 1.9 0.003 40% ----- Females 1.7 0.002 43% \-----/ </pre> or like this by a graphical user agent:

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References														
	A test table with merged cells <table><tr><th rowspan="2"></th><th colspan="2">Average</th><th rowspan="2">Red eyes</th></tr><tr><th>height</th><th>weight</th></tr><tr><td>Males</td><td>1.9</td><td>0.003</td><td>40%</td></tr><tr><td>Females</td><td>1.7</td><td>0.002</td><td>43%</td></tr></table> HTML 4.0, § 11.1, p. 50. ----- 1 2 3 ---- ---- 4 6 ---- ---- 7 8 9 ----- ----- 1 2 3 ----- ---- 4 6 ----- ---- 7 8 9 -----		Average		Red eyes	height	weight	Males	1.9	0.003	40%	Females	1.7	0.002	43%
	Average		Red eyes												
	height	weight													
Males	1.9	0.003	40%												
Females	1.7	0.002	43%												

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	HTML 4.0, § 11.2.6, pp. 58-59. “Images and other included objects may have hyperlinks associated with them, both through the standard linking mechanism, but also via image maps. An image map specifies active geometric regions of an included object and assigns a link to each region. When activated, these links may cause a document to be retrieved, may run a program on the server, etc.” HTML 4.0, p. 74. “In the visual formatting model, each element in the document tree generates zero or more boxes according to the box model.” CSS2, § 9.1, p. 95. “Tables represent relationships between data. Authors specify these relationships in the document language and specify their presentation in CSS, in two ways: visually and aurally. Authors may specify the visual formatting of a table as a rectangular grid of cells. Rows and columns of cells may be organized into row groups and column groups. Rows, columns, row groups, row columns, and cells may have borders drawn around them (there are two border models in CSS2). Authors may align data vertically or horizontally within a cell and align data in all cells of a row or column.” CSS2, § 17.1, p. 245. The ‘display property’ . . . none . . . This value causes an element to generate no boxes in the formatting structure . . . Please note that a display of ‘none’ does not create an invisible box; it creates no box at all.” CSS2, p. 101. “IMG { display: none } /* Don’t display images */” CSS2, p. 102.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“In CSS2, each box has a position in three dimensions. In addition to their horizontal and vertical positions, boxes lie along a “z-axis” and are formatted one on top of the other.” CSS2, p. 125. <i>See</i> CSS2, pp. 125-127. “The ‘visibility’ property specifies whether the boxes generated by an element are rendered . . .” CSS2, p. 149. <i>See</i> CSS2, pp. 149-151. “In the following example, pressing either form button invokes a user-defined script function that causes the corresponding box to become visible and the other to be hidden. Since these boxes have the same size and position, the effect is that one replaces the other.” CSS2, p. 150.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	CSS2, § 17.5.1, p. 255.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References																					
	current margins text text text previous paragraph text text above the table text text more text text text normal paragraph text text etc. etc. Table 72. This is the caption. It is right aligned. Also aligned at the bottom <table><tr><td>header</td><td>header</td><td>header</td></tr><tr><td>cell</td><td>cell</td><td>cell</td></tr><tr><td>cell</td><td>cell</td><td>cell</td></tr><tr><td>cell</td><td>cell</td><td>cell</td></tr><tr><td>cell</td><td>cell</td><td>cell</td></tr><tr><td>cell</td><td>cell</td><td>cell</td></tr><tr><td>cell</td><td>cell</td><td>cell</td></tr></table> CSS2, § 17.4.1, p. 253. See CSS2, pp. 253-256.	header	header	header	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell	cell
header	header	header																				
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  The screenshot shows the AOL Marketplace interface. At the top, it says 'Marketplace' and 'Spotlight'. Below this, there are several promotional banners: 'Wish you were there? Win a trip to Atlanta or \$3000 Cash with Travelers Advantage!', 'Make no mis-STEAK! Omaha Steaks are great for the grill. Free gift with purchase.', and 'Tower Records: It's a Global Thing. Our Special Offers will show you round'. On the right side, there is a 'Online Shopping' menu with categories like Apparel & Accessories, Automobile Services, Beauty, Health & Personal Care, Books, Education, & Subscriptions, Classifieds Online, Computing & Office Needs, Downtown AOL, Entertainment & Music, Flowers & Greetings, Food & Beverage, Gifts, Home & Garden, Kids, and Outdoor & Sports. At the bottom, there are logos for atOnce Software, Shopper Image, AutoVantage, and GBT Value Service, along with a 'Shopping Cart' button. AOL, p. 91.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 645.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 AOL, p. 679.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The image is a screenshot of a web browser displaying the NASA homepage. The browser's address bar shows 'http://www.nasa.gov/'. The page features a central 'NASA' logo with a stylized aircraft. Surrounding the logo is a grid of 12 rectangular buttons, each with a small icon and a text label. The buttons are arranged in three rows and four columns. The top row includes 'Welcome', 'Today's NASA', 'Organization', and 'NASA Centers'. The second row includes 'Go to', 'Gallery', and two buttons with icons but no text. The third row includes 'Aeronautics', 'Science', 'Planet Earth', 'Development', and 'Space Flight'. The browser's toolbar at the top includes buttons for 'Back', 'Reload', 'Forward', 'Search', 'Prefs', 'Home', 'Help', and 'Site'. AOL, p. 702. Moreover, a simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells was well known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element D</u>	
the two-dimensional	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the two-dimensional layer in a form of a navigation matrix.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
layer in a form of a navigation matrix,	§§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claim 1, preamble and Elements A-C. “Table cells may either contain "header" information (see the TH element) or "data" (see the TD element). Cells may span multiple rows and columns. The HTML 4.0 table model allows authors to label each cell so that non-visual user agents may more easily communicate heading information about the cell to the user. Not only do these mechanisms greatly assist users with visual disabilities, they make it possible for multi-modal wireless browsers with limited display capabilities (e.g., Web-enabled pagers and phones) to handle tables.” HTML 4.0, § 11.1, pp. 49-50. “In the visual formatting model, each element in the document tree generates zero or more boxes according to the box model.” CSS2, § 9.1, p. 95.

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 ‘196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“User agents, search engines, etc. may interpret these link types in a variety of ways. For example, user agents may provide access to linked documents through a navigation bar.” HTML 4.0, § 6.12, p. 23. “The link type of the first link is "prev" and that of the second is "next" (two of several recognized link types). Links specified by LINK are not rendered with the document's contents, although user agents may render them in other ways (e.g., as navigation tools). Even if they are not used for navigation, these links may be interpreted in interesting ways. For example, a user agent that prints a series of HTML documents as a single document may use this link information as the basis of forming a coherent linear document. Further information is given below of using links for the benefit of search engines.” HTML 4.0, § 12.1.2, p. 67. “HTML frames allow authors to present documents in multiple views, which may be independent windows or subwindows. Multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. For example, within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” HTML 4.0, § 16.1, p. 95. “The HTML table model allows authors to arrange data -- text, preformatted text, images, links, forms, form fields, other tables, etc. -- into rows and columns of cells .Each table may have an associated caption (see the CAPTION element) that provides a short description of the table's purpose. A longer description may also be provided (via the summary attribute) for the benefit of

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	people using speech or Braille-based user agents. Table rows may be grouped into a head, foot, and body sections, (via the THEAD, TFOOT and TBODY elements, respectively). Row groups convey additional structural information and may be rendered by user agents in ways that emphasize this structure. User agents may exploit the head/body/foot division to support scrolling of body sections independently of the head and foot sections. When long tables are printed, the head and foot information may be repeated on each page that contains table data. Authors may also group columns to provide additional structural information that may be exploited by user agents. Furthermore, authors may declare column properties at the start of a table definition (via the COLGROUP and COL elements) in a way that enables user agents to render the table incrementally rather than having to wait for all the table data to arrive before rendering. Table cells may either contain "header" information (see the TH element) or "data" (see the TD element). Cells may span multiple rows and columns. The HTML 4.0 table model allows authors to label each cell so that non-visual user agents may more easily communicate heading information about the cell to the user. Not only do these mechanisms greatly assist users with visual disabilities, they make it possible for multi-modal wireless browsers with limited display capabilities (e.g., Web-enabled pagers and phones) to handle tables.” HTML 4.0, § 11.1, pp. 49-50. A test table with merged cells

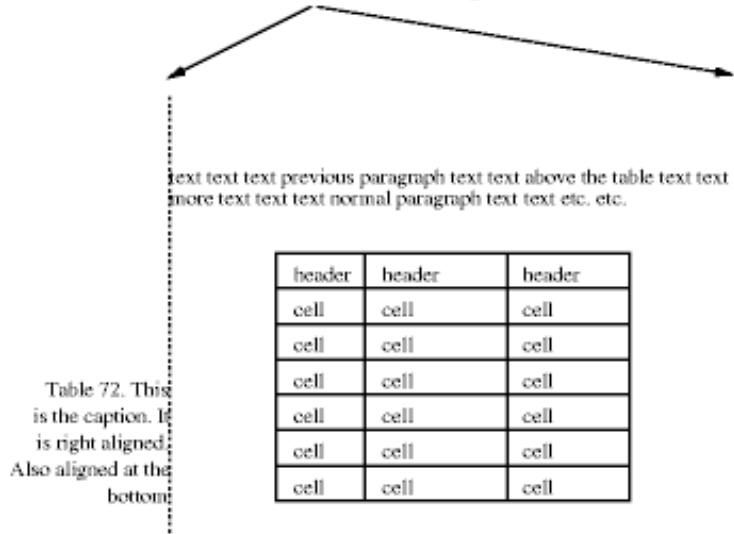
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References														
	/-----\ Average Red ----- eyes height weight ----- Males 1.9 0.003 40% ----- Females 1.7 0.002 43% \-----/ or like this by a graphical user agent: A test table with merged cells <table><tr><th rowspan="2"></th><th colspan="2">Average</th><th rowspan="2">Red eyes</th></tr><tr><th>height</th><th>weight</th></tr><tr><td>Males</td><td>1.9</td><td>0.003</td><td>40%</td></tr><tr><td>Females</td><td>1.7</td><td>0.002</td><td>43%</td></tr></table> HTML 4.0, § 11.1, p. 50. ----- 1 2 3 ---- -----		Average		Red eyes	height	weight	Males	1.9	0.003	40%	Females	1.7	0.002	43%
	Average		Red eyes												
	height	weight													
Males	1.9	0.003	40%												
Females	1.7	0.002	43%												

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	4 6 ---- --- ---- 7 8 9 ----- ----- 1 2 3 ----- --- 4 6 ----- --- 7 8 9 ----- HTML 4.0, § 11.2.6, pp. 58-59.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	current margins  Table 72. This is the caption. It is right aligned. Also aligned at the bottom CSS2, § 17.4.1, p. 253.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  The screenshot shows the AOL Marketplace interface. At the top, there's a 'Marketplace' header. Below it, a 'Spotlight' section features three promotional banners: 'Wish you were there? Win a trip to Atlanta or \$3000 Cash with Travelers Advantage', 'Make no mis-STEAK! Omaha Steaks are great for the grill. Free gift with purchase.', and 'Tower Records: It's a Global Thing. Our Special Offers will show you Young'. To the right, a 'Shopping Categories' list includes: Apparel & Accessories, Automobile Services, Beauty, Health & Personal Care, Books, Education, & Subscriptions, Classifieds Online, Computing & Office Needs, Downtown AOL, Entertainment & Music, Flowers & Greetings, Food & Beverage, Gifts, Home & Garden, Kids, and Outdoor & Sports. At the bottom, there are buttons for 'Customer Service', 'Help', 'Web Mail', and 'Shopping Cart'. AOL, p. 91.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 645.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 AOL, p. 679.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 661.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The image is a screenshot of a web browser displaying the NASA homepage. The browser window has a title bar that says 'The NASA Homepage'. Below the title bar is a navigation bar with buttons for Back, Reload, Forward, Search, Prefs, Home, Help, and Site. The address bar shows 'http://www.nasa.gov/'. The main content area features a large 'NASA' logo in the center. Surrounding the logo is a grid of 15 buttons, each with an icon and a label: 'Welcome' (man's head), 'Today's NASA' (space shuttle), 'Organization' (NASA logo), 'Q&A' (question mark), 'NASA Centers' (space shuttle), 'GO TO' (space shuttle), 'Gallery' (space shuttle), 'Aeronautics' (jet), 'Space' (space shuttle), 'Science' (telescope), 'Planet Earth' (Earth from space), 'Technology' (space shuttle), 'Development' (space shuttle), 'Human' (astronaut), and 'Space Flight' (space shuttle). The buttons are arranged in a 3x5 grid. AOL, p. 682. Moreover, a two-dimensional layer in a form of a navigation matrix was well known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element E</u> each cell is a division of a screen and	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
exclusive to a separate single navigation option associated with a specific unique input,	Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claim 1, preamble and Elements A-D. Table cells may either contain "header" information (see the TH element) or "data" (see the TD element). Cells may span multiple rows and columns. The HTML 4.0 table model allows authors to label each cell so that non-visual user agents may more easily communicate heading information about the cell to the user. Not only do these mechanisms greatly assist users with visual disabilities, they make it possible for multi-modal wireless browsers with limited display capabilities (e.g., Web-enabled pagers and phones) to handle tables.” HTML 4.0, § 11.1. pp. 49-50. “Relative URIs are resolved to full URIs using a base URI. As an example of relative URI resolution, assume we have the base URI "http://www.acme.com/support/intro.html". The relative URI in the following markup for a hypertext link: Suppliers would expand to the full URI "http://www.acme. com/support/suppliers.html", while the relative

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	URI in the following markup for an image would expand to the full URI "http://www.acme.com/icons/logo.gif". HTML 4.0, p. 8. “In HTML, URIs are used to: [1] Link to another document or resource, (see the A and LINK elements). [2] Link to an external style sheet or script (see the LINK and SCRIPT elements). [3] Include an image, object, applets in a page, (see the IMG, OBJECT, APPLET and INPUT elements) . [4] Create an image map (see the MAP and AREA elements). [5] Submit a form (see FORM). [6] Create a frame document (see the FRAME and IFRAME elements). [7] Cite an external reference (see the Q, BLOCKQUOTE, INS and DEL elements) . [8] Refer to metadata conventions describing a document (see the HEAD element) .” HTML 4.0, p. 8. “The HTML table model allows authors to arrange data -- text, preformatted text, images, links, forms, form fields, other tables, etc. – into rows and columns of cells.” HTML 4.0, p. 49. “In the example that follows, the A element defines a link. The source anchor is the text "W3C Web site" and the destination anchor is “http://www.w3.org/” : For more information about W3C, please consult the W3C Web site.” HTML 4.0, p. 69. “Images and other included objects may have hyperlinks associated with them, both through the standard linking mechanism, but also via image maps. An image map specifies active geometric regions of an included object and assigns a link to each region. When activated, these links may cause a document to be retrieved, may run a program on the server, etc.” HTML 4.0, p. 74.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“In an HTML document, an element must receive focus from the user in order to become active and perform its tasks. For example, users must activate a link specified by the A element in order to follow the specified link . . . There are several ways to give focus to an element: [1] Designate the element with a pointing device. [2] Navigate from one element to the next with the keyboard. The document's author may define a tabbing order that specifies the order in which elements will receive focus if the user navigates the document with the keyboard (see tabbing navigation). Once selected, an element may be activated by some other key sequence. [3] Select an element through an access key (sometimes called "keyboard shortcut" or "keyboard accelerator").” HTML 4.0, p. 113. “accesskey = character [CN] This attribute assigns an access key to an element. An access key is a single character from the document character set. Note. Authors should consider the input method of the expected reader when specifying an accesskey. Pressing an access key assigned to an element gives focus to the element. The action that occurs when an element receives focus depends on the element. For example, when a user activates a link defined by the A element, the user agent generally follows the link. When a user activates a radio button, the user agent changes the value of the radio button. When the user activates a text field, it allows input, etc.” HTML 4.0, § 17.11.2, pp. 113-14. “The rendering of access keys depends on the user agent. We recommend that authors include the access key in label text or wherever the access key is to apply. User agents should render the value of an access key in such a way as to emphasize its role and to distinguish it from other characters (e.g., by underlining it).” HTML 4.0, § 17.11.2, p. 114.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  The screenshot shows the AOL web interface with a top navigation bar containing 'Welcome AOL Sign On'. The main content area is divided into several sections: 'AMERICA Online' logo, 'CHANNELS' and 'WHAT'S HOT' buttons, a 'YOU HAVE MAIL' notification, a 'PEOPLE CONNECTION' section, an 'INTERNET' section, and a 'TOP NEWS STORY' section about a Marine Chopper crash. On the right side, there are three vertical panels: 'Cars, trucks, suvs and motorcycles - Come to the Wheels Exchange!', 'The Quelling 500 auto races. Keyword: SpeedNet', and 'Make the most of your time online. Get your Top Tips today!'. Each panel has a small icon next to it. AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input was well known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element F</u>	
the on-line content	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,	one or more of the unique inputs.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-E. “Relative URIs are resolved to full URIs using a base URI. As an example of relative URI resolution, assume we have the base URI "http://www.acme.com/support/intro.html". The relative URI in the following markup for a hypertext link: Supplierswould expand to the full URI "http://www.acme.com/support/suppliers.html", while the relative URI in the following markup for an image would expand to the full URI "http://www.acme.com/icons/logo.gif".” HTML 4.0, § 2.1.3, p. 8. “The HTML table model allows authors to arrange data -- text, preformatted text, images, links, forms, form fields, other tables, etc. -- into rows and columns of cells.” HTML 4.0, § 11.1, p. 49.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“HTML offers many of the conventional publishing idioms for rich text and structured documents, but what separates it from most other markup languages is its features for hypertext and interactive documents. This section introduces the link (or hyperlink, or Web link), the basic hypertext construct. A link is a connection from one Web resource to another. Although a simple concept, the link has been one of the primary forces driving the success of the Web. A link has two ends -- called anchors -- and a direction. The link starts at the "source" anchor and points to the "destination" anchor, which may be any Web resource (e.g., an image, a video clip, a sound bite, a program, an HTML document, an element within an HTML document, etc.).” HTML 4.0, § 12.1, p. 66. “The link type of the first link is "prev" and that of the second is "next" (two of several recognized link types). Links specified by LINK are not rendered with the document's contents, although user agents may render them in other ways (e.g., as navigation tools).” HTML 4.0, § 12.1.2, p. 67.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online. AOL, p. 91.  The screenshot shows the AOL Marketplace web page. At the top, it says 'Marketplace' and 'MARKEPLACE'. Below this is a 'Spotlight' section with three promotional banners: 'Wish you were there? Win a trip to Atlanta or \$3000 Cash with Travelers Advantage!', 'Make no mis-STEAK! Omaha Steaks are great for the grill. Free gift with purchase.', and 'Tower Records: It's a Global Thing. Our Special Offers will allow you to sound'. Below these are logos for 'atOnce Software', 'The Sharper Image', 'AutoVantage', and 'GRT Video Service'. On the right side, there is a 'Online Shopping' menu with categories: 'Apparel & Accessories', 'Automobile Services', 'Beauty, Health & Personal Care', 'Books, Education, & Subscriptions', 'Classifieds Online', 'Computing & Office Needs', 'Downtown AOL', 'Entertainment & Music', 'Flowers & Greetings', 'Food & Beverage', 'Gifts', 'Home & Garden', 'Kids', and 'Outdoor & Sports'. At the bottom right, there is a 'Keyword: Marketplace' search bar and buttons for 'Get more', 'Shop', and 'Add more'.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 661. Moreover, the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs was well-known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element G</u> navigation options to change between layers of the	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
simplified navigation interface from general to more specific in each deeper layer;	AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claim 1, preamble and Elements A-F. “Relative URIs are resolved to full URIs using a base URI. As an example of relative URI resolution, assume we have the base URI "http://www.acme.com/support/intro.html". The relative URI in the following markup for a hypertext link: Suppliers would expand to the full URI "http://www.acme.com/support/suppliers.html", while the relative URI in the following markup for an image would expand to the full URI "http://www.acme.com/icons/logo.gif". In HTML, URIs are used to: * Link to another document or resource, (see the A and LINK elements) .* Link to an external style sheet or script (see the LINK and SCRIPT elements) .* Include an image, object, applets in a page, (see the IMG, OBJECT,APPLET and INPUT elements) .* Create an image map (see the MAP and AREA elements) .* Submit a form (see FOBJVI).* Create a frame document (see the FRAME and IFRAME elements). * Cite an external reference (see the Q, BLOCKQUOTE, INS and DEL

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	elements) .* Refer to metadata conventions describing a document (see the HEAD element) .” HTML 4.0, § 2.1.3, p. 8. “HTML now offers a standard mechanism for embedding generic media objects and applications in HTML documents. The OBJECT element (together with its more specific ancestor elements IMG and APPLET) provides a mechanism for including images, video, sound, mathematics, specialized applications, and other objects in a document. It also allows authors to specify a hierarchy of alternate renderings for user agents that don't support a specific rendering.” HTML 4.0, § 2.3.4, p. 10. “Implementers are advised that future versions of HTML may extend the grouping mechanism to allow for nested groups (i.e., OPTGROUP elements may nest). This will allow authors to represent a richer hierarchy of choices. <!ELEMENT OPTION - O (#PCDATA) -- selectable choice --> <!ATTLIST OPTION %attrs; -- %coreattrs, %i18n, %events -- selected (selected) #IMPLIED disabled (disabled) #IMPLIED -- unavailable in this context -- label %Text; #IMPLIED -- for use in hierarchical menus -- value CDATA #IMPLIED -- defaults to element content -- >” HTML 4.0, § 17.6.1, p. 108. “Visual user agents may allow users to select from option groups through a hierarchical menu or

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	some other mechanism that reflects the structure of choices.” HTML 4.0, § 17.6.1, p. 109. HTML 4.0, § 17.6.1, p. 109.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	CSS2, § 17.5.1, p. 255. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  The screenshot shows the AOL web interface with a top navigation bar containing 'Welcome, AOL GeneG'. Below this, there are several sections: 'AMERICA Online' logo, 'CHANNELS', 'WHAT'S HOT', 'YOU HAVE MAIL', 'PEOPLE CONNECTION', 'INTERNET', and a 'TOP NEWS STORY' section. On the right side, there are three vertical panels: 'Cars, trucks, suvs and motorcycles - Come to the Wheels Exchange!', 'The Quelling 500 auto rates. Keyword: SpeedNet', and 'Make the most of your time online. Get your Top Tips today!'. Each panel has a corresponding icon. AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  The screenshot shows the AOL Marketplace interface. At the top, it says 'Marketplace' and 'MARKETPLACE'. Below this is a 'Spotlight' section with three promotional banners: 'Wish you were there? Win a trip to Atlanta or \$3000 Cash with Travelers Advantage!', 'Make no mis-STEAK! Omaha Steaks are great for the grill. Free gift with purchase.', and 'Tower Records: It's a Global Thing. Our Special Offers will show you round'. To the right is a 'Shopping Category' list with options like Apparel & Accessories, Automobile Services, Beauty, Health & Personal Care, Books, Education, & Subscriptions, Classifieds Online, Computing & Office Needs, Downtown AOL, Entertainment & Music, Flowers & Greetings, Food & Beverage, Gifts, Home & Garden, Kids, and Outdoor & Sports. At the bottom, there are buttons for 'Keyword: Marketplace', 'Search', 'Help', 'Site Map', and 'Shopping Cart'. AOL, p. 91. Moreover, navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer was well-known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element H</u>	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the

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sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site;	sister site.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-G. <pre> <html xmlns="http://www.w3.org/Profiles/voyager-strict"> <head> <title>Frobnostication</title> </head> <body> <p>Moved to www.frob.com.</p> </body> </html> </pre> Reformulating HTML, p. 12. “Relative URIs are resolved to full URIs using a base URI. As an example of relative URI

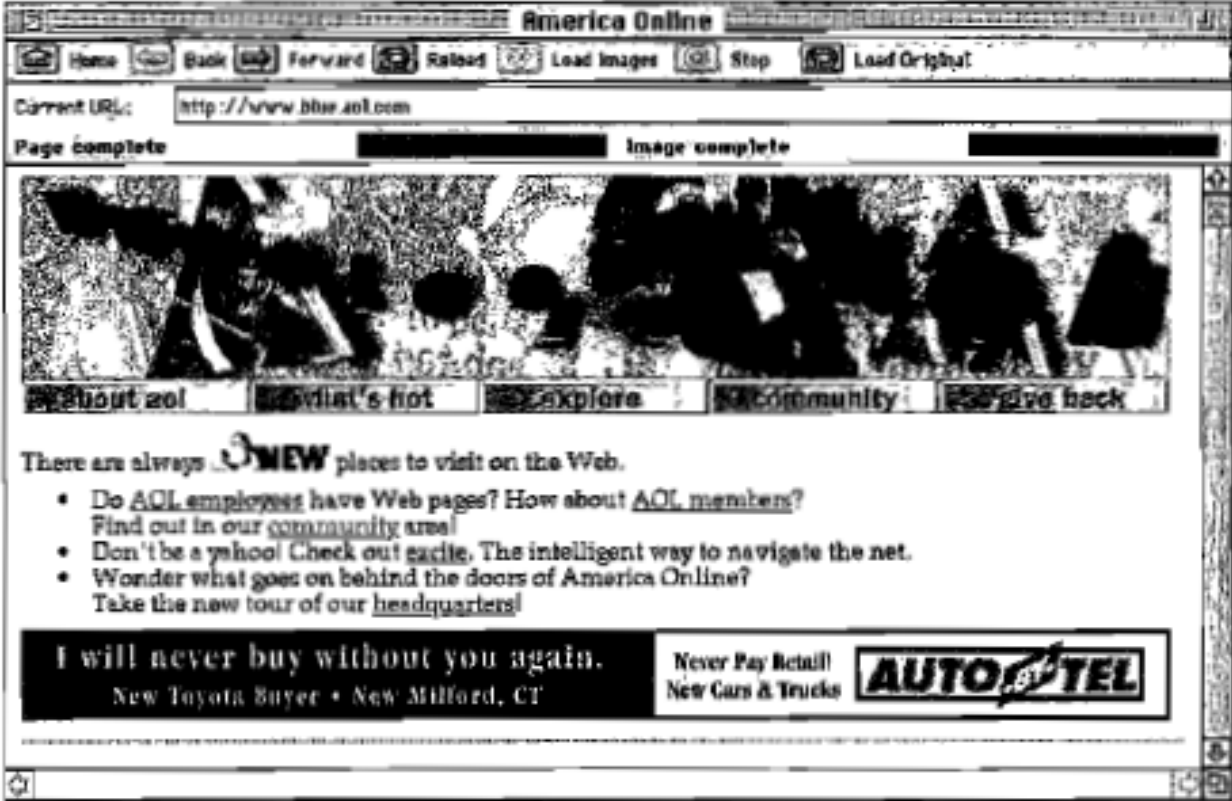
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	resolution, assume we have the base URI "http://www.acme.com/support/intro.html". The relative URI in the following markup for a hypertext link: Suppliers would expand to the full URI "http://www.acme. com/support/suppliers.html", while the relative URI in the following markup for an image would expand to the full URI "http://www.acme.com/icons/logo.gif". HTML 4.0, p. 8. “Authors may separate style sheets from HTML documents. This offers several benefits: [1] Authors and Web site managers may share style sheets across a number of documents (and sites). [2] Authors may change the style sheet without requiring modifications to the document. [3] User agents may load style sheets selectively (based on media descriptions).” HTML 4.0, p. 88. “HTML allows authors to associate any number of external style sheets with a document. The style sheet language defines how multiple external style sheets interact (for example, the CSS "cascade" rules). Authors may specify a number of mutually exclusive style sheets called alternate style sheets. Users may select their favorite among these depending on their preferences. For instance, an author may specify one style sheet designed for small screens and another for users with weak vision (e.g., large fonts). User agents should allow users to select from alternate style sheets. The author may specify that one of the alternates is a preferred style sheet User agents should apply the author's preferred style sheet unless the user has selected a different alternate. Authors may group several alternate style sheets (including the author's preferred style sheets) under a single style name. When a user selects a named style, the user agent must apply all style sheets with that name. User agents must not apply alternate style sheets with a different style name. The section on specifying external style sheets explains how to name a group of style

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	sheets.” HTML 4.0, p. 88. FIG. 35.5 A hypermedia document lets you turn Web pages by clicking underlined text or pictures.  AOL, at p. 642. AOL discloses the landing page of the White House, with a hyperlink to a text-only sister site in the upper left corner.

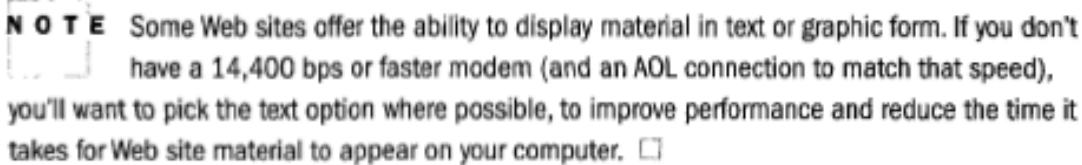
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 AOL, p. 645.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 35.23 The Underground Music Archive is a popular resource for music information on the WWW.  AOL, at p. 658. AOL discloses the website for Internet Underground Music Archive, which contains hyperlinks to graphic and text-only sister sites.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 NOTE Some Web sites offer the ability to display material in text or graphic form. If you don't have a 14,400 bps or faster modem (and an AOL connection to match that speed), you'll want to pick the text option where possible, to improve performance and reduce the time it takes for Web site material to appear on your computer. ☐ AOL, at p. 668. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. <i>See, e.g.</i>, Internet 1996 World Exposition – park.org/bandwidth.cgi (November 3, 1996) (landing page); park.org/main.html (November 3, 1996) (high bandwidth version); www.park.org/main.text.html (November 3, 1996) (low bandwidth version) (collectively, “Internet 96”); White House Website – www3.whitehouse.gov (October 23, 1997) (graphic version); www3.whitehouse.gov/index-plain.html (October 23, 1997) (text-only version) (collectively, “White House”); Jerry Teplitz Enterprises Website – www.teplitz.com/main.htm (June 26, 1998) (graphic version); www.teplitz.com/text/main.htm (June 26, 1998) (text-only version) (collectively, “Teplitz”); Sun Microsystems, Inc. Website – www.sun.com (August 3, 1997) (graphic version); www.sun.com/index.textonly.html (August 3, 1997) (text-only version); www.sun.com/index.java.html (August 3, 1997) (Java version) (collectively, “Sun”); Berliss, et. al, “Design of Accessible Web Pages”, copyright 1996 (dated May, 1996) by InfoUse (“InfoUse”); Yahoo.com – www.yahoo.com (Oct. 13, 1999) (main page); mobile.yahoo.com/wireless/home (Oct. 12, 1999) (mobile version) (collectively, “Yahoo”);

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	NASA Website – www.nasa.gov (Apr. 30, 1999) (main page); www.nasa.gov/siteindex (Apr. 27, 1999) (site map); www.nasa.gov/textonly.html (Apr. 28, 1999) (collectively, “NASA”). <i>See, e.g.:</i>

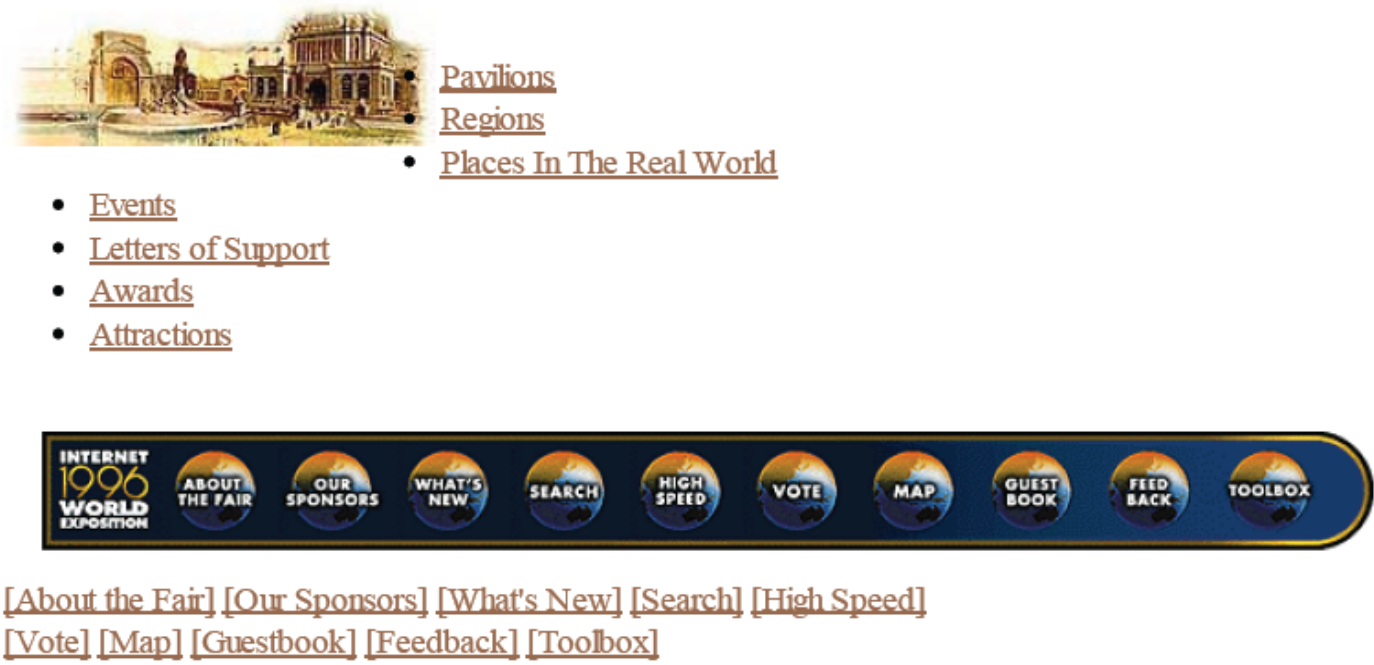
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Internet 96. (landing page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Internet 96. (high-speed page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	You've reached the text and simple graphics version of the Internet 1996 World Exposition.  Internet 96. (low speed page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	[Text version]  You can search the White House web site for: • All White House web features combined: Press releases, Radio Addresses, photographs and Web Pages. White House. (graphic version) [Graphic version] The White House Virtual Library You can search the White House web site for: • All White House features combined: Press releases, Radio Addresses, photographs and Web Pages.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	White House. (text version)  Teplitz. (graphic page)  Teplitz. (text-only page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 The screenshot shows the Sun website's graphic page. At the top, there are links for 'Java version' and 'text-only version'. A box on the right says 'Click here to critique Sun's website' with an arrow pointing to the 'text-only version' link. The main content area features a mobile phone on the left and the text 'Sun to Acquire Information Appliance Pioneer, Diba.' in the center. On the right, there is a search bar labeled 'Search Sun's Site:' with a 'Search' button. Below the search bar, there is a section titled 'hot topics' with a link for 'Trusted Solaris 2.5: Security for the Enterprise'. At the bottom of the page, there is another search bar labeled 'Search Sun's Site:' with a 'Start Search' button. Below the search bar, there is a line of text: 'For easier navigation, try the Java version or non-Java graphics version of our homepage.' Sun. (graphic page) • Contacts • Buy Sun. (text-only page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Applet not working? Firewall could be the cause. Try the non-Java or text-only version of our home page. Sun. (java page) “At the top of all home pages, the first line should be a text link labeled something like, ‘Click here to go to text-only version of site.’” Infouse, at 4. Mobile Help Yahoo! Mobile Yahoo! Content on Your PDA PDA Requirements More... Copyright © 1994-1999 Yahoo! Inc. All rights reserved. Important Disclaimers and Legal Information - Terms of Service Yahoo. (mobile site)  Yahoo! - My Yahoo! - Help?

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Yahoo. (mobile site) <u>Other Cool NASA Websites</u> [Frequently Asked Questions] [Hot Topics] [Multimedia Gallery] [NASA Television] [Textonly Version] [NASA Privacy Statement] [Site Map] NASA. (graphic page) Cool NASA Websites • Mars Global Surveyor • Science News • Space Flight • Earth Science Kids Website [Frequently Asked Questions] [Hot Topics] [Multimedia Gallery] [NASA Television] [Today@NASA] [NASA Privacy Statement] [Site Map] NASA. (text-only page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 NASA. (site map)
<u>Claim 1,</u> <u>Element I</u> receiving a user selection of one of the navigation options	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a user selection of one of the navigation options.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the

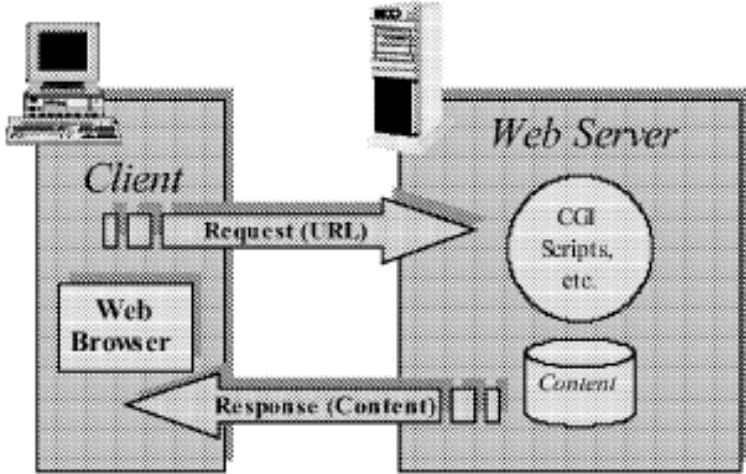
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	relevant time. See, <i>e.g.</i>, support cited herein for claim 1, preamble and Elements A-H. “HTML gives authors the means to: * Publish online documents with headings, text, tables, lists, photos, etc. * Retrieve online information via hypertext links, at the click of a button. * Design forms for conducting transactions with remote services, for use in searching for information, making reservations, ordering products, etc. * Include spread-sheets, video clips, sound clips, and other applications directly in their documents.” HTML 4.0, § 2.2, pp. 8-9. “By activating these links (by clicking with the mouse, through keyboard input, voice commands, etc.), users may visit these resources. Note that the href attribute in each source anchor specifies the address of the destination anchor with a URI.” HTML 4.0, § 12.1.1, p. 67. “Image maps allow authors to specify regions of an image or object and assign a specific action to each region (e.g., retrieve a document, run a program, etc.) When the region is activated by the user, the action is executed. An image map is created by associating an object with a specification of sensitive geometric areas on the object. There are two types of image maps: * Client-side. When a user activates a region of a client-side image map with a mouse, the pixel coordinates are interpreted by the user agent. The user agent selects a link that was specified for the activated region and follows it. * Server-side. When a user activates a region of a server-side image map with a mouse, the pixel coordinates of the click are sent to the server-side agent specified by the href attribute of the A element. The server-side agent interprets the coordinates and performs

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	some action. Client-side image maps are preferred over server-side image maps for at least two reasons: they are accessible to people browsing with non-graphical user agents and they offer immediate feedback as to whether or not the pointer is over an active region.” HTML 4.0, § 13.6, p. 80. Selecting the Right Channel Finding the right place to visit on AOL is similar to selecting a channel on your TV set, except you click an icon rather than push a button. Once you've signed on to AOL and learned how to get the most out of its highly flexible software, you'll want to do more than just get your feet wet. Every time you log on to America Online, you'll see the Welcome screen (see fig. 6.1), also known as In The Spotlight. This screen shows you the major highlights of the service and informs you if you have e-mail waiting. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82. Moreover, receiving a user selection of one of the navigation options was well-known at the time

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	of the alleged invention. <i>See, e.g.</i> WAP. 6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  Figure 1. World-Wide Web Programming Model WAP, p. 11.
<u>Claim 1,</u> <u>Element J</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface;	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-I. “HTML gives authors the means to: * Publish online documents with headings, text, tables, lists, photos, etc. * Retrieve online information via hypertext links, at the click of a button. * Design forms for conducting transactions with remote services, for use in searching for information, making reservations, ordering products, etc. * Include spread-sheets, video clips, sound clips, and other applications directly in their documents.” HTML 4.0, § 2.2, pp. 8-9. “HTML offers many of the conventional publishing idioms for rich text and structured documents, but what separates it from most other markup languages is its features for hypertext and interactive documents. This section introduces the link (or hyperlink, or Web link), the basic

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	hypertext construct. A link is a connection from one Web resource to another. Although a simple concept, the link has been one of the primary forces driving the success of the Web. A link has two ends -- called anchors -- and a direction. The link starts at the "source" anchor and points to the "destination" anchor, which may be any Web resource (e.g., an image, a video clip, a sound bite, a program, an HTML document, an element within an HTML document, etc.).” HTML 4.0, § 12.1, p. 66. “By far the most common use of a link is to retrieve another Web resource, as illustrated in the previous examples.” HTML 4.0, § 12.1.2, p. 67.

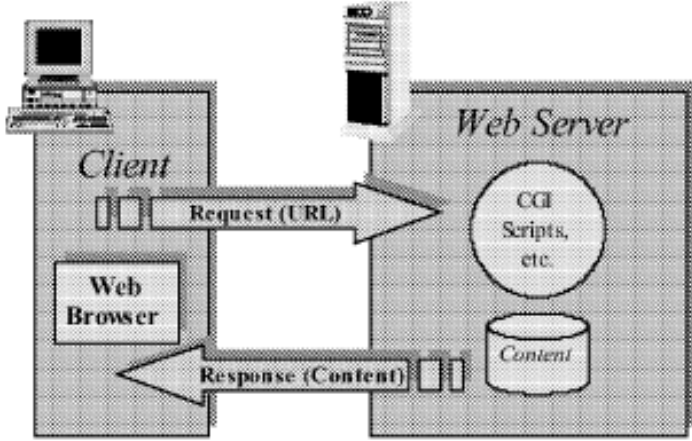
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Some Nuts and Bolts Information About America Online Our daily press and broadcast news outlets commonly refer to communicating online as being a part of the Information Superhighway, and this is likely an apt expression. But it's an expression designed to represent the entire global information network, not just a single service, and I like to think of that network as more akin to a planet than a highway. So let's consider America Online as one large city (or country) that exists on that planet. Let's take that description of a city a bit further. Besides all those people, you can find neighborhoods, highways, stores, libraries, and schools. You interact with that community from your own computer and modem, using America Online's unique graphical interface, which transports you from one place to another when you click an icon or type a simple keyboard command. But behind that easy-to-use technology is a huge network of micro- and minicomputers storing many gigabytes of data, linked to the outside world by advanced fiber-optic telephone cables.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Looking at AOL's Distributed Network Bear with me for a moment as I give you a few insights into the state-of-the-art equipment that resides at America Online's headquarters in Vienna, Virginia. It is a truly advanced setup. America Online's computers are built on the client-server model with a peer-to-peer application architecture. The systems consist of Stratus RISC processors running the VOS operating system, Hewlett-Packard RISC processors running the UNIX operating system, and PCs running DOS or OS/2. All these computers are interconnected by high-speed networks. Using a technique called <i>distributed processing</i>, they can share information-handling tasks, resulting in extremely fast data processing, enabling thousands of simultaneous transactions. This capability means that thousands of America Online members can log on to the network at the same time without any loss in system performance. AOL, p. 3. Moreover, forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface was well-known at the time of the alleged invention. <i>See, e.g.</i> WAP.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  Figure 1. World-Wide Web Programming Model WAP, p. 11.
Claim 1, Element K	receiving a next deeper HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option.” <i>See,</i>

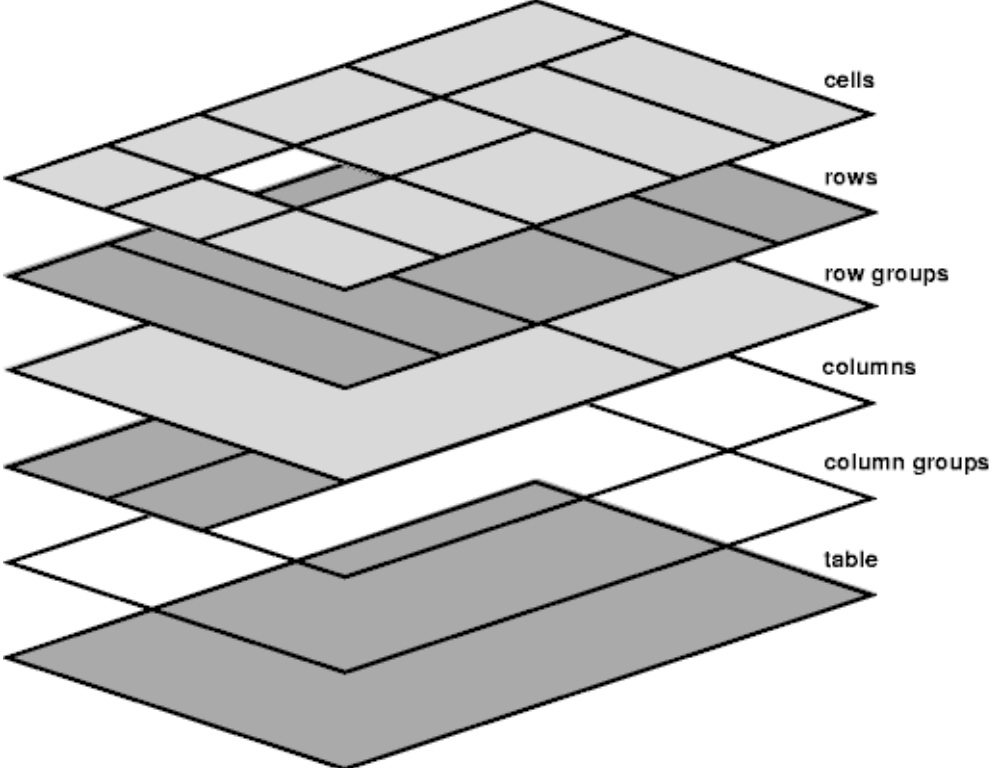
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation layer of the simplified navigation interface corresponding to the selected navigation option;	<i>e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-J. “Relative URIs are resolved to full URIs using a base URI. As an example of relative URI resolution, assume we have the base URI "http://www.acme.com/support/intro.html". The relative URI in the following markup for a hypertext link: Suppliers would expand to the full URI "http://www.acme.com/support/suppliers.html", while the relative URI in the following markup for an image would expand to the full URI "http://www.acme.com/icons/logo.gif"." HTML 4.0, § 2.1.3, p. 8. “HTML now offers a standard mechanism for embedding generic media objects and applications in HTML documents. The OBJECT element (together with its more specific ancestor elements IMG and APPLET) provides a mechanism for including images, video, sound, mathematics,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	specialized applications, and other objects in a document. It also allows authors to specify a hierarchy of alternate renderings for user agents that don't support a specific rendering.” HTML 4.0, § 2.3.4, p. 10. “Implementers are advised that future versions of HTML may extend the grouping mechanism to allow for nested groups (i.e., OPTGROUP elements may nest). This will allow authors to represent a richer hierarchy of choices. <pre><!ELEMENT OPTION - O (#PCDATA) -- selectable choice --> <!ATTLIST OPTION %attrs; -- %coreattrs, %i18n, %events -- selected (selected) #IMPLIED disabled (disabled) #IMPLIED -- unavailable in this context -- label %Text; #IMPLIED -- for use in hierarchical menus -- value CDATA #IMPLIED -- defaults to element content -- >” HTML 4.0, § 17.6.1, p. 108.</pre> “Visual user agents may allow users to select from option groups through a hierarchical menu or some other mechanism that reflects the structure of choices.” HTML 4.0, § 17.6.1, p. 109. 

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	HTML 4.0, § 17.6.1, p. 109.  CSS2, § 17.5.1, p. 255.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option was well-known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element L</u>	and manipulating a region of the HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” See, e.g., HTML 4.0

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screen for viewing and zooming and/or scrolling of the displayed on-line content.	§§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claim 1, preamble and Elements A-K. When magnifying a page, UAs should preserve the relationships between positioned elements. For example, a comic strip may be composed of images with overlaid text elements. When magnifying this page, a user agent should keep the text within the comic strip balloon. CSS2, § 18.5, p. 276. “User agents for continuous media [p. 79] generally offer users a viewport (a window or other viewing area on the screen) through which users consult a document. User agents may change the document's layout when the viewport is resized (see the initial containing block [p. 96]). When the viewport is smaller than the document's initial containing block, the user agent should offer a scrolling mechanism. There is at most one viewport per canvas [p.. 26], but user agents may render to more than one canvas (i.e., provide different views of the same document).” CSS2, p.

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	96. “scroll This value indicates that the content is clipped and that if the user agent uses scrolling mechanism that is visible on the screen (such as a scroll bar or a panner), that mechanism should be displayed for a box whether or not any of its content is clipped. This avoids any problem with scrollbars appearing and disappearing in a dynamic environment. When this value is specified and the target medium is 'print' or 'projection', overflowing content should be printed. auto The behavior of the 'auto' value is user agent-dependent, but should cause a scrolling mechanism to be provided for overflowing boxes.” CSS2, p. 146. “Table rows may be grouped into a table head, table foot, and one or more table body sections, using the THEAD, TFOOT and TBODY elements, respectively. This division enables user agents to support scrolling of table bodies independently of the table head and foot. When long tables are printed, the table head and foot information may be repeated on each page that contains table data.” HTML 4.0, § 11.2.3, p. 52. “HTML frames allow authors to present documents in multiple views, which may be independent windows or subwindows. Multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. For example, within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” HTML 4.0, § 16.1, p. 95.

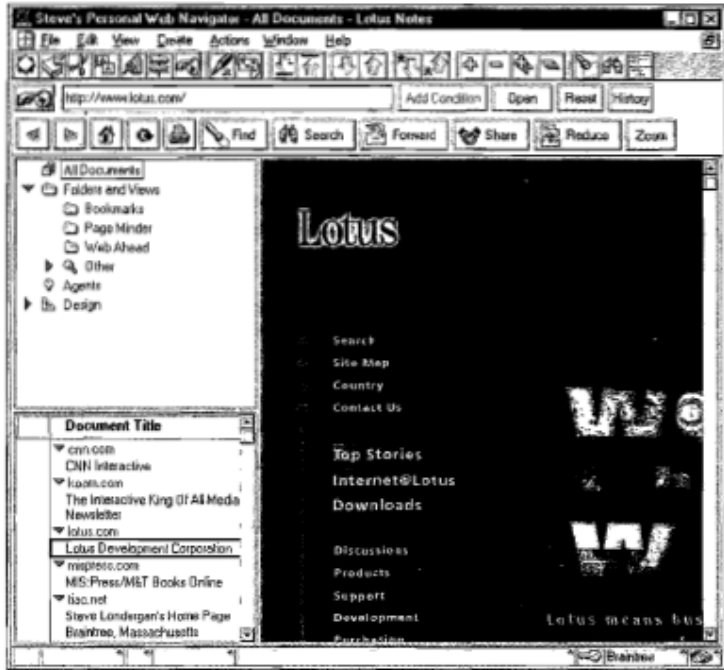
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	“Visual user agents should avoid clipping any part of the table including the caption, unless a means is provided to access all parts, e.g., by horizontal or vertical scrolling. We recommend that the caption text be wrapped to the same width as the table.” HTML 4.0, p. 52. FIG. 6.28 AOL's Internet Connection is the entranceway to the global Information Super-highway. The image is a screenshot of the AOL 'Internet Connection' window. It features a central hub-and-spoke interface. The central area contains four main icons: 'World Wide Web' (globe), 'Gopher & WAIS' (gopher), 'FTP' (floppy disk), and 'News Groups' (speech bubble). These are connected to a central point. To the right is a vertical sidebar titled 'RESOURCES' which lists various links: 'How's Our New Layout?', 'What's Hot', 'Eam 15 FREE Hours', 'NEW! Netscape', 'Coming Attractions', 'CyberLove & Laughter', 'Doing Business on the Net', 'Help', 'Internet Newsstand', 'Jump into the Net', 'Newsgroups', 'Search the Internet', 'This Week's Top Ten', 'Town Square', 'World Wide Web', and 'IC Download Libraries'. At the bottom of the window are buttons for 'MAIN MENU', 'AVAILABLE SERVICES', and 'HELP', along with a 'Keyword: Internet' search bar. AOL, p. 102. AOL discloses a bar on the rightmost edge of the viewing window for scrolling of the displayed on-line content. Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, STEVE LONDERGAN, THE LOTUS DOMINO SERVER (1st ed. 1997) (“DOMINO”); <i>B.B. Bederson et al.</i>,

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	Pad++: A Zoomable Graphical Sketchpad for Exploring Alternative Interface Physics (Sept. 19, 1995) ("Pad++"). The Zoom button simply maximizes the window for the Web page that is currently selected. And, least but not least, the Folder button is used to put the current page into a folder in the database. DOMINO, at p. 291.

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	The Views and Folders  Figure 16.9 The Views and Folders in the Personal Web Navigator database. DOMINO, Fig. 16.9. “The user controls where they look on this vast data surface by panning and zooming. Portals are

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	objects on the Pad++ data surface that can see anywhere on the surface, as well as filter data to represent it differently than it normally appears. Panning and zooming allow navigation through a large information space via direct manipulation.” Pad++, at p. 2. “Using an interactive zoomable surface, however, allows very different methods of visually representing large data structures. The fact that there is always more room to put information “between the cracks” gives many more options. Pad++ is particularly well suited to visualizing hierarchical data because information that is deeper in the hierarchy can be made smaller. Accessing this information is accomplished by zooming.” Pad++, at p. 9. “Pad++ also can follow links across the internet. Figure 5 shows a snapshot where several hypertext links have been followed. Two views show the same tree focused on different nodes. The Pad++ user interface for accessing hypertext is similar to traditional systems, but zooming mechanisms are employed.” Pad++, at p. 10.
<u>Claim 2,</u>	
2. The method of claim 1, further comprising: displaying one or more advertisements on the screen; receiving a user	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying one or more advertisements on the screen; receiving a user selection of a displayed advertisement; and displaying second content accessed via the Internet, wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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selection of a displayed advertisement; and displaying second content accessed via the Internet, wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs.	determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1. “Definition lists, created using the DL element, generally consist of a series of term/definition pairs (although definition lists may have other applications). Thus, when advertising a product, one might use a definition list: Lower cost The new version of this product costs significantly less than the previous one! Easier to use We've changed the product so that it's much easier to use! Safe for kids You can leave your kids alone in a room with this product and they won't get hurt (not a guarantee).” HTML 4.0, § 10.1, p. 46. “ HTML gives authors the means to: * Publish online documents with headings, text, tables, lists, photos, etc. * Retrieve online information via hypertext links, at the click of a button. * Design forms for conducting transactions with remote services, for use in searching for information, making reservations, ordering products, etc. * Include spread-sheets, video clips, sound clips, and other applications directly in their documents.” HTML 4.0, § 2.2, pp. 8-9. “Thus, when advertising a product, might use a definition list” HTML 4.0 p. 46.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“Lists may also be nested and different list types may be used together, as in the following example, which is a definition list that contains an unordered list (the ingredients) and an ordered list (the procedure)” HTML 4.0, p. 46. By activating these links (by clicking with the mouse, through keyboard input, voice commands, etc.), users may visit these resources. Note that the href attribute in each source anchor specifies the address of the destination anchor with a URI. HTML 4.0, § 12.1.1, p. 67. “Image maps allow authors to specify regions of an image or object and assign a specific action to each region (e.g., retrieve a document, run a program, etc.) When the region is activated by the user, the action is executed. An image map is created by associating an object with a specification of sensitive geometric areas on the object. There are two types of image maps: * Client-side. When a user activates a region of a client-side image map with a mouse, the pixel coordinates are interpreted by the user agent. The user agent selects a link that was specified for the activated region and follows it. * Server-side. When a user activates a region of a server-side image map with a mouse, the pixel coordinates of the click are sent to the server-side agent specified by the href attribute of the A element. The server-side agent interprets the coordinates and performs some action. Client-side image maps are preferred over server-side image maps for at least two reasons: they are accessible to people browsing with non-graphical user agents and they offer immediate feedback as to whether or not the pointer is over an active region.” HTML 4.0, § 13.6, p. 80.

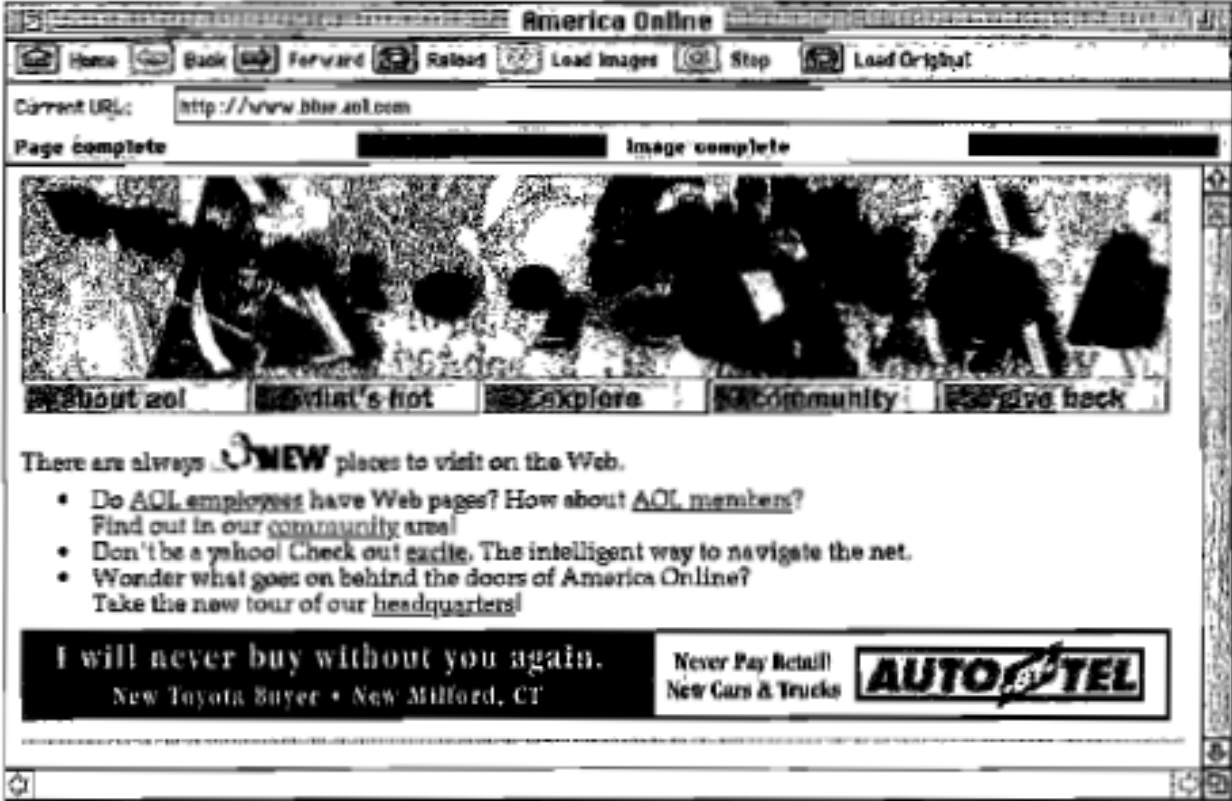
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	BODY { background: url("http://www.bg.com/pinkish.gif") } CSS2, p. 46. <pre> <DIV id="text3" class="pile" style="z-index: 2"> This text will underlay text1, but overlay the butterfly image </DIV> </pre> CSS2, p. 126. <pre> <P> <DIV id="text1" class="pile" style="z-index: 3"> This text will overlay the butterfly image. </pre> CSS2, p. 127.

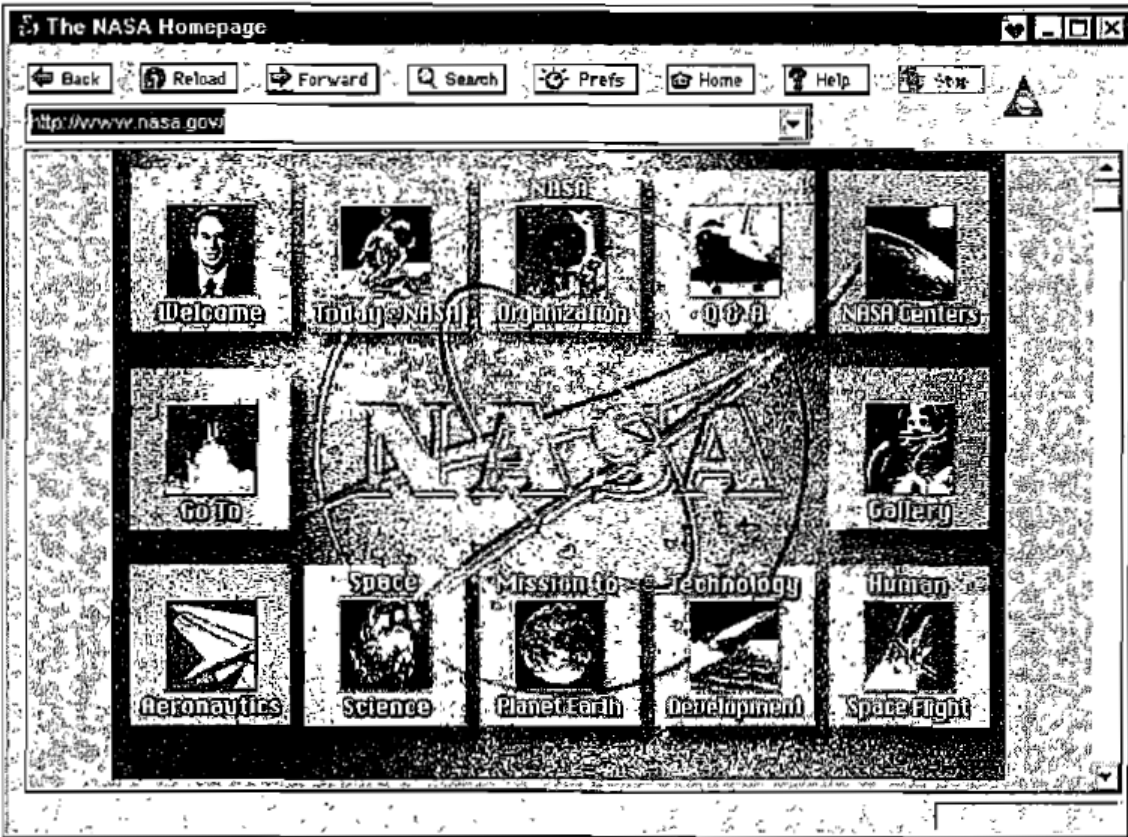
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Marketplace Keyword: Marketplace The marketplace is your AOL center for shopping galore! Whether you are looking for America Online goodies, such as T-shirts and coffee mugs, wanting to buy or sell a car, or looking for computer training aids, AOL's Marketplace channel offers you these things and more (see fig. 6.15). FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, pp. 90-91.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 The screenshot shows the America Online (AOL) homepage in a Netscape browser window. The browser's address bar displays 'http://www.blue.aol.com'. The page features a large banner image at the top, followed by a navigation bar with links: 'About AOL', 'What's Hot', 'Explore', 'Community', and 'Give Back'. Below this, a text block reads: 'There are always NEW places to visit on the Web.' This is followed by a bulleted list: '• Do AOL employees have Web pages? How about AOL members? Find out in our community area!', '• Don't be a yahoo! Check out excite. The intelligent way to navigate the net.', and '• Wonder what goes on behind the doors of America Online? Take the new tour of our headquarters!'. At the bottom, there is a large black box with white text: 'I will never buy without you again. New Toyota Buyer • New Milford, CT'. To the right of this box is another section titled 'Never Pay Retail! New Cars & Trucks' with the 'AUTOTEL' logo. AOL, p. 645.

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	 AOL, p. 682. Moreover, displaying one or more advertisements on the screen; receiving a user selection of a

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	displayed advertisement; and displaying second content accessed via the Internet, wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs was well-known at the time of the alleged invention.
<u>Claim 3</u>	
3. The method of claim 1, wherein the on-line content is selected based, at least in part, on a navigation path of a user.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the on-line content is selected based, at least in part, on a navigation path of a user.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1. “Every resource available on the Web -- HTML document, image, video clip, program, etc. -- has an address that may be encoded by a Universal Resource Identifier, or "URI".URIs typically consist of three pieces: 1. The naming scheme of the mechanism used to access the resource. 2. The name of the machine hosting the resource. 3. The name of the resource itself, given as a

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	path. Consider the URI that designates the current HTML specification: http://www.w3.org/TR/REC-html40/ This URI may be read as follows: There is a document available via the HTTP protocol (see [RFC2068]), residing on the machine www.w3.org, accessible via the path <code>"/TR/REC-html40/"</code>. Other schemes you may see in HTML documents include <code>"mailto"</code> for email and <code>"ftp"</code> for FTP.” HTML 4.0, § 2.1.1, p. 8. <pre> <!DOCTYPE HTML PUBLIC "-//W3C//DTD HTML 4.0//EN" "http://www.w3.org/TR/REC-html40/strict.dtd"> <HTML> <HEAD> <TITLE>Our Products</TITLE> <BASE href="http://www.aviary.com/products/intro.html"> </HEAD> <BODY> <P>Have you seen our Bird Cages? </BODY> </HTML> </pre> HTML 4.0, p. 72. “In the following example, pressing either form button invokes a user-defined script function that causes the corresponding box to become visible and the other to be hidden. Since these boxes have the same size and position, the effect is that one replaces the other.” CSS2, p. 150. See CSS2, pp. 149-151.

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	■ <i>World Wide Web</i>. Much of the content of the Internet is in text form, but it's easy to navigate through America Online's friendly, helpful interface. The World Wide Web is the newest Internet feature that combines text, pictures, and even sound into a single, unified presentation. Using hypertext links, you are able to click a topic and jump right to the material related to that subject. (Macintosh users familiar with HyperCard have already had somewhat of a sample of what the World Wide Web looks like.) AOL, p. 103. Moreover, on-line content selected based, at least in part, on a navigation path of a user was well-known at the time of the alleged invention. <i>See, e.g.</i>, WAP.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats. <pre> graph LR subgraph Client WB[Web Browser] end subgraph Web_Server [Web Server] CGI((CGI Scripts, etc.)) Content[(Content)] end WB -- "Request (URL)" --> CGI CGI -- "Response (Content)" --> WB </pre> Figure 1. World-Wide Web Programming Model WAP, p. 11.
Claim 4	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the user selection of one of claim 1, wherein the navigation options is received any one of a remote control, a pointer device, a keypad, and a keyboard.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp.

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of one of the navigation options is received any one of a remote control, a pointer device, a keypad, and a keyboard.	3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claim 1. “By activating these links (by clicking with the mouse, through keyboard input, voice commands, etc.), users may visit these resources. Note that the href attribute in each source anchor specifies the address of the destination anchor with a URI.” HTML 4.0, § 12.1.1, p. 67. “Retrieve online information via hypertext links, at the click of a button.” HTML 4.0, p. 9. “[1] Client-side. When a user activates a region of a client-side image map with a mouse, the pixel coordinates are by the user agent. The user agent selects a link that region and follows it. [2] Server-side. When activates a region of a server-side image map with a mouse, the pixel coordinates of the click are sent to the server-side agent specified by the href attribute of the A element. The server-side agent interprets the coordinates and performs some action.” HTML 4.0,

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	p. 80. “feedback as to whether or not the pointer is over an active region.” HTML 4.0, p. 80. <pre> <!ENTITY % events "onclick %Script; #IMPLIED -- a pointer button was clicked -- ondblclick %Script; #IMPLIED -- a pointer button was double clicked-- onmousedown %Script; #IMPLIED -- a pointer button was pressed down -- onmouseup %Script; #IMPLIED -- a pointer button was released -- onmouseover %Script; #IMPLIED -- a pointer was moved onto -- onmousemove %Script; #IMPLIED -- a pointer was moved within -- onmouseout %Script; #IMPLIED -- a pointer was moved away -- onkeypress %Script; #IMPLIED -- a key was pressed and released -- onkeydown %Script; #IMPLIED -- a key was pressed down -- onkeyup %Script; #IMPLIED -- a key was released --" > </pre> HTML 4.0, p. 126. “In an HTML document, an element must receive focus from the user in order to become active and perform its tasks. For example, users must activate a link specified by the A element in order to follow the specified link. Similarly, users must give a TEXTAREA focus in order to enter text into it.” HTML 4.0, p. 113. “Interactive user agents sometimes change the rendering in response to user actions. CSS provides three pseudo-classes for common cases: • The :hover pseudo-class applies while the user designates an element (with some pointing device), but does not activate it. For example, a visual

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	user agent could apply this pseudo-class when the cursor (mouse pointer) hovers over a box generated by the element. User agents not supporting interactive media do not have to support this pseudo-class. Some conforming user agents supporting interactive media may not be able to support this pseudo-class (e.g., a pen device). • The :active pseudo-class applies while an element is being activated by the user. For example, between the times the user presses the mouse button and releases it. • The :focus pseudo-class applies while an element has the focus (accepts keyboard events or other forms of text input).” CSS2, § 5.11.3, pp. 63-64. Understanding How Your Computer Links with America Online When you connect to America Online, it seems like such a simple process. For you it involves a single click of the mouse, but behind that simple action is a complex process of data transfers and computer processing. You generally hook up to America Online with two electronic boxes: your computer and a device called a modem. A modem is a small computer that converts a stream of digital ones and zeros into audible tones that are fed through telephone lines and received by another modem at a remote location. AOL, p. 4. Moreover, the user selection of one of the navigation options received by any one of a remote control, a pointer device, a keypad, and a keyboard was well-known at the time of the alleged invention. <i>See, e.g.,</i> WAP.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“Because of fundamental limitations of power and form-factor, mass-market handheld devices tend to have: Less powerful CPUs, Less memory (ROM and RAM), Restricted power consumption, Smaller displays, and Different input devices (e.g., a phone keypad).” WAP, p. 9.
<u>Claim 5</u>	
5. The method of claim 1, wherein a wireless Internet appliance comprises a voice recognition system, the method further comprising receiving one or more navigation input selections through the voice recognition system.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein a wireless Internet appliance comprises a voice recognition system, the method further comprising receiving one or more navigation input selections through the voice recognition system.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1. “By activating these links (by clicking with the mouse, through keyboard input, voice commands, etc.), users may visit these resources. Note that the href attribute in each source anchor specifies the address of the destination anchor with a URI.” HTML 4.0, § 12.1.1, p. 67.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<pre> graph TD A[Document mark-up] --> B[Transformed by means of a style sheet, script or program] B --> C(()) C --> D[TV screen] C --> E[Cellular phone] C --> F[Voice-based device] C --> G[Desk-top computer] H[Transformation can be done on the primary server, on the proxy server or at the client] --> C </pre> Reformulating HTML, p. 8. “HTML has been developed with the vision that all manner of devices should be able to use information on the Web: PCs with graphics displays of varying resolution and color depths, cellular telephones, hand held devices, devices for speech for output and input, computers with high or low bandwidth, and so on.” HTML 4.0, p. 9.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	How to Let AOL Talk to You Beginning with version 2.6, AOL's Mac software supports Apple's Speech Manager technology. Apple's Speech Manager (and PlainTalk speech recognition software) can read text back to you. This provides for some fascinating possibilities during your AOL sessions. At the very least, you don't have to be in front of your computer during a conference, because the text can be read back to you as it appears on your screen. CAUTION Sound capabilities are only available in your AOL Mac software if you have a Macintosh with PlainTalk or Speech Manager software installed. Otherwise, this feature, which appears in the Edit menu, won't work. NOTE Apple's speech technology (and similar features used on other computing platforms) is not advanced enough to provide perfect speech-to-text capability. Some words may not be enunciated properly by your computerized speaker, making those words difficult to understand. In other cases, when the way a word is pronounced varies by its context, you may have difficulty figuring out what the computer is trying to tell you. The talking computer that many of you know from <i>Star Trek</i> episodes is something we shouldn't expect to see for quite some time. ☐ AOL, p. 41. Moreover, receiving one or more navigation input selections through the voice recognition system was well-known at the time of the alleged invention. <i>See, e.g.,</i> DRAGON SYSTEMS, DRAGON NATURALLY SPEAKING (August 1998) (“Dragon”).

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“Dragon NaturallySpeaking scripting commands provide you with a powerful set of tools for controlling Dragon “NaturallySpeaking, the Windows environment, and your applications. With them, a voice command script can: · Launch and control applications on the desktop, including changing the active application. · Control applications by using DDE commands and DLL calls, sending keystrokes to an application, selecting a window control, and selecting a menu item. · Control Dragon NaturallySpeaking by putting it into and out of sleep mode and turning the microphone on and off. · Control script execution by displaying a confirmation box, running another voice command script, and making the script pause. · Control the mouse, including clicking the mouse buttons, dragging the mouse, controlling mouse motion, and controlling the MouseGrid™.” Dragon, p. 12. “Windows lets you interact with applications by:· Using the keyboard · Using the mouse · Selecting menus, menu items, buttons, and other controls directly · Using DDE commands· Calling functions in DLL files. Dragon NaturallySpeaking lets you use all these methods of interacting with Windows applications in your voice commands.” Dragon, p. 26. “The scripting language lets you access and select windows, menus, and controls in several ways: · You can send shortcut keystrokes. For example, the global Copy All to Clipboard command is a keystroke command that sends the {Ctrl+a}{Ctrl+c} key combination to select the entire document and copy it to the clipboard. However, global commands that use shortcut keys may have unexpected results in applications that do not follow standard Windows shortcut key conventions. · You can send {Tab} keystrokes to tab through controls such as text fields and

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
	buttons. This technique is useful for accessing controls that do not have shortcut (accelerator) keys. You can also send the {Space} or {Enter} keystroke to activate a control. · If the application can function as a DDE server, you can use the DdeExecute and DdePoke commands to send Windows DDE requests directly to an application. You may prefer this method to using keystrokes with applications, such as Microsoft Word, where you can change key assignments.” Dragon, p. 28.
<u>Claim 6</u>	
6. The method of claim 1, wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1. “Table rows may be grouped into a table head, table foot, and one or more table body sections,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	using the THEAD, TFOOT and TBODY elements, respectively. This division enables user agents to support scrolling of table bodies independently of the table head and foot. When long tables are printed, the table head and foot information may be repeated on each page that contains table data.” HTML 4.0, § 11.2.3, p. 52. “onclick, ondblclick, onmousedown, onmouseup, onmouseover, onmousemove, onmouseout, onkeypress, onkeydown, onkeyup (intrinsic events)” HTML 4.0, p. 31. “The HTML table model allows authors to arrange data -- text, preformatted text, images, links, forms, form fields, other tables, etc. – into rows and columns of cells.” HTML 4.0, p. 49. tabindex NUMBER #IMPLIED -- position in tabbing order -- HTML 4.0, p. 68. “HTML frames allow authors to present documents in multiple views, which may be independent windows or subwindows. Multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. For example, within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” HTML 4.0, § 16.1, p. 95. ‘<IFRAME src=“foo.html” width=“400” height=“500” scrolling=“auto” frameborder=“1”>’ HTML 4.0, pp. 101-102.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“In an HTML document, an element must receive focus from the user in order to become active and perform its tasks. For example, users must activate a link specified by the A element in order to follow the specified link. Similarly, users must give a TEXTAREA focus in order to enter text into it.” HTML 4.0, p. 113. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online. AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions were well-known at the time of the alleged invention.
<u>Claim 7</u>	7. The method of claim 6, further comprising HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “further comprising tabbing to focus on different one of the regions.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
tabbing to focus on different one of the regions.	Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claims 1 and 6. “Attribute definitions tabindex = number [CN] This attribute specifies the position of the current element in the tabbing order for the current document. This value must be a number between 0 and 32767. User agents should ignore leading zeros. The tabbing order defines the order in which elements will receive focus when navigated by the user via the keyboard. The tabbing order may include elements nested within other elements. Elements that may receive focus should be navigated by user agents according to the following rules: 1. Those elements that support the tabindex attribute and assign a positive value to it are navigated first. Navigation proceeds from the element with the lowest tabindex value to the element with the highest value. Values need not be sequential nor must they begin with any particular value. Elements that have identical tabindex values should be navigated in the order they appear in the character stream. 2. Those elements that do not support the tabindex attribute or support it and assign it a value of "0" are navigated next. These elements are navigated in the order they appear in the character stream. 3. Elements

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	that are disabled do not participate in the tabbing order.” HTML 4.0, § 17.11.1, p. 113. “Tabbing keys. The actual key sequence that causes tabbing navigation or element activation depends on the configuration of the user agent (e.g., the "tab" key is used for navigation and the "enter" key is used to activate a selected element). User agents may also define key sequences to navigate the tabbing order in reverse. When the end (or beginning) of the tabbing order is reached, user agents may circle back to the beginning (or end).” HTML 4.0, § 17.11.1, p. 113. “Alternative language bindings. The set of CSS properties described in this specification form a consistent formatting model for visual and aural presentations. This formatting model can be accessed through the CSS language, but bindings to other languages are also possible. For example, a JavaScript program may dynamically change the value of a certain element's 'color' property. CSS2, p. 27. <pre> P { font-size: 12pt; } BLOCKQUOTE { font-size: larger } EM { font-size: 150% } EM { font-size: 1.5em } </pre> CSS2, p. 204. <pre> A:focus { background: yellow } A:focus:hover { background: white } </pre> CSS2, p. 275.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References																										
	<pre>:focus { outline: thick solid black } :active { outline: thick solid red }</pre> CSS2, p. 276. Table 4.1 Keyboard Shortcuts for Windows <table> <tr> <th>Function</th><th>Keyboard Short</th></tr> <tr> <td>Access Download Manager</td><td>Ctrl+T</td></tr> <tr> <td>Cancel an action</td><td>Esc</td></tr> <tr> <td>Cascade windows</td><td>Shift+F5</td></tr> <tr> <td>Close a window</td><td>Ctrl+F4</td></tr> <tr> <td>Copy</td><td>Ctrl+C</td></tr> <tr> <td>Cut</td><td>Ctrl+X</td></tr> <tr> <td>Find a member, file, area</td><td>Ctrl+F</td></tr> <tr> <td>Get member profile</td><td>Ctrl+G</td></tr> <tr> <td>Locate a member online</td><td>Ctrl+L</td></tr> <tr> <td>Move to next button</td><td>Tab</td></tr> <tr> <td>Move to next window</td><td>Ctrl+F6</td></tr> <tr> <td>Move to previous button</td><td>Shift+Tab</td></tr> </table> AOL, p. 63.	Function	Keyboard Short	Access Download Manager	Ctrl+T	Cancel an action	Esc	Cascade windows	Shift+F5	Close a window	Ctrl+F4	Copy	Ctrl+C	Cut	Ctrl+X	Find a member, file, area	Ctrl+F	Get member profile	Ctrl+G	Locate a member online	Ctrl+L	Move to next button	Tab	Move to next window	Ctrl+F6	Move to previous button	Shift+Tab
Function	Keyboard Short																										
Access Download Manager	Ctrl+T																										
Cancel an action	Esc																										
Cascade windows	Shift+F5																										
Close a window	Ctrl+F4																										
Copy	Ctrl+C																										
Cut	Ctrl+X																										
Find a member, file, area	Ctrl+F																										
Get member profile	Ctrl+G																										
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Move to next button	Tab																										
Move to next window	Ctrl+F6																										
Move to previous button	Shift+Tab																										

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	A quick way to navigate from one data-entry point (field) to another is to press Tab. To return to the preceding field, press Shift+Tab. AOL, p. 841. Moreover, tabbing to focus on different one of the regions was well-known at the time of the alleged invention.
<u>Claim 8</u>	
8. The method of claim 6, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claims 1 and 6.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“Table rows may be grouped into a table head, table foot, and one or more table body sections, using the THEAD, TFOOT and TBODY elements, respectively. This division enables user agents to support scrolling of table bodies independently of the table head and foot. When long tables are printed, the table head and foot information may be repeated on each page that contains table data.” HTML 4.0, § 11.2.3, p. 52. “HTML frames allow authors to present documents in multiple views, which may be independent windows or subwindows. Multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. For example, within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” HTML 4.0, § 16.1, p. 95. “When magnifying a page, UAs should preserve the relationships between positioned elements. For example, a comic strip may be composed of images with overlaid text elements. When magnifying this page, a user agent should keep the text within the comic strip balloon.” CSS2, § 18.5, p. 276.

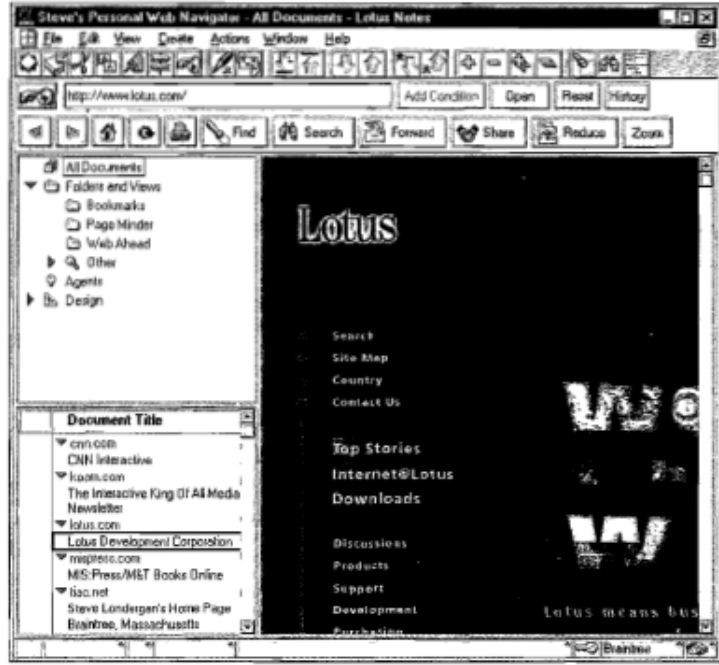
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.28 AOL's Internet Connection is the entranceway to the global Information Super-highway.  AOL, p. 102. AOL discloses a bar on the rightmost edge of the viewing window for scrolling of the displayed on-line content. Moreover, regions adapted to be zoomed and/or scrolled independently of other ones of the regions were well-known at the time of the alleged invention. <i>See, e.g.</i>, STEVE LONDERGAN, THE LOTUS DOMINO SERVER (1st ed. 1997)(“DOMINO”); B.B. Bederson <i>et al.</i>, Pad++: A Zoomable Graphical Sketchpad for Exploring Alternative Interface Physics (Sept. 19, 1995) (“Pad++”).

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The Zoom button simply maximizes the window for the Web page that is currently selected. And, least but not least, the Folder button is used to put the current page into a folder in the database. DOMINO, at p. 291.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The Views and Folders  Figure 16.9 The Views and Folders in the Personal Web Navigator database. DOMINO, Fig. 16.9. “The user controls where they look on this vast data surface by panning and zooming. Portals are objects on the Pad++ data surface that can see anywhere on the surface, as well as filter data to

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	represent it differently than it normally appears. Panning and zooming allow navigation through a large information space via direct manipulation.” Pad++, at p. 2. “Using an interactive zoomable surface, however, allows very different methods of visually representing large data structures. The fact that there is always more room to put information “between the cracks” gives many more options. Pad++ is particularly well suited to visualizing hierarchical data because information that is deeper in the hierarchy can be made smaller. Accessing this information is accomplished by zooming.” Pad++, at p. 9. “Pad++ also can follow links across the internet. Figure 5 shows a snapshot where several hypertext links have been followed. Two views show the same tree focused on different nodes. The Pad++ user interface for accessing hypertext is similar to traditional systems, but zooming mechanisms are employed.” Pad++, at p. 10.
<u>Claim 9,</u> <u>Preamble</u>	
9. A method comprising:	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “A method of navigating the Internet.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble.
<u>Claim 9,</u> <u>Element A</u>	
displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, displaying a first content via the internet	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified	<i>See, e.g.</i>, claim 1, Preamble and Element A; claim 9, Preamble. “Definition lists, created using the DL element, generally consist of a series of term/definition pairs (although definition lists may have other applications). Thus, when advertising a product, one might use a definition list: Lower cost The new version of this product costs significantly less than the previous one! Easier to use We've changed the product so that it's much easier to use! Safe for kids You can leave your kids alone in a room with this product and they won't get hurt (not a guarantee).” HTML 4.0, § 10.1, p. 46. “HTML gives authors the means to: * Publish online documents with headings, text, tables, lists, photos, etc. * Retrieve online information via hypertext links, at the click of a button. * Design forms for conducting transactions with remote services, for use in searching for information, making reservations, ordering products, etc. * Include spread-sheets, video clips, sound clips, and other applications directly in their documents.” HTML 4.0, § 2.2, pp. 8-9. “By activating these links (by clicking with the mouse, through keyboard input, voice commands, etc.), users may visit these resources. Note that the href attribute in each source anchor specifies the address of the destination anchor with a URI.” HTML 4.0, § 12.1.1, p. 67. “Image maps allow authors to specify regions of an image or object and assign a specific action to each region (e.g., retrieve a document, run a program, etc.) When the region is activated by the user, the action is executed. An image map is created by associating an object with a specification of sensitive geometric areas on the object. There are two types of image maps: * Client-side.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation interface,	When a user activates a region of a client-side image map with a mouse, the pixel coordinates are interpreted by the user agent. The user agent selects a link that was specified for the activated region and follows it. * Server-side. When a user activates a region of a server-side image map with a mouse, the pixel coordinates of the click are sent to the server-side agent specified by the href attribute of the A element. The server-side agent interprets the coordinates and performs some action. Client-side image maps are preferred over server-side image maps for at least two reasons: they are accessible to people browsing with non-graphical user agents and they offer immediate feedback as to whether or not the pointer is over an active region.” HTML 4.0, § 13.6, p. 80. Marketplace Keyword: Marketplace The marketplace is your AOL center for shopping galore! Whether you are looking for America Online goodies, such as T-shirts and coffee mugs, wanting to buy or sell a car, or looking for computer training aids, AOL's Marketplace channel offers you these things and more (see fig. 6.15).

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, pp. 90-91. Today America Online is a publicly owned company that offers an online community for over five million members (with millions more joining each year). The service offers online shopping, information services such as daily newspapers and magazines, and even virtual reference books such as encyclopedias. In addition, America Online lets you reach out beyond the borders of its service, by providing a direct gateway to the Internet, which serves tens of millions of computer users across the world. AOL, p. 2.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Moreover, displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, and displaying a first content via the internet and through the simplified navigation interface were well-known at the time of the alleged invention.
<u>Claim 9,</u> <u>Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified navigation interface on any one of a television, web appliance, console device, handheld device,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1, Preamble and Elements A-B; claim 9, Preamble and Element A.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
wireless device or cellular phone,	
<u>Claim 9, Element C</u>	
the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the first content displayed in one or more of the plurality of cells.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.
the first content displayed in one or more of the plurality of cells,	<i>See, e.g.</i> , claim 1, Preamble and Elements A-C; claim 9, Preamble and Elements A-B.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
<u>Claim 9, Element D</u>	
the two-dimensional layer in a form of a navigation matrix,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the two-dimensional layer in a form of a navigation matrix.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-D ; claim 9, Preamble and Elements A-C.
<u>Claim 9, Element E</u>	
each cell in the navigation matrix associated with a specific unique input, each cell is a	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
division of a screen and exclusive to a separate single navigation option,	determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-E; claim 9, Preamble and Elements A-D.
<u>Claim 9, Element F</u>	
the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
	<i>See, e.g.</i> , claim 1, Preamble and Elements A-F; claim 9, Preamble and Elements A-E.
<u>Claim 9, Element G</u>	
navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer;	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.
	<i>See, e.g.</i> , claim 1, Preamble and Elements A-G; claim 9, Preamble and Elements A-F.
<u>Claim 9, Element H</u>	
displaying a hyperlink on the sister site to navigate to the	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
web page, or displaying a hyperlink on the web page to navigate to the sister site;	AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-H; claim 9, Preamble and Elements A-G. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element H; <i>see also</i> AOL, Internet 96, White House, Teplitz, Sun, Infouse, Yahoo, NASA.
<u>Claim 9, Element I</u>	
receiving a first input, the first input received as the specific unique input that is uniquely	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
coupled with an associated cell in the navigation matrix;	HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-I; claim 9, Preamble and Elements A-H.
<u>Claim 9, Element J</u>	
forwarding the first input across the internet to a server providing the simplified navigation interface;	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “forwarding the first input across the internet to a server providing the simplified navigation interface.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-J; claim 9, Preamble and Elements A-I.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
<u>Claim 9, Element K</u>	
receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input; and	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-J.
<u>Claim 9, Element L</u>	
manipulating a selected region of the screen for viewing and zooming and/or scrolling of the	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2,

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
displayed on-line content.	Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-J. Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element L, DOMINO, Pad++.
<u>Claim 10</u>	
10. The method of claim 9, further comprising: customizing the display of the simplified navigation interface based on a navigation path of the user.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “customizing the display of the simplified navigation interface based on a navigation path of the user.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	See, e.g., claim 9. “HTML now offers a standard mechanism for embedding generic media objects and applications in HTML documents. The OBJECT element (together with its more specific ancestor elements IMG and APPLET) provides a mechanism for including images, video, sound, mathematics, specialized applications, and other objects in a document. It also allows authors to specify a hierarchy of alternate renderings for user agents that don't support a specific rendering.” HTML 4.0, § 2.3.4, p. 10. “Implementers are advised that future versions of HTML may extend the grouping mechanism to allow for nested groups (i.e., OPTGROUP elements may nest). This will allow authors to represent a richer hierarchy of choices. <!ELEMENT OPTION - O (#PCDATA) -- selectable choice --> <!ATTLIST OPTION %attrs; -- %coreattrs, %i18n, %events -- selected (selected) #IMPLIED disabled (disabled) #IMPLIED -- unavailable in this context -- label %Text; #IMPLIED -- for use in hierarchical menus -- value CDATA #IMPLIED -- defaults to element content -- >” HTML 4.0, § 17.6.1, p. 108. “Visual user agents may allow users to select from option groups through a hierarchical menu or

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	some other mechanism that reflects the structure of choices.” HTML 4.0, § 17.6.1, p. 109. The image is a screenshot of a web browser window. It displays a table with four rows. The first row is 'PortMaster 3 3.7.1'. The second row is 'PortMaster 3'. The third row is 'PortMaster 2' and is highlighted. The fourth row is 'IRX'. To the right of the table, there are two columns of values: '3.7' and '3.5'. A mouse cursor is pointing at the '3.5' value. HTML 4.0, § 17.6.1, p. 109. “The 'visibility' property takes the value 'collapse' for row, row group, column, and column group elements. This value causes the entire row or column to be removed from the display, and the space normally taken up by the row or column to be made available for other content. The suppression of the row or column, however, does not otherwise affect the layout of the table. This allows dynamic effects to remove table rows or columns without forcing a re-layout of the table in order to account for the potential change in column constraints.” CSS2, § 17.5.5, p. 261.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, customizing the display of the simplified navigation interface based on a navigation path of the user was well-known at the time of the alleged invention.
<u>Claim 11</u>	11. The method of claim 9, wherein the first §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
input selects a primary navigation option.	Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 9. “Table cells may either contain "header" information (see the TH element) or "data" (see the TD element). Cells may span multiple rows and columns. The HTML 4.0 table model allows authors to label each cell so that non-visual user agents may more easily communicate heading information about the cell to the user. Not only do these mechanisms greatly assist users with visual disabilities, they make it possible for multi-modal wireless browsers with limited display capabilities (e.g., Web-enabled pagers and phones) to handle tables.” HTML 4.0, § 11.1, p. 49. “accesskey = character [CN] This attribute assigns an access key to an element. An access key is a single character from the document character set.Note. Authors should consider the input method of the expected reader when specifying an accesskey. Pressing an access key assigned to an element gives focus to the element. The action that occurs when an element receives focus depends on the element. For example, when a user activates a link defined by the A element, the

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	user agent generally follows the link. When a user activates a radio button, the user agent changes the value of the radio button. When the user activates a text field, it allows input, etc.” HTML 4.0, § 17.11.2, p. 113-14. “The rendering of access keys depends on the user agent. We recommend that authors include the access key in label text or wherever the access key is to apply. User agents should render the value of an access key in such a way as to emphasize its role and to distinguish it from other characters (e.g., by underlining it).” HTML 4.0, § 17.11.2, p. 114. “Relative URIs are resolved to full URIs using a base URI. As an example of relative URI resolution, assume we have the base URI "http://www.acme.com/support/intro.html". The relative URI in the following markup for a hypertext link: Suppliers would expand to the full URI "http://www.acme. com/support/suppliers.html", while the relative URI in the following markup for an image would expand to the full URI "http://www.acme.com/icons/logo.gif". HTML 4.0, p. 8.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

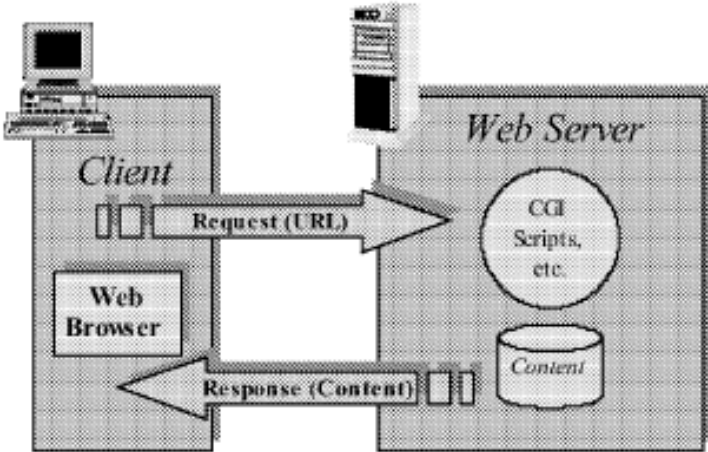
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, a first input selecting a primary navigation option was well-known at the time of the alleged invention. See, e.g., WAP.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  Figure 1. World-Wide Web Programming Model WAP, p. 11.
Claim 12 12. The method of claim 9,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the first content simultaneous with the first advertisement.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19;

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
further comprising: displaying the first content simultaneous with the first advertisement.	Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 9. “HTML frames allow authors to present documents in multiple views, which may be independent windows or subwindows. Multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. For example, within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” HTML 4.0, § 16.1, p. 95. “Definition lists, created using the DL element, generally consist of a series of term/definition pairs (although definition lists may have other applications). Thus, when advertising a product, one might use a definition list: Lower cost The new version of this product costs significantly less than the previous one! Easier to use We've changed the product so that it's much easier to use!

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Safe for kids You can leave your kids alone in a room with this product and they won't get hurt (not a guarantee).” HTML 4.0, § 10.1, p. 46. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, displaying the first content simultaneous with the first advertisement was well-known at the time of the alleged invention.
<u>Claim 13</u> 13. The method of claim 9, wherein the first input is received from any one of	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the first input is received from any one of a remote control, a pointer device, a keypad, and a keyboard.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
a remote control, a pointer device, a keypad, and a keyboard.	disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 9 and claim 4.</i>
<u>Claim 14</u>	
14. The method of claim 9, further comprising: displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 9.</i>

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“HTML frames allow authors to present documents in multiple views, which may be independent windows or subwindows. Multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. For example, within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” HTML 4.0, § 16.1, p. 95. “Definition lists, created using the DL element, generally consist of a series of term/definition pairs (although definition lists may have other applications). Thus, when advertising a product, one might use a definition list: Lower cost The new version of this product costs significantly less than the previous one! Easier to use We've changed the product so that it's much easier to use! Safe for kids You can leave your kids alone in a room with this product and they won't get hurt (not a guarantee).” HTML 4.0, § 10.1, p. 46.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 36.2 Here's a WWW site where you can definitely say it with flowers. AOL, p. 670. Moreover, displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix was well-known at the time of the alleged invention.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
<u>Claim 15</u>	
15. The method of claim 14, further comprising: displaying the simplified navigation interface as an overlay over the second advertisement.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the simplified navigation interface as an overlay over the second advertisement.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9 and claim 14. “In the following sections, the expression "in front of" means closer to the user as the user faces the screen. In CSS2, each box has a position in three dimensions. In addition to their horizontal and vertical positions, boxes lie along a "z-axis" and are formatted one on top of the other. Z-axis positions are particularly relevant when boxes overlap visually. This section discusses how boxes may be positioned along the z-axis. Each box belongs to one stacking context. Each box in a given stacking context has an integer stack level, which is its position on the z-axis relative to other boxes in the same stacking context. Boxes with greater stack levels are always formatted in front of boxes with lower stack levels. Boxes may have negative stack levels. Boxes with the

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	same stack level in a stacking context are stacked bottom-to-top according to document tree order. The root element creates a root stacking context, but other elements may establish local stacking contexts. Stacking contexts are inherited. A local stacking context is atomic; boxes in other stacking contexts may not come between any of its boxes. An element that establishes a local stacking context generates a box that has two stack levels: one for the stacking context it creates (always '0') and one for the stacking context to which it belongs (given by the 'z-index' property). An element's box has the same stack level as its parent's box unless given a different stack level with the 'z-index' property.” CSS2, § 9.9, p. 125. “This example demonstrates the notion of transparency. The default behavior of a box is to allow boxes behind it to be visible through transparent areas in its content. In the example, each box transparently overlays the boxes below it. This behavior can be overridden by using one of the existing background properties.” CSS2, § 9.9.1, p. 127. .

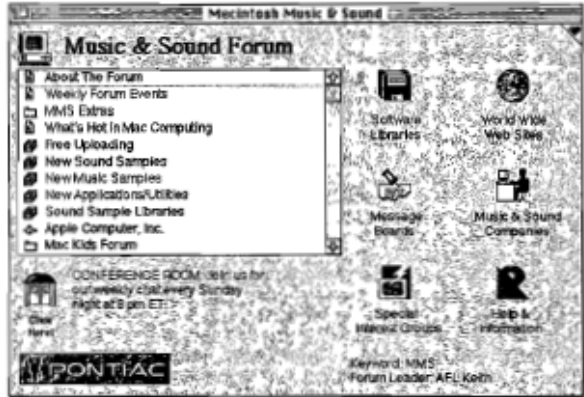
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.19 2Market is also available in CD-ROM form, so you can view colorful, interactive demonstrations on new products.  AOL, p. 517. Moreover, displaying the simplified navigation interface as an overlay over the second advertisement was well-known at the time of the alleged invention.
<u>Claim 16</u>	
16. The method of claim 9, wherein the first	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the first content includes one or more of audio content and video content from the web page.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is

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content includes one or more of audio content and video content from the web page.	made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “HTML gives authors the means to: * Publish online documents with headings, text, tables, lists, photos, etc. * Retrieve online information via hypertext links, at the click of a button. * Design forms for conducting transactions with remote services, for use in searching for information, making reservations, ordering products, etc. * Include spread-sheets, video clips, sound clips, and other applications directly in their documents.” HTML 4.0, § 2.2, pp. 8-9. “Every resource available on the Web -- HTML document, image, video clip, program, etc. -- has an address that may be encoded by a Universal Resource Identifier, or "URI".” HTML 4.0, § 2.1.1, p. 8.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Exploring the Music & Sound Forums Keyword: MMS (Macintosh), PC Music (Windows) <i>From Keith Jablonski (AFL Keith)</i> The Macintosh Music & Sound Forum on America Online (see fig. 19.24) is the place to go to learn about music, sound, digital audio, MIDI, MOD, samplers, synthesizers, and anything else that causes noise to come from your Macintosh. FIG. 19.24 The Macintosh Music & Sound Forum is for professional musicians and amateurs alike.  AOL, p. 335. Moreover, content including one or more of audio content and video content from the web page was well-known at the time of the alleged invention.
<u>Claim 17</u>	
17. The method	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving navigation input

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
of claim 9, further comprising: receiving navigation input selections for the simplified navigation interface from a voice recognition system.	selections for the simplified navigation interface from a voice recognition system.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 9 and claim 5.
<u>Claim 18</u>	
18. The method of claim 9, further comprising: maintaining a database of sister site web pages by a content partner.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “maintaining a database of sister site web pages by a content partner.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of

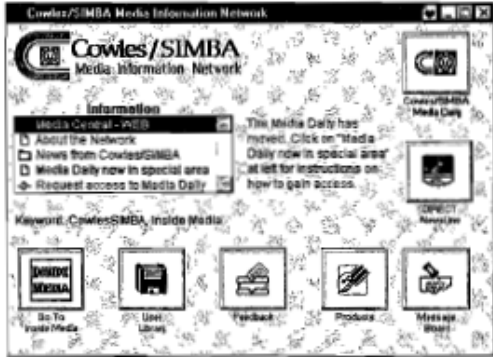
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	ordinary skill in the art at the relevant time. See, <i>e.g.</i>, claim 9. “How does a server determine which character encoding applies for a document it serves? Some servers examine the first few bytes of the document, or check against a database of known files and encodings. Many modern servers give Web masters more control over charset configuration than old servers do. Web masters should use these mechanisms to send out a "charset" parameter whenever possible, but should take care not to identify a document with the wrong "charset" parameter value.” HTML 4.0, § 5.2.2. “The id attribute has several roles in HTML: * As a style sheet selector. * As a target anchor for hypertext links. * As a means to reference a particular element from a script. * As the name of a declared OBJECT element. * For general purpose processing by user agents (e.g. for identifying fields when extracting data from HTML pages into a database, translating HTML documents into other formats, etc.).” HTML 4.0, § 7.5.2, p. 18. “Authors may separate style sheets from HTML documents. This offers several benefits: * Authors and Web site managers may share style sheets across a number of documents (and sites). * Authors may change the style sheet without requiring modifications to the document. * User agents may load style sheets selectively (based on media descriptions).” HTML 4.0, § 14.3, p. 88. “For general purpose processing by user agents (e.g. for identifying fields when extracting data

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	from HTML pages into a database, translating HTML documents into other formats, etc.).” HTML 4.0, p. 31. “Suppose, for example, that we wanted to generate an HTML document based on a database of client information. Since HTML does not include elements that identify objects such as "client", "telephone number", "email address", etc., we use DIV and SPAN to achieve the desired structural and presentational effects.” HTML 4.0, p. 33.

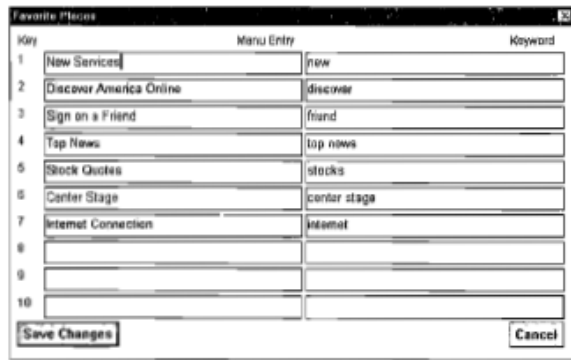
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Cowles/SIMBA Media Information Network Keyword: CowlesSIMBA The word <i>media</i> connotes a variety of industries, from advertising agencies to broadcasting and publishing businesses. The Cowles/SIMBA Media Information Network is a major resource for information about this challenging and ever-changing field (see fig. 24.19). FIG. 24.19 If you're a media watcher (and a lot of us are), Cowles/SIMBA is your source for the latest information.  Whether you want to know about the latest deal to acquire a big entertainment conglomerate, or about how your favorite magazine is faring, consult Cowles/SIMBA for current information in an easy-to-read form. AOL, p. 441. Moreover, maintaining a database of sister site web pages by a content partner was well-known at the time of the alleged invention.

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<u>Claim 19</u>	
19. The method of claim 9, further comprising: accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “accesskey = character [CN] This attribute assigns an access key to an element. An access key is a single character from the document character set. Note. Authors should consider the input method of the expected reader when specifying an accesskey. “Pressing an access key assigned to an element gives focus to the element. The action that occurs when an element receives focus depends on the element. For example, when a user activates a link defined by the A element, the user agent generally follows the link. When a user activates a radio button, the user agent changes the value of the radio button. When the user activates a text field, it allows input, etc.” HTML

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	4.0, § 17.11.2, pp. 113-14. “The rendering of access keys depends on the user agent. We recommend that authors include the access key in label text or wherever the access key is to apply. User agents should render the value of an access key in such a way as to emphasize its role and to distinguish it from other characters (e.g., by underlining it).” HTML 4.0, § 17.11.2, p. 114. Using the Edit Go To Menu Option When you install your America Online software, you have a list of 10 regular spots to which you can travel by pressing two keys (Ctrl plus a number from 0 to 9). Editing the Go To Menu is a simple task. Just proceed with the following steps if you want to change the default destinations shown in figure C.30, which are set by the software. FIG. C.30 You can list your favorite places on this window for fast access.  AOL, p. 863.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Moreover, accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value was well-known at the time of the alleged invention.
<u>Claim 20</u>	
20. The method of claim 9, wherein the simplified navigation interface includes a search form.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “Design forms for conducting transactions with remote services, for in searching for information, making reservations, ordering products, etc.” HTML 4.0, p. 9. “An HTML form is a section of a document containing normal content, markup, special elements called controls (checkboxes, radio buttons, menus, etc.), and labels on those controls. Users

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	generally “complete” a form by modifying tits controls (enter text selecting menu items, etc.), before submitting the form to an agent for processing (e.g., to a Web server, to a mail server, etc.).” Ex. 1013, p. 102. <pre> <FORM action="http://somesite.com/prog/adduser" method="post"> <P> <LABEL for="firstname">First name: </LABEL> <INPUT type="text" id="firstname">
 <LABEL for="lastname">Last name: </LABEL> <INPUT type="text" id="lastname">
 <LABEL for="email">email: </LABEL> <INPUT type="text" id="email">
 <INPUT type="radio" name="sex" value="Male"> Male
 <INPUT type="radio" name="sex" value="Female"> Female
 <INPUT type="submit" value="Send"> <INPUT type="reset"> </P> </FORM> </pre> HTML 4.0, p. 102. <pre> <FORM action="..." method="post"> <P>Enter your search phrase: <INPUT type="text"></P> </FORM> </pre> HTML 4.0, p. 110. “Authors may use the LINK element to provide a variety of information to search engines, including: * Links to alternate versions of a document, written in another human language. * Links to alternate versions of a document, designed for different media, for instance a version

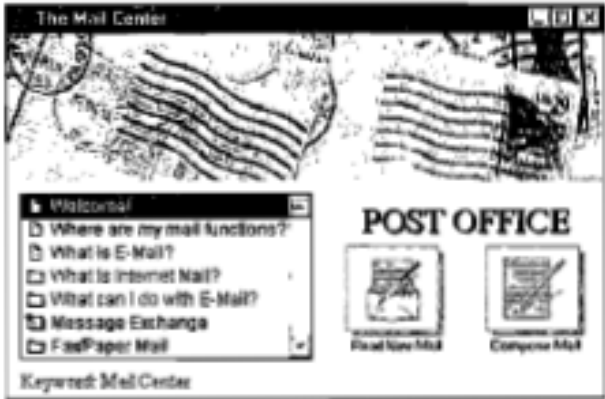
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	especially suited for printing. * Links to the starting page of a collection of documents. The examples below illustrate how language information, media types, and link types may be combined to improve document handling by search engines.” HTML 4.0, § 12.3.3, p. 71. Using the Find Option The Find feature on the Go To menu lets you search for members, software, and services, all from a convenient interface. Just enter the member name or the topic you want to learn more about, and AOL's handy search engine will get to work to look up the information you requested. AOL, p. 862. Moreover, a simplified navigation interface which includes a search form was well-known at the time of the alleged invention.
<u>Claim 21</u>	
21. The method of claim 9, wherein the simplified navigation interface includes an email form.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 9. “Here is another example of a URI. This one refers to a user's mailbox: ...this is text... For all comments, please send email to Joe Cool.” HTML 4.0, § 2.1.1, p. 8. “The following example shows a form that is to be processed by the "adduser" program when submitted. The form will be sent to the program using the HTTP "post" method. <FORM action=" http://somesite.com/prog/adduser" method="post"> ...form contents... </FORM> The next example shows how to send a submitted form to an email address: <FORM action="mailto:Kligor.T@gee.whiz.com" method="post"> ...form contents... </FORM>” HTML 4.0, § 17.3, p. 104. AOL's Mail Center AOL's Mail Center (see fig. C.32) is an information center that helps guide you to writing e-mail on AOL and via the Internet. You can also click the handy icons to read and write e-mail. AOL, p. 864.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. C.32 AOL's convenient Mail Center helps you manage your e-mail tasks.  AOL, p. 865. Moreover, a simplified navigation interface which includes an email form was well-known at the time of the alleged invention.
<u>Claim 22</u>	
22. The method of claim 9, further comprising: displaying a purchasing interface in	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the first input.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of

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response to receiving the first input.	HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 9. “HTML gives authors the means to: * Publish online documents with headings, text, tables, lists, photos, etc. * Retrieve online information via hypertext links, at the click of a button. * Design forms for conducting transactions with remote services, for use in searching for information, making reservations, ordering products, etc. * Include spread-sheets, video clips, sound clips, and other applications directly in their documents.” HTML 4.0, § 2.2, pp. 8-9.

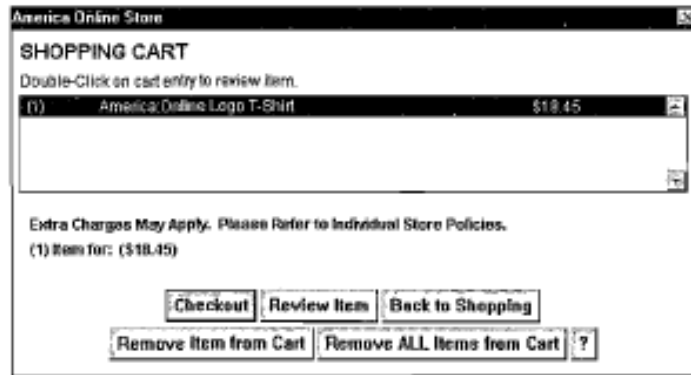
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.3 AOL's graphical interface lets you see the product before you buy. FIG. 28.3 AOL's graphical interface lets you see the product before you buy. The screenshot shows a web browser window titled 'T-Shirt - AOL Logo'. The main heading is 'America Online Logo T-Shirt'. On the left is an image of a white t-shirt with the AOL logo on the front and a slogan on the back. To the right of the image is a description: 'This America Online T-shirt features the AOL logo over the right front, and "The More Windows You Open, The Cooler It Gets" across the back.' Below this are bullet points: '- 100% cotton Hanes "Buffy-T"' and '- Shirts are white with purple and teal printing'. Further down, it states: 'Shirts are available in four adult sizes - medium, large and XL for \$14.95, and XX-Large for \$16.95, plus \$3.50 shipping and handling, plus any applicable sales tax. You should receive your'. At the bottom are three buttons: 'Click Here To Order', 'Cancel', and 'Review Shopping Cart/Checkout'. A small note at the bottom left of the window says 'You'll love this 100% cotton America Online t-shirt!'. The descriptive window gives you the very same sort of information you'd find in a mail-order catalog. The description is enticing enough to give you a pretty fair picture of what the shirt really looks like. I think I'm going to order one, so let's select the Click Here To Order button to bring up the screen shown in figure 28.4. Choose the shirt size you want by double-clicking the entry in the directory window. AOL, p. 507.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.4 Ready to order? Select the size you want here.  The screenshot shows a web browser window titled "America Online Store". Inside, the page is for an "America Online Logo T-Shirt". Under the heading "SIZE", it says "Please select a size:". Below this is a dropdown menu with four options: "01 Medium", "02 Large", "03 X-Large", and "04 XX-Large (+ \$2.00)". The "03 X-Large" option is currently selected. At the bottom of the window are four buttons: "Continue", "Previous Screen", "Cancel", and a help icon (?) In the next screen, you'll choose the number of shirts you want. After you select the merchandise you want to order, you will probably want to double-check your shopping cart to make sure that you've selected the correct item. AOL's software does this automatically for you by displaying a confirmation that the product you want has been added to your shopping cart (see fig. 28.5). AOL, p. 508.

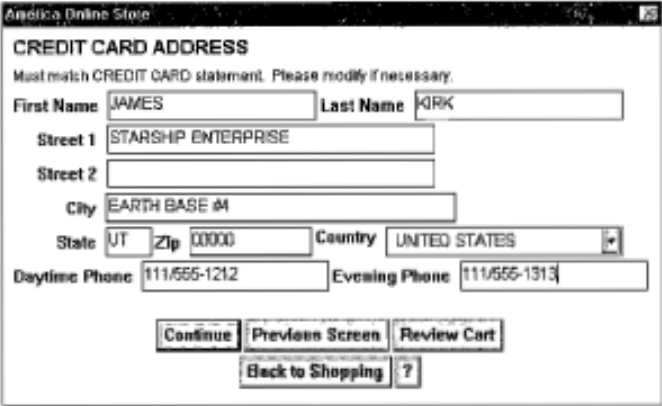
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.5 Your selection is confirmed as you add items to your shopping cart.  Click the Checkout icon once to bring up a window that allows you to enter billing and shipping information, and then place your order (see fig. 28.6). AOL, p. 508.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.6 Enter your billing information.  The screenshot shows a web browser window titled 'America Online Store'. Inside, there is a section titled 'CREDIT CARD INFORMATION' with the instruction 'Please enter the following credit card information.' Below this, it states 'America Online Store accepts: MasterCard, VISA, American Express, Discover'. There are two input fields: 'Credit Card Number' with a placeholder '9999-9999-9999-9999' and 'Expires (mm-yy)' with a placeholder '07/08'. Below these is a text input field for 'Name As It Appears On Credit Card' containing 'Roger Rabbit'. At the bottom, there are four buttons: 'Continue', 'Previous Screen', 'Review Cart', and 'Back to Shopping' with a question mark icon next to it. AOL, p. 508.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	After you've entered your billing information, enter your correct shipping address. By default, the address recorded for your online account is listed as the billing address (see fig. 28.7). You can have the same address automatically entered for shipping or enter a different shipping location. Click the Continue button to add your shipping information. FIG. 28.7 Complete the order. The second Street line is designed to accommodate a longer street address.  AOL, p. 509. Moreover, displaying a purchasing interface in response to receiving the first input was well-known at the time of the alleged invention.
<u>Claim 23</u>	
23. The method of claim 9, wherein the	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
simplified navigation interface is not presented through a standard web browser.	HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 9.</i> “Over the last couple of years, many specialized markets have begun looking to HTML as a content language. There is a great movement afoot for using HTML across increasingly diverse computing platforms. Currently there is activity to move HTML onto mobile devices (handheld computers, portable phones, etc.), television devices (digital televisions, tv-based web browsers, etc.), and appliances (fixed function devices). Each of these devices has different requirements and constraints. Reformulating HTML in XML gives product developers the tools with which they can extend or subset HTML to address the perceived needs of their customers. However, this does not solve the needs of the content community for conformance.” Reformulating HTML, § 1.2, p. 4. “HTML has been developed with the vision that all manner of devices should be able to use information on the Web: PCs with graphics displays of varying resolution and color depths,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	cellular telephones, hand held devices, devices for speech for output and input, computers with high or low bandwidth, and so on.” HTML 4.0, § 2.2.1, p. 9. “Some style sheet languages support syntax intended to allow authors to hide the content of STYLE elements from non-conforming user agents.” HTML 4.0, § 14.5, p. 90. “In general, the following points must be observed by a user agent claiming conformance to this specification: 1. It must support one or more of the CSS2 media types. 2. For each source document, it must attempt to retrieve all associated style sheets that are appropriate for the supported media types. If it cannot retrieve all associated style sheets (for instance, because of network errors), it must display the document using those it can retrieve. 3. It must parse the style sheets according to this specification. In particular, it must recognize all at-rules, blocks, declarations, and selectors (see the grammar of CSS2). If a user agent encounters a property that applies for a supported media type, the user agent must parse the value according to the property definition. This means that the user agent must accept all valid values and must ignore declarations with invalid values. User agents must ignore rules that apply to unsupported media types. 4. For each element in a document tree, it must assign a value for every applicable property according to the property's definition and the rules of cascading and inheritance. 5. If the source document comes with alternate style sheets (such as with the "alternate" keyword in HTML 4.0 [HTML40]), the UA must allow the user to select one from among these style sheets and apply the selected one. Not every user agent must observe every point, however: • A user agent that inputs style sheets must respect points 1 - 3. • An authoring tool is only required to output valid style sheets • A user agent that renders a document with associated style sheets must respect

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	points 1 - 5 and render the document according to the media-specific requirements set forth in this specification. Values may be approximated when required by the user agent. The inability of a user agent to implement part of this specification due to the limitations of a particular device (e.g., a user agent cannot render colors on a monochrome monitor or page) does not imply non-conformance.” CSS2, § 3.2, p. 32. “This version of Windows AOL software was released in the spring of 1995. The software includes . . . [a] World Wide Web Browser . . . This feature, integrated into your AOL software, enables you to access World Wide Web pages on the Internet.” AOL, p. 24.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Some Nuts and Bolts Information About America Online Our daily press and broadcast news outlets commonly refer to communicating online as being a part of the Information Superhighway, and this is likely an apt expression. But it's an expression designed to represent the entire global information network, not just a single service, and I like to think of that network as more akin to a planet than a highway. So let's consider America Online as one large city (or country) that exists on that planet. Let's take that description of a city a bit further. Besides all those people, you can find neighborhoods, highways, stores, libraries, and schools. You interact with that community from your own computer and modem, using America Online's unique graphical interface, which transports you from one place to another when you click an icon or type a simple keyboard command. AOL, p. 3.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Using AOL's Macintosh Web Browsers Keyword: WWW Depending on the version of AOL's Mac software you're using, you may see a different type of WWW browser. For version 2.6 and 2.7, it comes as a separate application that you can launch in two ways: ■ Enter a URL in your AOL software's keyword field (or just WWW). AOL is busy integrating WWW content into the service behind the scenes. So simply accessing an online forum might automatically take you to the corresponding WWW page instead. If the WWW browser isn't open, it will open, and then the site will be accessed. ■ Choose Switch to Browser from the Windows menu of your AOL software. NOTE The Macintosh Web browser provided for versions 2.6 and 2.7 of your AOL software consists of a separate application that's linked to your AOL software. Before you use this application, it must first be installed. If you did not receive a disk containing the Web browser software, you'll want to use the keyword Upgrade to obtain the latest version of the Web browser. □ AOL, p. 644.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Using AOL with Another WWW Browser Although AOL's regular WWW browser can meet most of your needs, you may have already become accustomed to using another browser on another service. You may be surprised to learn, then, that AOL contracts with other publishers to deliver browser technology to its members. For example, as I explained in my introduction to version 3.0 of the Mac browser (see "Mac 3.0 Web Browser Features," earlier in this chapter), it's based on Microsoft's Internet Explorer. As this book went to press, AOL was preparing to deliver a Windows version of the same browser with version 3.0 of its Windows software. Again, while the underlying technology will change, the interface that you see as a member will not change significantly. If you'd rather use another browser anyway, that's no problem. All you have to do is log on to AOL, and then launch the other Internet program. You'll find more information about it in Chapter 33, "Internet Chats." AOL, p. 654. Moreover, simplified navigation interfaces not presented through a standard web browser were well-known at the time of the alleged invention. <i>See, e.g.</i>, WAP. "WAP content and applications are specified in a set of well-known content formats based on the familiar WWW content formats. Content is transported using a set of standard communication protocols based on the WWW communication protocols. A <i>micro browser</i> in the wireless terminal co-ordinates the user interface and is analogous to a standard web browser." WAP, p.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	12.
Claim 24	
24. The method of claim 9, further comprising: displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “HTML frames allow authors to present documents in multiple views, which may be independent windows or subwindows. Multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. For example, within the same window, one frame might display a static banner, a second a navigation menu, and a third the main document that can be scrolled though or replaced by navigating in the second frame.” HTML 4.0, § 16.1, p. 95.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“Definition lists, created using the DL element, generally consist of a series of term/definition pairs (although definition lists may have other applications). Thus, when advertising a product, one might use a definition list: Lower cost The new version of this product costs significantly less than the previous one! Easier to use We've changed the product so that it's much easier to use! Safe for kids You can leave your kids alone in a room with this product and they won't get hurt (not a guarantee).” HTML 4.0, § 10.1, p. 46. “Sometimes, rather than linking to a document, an author may want to embed it directly into a primary HTML document. Authors may use either the IFRAME element or the OBJECT element for this purpose, but the elements differ in some ways. Not only do the two elements have different content models, the IFRAME element may be a target frame (see the section on specifying target frame information for details) and may be "selected" by a user agent as the focus for printing, viewing HTML source, etc. User agents may render selected frames elements in ways that distinguish them from unselected frames (e.g., by drawing a border around the selected frame). An embedded document is entirely independent of the document in which it is embedded. For instance, relative URIs within the embedded document resolve according to the base URI of the embedded document, not that of the main document. An embedded document is only rendered within another document (e.g., in a subwindow); it remains otherwise independent.” HTML 4.0, § 13.5, p. 80.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option was well-known at the time of the alleged invention.
<u>Claim 25,</u> <u>Preamble</u>	
25. A machine	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “A machine readable medium

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations comprising:	having instructions stored therein, which when executed cause a machine to perform a set of operations.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and claim 9, Preamble. “To publish information for global distribution, one needs a universally understood language, a kind of publishing mother tongue that all computers may potentially understand. The publishing language used by the World Wide Web is HTML (from HyperText Markup Language). HTML gives authors the means to: * Publish online documents with headings, text, tables, lists, photos, etc. * Retrieve online information via hypertext links, at the click of a button. * Design forms for conducting transactions with remote services, for use in searching for information, making reservations, ordering products, etc. * Include spread-sheets, video clips, sound clips, and other applications directly in their documents.” HTML 4.0, § 2.2, pp. 8-9.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“This specification defines Cascading Style Sheets, level 2 (CSS2). CSS2 is a style sheet language that allows authors and users to attach style (e.g., fonts, spacing, and aural cues) to structured documents (e.g., HTML documents and XML applications). By separating the presentation style of documents from the content of documents, CSS2 simplifies Web authoring and site maintenance.” CSS2, Abstract, p. 1.
<u>Claim 25,</u> <u>Element A</u>	
displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, displaying a first content via the internet	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified	of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 1, Preamble and Element A; claim 9, Preamble and Element A.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation interface,	
<u>Claim 25,</u> <u>Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-B; claim 9, Preamble and Elements A-B.

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phone,	
<u>Claim 25,</u> <u>Element C</u>	
the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the first content displayed in one or more of the plurality of cells.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.
the first content displayed in one or more of the plurality of cells,	<i>See, e.g.</i> , claim 1, Preamble and Elements A-C; claim 9, Preamble and Elements A-C.
<u>Claim 25,</u> <u>Element D</u>	

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the two-dimensional layer in a form of a navigation matrix,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the two-dimensional layer in a form of a navigation matrix.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-D; claim 9, Preamble and Elements A-D.
<u>Claim 25, Element E</u>	
each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of

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exclusive to a separate single navigation option,	HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-E; claim 9, Preamble and Elements A-E.
<u>Claim 25, Element F</u>	
the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-F; claim 9, Preamble and Elements A-F.
<u>Claim 25,</u>	

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<u>Element G</u>	
navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer;	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-G; claim 9, Preamble and Elements A-G.
<u>Claim 25, Element H</u>	
displaying a hyperlink on the sister site to navigate to the web page, or displaying a	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0,

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hyperlink on the web page to navigate to the sister site;	CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-H; claim 9, Preamble and Elements A-H. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element H; <i>see also</i> AOL, Internet 96, White House, Teplitz, Sun, Infouse, Yahoo, NASA.
<u>Claim 25, Element I</u>	
receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2,

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the navigation matrix;	Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-I; claim 9, Preamble and Elements A-I.
<u>Claim 25, Element J</u> forwarding the first input across the internet to a server providing the simplified navigation interface;	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “forwarding the first input across the internet to a server providing the simplified navigation interface.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-J; claim 9, Preamble and Elements A-J.
<u>Claim 25, Element K</u>	

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receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input; and	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-K.
<u>Claim 25, Element L</u>	
manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time.

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	AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-L; claim 9, Preamble and Elements A-L. Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element L, DOMINO, Pad++.
<u>Claim 26</u>	
26. The machine readable medium of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: customizing the	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “customizing the display of the simplified navigation interface based on a navigation path of the user.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 10.

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display of the simplified navigation interface based on a navigation path of the user.	
<u>Claim 27</u>	
27. The machine readable medium of claim 25, wherein the first input selects a primary navigation option.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the first input selects a primary navigation option.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 25 and claim 11.
<u>Claim 28</u>	
28. The machine readable medium	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the first content simultaneous with the first advertisement.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19;

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of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying the first content simultaneous with the first advertisement.	Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 25 and claim 12.
<u>Claim 29</u>	
29. The machine readable medium of claim 25, wherein the first input is received from any one of a remote control,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the first input is received from any one of a remote control, a pointer device, a keypad, and a keyboard.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in

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a pointer device, a keypad, and a keyboard.	view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 4.
<u>Claim 30</u>	
30. The machine readable medium of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying a second advertisement in the simplified	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 14.

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navigation interface, the second advertisement not displayed in a cell or matrix.	
<u>Claim 31</u>	
31. The machine readable medium of claim 30, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying the simplified navigation interface as an	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the simplified navigation interface as an overlay over the second advertisement.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 25 and claim 15.

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overlay over the second advertisement.	
Claim 32	
32. The machine readable medium of claim 25, wherein the first content includes one or more of audio content and video content from the web page.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the first content includes one or more of audio content and video content from the web page.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 25 and claim 16.
Claim 33	
33. The machine readable medium of claim 25, having further instructions	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving navigation input selections for the simplified navigation interface from a voice recognition system.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly

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stored therein, which when executed cause the machine to perform further operations, comprising: receiving navigation input selections for the simplified navigation interface from a voice recognition system.	disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 25 and claim 5.</i>
<u>Claim 34</u>	
34. The machine readable medium of claim 25, the machine readable medium further comprising:	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this

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accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.	limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 19.
<u>Claim 35</u>	
35. The machine readable medium of claim 25, wherein the simplified navigation interface includes a search form.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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	See, e.g., claim 25 and claim 20.
<u>Claim 36</u>	
36. The machine readable medium of claim 25, wherein the simplified navigation interface includes an email form.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 25 and claim 21.
<u>Claim 37</u>	
37. The machine readable medium of claim 25, having further instructions stored therein,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the first input.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose

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which when executed cause the machine to perform further operations, comprising: displaying a purchasing interface in response to receiving the first input.	this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 22.
<u>Claim 38</u>	
38. The machine readable medium of claim 25, wherein the simplified navigation interface is not presented through a standard web	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge

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browser.	of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 23.
Claim 39	
39. The machine readable medium of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying a third advertisement embedded within the on-line content, the third advertisement	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 24.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
corresponding to a third navigation option.	
<u>Claim 40</u>	
40. The method of claim 1, wherein at least some of the plurality of cells correspond to primary navigation options.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein at least some of the plurality of cells correspond to primary navigation options.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1 and claim 11.
<u>Claim 41</u>	
41. The method of claim 1, further comprising using	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this

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a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.	limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 1. “Image maps allow authors to specify regions of an image or object and assign a specific action to each region (e.g., retrieve a document, run a program, etc.) When the region is activated by the user, the action is executed. An image map is created by associating an object with a specification of sensitive geometric areas on the object. There are two types of image maps: * Client-side. When a user activates a region of a client-side image map with a mouse, the pixel coordinates are interpreted by the user agent. The user agent selects a link that was specified for the activated region and follows it. * Server-side. When a user activates a region of a server-side image map with a mouse, the pixel coordinates of the click are sent to the server-side agent specified by the href attribute of the A element. The server-side agent interprets the coordinates and performs some action. Client-side image maps are preferred over server-side image maps for at least two reasons: they are accessible to people browsing with non-graphical user agents and they offer immediate feedback as to whether or not the pointer is over an active region.” HTML 4.0, § 13.6, p. 80.

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	“Visual user agents may allow users to select from option groups through a hierarchical menu or some other mechanism that reflects the structure of choices. A graphical user agent might render this as:  This image shows a SELECT element rendered as cascading menus. The top label of the menu displays the currently selected value (PortMaster 3, 3.7.1). The user has unfurled two cascading menus, but has not yet selected the new value (PortMaster 2, 3.7). Note that each cascading menu displays the label of an OPTGROUP or OPTION element.” HTML 4.0, § 17.6.1, p. 109. Selecting the Right Channel Finding the right place to visit on AOL is similar to selecting a channel on your TV set, except you click an icon rather than push a button. Once you’ve signed on to AOL and learned how to get the most out of its highly flexible software, you’ll want to do more than just get your feet wet. AOL, p. 82.

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	Moreover, using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen was well-known at the time of the alleged invention.
Claim 42	
42. The method of claim 1, further comprising: maintaining a database of sister site webpages by a content partner.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “maintaining a database of sister site webpages by a content partner.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1 and claim 18.
Claim 43	
43. The method of claim 1, further comprising: displaying the	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the on-line content concurrently with one or more advertisements.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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on-line content concurrently with one or more advertisements.	determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1 and claim 12.
<u>Claim 44</u>	
44. The method of claim 43, further comprising: displaying the simplified navigation interface as an overlay over the one or more advertisements.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the simplified navigation interface as an overlay over the one or more advertisements.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 43 and claim 15.
<u>Claim 45</u>	

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45. The method of claim 1, further comprising: accepting an alphanumeric value as the user selection of the first navigation option, the first navigation option corresponding to a cell including a display of the alphanumeric value.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “accepting an alphanumeric value as the user selection of the first navigation option, the first navigation option corresponding to a cell including a display of the alphanumeric value.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1 and claim 19.
<u>Claim 46</u>	
46. The method of claim 1, wherein the simplified navigation	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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interface includes a search form.	determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1 and claim 20.
<u>Claim 47</u>	
47. The method of claim 1, wherein the simplified navigation interface includes an email form.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1 and claim 21.
<u>Claim 48</u>	

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48. The method of claim 1, further comprising: displaying a purchasing interface in response to receiving the first navigation option.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the first navigation option.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1 and claim 22.
<u>Claim 49</u>	
49. The method of claim 1, wherein the simplified navigation interface is not presented through a standard web	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in

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browser.	view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1 and claim 23.
<u>Claim 50</u>	
50. The method of claim 9, wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 9 and claim 6.
<u>Claim 51</u>	
51. The method of claim 50,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “tabbing to focus on different one of the regions.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL

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further comprising tabbing to focus on different one of the regions.	pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 50 and claim 7.
<u>Claim 52</u>	
52. The method of claim 50, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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	See, e.g., claim 50 and claim 8.
<u>Claim 53</u>	
53. The method of claim 9, further comprising using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 9 and claim 41.
<u>Claim 54</u>	
54. The machine readable medium of claim 25, wherein the screen includes individual	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this

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regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.	limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 25 and claim 6.</i>
<u>Claim 55</u>	
55. The machine readable medium of claim 54, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising:	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “tabbing to focus on different one of the regions.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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tabbing to focus on different one of the regions.	See, e.g., claim 54 and claim 7.
<u>Claim 56</u>	
56. The machine readable medium of claim 54, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 54 and claim 8.
<u>Claim 57</u>	
57. The machine readable medium of claim 25, having further	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this

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instructions stored therein, which when executed cause the machine to perform further operations, comprising: using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.	limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 25 and claim 41.
<u>Claim 58, Preamble</u>	
58. A machine readable medium having instructions stored therein, which when	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “A machine readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations.” See, <i>e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0,

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executed cause a machine to perform a set of operations comprising:	CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble; claim 9, Preamble; claim 25, Preamble.
<u>Claim 58, Element A</u>	
displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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(XML) format to generate a sister site,	<i>See, e.g.</i> , claim 1, Preamble and Element A; claim 9, Preamble and Element A; claim 25, Preamble and Element A.
<u>Claim 58, Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1, Preamble and Elements A-B; claim 9, Preamble and Elements A-B; claim 25, Preamble and Elements A-B.

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or cellular phone,	
<u>Claim 58, Element C</u>	
the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-C; claim 9, Preamble and Elements A-C; claim 25, Preamble and Elements A-C.
<u>Claim 58, Element D</u>	
the two-	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the two-dimensional layer in a

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dimensional layer in a form of a navigation matrix,	form of a navigation matrix.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-D; claim 9, Preamble and Elements A-D; claim 25, Preamble and Elements A-D.
<u>Claim 58, Element E</u>	
each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and

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unique input,	AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-E; claim 9, Preamble and Elements A-E; claim 25, Preamble and Elements A-E.
<u>Claim 58, Element F</u>	
the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-F; claim 9, Preamble and Elements A-F; claim 25,

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	Preamble and Elements A-F.
<u>Claim 58, Element G</u>	
navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer;	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-G; claim 9, Preamble and Elements A-G; claim 25, Preamble and Elements A-G.
<u>Claim 58, Element H</u>	
displaying a hyperlink on the	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the

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sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site;	sister site.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-H; claim 9, Preamble and Elements A-H; claim 25, Preamble and Elements A-H. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element H; <i>see also</i> AOL, Internet 96, White House, Teplitz, Sun, Infouse, Yahoo, NASA.
<u>Claim 58,</u> <u>Element I</u>	
receiving a user	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a user selection of one of

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selection of one of the navigation options	the navigation options.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-I; claim 9, Preamble and Elements A-I; claim 25, Preamble and Elements A-I.
<u>Claim 58, Element J</u>	
forwarding the selected navigation option across the Internet to a server providing the simplified navigation	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and

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interface;	AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-J; claim 9, Preamble and Elements A-J; claim 25, Preamble and Elements A-J.
<u>Claim 58, Element K</u>	
receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option;	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-K; claim 25, Preamble and Elements A-K.
<u>Claim 58,</u>	

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<u>Element L</u>	
and manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-L; claim 9, Preamble and Elements A-L; claim 25, Preamble and Elements A-L. Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element L, DOMINO, Pad++.
<u>Claim 59</u>	
59. The machine readable medium	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying one or more advertisements on the screen; receiving a user selection of a displayed advertisement; and

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of claim 58, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying one or more advertisements on the screen; receiving a user selection of a displayed advertisement; and displaying second content accessed via the Internet,	displaying second content accessed via the Internet, wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs..” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 58 and claim 2.

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wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs.	
<u>Claim 60</u>	
60. The machine readable medium of claim 58, wherein the on-line content is selected based, at least in part, on a navigation path	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the on-line content is selected based, at least in part, on a navigation path of a user.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the

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of a user.	knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 58 and claim 3.</i>
<u>Claim 61</u>	
61. The machine readable medium of claim 58, wherein the user selection of one of the navigation options is received from any one of a remote control, a pointer device, a keypad, and a keyboard.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the user selection of one of the navigation options is received from any one of a remote control, a pointer device, a keypad, and a keyboard.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 58 and claim 4.</i>
<u>Claim 62</u>	
62. The machine	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “receiving one or more navigation

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readable medium of claim 58, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: receiving one or more navigation input selections through a voice recognition system.	input selections through a voice recognition system.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 5.
<u>Claim 63</u>	
63. The machine readable medium of claim 58, wherein the screen includes	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this

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individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.	limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 58 and claim 6.
<u>Claim 64</u>	
64. The machine readable medium of claim 63, having further instructions stored therein, which when executed cause the machine to perform further operations,	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “tabbing to focus on different one of the regions.” See, <i>e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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‘196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
comprising: tabbing to focus on different one of the regions.	<i>See, e.g.</i> , claim 63 and claim 7.
<u>Claim 65</u>	
65. The machine readable medium of claim 63, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 63 and claim 8.
<u>Claim 66</u>	
66. The machine readable medium of claim 58, wherein at least	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein at least some of the plurality of cells correspond to primary navigation options.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
some of the plurality of cells correspond to primary navigation options.	HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 11.
<u>Claim 67</u>	
67. The machine readable medium of claim 58, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: using a pointer	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” <i>See, e.g.</i>, HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 41.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
device to select one or more of the plurality of cells and/or to manipulate the screen.	
<u>Claim 68</u>	
68. The machine readable medium of claim 58, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying the on-line content concurrently with one or more	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the on-line content concurrently with one or more advertisements.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 58 and claim 12.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
advertisements.	
<u>Claim 69</u>	
69. The machine readable medium of claim 68, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying the simplified navigation interface as an overlay over the one or more advertisements.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying the simplified navigation interface as an overlay over the one or more advertisements.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 68 and claim 15.
<u>Claim 70</u>	

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
70. The machine readable medium of claim 58, the machine readable medium further comprising: accepting an alphanumeric value to indicate selection of the first navigation option, the first navigation option corresponding to a cell including a display of the alphanumeric value.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “accepting an alphanumeric value to indicate selection of the first navigation option, the first navigation option corresponding to a cell including a display of the alphanumeric value.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 58 and claim 19.
<u>Claim 71</u>	
71. The machine readable medium	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
of claim 58, wherein the simplified navigation interface includes a search form.	HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 58 and claim 20.
<u>Claim 72</u>	
72. The machine readable medium of claim 58, wherein the simplified navigation interface includes an email form.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	See, e.g., claim 58 and claim 21.
<u>Claim 73</u>	
73. The machine readable medium of claim 58, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying a purchasing interface in response to receiving the selection of the first navigation option.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the selection of the first navigation option.” See, e.g., HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 58 and claim 22.

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‘196 Invalidity Chart – HTML 4.0, CSS2, Reformulating HTML, AOL, and Knowledge

<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
<u>Claim 74</u>	
74. The machine readable medium of claim 58, wherein the simplified navigation interface is not presented through a standard web browser.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 58 and claim 23.
<u>Claim 75</u>	
75. The method of claim 1, wherein the on-line content includes one or more of audio content and video content	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the on-line content includes one or more of audio content and video content from the web page.” <i>See, e.g.</i> , HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and

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from the web page.	AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1 and claim 16.
<u>Claim 76</u>	
76. The machine readable medium of claim 58, wherein the on-line content includes one or more of audio content and video content from the web page.	HTML 4.0, CSS2, Reformulating HTML, and AOL disclose “wherein the on-line content includes one or more of audio content and video content from the web page.” <i>See, e.g.,</i> HTML 4.0 §§ 2-24; CSS2 §§ 2-19; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then HTML 4.0, CSS2, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that HTML 4.0, CSS2, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of HTML 4.0, CSS2, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of HTML 4.0, CSS2, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 58 and claim 16.

Appendix 3

To the Declaration of Robert J. Sherwood

Claim Chart for Apte, Leak, Reformulating
HTML, AOL, and Knowledge

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European Patent Application No. EP 0822535A2 to Apte, et al. (“Apte”) was published April 2, 1998 and is thus prior art under at least §§ 102(a) and 102(b).

World Patent Application No. WO 9843381 to Leak, et al. (“Leak”) was published October 1, 1998 and is thus prior art under at least §§ 102(a) and 102(b).

“Reformulating HTML in XML” (“Reformulating HTML”), *available at* <http://www.w3.org/TR/1998/WD-html-in-xml-19981205/>, was published on December 5, 1998 and thus is prior art under at least §§ 102(a). In addition, because the ‘196 patent is entitled to a priority date no earlier than March 3, 2000, Reformulating HTML is also prior art under at least § 102(b).

GENE STEINBERG, USING AMERICA ONLINE (2d Ed. 1996) (“AOL”). AOL was published in 1996 and thus is prior art under at least §§ 102(a) and 102(b).

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
<u>Claim 1,</u> <u>Preamble</u>	
1. A method of navigating the Internet, comprising:	Apte, Leak, Reformulating HTML, and AOL disclose “A method of navigating the Internet.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,:</i> Leak is directed to “displaying World Wide Web pages on a display device. A number of hypertext links are identified, wherein each hypertext link is for locating one of a plurality of Web pages. The hypertext links may be identified from a particular Web page or from results of a Web search. Web pages are retrieved using the identified hypertext links.” Leak, Abstract. “The present invention pertains to the field of network-based processing systems. More particularly, the present invention relates to processing systems configured to allow browsing of the World Wide Web.” Leak, 1:5-7. “This invention relates to providing interactive advertising and secure purchase opportunities on a network, and particularly to a system and method for providing targeted, interactive, multimedia advertising and electronic commerce capabilities through a hypertext network.” Apte, 1:5-10. “A hypertext file is displayed on a computer as a page through software called a browser. A page comprises links that, when selected by a user, cause another page to be displayed (known as the linked page), cause another part of the presently displayed page to be shown, or else cause a computer program to execute. A hypertext file is written in a programming language such as

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Hypertext Markup Language (HTML). A logical grouping of hypertext files is called a site. Sites may reside on different computers. A set of sites that are interconnected by links is called a web. A site on a first computer may be effectively linked to a site on a second computer by connecting the first and second computers through a network. An example of a set of sites residing on different computers interconnected by a network is the World Wide Web (WWW), which is a set of sites written in HTML on computers interconnected by the Internet. Each site on the WWW is known as a website.” Apte, 1:14-32. "Over the last couple of years, many specialized markets have begun looking to HTML as a content language. There is a great movement afoot for using HTML across increasingly diverse computing platforms. Currently there is activity to move HTML onto mobile devices (handheld computers, portable phones, etc.), television devices (digital televisions, tv-based web browsers, etc.), and appliances (fixed function devices. Each of these devices has different requirements and constraints. Reformulating HTML in XML gives product developers the tools with which they can extend or subset HTML to address the perceived needs of their customers." Reformulating HTML, § 1.2, p. 4.

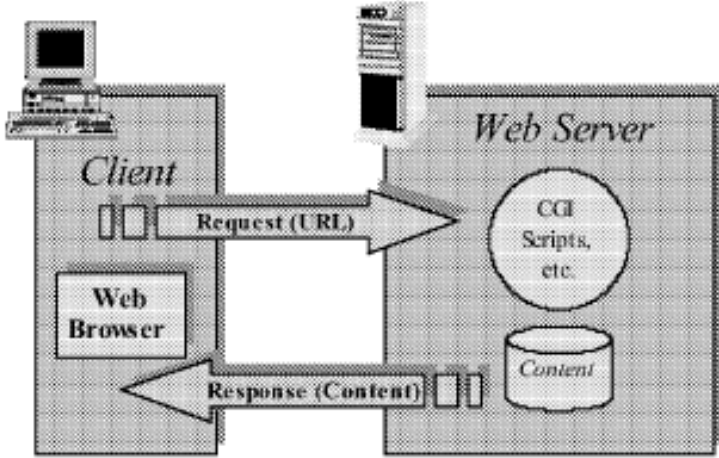
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Today America Online is a publicly owned company that offers an online community for over five million members (with millions more joining each year). The service offers online shopping, information services such as daily newspapers and magazines, and even virtual reference books such as encyclopedias. In addition, America Online lets you reach out beyond the borders of its service, by providing a direct gateway to the Internet, which serves tens of millions of computer users across the world. AOL, p. 2. “This version of Windows AOL software was released in the spring of 1995. The software includes . . . [a] World Wide Web Browser . . . This feature, integrated into your AOL software, enables you to access World Wide Web pages on the Internet.” AOL, p. 24.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 679. Moreover, navigating the Internet was well-known at the time of the alleged invention. <i>See, e.g.</i>, WAP Forum, Wireless Application Protocol Architecture Specification Version 30-April-1998 (“WAP”).

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  Figure 1. World-Wide Web Programming Model WAP, p. 11.
<u>Claim 1,</u> <u>Element A</u>	
displaying on-line content	Apte, Leak, Reformulating HTML, and AOL disclose “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language

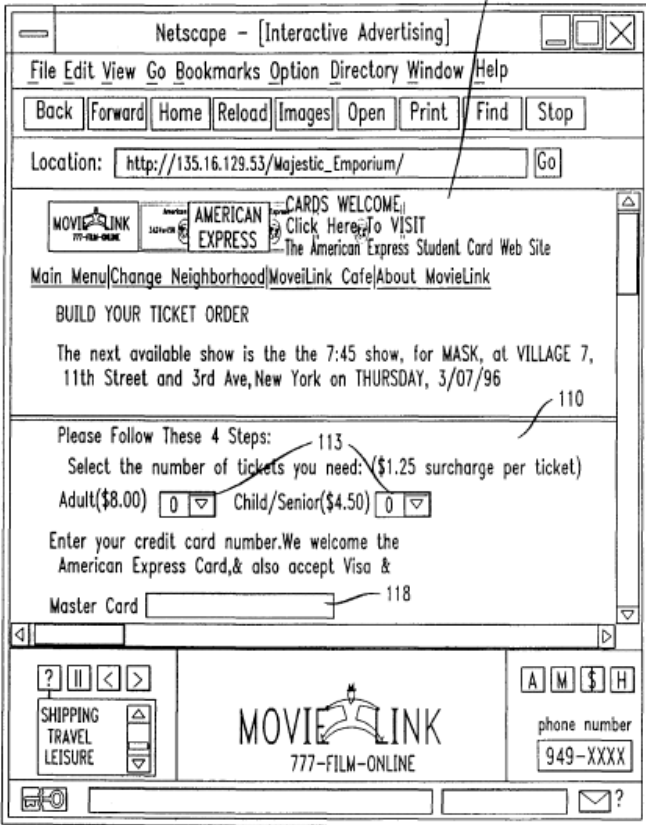
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site,	(HTML) format into an extensible markup language (XML) format to generate a sister site.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> support cited herein for claim 1, preamble. “This invention relates to providing interactive advertising and secure purchase opportunities on a network, and particularly to a system and method for providing targeted, interactive, multimedia advertising and electronic commerce capabilities through a hypertext network.” Apte, 1:5-10. “The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area. The browser area 31 retains all of the controls originally provided by the browser, including the file features 33, the edit feature

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	34, the bookmarks feature 35, and so on. Thus, the browser area continues to function essentially as the original browser (before the advertising software was downloaded and executed). In this embodiment, the area for viewing pages 31 has been decreased to accommodate the advertiser area 32. The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button.” Apte, 7:9-34.

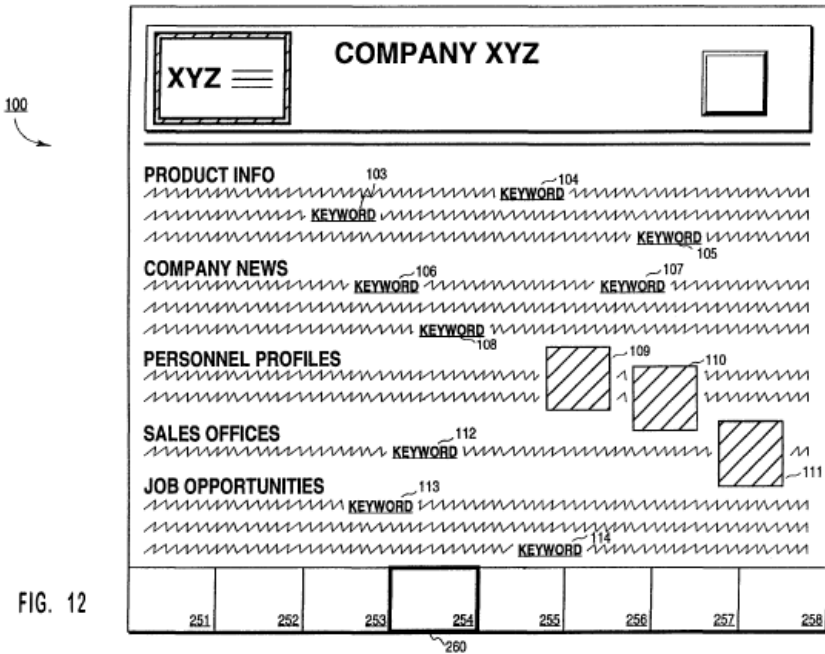
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Apte, Figure 9 and associated disclosure.

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 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<pre> graph TD subgraph "WEB SERVER 51" PC[PROXY CACHE 65] <--> T[TRANSCODER 66] end T --> I[TO / FROM INTERNET] I --> PC </pre> The diagram shows a dashed rectangular box labeled 'WEB SERVER 51' at the bottom. Inside the box, there are two rectangular blocks: 'PROXY CACHE 65' at the top and 'TRANSCODER 66' at the bottom. They are connected by a vertical double-headed arrow. To the left of the box, there is a label 'TO / FROM INTERNET' with two arrows pointing towards the 'PROXY CACHE 65' and 'TRANSCODER 66' blocks respectively. FIG. 6 Leak, Fig. 6. “Referring now to Figure 6, the WebTV server 5 includes a proxy cache 65 and a transcoder 66, which are functionally coupled together and to the Internet 3. The proxy cache 65 provides temporary storage Web documents, images, and other information that is requested frequently by either the WebTV client 1 or the server 5. The transcoder 66 automatically modifies certain Web

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	pages and other files retrieved from remote servers 4.” Leak, c. 7 ll. 23-28.  FIG. 12 Leak, Figure 12 and associated disclosure. “FIG. 12 again illustrates the home page 100 of Company XYZ. In addition, a number of reduced size images 251-258 of Web pages have been displayed over Web page 100 . . . The images 251-258 indicate the context of the currently displayed Web page 100, as indicated by highlighting 260. The other images, 251-253 and 255-258, represent the web pages which are immediately

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	adjacent to web page 100 within the display sequence. The size of the images 251-258 can be appropriately selected to provide the user with a rough indication of the content of the represented Web pages. In addition, the images 251-258 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to highlight the appropriate image and then press Enter button 19 to cause the selected Web page to be displayed.” Leak, 13:22-14:1. “Modularizing HTML is the notion of specifying well-defined sets of HTML tags that can be mixed and matched by product designers. For example, a "table module" would contain the elements and attributes necessary to support tables and a "list module" would contain the elements and attributes necessary to support lists. The reason for modularizing HTML is to make it economically feasible for content developers to delivery content on a greater number and diversity of platforms. Over the last couple of years, many specialized markets have begun looking to HTML as a content language. There is a great movement afoot for using HTML across increasingly diverse computing platforms. Currently there is activity to move HTML onto mobile devices (handheld computers, portable phones, etc.), television devices (digital televisions, tv-based web browsers, etc.), and appliances (fixed function devices). Each of these devices has different requirements and constraints. Reformulating HTML in XML gives product developers the tools with which they can extend or subset HTML to address the perceived needs of their customers. However, this does not solve the needs of the content community for conformance. Modularizing HTML provides a means for product designers to specify which elements are supported by a device using standard building blocks and standard methods for specifying which

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	building blocks are used. These modules serve as "points of conformance" for the content community. The content community can now target the installed base that supports a certain collection of modules, rather than worry about the installed base that supports this permutation of HTML elements or that permutation of HTML elements. The use of standards is critical for modularized HTML to be successful on a large scale. It is not economically feasible for content developers (authors) to tailor content to each and every permutation of HTML elements. By specifying a standard, either software processes can autonomously tailor content to a device, or the device can automatically load the software required to process a module. XML provides the tools necessary for defining a modularized HTML language and for specifying how modules are defined, declared, and combined into meaningful systems.” Reformulating HTML, §1.2, pp. 4-5. “Voyager is the code name for HTML reformulated as an application of XML. Voyager specifies document profiles as XML namespaces each with their own web address (URI). The HTML Working Group will specify a set of Voyager Document Profiles for use in particular domains (such as mobile and television). For example, the "HTML Strict" Profile would contain the modules that, in general, correspond to the HTML 4 Strict DTD. The profile specifies the syntax of conforming documents in terms of a combination of syntax modules. For example, the "Table" module would contain the elements and attributes associated with HTML tables. It is expected that non-W3C entities (companies, consortiums, other standards organizations) will specify Platforms. Platforms consist of Voyager Profiles, platform-specific technologies, constraints, and usage requirements. For example, a digital television standards organization might specify a "DTV" Platform that contains the Television Profile, Java virtual machine, and a

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	constrained set of allowable plug-ins.” Reformulating HTML, § 2.1, pp. 8-9. “HTML Tidy is W3C sample code providing a means to automatically convert existing web content to Voyager. It can cope with a wide range of markup errors, and offers a means to help realize a smooth transition for HTML.” Reformulating HTML, § 2.6, p. 13. Moreover, reformatting HTML into XML was well-known at the time of the alleged invention. See, e.g., Dave Raggett, Clean up your Web pages with HTML TIDY, W3C (July 26, 1999) (“HTML TIDY”); WAP. “Tidy's Options To get a list of available options use: tidy -help You should see something like this: options for tidy vers: -config <i>file</i> read config <i>file</i> -indent <i>or</i> -i indent element content -omit <i>or</i> -o omit optional endtags -wrap 72 wrap text at column 72 (default is 68) -upper <i>or</i> -u force tags to upper case (default is lower) -clean <i>or</i> -c replace font, nobr & center tags by CSS

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	-raw don't o/p entities for chars 128 to 255 -ascii use ASCII for output, Latin-1 for input -latin1 use Latin-1 for both input and output -utf8 use UTF-8 for both input and output -iso2022 use ISO2022 for both input and output -numeric <i>or</i> -n output numeric rather than named entities -modify <i>or</i> -m to modify original files -errors <i>or</i> -e show only error messages -f <i>file</i> write errors to <i>file</i> -xml use this when input is in XML -asxml to convert HTML to XML -slides to burst into slides on h2 elements -help list command line option” HTML TIDY, at p. 10. HTML TIDY discloses an option “-asxml” to “convert HTML to XML.”

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Figure 3. Example WAP Network WAP, at p. 13. “In the example, the WAP client communicates with two servers in the wireless network. The WAP proxy translates WAP requests to WWW requests thereby allowing the WAP client to submit requests to the web server. The proxy also encodes the responses from the web server into the compact binary format understood by the client. If the web server provides WAP content (e.g. WML), the WAP proxy retrieves it directly from the web server. However, if the web server provides WWW content (such as HTML), a filter is used to translate the WWW content into WAP content. For example, the HTML filter would translate HTML into WML.”

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
	WAP, at p. 13.
<u>Claim 1, Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone,	Apte, Leak, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Element A. “Document profiles and device profiles should greatly simplify tuning mark-up to match the needs of different devices. When the set of HTML features supported by a class of devices can be precisely anticipated, transformational software can re-purpose the markup in a simple and reliable fashion. For example, consider a mobile phone that doesn't support scripts, style sheets or

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	images. The server strips these out of documents before sending them to the phone, speeding page display and reducing connection charges. The server can do this by comparing the device profile and the document profile for the documents in question, to determine what to strip out. Transformations may be applied by the author working on the website, at a proxy server under the control of an ISP, or in the browser itself. Work on the next generation of HTML will seek to encourage the development of authoring an related management tools that reduce the cost of creating content that may be easily re-purposed for different user agents operating on different devices.” Reformulating HTML, § 1.5, pp. 7-8.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<pre> graph TD A[Document mark-up] --> B[Transformed by means of a style sheet, script or program] B --> C[Transformation can be done on the primary server, on the proxy server or at the client] B --> D[TV screen] B --> E[Cellular phone] B --> F[Voice-based device] B --> G[Desk-top computer] </pre> Reformulating HTML, p. 8. “In one embodiment, the present invention is included in a system known as WebTV (hereinafter "WebTV"), which uses a standard television set as a display device for browsing the Web and which connects to the Internet using a standard telephone, ISDN, Ethernet, or other similar communication path.” Leak, 3:33-36.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 2 Leak, Fig. 2. “The WebTV Network services are used in conjunction with software running in a WebTV client system to browse the Web, send electronic mail, and to make use of the Internet in various other ways. The WebTV servers generally function as proxies by retrieving Web pages and other data requested by a WebTV client system from remote Web servers and then providing the

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	information to the WebTV client system.” Leak, 4:1-6 “The World-Side Web (‘the Web’) is a collection of formatted hypertext pages and other information distributed among numerous computers logically connected by the Internet. ... [C]ertain Web browsers in the prior art generally do not provide the degree of user-friendliness desired by some people who lack computer experience, and many computer novices do not have the patience to learn how to use the software. In contrast, most people in modern society are quite comfortable with their television sets. Even ardent technophobes tend to view the television set as a familiar part of daily life. Most people are also comfortable using a remote control to operate a television set, a video cassette recorder (VCR), home audio system, or other electronic device. Consequently, Web TV Networks Inc., of Palo Alto, Calif., has developed technology to allow people to access the Web through their television sets. This technology is known as 'WebTV™' and is currently available through Philips Magnavox and Sony Electronics Inc. WebTV allows a person to access and navigate through Web pages using an ordinary television set and a remote control. More specifically, WebTV is designed so that a person can use a remote control to navigate between hypertext objects on a Web page with little effort or thought, so that a person feels more as if he is simply changing the channels on a television set, rather than using a complex, global computer network. Hence, one basic quality of WebTV is to make Web browsing more comfortable for people by making it feel more like watching television.” Leak, 1:10-2:2. “An HTML document may contain text and/or refer to images and other media types. FIG. 7 illustrates a Web page 100 as it is displayed by the client system 1 on the television 12. Web page

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	100 is the 'home page' (top level page, or root level) of the Web site of a fictitious company, Company XYZ. An HTML document typically includes one or more 'hypertext anchors'. Hypertext anchors, which are also sometimes called 'links', 'hot links' or 'hot spots', are displayable objects (text or image) that represent hypertext links to other Web pages or other data ... Each hypertext anchor in an HTML Web page is associated with a particular URI (Uniform Resource Identifier), which specifies the location (i.e., logical address) of another Web page or other data. Hypertext anchors and other displayable objects are identified in an HTML document by a number of 'tags', which specify the attributes of the object, including the associated URI in the case of hypertext anchors. Consequently, the browser software can locate hypertext anchors and determine their corresponding URIs based on these tags." Leak, 8:5-24. "N represents a current level within a Web page hierarchy for a given Web site. Thus, N=1 corresponds to the top (root) level, or home page, of the given Web site. Increasing values of N represent successive 'generations' (i.e., levels increasing in 'link distance' from the root level) in the hierarchy." Leak, 10:35-11:3.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<pre> graph TD BEGIN([BEGIN]) --> N1[N = 1] N1 --> 1002[IDENTIFY URI's REFERED TO
IN NEXT NTH LEVEL WEB PAGE] 1002 --> 1003[ADD IDENTIFIED
URI's TO URI LIST] 1003 --> 1004{MORE
NTH LEVEL
WEB PAGES TO
CONSIDER?} 1004 -- YES --> 1002 1004 -- NO --> 1005{N = MAX_LEVEL?} 1005 -- YES --> END([END]) 1005 -- NO --> 1006[N = N + 1] 1006 --> 1002 </pre> Leak, Figure 10 and associated disclosure. World Wide Web Browser This feature, integrated into your AOL software, enables you to access World Wide Web pages on the Internet. AOL, p. 24.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Moreover, a sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone was well known at the time of the alleged invention. <i>See, e.g.</i>, WAP. “The objectives of the WAP Forum are: To bring Internet content and advanced data services to digital cellular phones and other wireless terminals.” WAP, p. 3.
<u>Claim 1,</u> <u>Element C</u>	
the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells,	Apte, Leak, Reformulating HTML, and AOL disclose “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-B.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 5 Apte, Fig. 5. “FIG 5 shows an embodiment of a graphical user interface in accordance with the present invention”

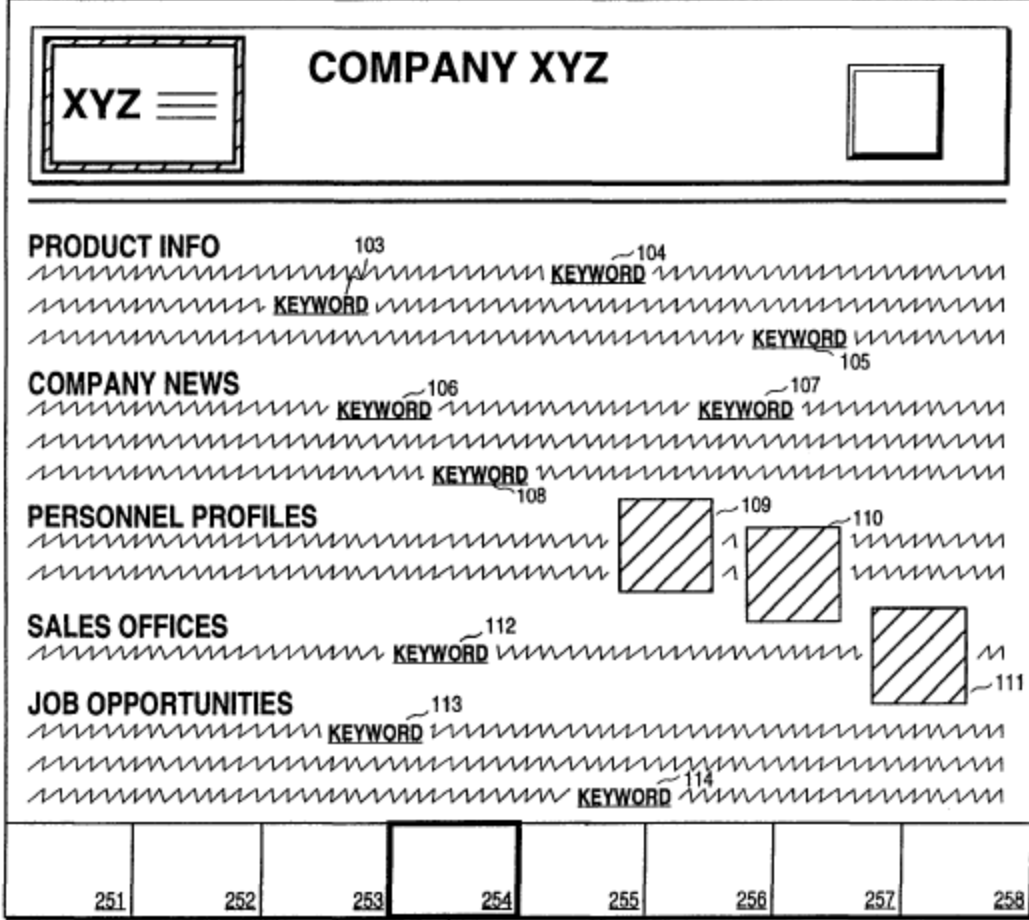
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Apte, c. 5 ll. 26-28. “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. “A predetermined number of advertisements shown in the display area are cached on the client computer. The present invention provides the capability of stepping back to previously displayed advertisements by selecting the step back button 41. When this button is selected, the progression of advertisements shown in the display area 37 is suspended, and the user may review previously displayed advertisements

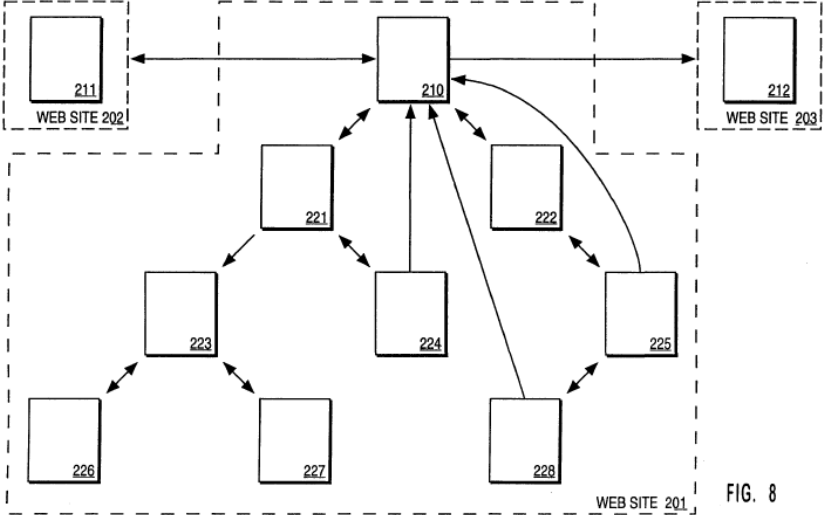
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	one at a time. The progression may be resumed at any time by selecting the pause button 40.” Apte, 7:54-8:5. “Figure 12 again illustrates the home page 100 of Company XYZ. In addition, a number of reduced size images 251-258 of Web pages have been displayed over Web page 100. (Figure 12 does 25 not show the content of images 251-258, because such content is not necessary for understanding the present feature.) The images 251-258 indicate the context of the currently-displayed Web page to the user. One of the images 254 represents the currently displayed Web page 100, as indicated by highlighting 260. The other images, 251-253 and 255-258, represent the Web pages which are immediately adjacent to Web page 100 30 within the display sequence. The size of the images 251-258 can be appropriately selected to provide the user with a rough indication of the content of the represented Web pages. In addition, the images 251-25 8 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to 35 highlight the appropriate image and then press Enter button 19 to cause the selected Webpage to be displayed. In this manner, the user can alter the tour by skipping over certain Web pages.” Leak, 13:22-14:2.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Leak, Fig. 12.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 FIG. 8 Leak, Figure 8 and associated disclosure.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

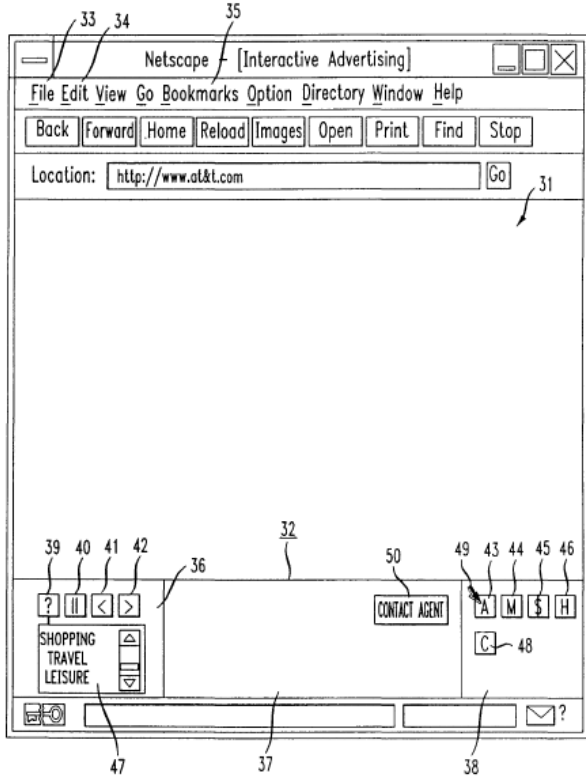
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, a simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells was well known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element D</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
the two-dimensional layer in a form of a navigation matrix,	Apte, Leak, Reformulating HTML, and AOL disclose “the two-dimensional layer in a form of a navigation matrix.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-C.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 5</i>  Apte, Fig. 5. “FIG 5 shows an embodiment of a graphical user interface in accordance with the present invention”

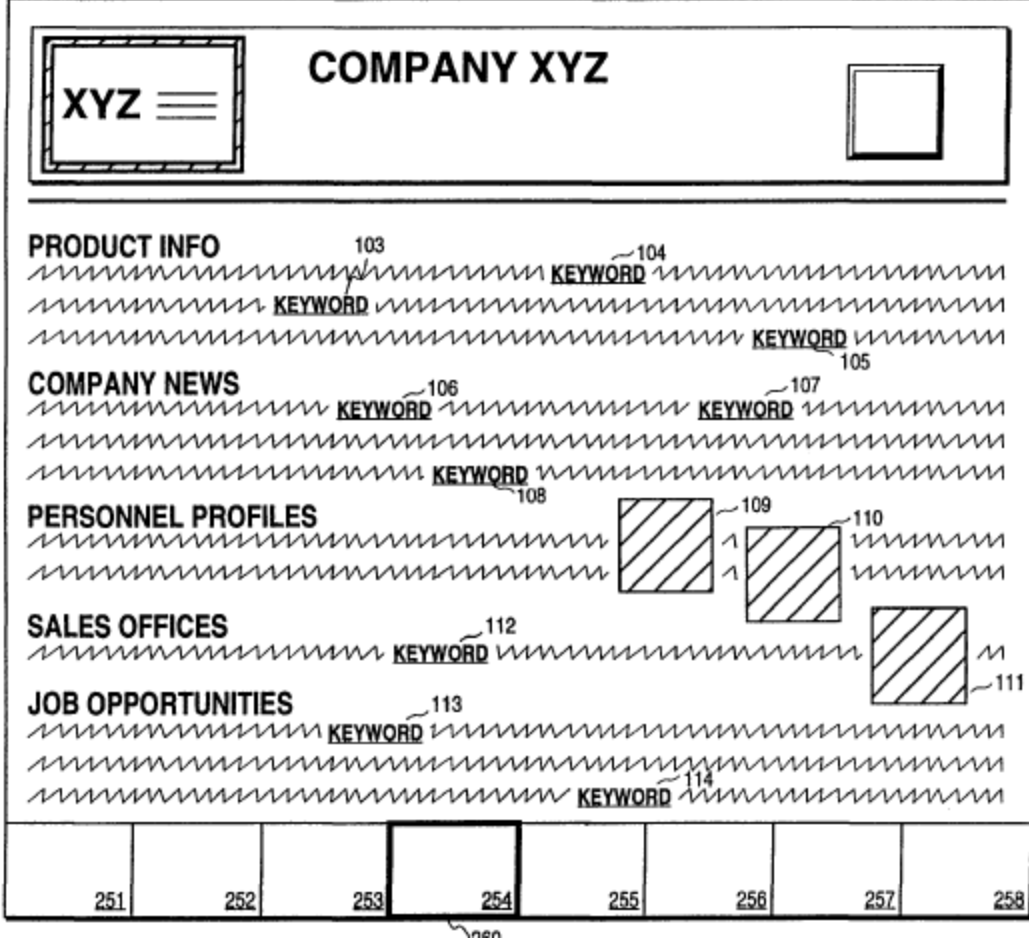
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Apte, c. 5 ll. 26-28. “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. “A predetermined number of advertisements shown in the display area are cached on the client computer. 55 The present invention provides the capability of stepping back to previously displayed advertisements by selecting the step back button 41. When this button is selected, the progression of advertisements shown in the display area 37 is suspended, and the user may

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	review previously displayed advertisements one at a time. The progression may be resumed at any time by selecting the pause button 40.” Apte, 7:54-8:5. “Figure 12 again illustrates the home page 100 of Company XYZ. In addition, a number of reduced size images 251-258 of Web pages have been displayed over Web page 100. (Figure 12 does not show the content of images 251-258, because such content is not necessary for understanding the present feature.) The images 251-258 indicate the context of the currently-displayed Web page to the user. One of the images 254 represents the currently displayed Web page 100, as indicated by highlighting 260. The other images, 251-253 and 255-258, represent the Web pages which are immediately adjacent to Web page 100 30 within the display sequence. The size of the images 251-258 can be appropriately selected to provide the user with a rough indication of the content of the represented Web pages. In addition, the images 251-258 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to 35 highlight the appropriate image and then press Enter button 19 to cause the selected Webpage to be displayed. In this manner, the user can alter the tour by skipping over certain Web pages. Leak, 13:22-14:2.”

Appendix 3 to the Declaration of Robert J. Sherwood
 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Leak, Fig. 12.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“[A]dvertisements shown to the user are interactive multimedia advertisements, comprising one or more of text, graphics, animation, video, audio, and virtual object media that include at least one link to a page that is displayed in the browser area when selected.” Apte, 4:43-49. "FIG. 7 illustrates a Web page 100 as it is displayed by the client system 1 on the television 12. Web page 100 is the 'home page' (top level page, or root level) 45 of the Web site of a fictitious company, Company XYZ. An HTML document typically includes one or more 'hypertext anchors'. Hypertext anchors, which are also sometimes called 'links', 'hot links' or 'hot spots', are displayable objects (text or image) that represent hypertext links to other Web pages or other data. A hypertext anchor may represent a link to different media types, such as an audio stream. Web page 100 includes a number of hypertext anchors 101-115. Anchors 103-108 and 112-114 are keywords or phrases representing hypertext links to pages related to those keywords. Hypertext anchors 109-111 are image maps. Hypertext anchor 115 provides a link to an audio stream, such as the jingle (theme song) of Company XYZ. Each hypertext anchor in an HTML Web page is associated with a particular URI (Uniform Resource Identifier), which specifies the location (i.e., logical address) of another Web page or other data. Hypertext anchors and other displayable objects are identified in an HTML document by a number of 'tags', which specify the attributes of the object, including the associated URI in the case of hypertext anchors. Consequently, the browser software can locate hypertext anchors and determine their corresponding URI is based on these tags." Leak, 8:5-24.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

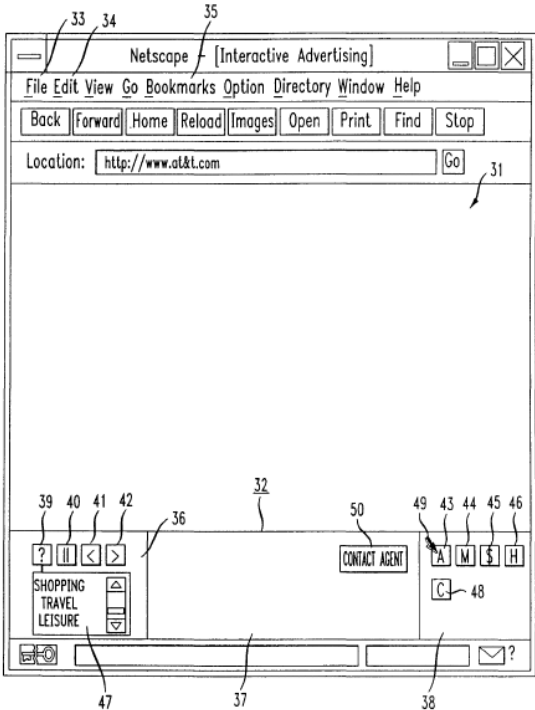
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 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, a two-dimensional layer in a form of a navigation matrix was well known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element E</u>	
each cell is a	Apte, Leak, Reformulating HTML, and AOL disclose “each cell is a division of a screen and

Appendix 3 to the Declaration of Robert J. Sherwood
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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
division of a screen and exclusive to a separate single navigation option associated with a specific unique input,	exclusive to a separate single navigation option associated with a specific unique input.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-D.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 5</i>  Apte, Fig. 5. “FIG 5 shows an embodiment of a graphical user interface in accordance with the present invention” Apte, c. 5 ll. 26-28.

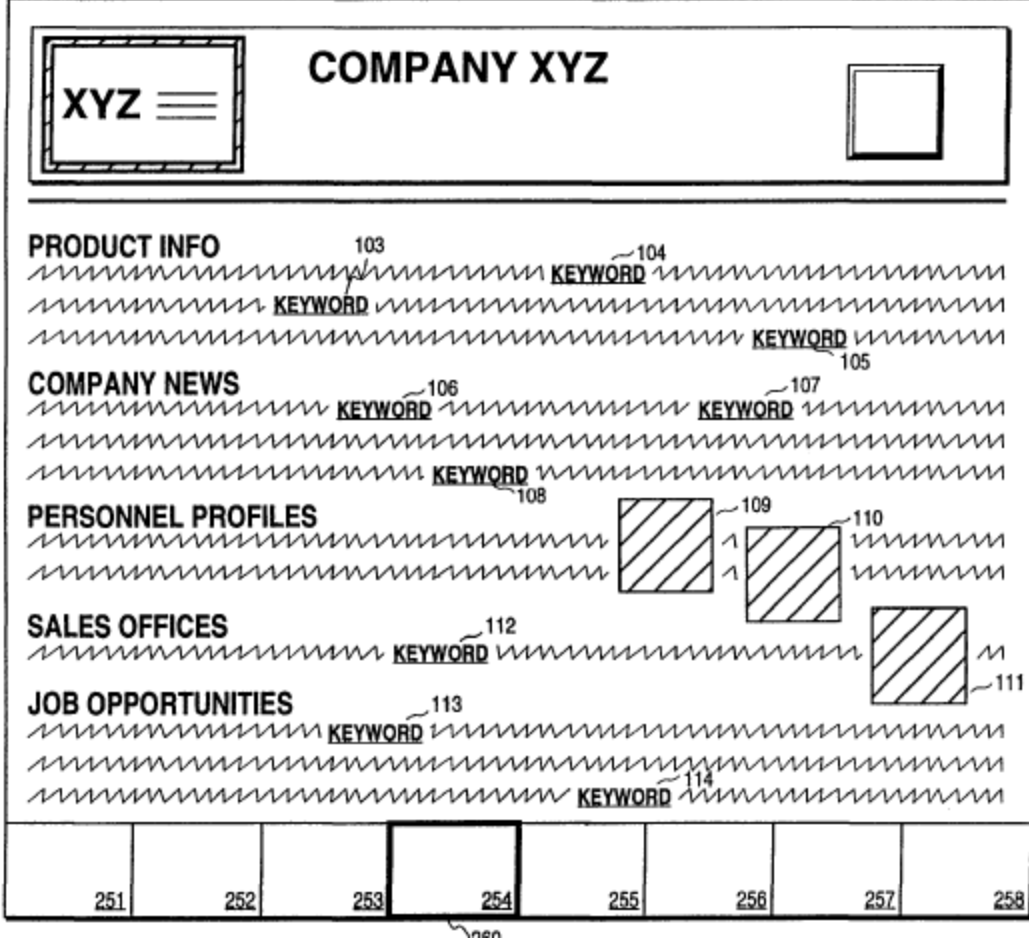
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‘196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. “A predetermined number of advertisements shown in the display area are cached on the client computer. 55 The present invention provides the capability of stepping back to previously displayed advertisements by selecting the step back button 41. When this button is selected, the progression of advertisements shown in the display area 37 is suspended, and the user may review previously displayed advertisements one at a time. The progression may be resumed at any time by selecting

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	the pause button 40.” Apte, 7:54-8:5. “Figure 12 again illustrates the home page 100 of Company XYZ. In addition, a number of reduced size images 251-258 of Web pages have been displayed over Web page 100. (Figure 12 does 25 not show the content of images 251-258, because such content is not necessary for understanding the present feature.) The images 251-258 indicate the context of the currently-displayed Web page to the user. One of the images 254 represents the currently displayed Web page 100, as indicated by highlighting 260. The other images, 251-253 and 255-258, represent the Web pages which are immediately adjacent to Web page 100 30 within the display sequence. The size of the images 251-258 can be appropriately selected to provide the user with a rough indication of the content of the represented Web pages. In addition, the images 251-25 8 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to 35 highlight the appropriate image and then press Enter button 19 to cause the selected Webpage to be displayed. In this manner, the user can alter the tour by skipping over certain Web pages. Leak, 13:22-14:2.”

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Leak, Fig. 12.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

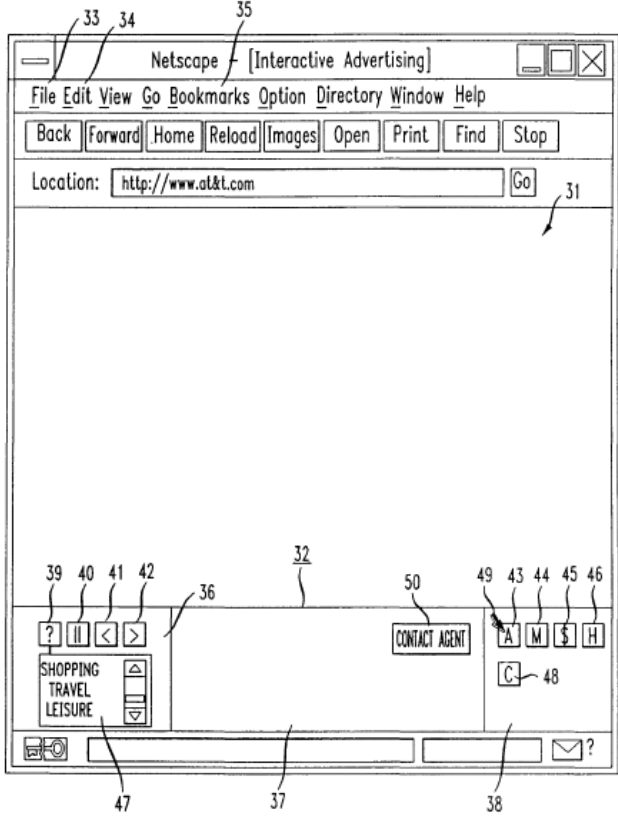
Appendix 3 to the Declaration of Robert J. Sherwood
 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input was well known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element F</u>	
the on-line	Apte, Leak, Reformulating HTML, and AOL disclose “the on-line content formatted to be

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,	displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs.” See, <i>e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-E.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 5</i>  Apte, Fig. 5. “FIG 5 shows an embodiment of a graphical user interface in accordance with the present

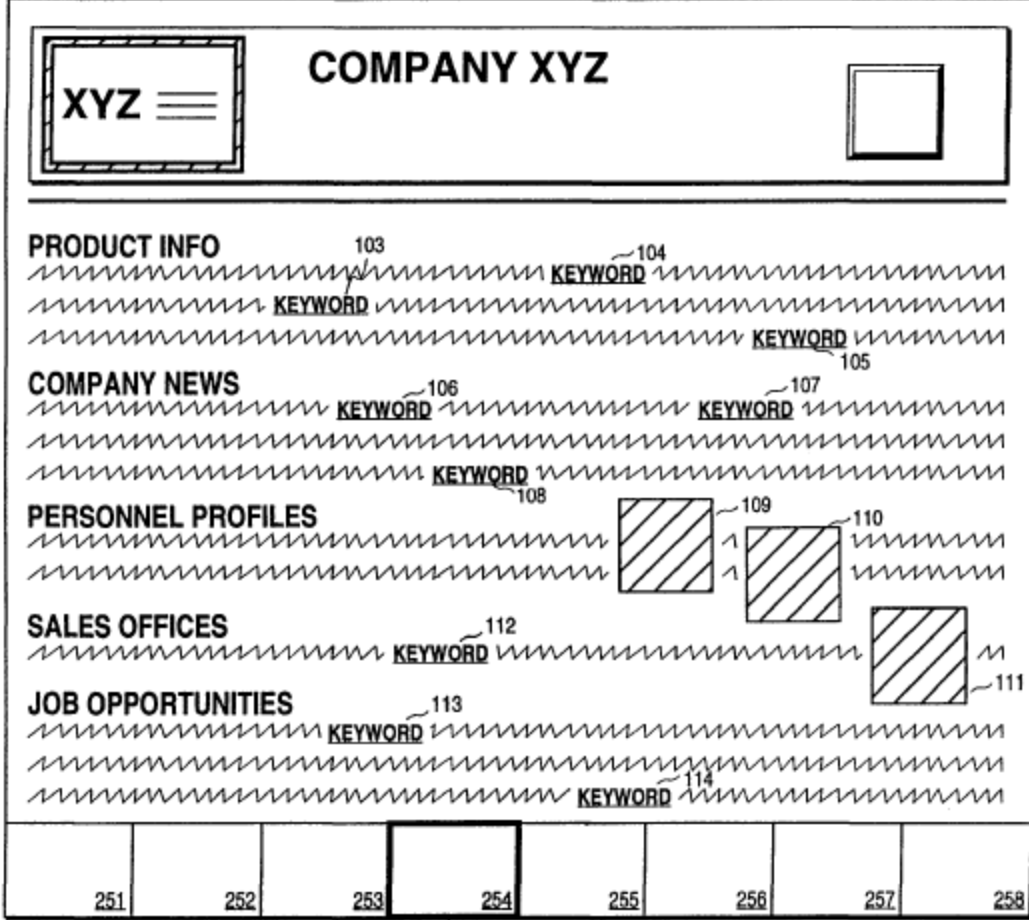
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	invention” Apte, c. 5 ll. 26-28. “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. “A predetermined number of advertisements shown in the display area are cached on the client computer. 55 The present invention provides the capability of stepping back to previously displayed

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	advertisements by selecting the step back button 41. When this button is selected, the progression of advertisements shown in the display area 37 is suspended, and the user may review previously displayed advertisements one at a time. The progression may be resumed at any time by selecting the pause button 40.” Apte, 7:54-8:5. “Figure 12 again illustrates the home page 100 of Company XYZ. In addition, a number of reduced size images 251-258 of Web pages have been displayed over Web page 100. (Figure 12 does not show the content of images 251-258, because such content is not necessary for understanding the present feature.) The images 251-258 indicate the context of the currently-displayed Web page to the user. One of the images 254 represents the currently displayed Web page 100, as indicated by highlighting 260. The other images, 251-253 and 255-258, represent the Web pages which are immediately adjacent to Web page 100 within the display sequence. The size of the images 251-258 can be appropriately selected to provide the user with a rough indication of the content of the represented Web pages. In addition, the images 251-258 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to highlight the appropriate image and then press Enter button 19 to cause the selected Webpage to be displayed. In this manner, the user can alter the tour by skipping over certain Web pages. Leak, 13:22-14:2.”

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Figure 12 is a schematic diagram of a web page layout for "COMPANY XYZ". The page is divided into a grid of 8 columns (251-258) and 4 rows. The header section (rows 1-2) contains a logo "XYZ" (103) and the title "COMPANY XYZ". Below the header are five main sections: "PRODUCT INFO" (104), "COMPANY NEWS" (106), "PERSONNEL PROFILES" (108), "SALES OFFICES" (112), and "JOB OPPORTUNITIES" (113). Each section contains a "KEYWORD" (105, 107, 109, 110, 111, 114) and a corresponding image (109, 110, 111). The "KEYWORD" labels are located in the first three rows of the grid. The "PERSONNEL PROFILES" section (108) contains three images (109, 110, 111) arranged in a row. The "SALES OFFICES" section (112) contains one image (111) in the first row. The "JOB OPPORTUNITIES" section (113) contains one image (114) in the first row. The "PRODUCT INFO" section (104) contains one image (105) in the first row. The "COMPANY NEWS" section (106) contains one image (107) in the first row. The "PERSONNEL PROFILES" section (108) contains one image (109) in the first row. The "SALES OFFICES" section (112) contains one image (111) in the first row. The "JOB OPPORTUNITIES" section (113) contains one image (114) in the first row.

Leak, Fig. 12.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs was well-known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element G</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer;	Apte, Leak, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., support cited herein for claim 1, preamble and Elements A-F. “The remote servers 4 which provide Web pages to other computer systems are commonly referred to as Web sites.” A Web site can be defined as one or more Web servers that are registered under one or more domain names for public or private information retrieval across a network. Any given site may store a number of Web pages. Figure 8 illustrates three Web sites, i.e., sites 201, 202 and 203. Each of the Web sites 201-203 has a home page, i.e., Web pages 210, 211 and 212, respectively. The Web pages stored on sites 201-203 are arranged in a logical hierarchy, as shown in Web site 201. (Although Figure 8 shows only the home pages 211 and 212 of sites 202 and 203, these Web sites may include other Web pages arranged in similar hierarchies.) The home page of each Web site represents the top level (level 1) of the hierarchy.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The home page of each site contains an number of hypertext links to other Web pages on that Web site; for example, Web site 201 contains links to Web pages 221-228. Web pages 221 and 222, which are directly linked to home page 210, shall be referred to herein as second level (level 2) Web pages on Web site 201. Web pages 223, 224 and 225, which are directly linked to the second level Web pages, shall be referred to as third level Web pages of site 201. Similarly, Web pages 226, 227 and 228, which are directly linked to the third level Web pages, shall be referred to as fourth level Web pages of Web site 201.” Leak, 8:25-9:5.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Leak, Fig. 8. “In Figure 10, N represents a current level within a Web page hierarchy for a given Web site. Thus, N=1 corresponds to the top (root) level, or home page, of the given Web site. Increasing values of N represent successive 'generations' (i.e., levels increasing in 'link distance' from the root level) in the hierarchy.” (Leak, p. 10, 36-p. 11, 3). “[T]he images 251-258 can be made

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to highlight the appropriate image and then press Enter button 19 to cause the selected Web page to be displayed.” Leak, 13:32-14:1. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  The screenshot shows a web browser window titled 'Channels'. It displays a grid of various online channels and services. The channels are organized into three columns. The first column includes 'AMERICA Online CHANNELS', 'Find', 'computers & software', 'DIGITAL CITY', 'entertainment', 'GAMES', and 'HEALTH & FITNESS'. The second column includes 'THE FID', 'International', 'INTERNET CONNECTION', 'KIDS ONLY', 'Learning & Culture', 'Extra Style & Interests', 'MARKETPLACE', and 'MusicSpace'. The third column includes 'STAND', 'TODAY'S NEWS', 'PEOPLE CONNECTION', 'PERSONAL FINANCE', 'REFERENCE DESK', 'VUE', 'STYLE CHANNEL', and 'TRAVEL'. At the bottom right, there is a 'Presenting...' button. The bottom of the window shows a status bar with 'POWERED BY AOL' and other small text. AOL, p. 83.

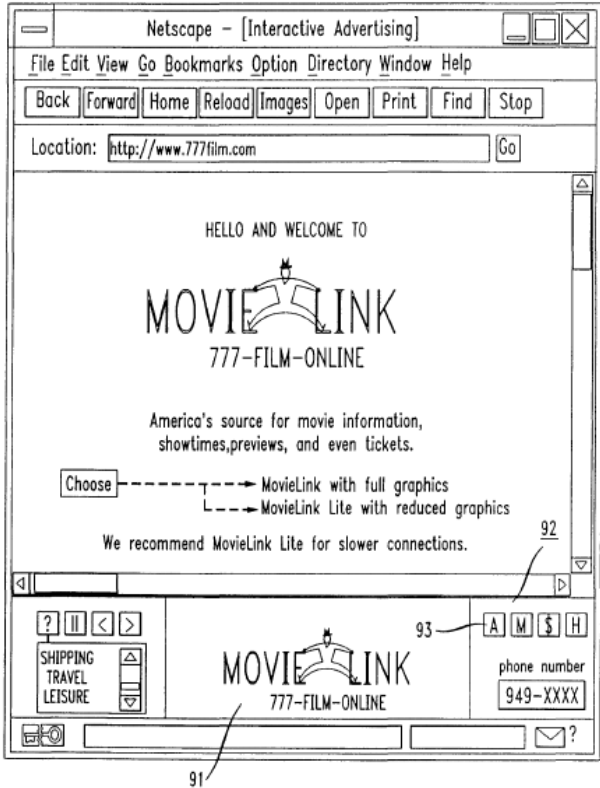
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer was well-known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element H</u>	
displaying a hyperlink on the	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.”

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site;	See, <i>e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i>, support cited herein for claim 1, preamble and Elements A-G. “The server includes a home page by which the advertising service may be accessed by the user. The server also includes a help page by which assistance in using the advertising service may be provided to the user.” Apte, 4:32-36

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 7</i>  Apte, Fig. 7. Apte discloses a MovieLink home page with hyperlinks to full-graphics and reduced-graphics sister sites.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 35.5 A hypermedia document lets you turn Web pages by clicking underlined text or pictures.  AOL, at p. 642. AOL discloses the landing page of the White House, with a hyperlink to a text-only sister site in the upper left corner.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 35.23 The Underground Music Archive is a popular resource for music information on the WWW.  AOL, at p. 658. AOL discloses the website for Internet Underground Music Archive, which contains hyperlinks to graphic and text-only sister sites.

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	NOTE Some Web sites offer the ability to display material in text or graphic form. If you don't have a 14,400 bps or faster modem (and an AOL connection to match that speed), you'll want to pick the text option where possible, to improve performance and reduce the time it takes for Web site material to appear on your computer. □ AOL, at p. 668. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. See, e.g., Internet 1996 World Exposition – park.org/bandwidth.cgi (November 3, 1996) (landing page); park.org/main.html (November 3, 1996) (high bandwidth version); www.park.org/main.text.html (November 3, 1996) (low bandwidth version) (collectively, “Internet 96”); White House Website – www3.whitehouse.gov (October 23, 1997) (graphic version); www3.whitehouse.gov/index-plain.html (October 23, 1997) (text-only version) (collectively, “White House”); Jerry Teplitz Enterprises Website – www.teplitz.com/main.htm (June 26, 1998) (graphic version); www.teplitz.com/text/main.htm (June 26, 1998) (text-only version) (collectively, “Teplitz”); Sun Microsystems, Inc. Website – www.sun.com (August 3, 1997) (graphic version); www.sun.com/index.textonly.html (August 3, 1997) (text-only version); www.sun.com/index.java.html (August 3, 1997) (Java version) (collectively, “Sun”); Berliss, et. al, “Design of Accessible Web Pages”, copyright 1996 (dated May, 1996) by InfoUse (“InfoUse”); Yahoo.com – www.yahoo.com (Oct. 13, 1999) (main page); mobile.yahoo.com/wireless/home (Oct. 12, 1999) (mobile version) (collectively, “Yahoo”); NASA Website – www.nasa.gov (Apr. 30, 1999) (main page); www.nasa.gov/siteindex (Apr. 27,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	1999) (site map); www.nasa.gov/textonly.html (Apr. 28, 1999) (collectively, “NASA”).  Internet 96. (landing page)

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	 Internet 96. (high-speed page)

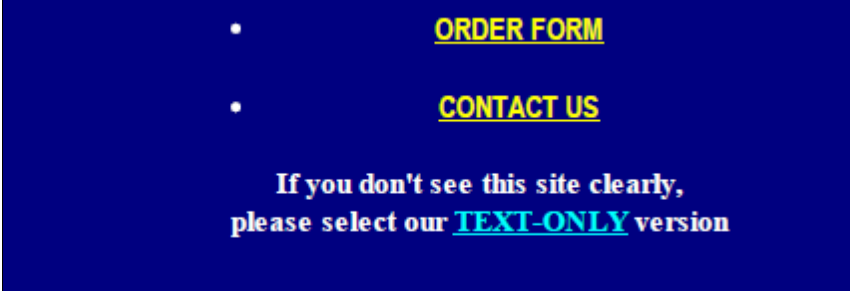
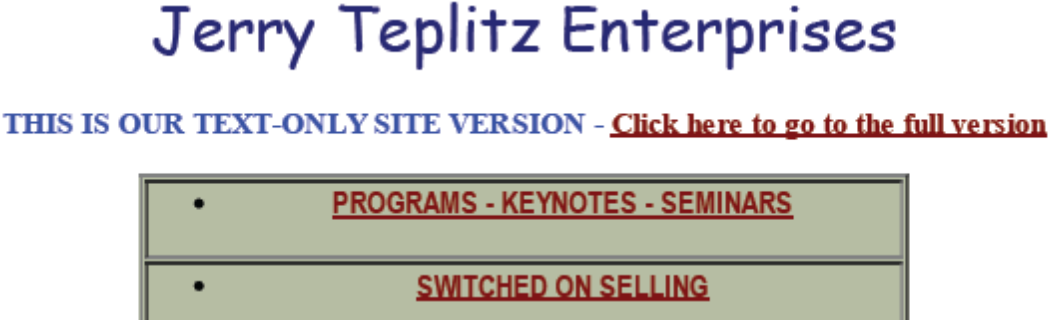
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	You've reached the text and simple graphics version of the Internet 1996 World Exposition.  [About the Fair] [Our Sponsors] [What's New] [Search] [High Speed] [Vote] [Map] [Guestbook] [Feedback] [Toolbox] Internet 96. (low speed page)

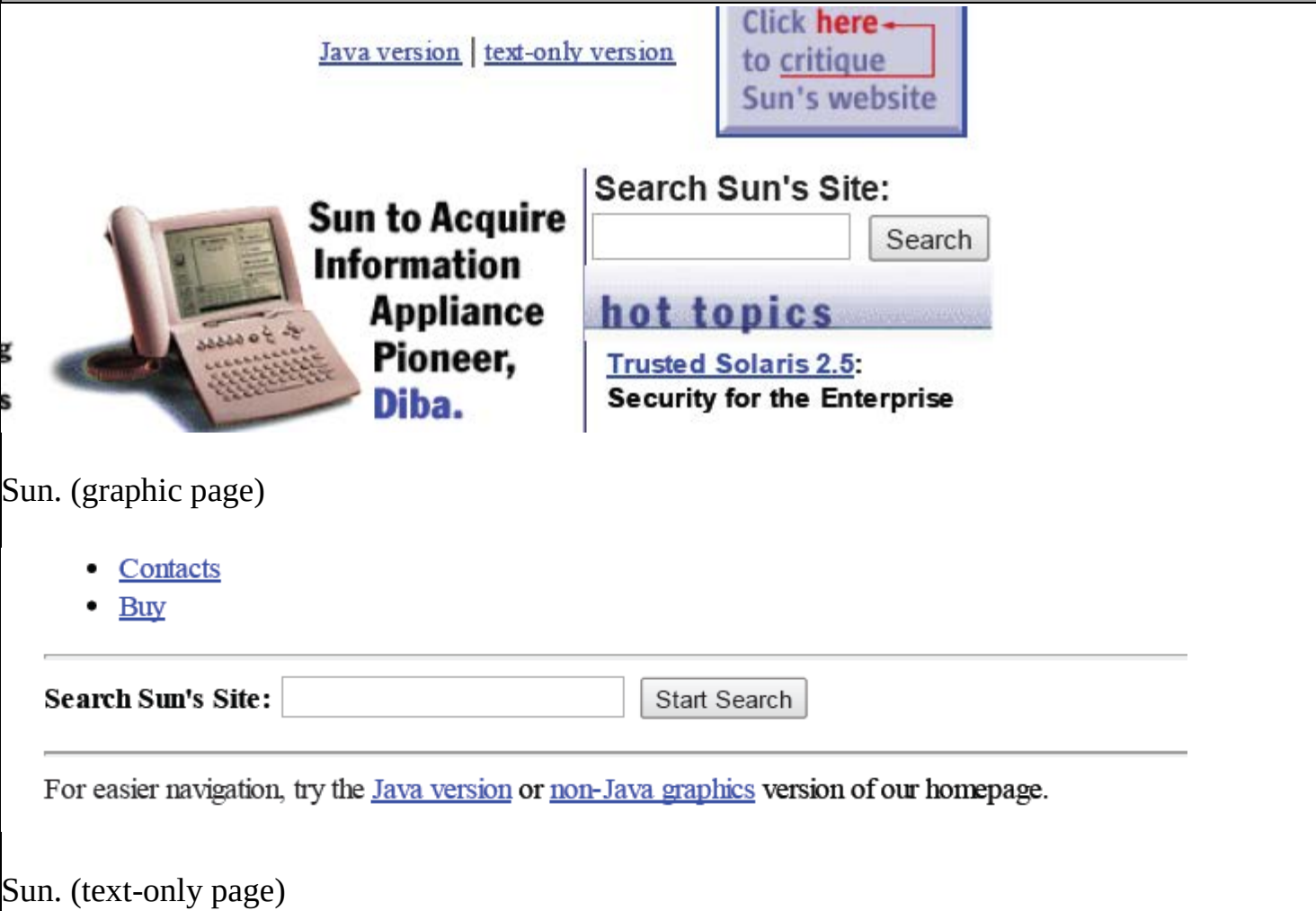
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	[Text version]  The graphic version of the White House Virtual Library page features a background of bookshelves. At the top center is a circular emblem containing an open book. To the right of the emblem, the text "White House Virtual Library" is written in a cursive font. Below this, a horizontal line separates the header from the main content. The text "You can search the White House web site for:" is centered. Below this text is a bulleted list with one item: "• All White House web features combined: Press releases, Radio Addresses, photographs and Web Pages." White House. (graphic version) [Graphic version] The White House Virtual Library You can search the White House web site for: • All White House features combined: Press releases, Radio Addresses, photographs and Web Pages. White House. (text version)

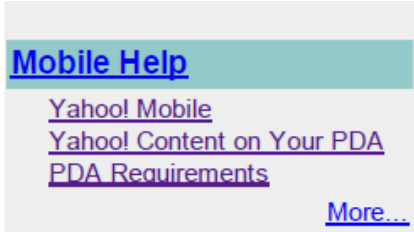
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Teplitz. (graphic page)  Teplitz. (text-only page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
Sun. (graphic page) • Contacts • Buy Sun. (text-only page)	 The screenshot shows the Sun Microsystems website. At the top, there are links for Java version and text-only version. A box on the right says "Click here to critique Sun's website". The main content area features a mobile phone on the left, the text "Sun to Acquire Information Appliance Pioneer, Diba." in the center, and a search bar on the right labeled "Search Sun's Site:". Below the search bar is a "hot topics" section with the link "Trusted Solaris 2.5: Security for the Enterprise". At the bottom, there is another search bar labeled "Search Sun's Site:" with a "Start Search" button. A footer note says "For easier navigation, try the Java version or non-Java graphics version of our homepage."

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Applet not working? Firewall could be the cause. Try the non-Java or text-only version of our home page. Sun. (java page) “At the top of all home pages, the first line should be a text link labeled something like, ‘Click here to go to text-only version of site.’” Infouse, at 4.  Copyright © 1994-1999 Yahoo! Inc. All rights reserved. Important Disclaimers and Legal Information - Terms of Service Yahoo. (mobile site)

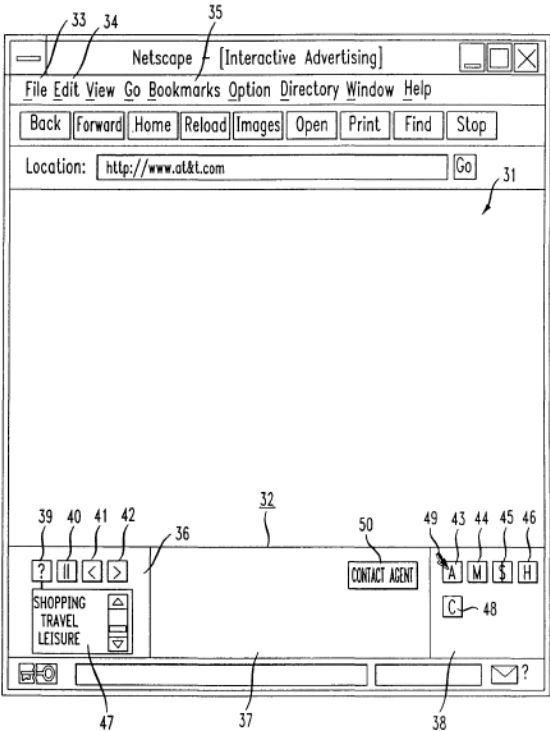
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Yahoo! - My Yahoo! - Help? Yahoo. (mobile site) <u>Other Cool NASA Websites</u> [Frequently Asked Questions] [Hot Topics] [Multimedia Gallery] [NASA Television] [Textonly Version] [NASA Privacy Statement] [Site Map] NASA. (graphic page) Cool NASA Websites • Mars Global Surveyor • Science News • Space Flight • Earth Science Kids Website [Frequently Asked Questions] [Hot Topics] [Multimedia Gallery] [NASA Television] [Today@NASA] [NASA Privacy Statement] [Site Map] NASA. (text-only page)

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 NASA. (site map)
<u>Claim 1,</u> <u>Element I</u> receiving a user selection of one of the navigation options	Apte, Leak, Reformulating HTML, and AOL disclose “receiving a user selection of one of the navigation options.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	See, e.g., support cited herein for claim 1, preamble and Elements A-H. <i>FIG. 5</i>  Apte, Fig. 5.

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	“FIG 5 shows an embodiment of a graphical user interface in accordance with the present invention” Apte, c. 5 ll. 26-28. “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. “A predetermined number of advertisements shown in the display area are cached on the client computer. 55 The present invention provides the capability of stepping back to previously

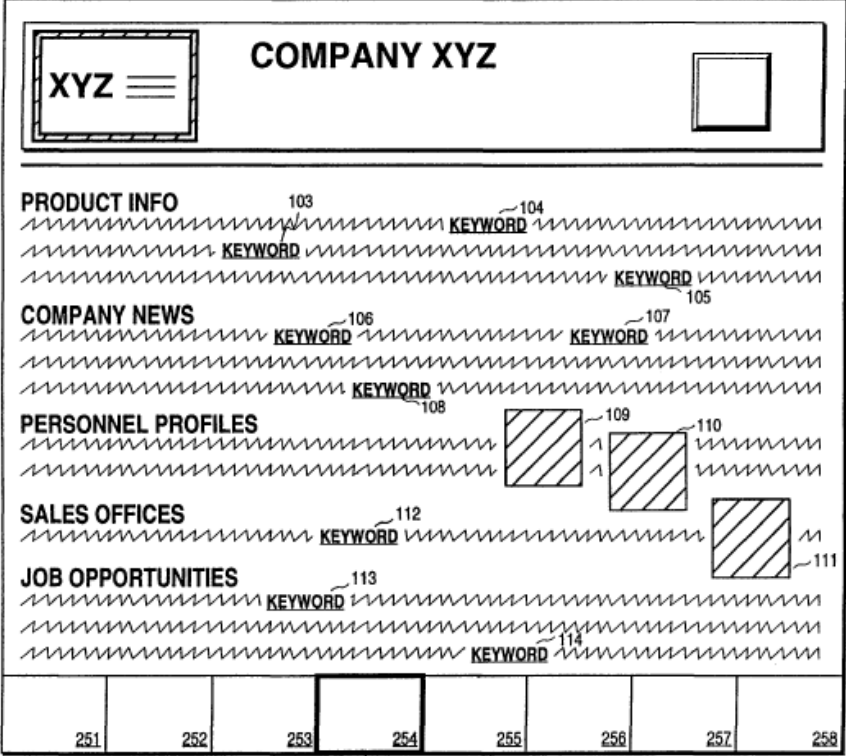
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	displayed advertisements by selecting the step back button 41. When this button is selected, the progression of advertisements shown in the display area 37 is suspended, and the user may review previously displayed advertisements one at a time. The progression may be resumed at any time by selecting the pause button 40.” Apte, 7:54-8:5. “Hence, the client system 1 automatically displays a sequence of Web pages without requiring the user to enter any input once the tour is initiated. However, the user may interrupt the tour or alter the tour at any time. Specifically, if the user sees a Web page that he would like to examine more closely, he may enter an input using the remote Control 11. For example, by pressing the Options button 7, a pop-up menu or dialog box can be activated, by which the user can pause or terminate the tour. The user might also initiate the tour in a similar manner, from a currently displayed Web page or from hit list.” Leak, c. 10 ll. 17-23. “Figure 12 again illustrates the home page 100 of Company XYZ. In addition, a number of reduced size images 251-258 of Web pages have been displayed over Web page 100. (Figure 12 does 25 not show the content of images 251-258, because such content is not necessary for understanding the present feature.) The images 251-258 indicate the context of the currently-displayed Web page to the user. One of the images 254 represents the currently displayed Web page 100, as indicated by highlighting 260. The other images, 251-253 and 255-258, represent the Web pages which are immediately adjacent to Web page 100 30 within the display sequence. The size of the images 251-258 can be appropriately selected to provide the user with a rough

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	indication of the content of the represented Web pages. In addition, the images 251-258 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to 35 highlight the appropriate image and then press Enter button 19 to cause the selected Webpage to be displayed. In this manner, the user can alter the tour by skipping over certain Web pages. Leak, 13:22-14:2.”

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	 The diagram illustrates a web page layout for 'COMPANY XYZ'. At the top is a header bar containing a logo with 'XYZ' and three horizontal lines, the text 'COMPANY XYZ', and a small square icon. Below the header are several sections: 'PRODUCT INFO' (with a 'KEYWORD' at 104), 'COMPANY NEWS' (with 'KEYWORD' at 106 and 107), 'PERSONNEL PROFILES' (with a 'KEYWORD' at 108 and three profile icons labeled 109, 110, and 111), 'SALES OFFICES' (with a 'KEYWORD' at 112 and one office icon labeled 111), and 'JOB OPPORTUNITIES' (with 'KEYWORD' at 113 and 114). At the bottom is a navigation bar with buttons labeled 251 through 258, where button 254 is highlighted. Leak, Fig. 12. "The remote servers 4 which provide Web pages to other computer systems are commonly referred to as Web sites." A Web site can be defined as one or more Web servers that are registered under one or more domain names for public or private information retrieval across a

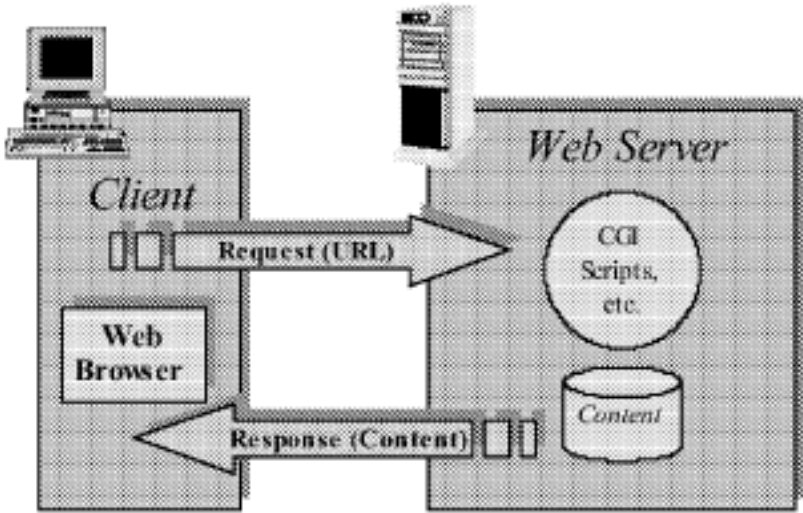
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	network. Any given site may store a number of Web pages. Figure 8 illustrates three Web sites, i.e., sites 201, 202 and 203. Each of the Web sites 201-203 has a home page, i.e., Web pages 210, 211 and 212, respectively. The Web pages stored on sites 201-203 are arranged in a logical hierarchy, as shown in Web site 201. (Although Figure 8 shows only the home pages 211 and 212 of sites 202 and 203, these Web sites may include other Web pages arranged in similar hierarchies.) The home page of each Web site represents the top level (Level 1) of the hierarchy. The home page of each site contains an number of hypertext links to other Web pages on that Web site; for example, Web site 201 contains links to Web pages 221-228. Web pages 221 and 222, which are directly linked to home page 210, shall be referred to herein as second level (level 2) Web pages on Web site 201. Web pages 223, 224 and 225, which are directly linked to the second level Web pages, shall be referred to as third level Web pages of site 201. Similarly, Web pages 226, 227 and 228, which are directly linked to the third level Web pages, shall be referred to as fourth level Web pages of Web site 201.” Leak, 8:25-9:5.

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	Selecting the Right Channel Finding the right place to visit on AOL is similar to selecting a channel on your TV set, except you click an icon rather than push a button. Once you've signed on to AOL and learned how to get the most out of its highly flexible software, you'll want to do more than just get your feet wet. Every time you log on to America Online, you'll see the Welcome screen (see fig. 6.1), also known as In The Spotlight. This screen shows you the major highlights of the service and informs you if you have e-mail waiting. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  The screenshot shows the AOL Welcome screen with a title bar 'Welcome, AOL 6.0a5!'. It features several sections: 'AMERICA Online' logo, 'CHANNELS' with a 'WHAT'S HOT' sub-section, 'NetDir takes to people like you about how we live and love online.', 'Car, Trucks, SUVs and motorcycles - Come to the Wheels Exchange!', 'The Dueling 500 auto races. Keyword: SpeedNet', 'Make the most of your time online. Get your Top Tips today!', and 'TOP NEWS STORY: Maine Choppers Collide, 18 Dead or Missing!'. At the bottom, there are icons for 'YOU HAVE MAIL', 'PEOPLE CONNECTION', and 'INTERNET'. AOL, p. 82. Moreover, receiving a user selection of one of the navigation options was well-known at the time of the alleged invention. <i>See, e.g.,</i> WAP.

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	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  The diagram illustrates the interaction between a Client and a Web Server. On the left, the Client is represented by a computer icon and contains a 'Web Browser' box. On the right, the Web Server is represented by a server rack icon and contains a circle labeled 'CGI Scripts, etc.' and a cylinder labeled 'Content'. An arrow labeled 'Request (URL)' points from the Web Browser to the CGI Scripts. A return arrow labeled 'Response (Content)' points from the Content back to the Web Browser. Figure 1. World-Wide Web Programming Model WAP, p. 11.
Claim 1, Element J	

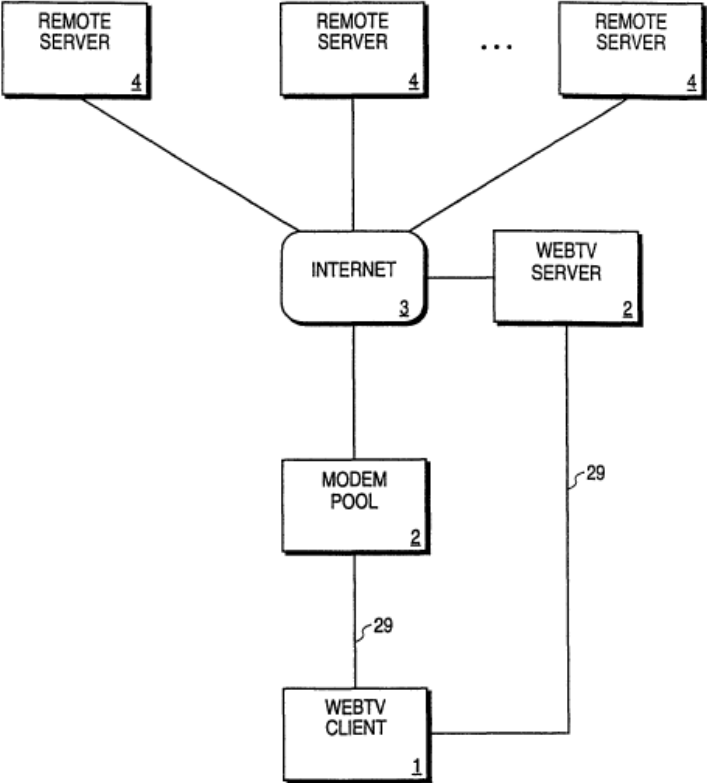
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forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface;	Apte, Leak, Reformulating HTML, and AOL disclose “forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-I. “The present invention pertains to the field of network-based processing systems. More particularly, the present invention relates to processing systems configured to allow browsing of the World Wide Web.” Leak, 1:5-7. “Figure 1 illustrates a configuration of a WebTV network according to one embodiment. A WebTV client 1 is coupled to a modem pool 2 via direct-dial, bi-directional data connections 29, which may be a conventional telephone, i.e., “plain old telephone service” (POTS), ISDN (Integrated Services Digital Network) link, Ethernet, or any other suitable type of data connection. The modem pool 2 is coupled typically through a router, such as that conventionally

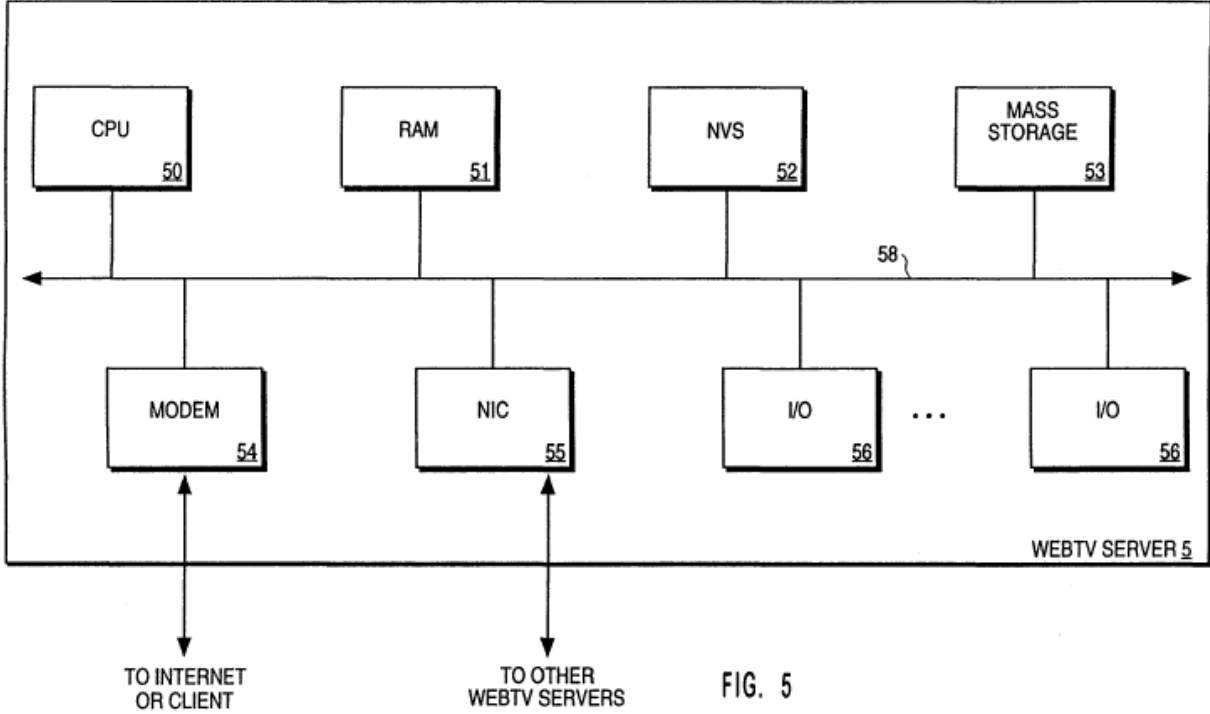
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	known in the art, to a number of remote servers 4 (i.e., conventional Web servers) via a conventional network infrastructure 3, 15 such as the Internet. The WebTV system also includes a WebTV server 5, which implements WebTV Network services and specifically supports the Web TV client 1. The server 5 generally includes one or more conventional computer systems. The server 5 may actually comprise multiple physical and logical devices connected in a distributed architecture. The client 1 can connect to the server 5 through POTS, ISDN, or Ethernet 20 connection or through the Internet 3 via the modem pool 2. Note that the modem pool 2 is a conventional modem pool, such as those found today throughout the world providing access to the Internet and private networks. The modem pool 2 may be provided by a local Internet Service Provider (ISP).” Leak, 4:8-23.

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	 <pre> graph TD RS1[REMOTE SERVER 4] --- I[INTERNET 3] RS2[REMOTE SERVER 4] --- I RS3[REMOTE SERVER 4] --- I I --- WS[WEBTV SERVER 2] I --- MP[MODEM POOL 2] MP --- WC[WEBTV CLIENT 1] WS --- WC WC -.- 29 WS -.- 29 </pre> Leak, Fig. 1.

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	 Leak, Fig. 5. “This invention relates to providing interactive advertising and secure purchase opportunities on a network, and particularly to a system and method for providing targeted, interactive, multimedia advertising and electronic commerce capabilities through a hypertext network.”

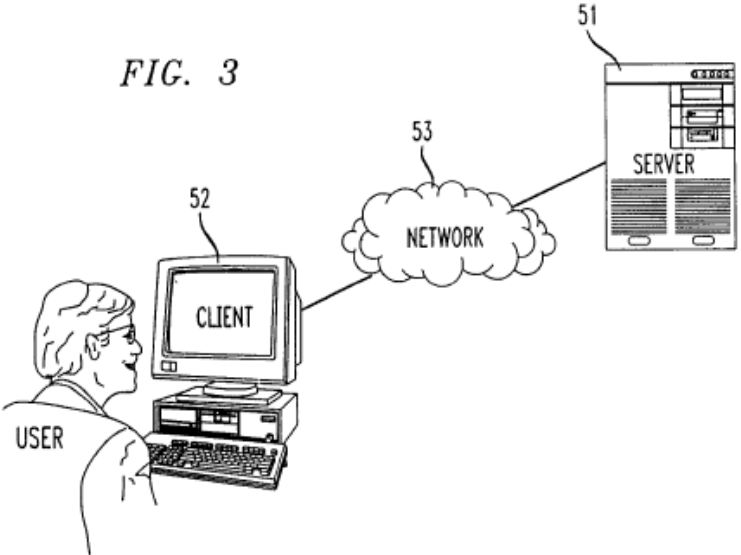
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	Apte, 1:5-10. “A hypertext file is displayed on a computer as a page through software called a browser. A page comprises links that, when selected by a user, cause another page to be displayed (known as the linked page), cause another part of the presently displayed page to be shown, or else cause a computer program to execute. A hypertext file is written in a programming language such as Hypertext Markup Language (HTML). A logical grouping of hypertext files is called a site. Sites may reside on different computers. A set of sites that are interconnected by links is called a web. A site on a first computer may be effectively linked to a site on a second computer by connecting the first and second computers through a network. An example of a set of sites residing on different computers interconnected by a network is the World Wide Web (WWW), which is a set of sites written in HTML on computers interconnected by the Internet. Each site on the WWW is known as a website.” Apte, 1:14-32. “Each advertisement 14 is a link. When the user selects an advertisement link, PCN launches a browser and loads and displays a page 21 (FIG 2) at a predetermined address, known as a Universal Resource Locator (URL) 22. The browser replaces the advertisement area 13, so PCN no longer displays advertisements to the user. Alternatively, PCN may be configured to launch a separate stand-alone browser, such as the Netscape browser, when an advertisement link is selected. In this case, the stand-alone browser appears in front of and obscures the advertisements presented by PCN. However, the browser can be moved to another part of the screen, thus revealing the ongoing stream of advertisements from PCN.”

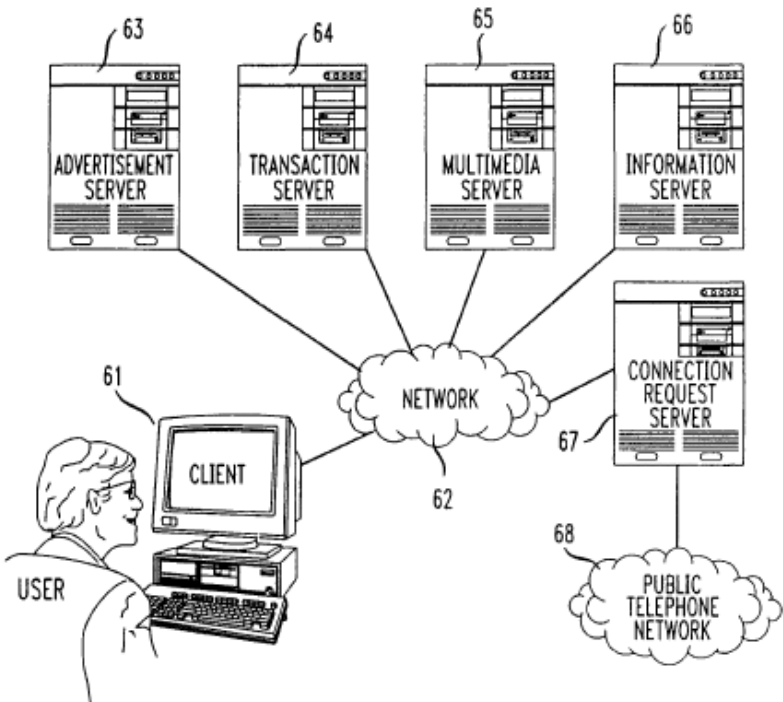
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Apte, c. 2 ll. 28-41. “Advertising software on the server 51 is downloaded to the client computer 52 and executes to act as 25 an overlay to the browser. In one embodiment, this software is written in the Java programming language, and is loaded and executed on the client computer 52 when a user selects an advertising service link on an advertising service page displayed to the user through the 30 user's browser. This mode of operation is superior to known advertising systems that execute exclusively outside of the client computer 52, because the system of the present invention is able to obtain information regarding the client computer 52 that may be screened 35 by a firewall between the client computer 52 and the server 51. For example, the present system is able to obtain the exact network address of client computer 54 (FIG 3a) that is connected to the network 55 through a local area network 56, whereas known systems would 40 only be able to determine the network address of the network server 57 on the local area network.” Apte, c. 6 ll. 23-41.

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	<i>FIG. 3</i>  The diagram, labeled FIG. 3, illustrates a networked computing environment. On the left, a user (52) is shown in profile, seated at a desk and interacting with a client computer system (51). The client system includes a CRT monitor displaying the word 'CLIENT', a system unit, and a keyboard. A line connects the client system to a cloud-shaped network (53) labeled 'NETWORK'. Another line connects the network to a server (51) on the right. The server is depicted as a rack-mounted unit with a control panel at the top and horizontal slots below, with the word 'SERVER' printed on its front. The reference numerals 51, 52, and 53 are placed near their respective components. Apte, Fig. 3.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 4</i>  Apte, Fig. 4.

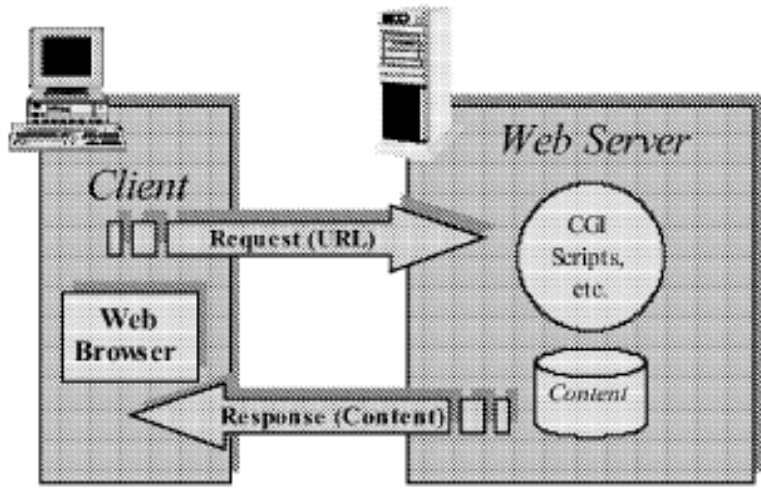
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Some Nuts and Bolts Information About America Online Our daily press and broadcast news outlets commonly refer to communicating online as being a part of the Information Superhighway, and this is likely an apt expression. But it's an expression designed to represent the entire global information network, not just a single service, and I like to think of that network as more akin to a planet than a highway. So let's consider America Online as one large city (or country) that exists on that planet. Let's take that description of a city a bit further. Besides all those people, you can find neighborhoods, highways, stores, libraries, and schools. You interact with that community from your own computer and modem, using America Online's unique graphical interface, which transports you from one place to another when you click an icon or type a simple keyboard command. But behind that easy-to-use technology is a huge network of micro- and minicomputers storing many gigabytes of data, linked to the outside world by advanced fiber-optic telephone cables.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Looking at AOL’s Distributed Network Bear with me for a moment as I give you a few insights into the state-of-the-art equipment that resides at America Online’s headquarters in Vienna, Virginia. It is a truly advanced setup. America Online’s computers are built on the client-server model with a peer-to-peer application architecture. The systems consist of Stratus RISC processors running the VOS operating system, Hewlett-Packard RISC processors running the UNIX operating system, and PCs running DOS or OS/2. All these computers are interconnected by high-speed networks. Using a technique called <i>distributed processing</i>, they can share information-handling tasks, resulting in extremely fast data processing, enabling thousands of simultaneous transactions. This capability means that thousands of America Online members can log on to the network at the same time without any loss in system performance. AOL, p. 3. Moreover, forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface was well-known at the time of the alleged invention. <i>See, e.g.,</i> WAP.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  The diagram illustrates the interaction between a Client and a Web Server. On the left, the Client is represented by a computer icon and contains a box labeled 'Web Browser'. On the right, the Web Server is represented by a server rack icon and contains a circle labeled 'CGI Scripts, etc.' and a cylinder labeled 'Content'. An arrow labeled 'Request (URL)' points from the Web Browser to the CGI Scripts. Another arrow labeled 'Response (Content)' points from the Content back to the Web Browser. Figure 1. World-Wide Web Programming Model WAP, p. 11.
<u>Claim 1,</u> <u>Element K</u>	
receiving a next	Apte, Leak, Reformulating HTML, and AOL disclose “forwarding the selected navigation option

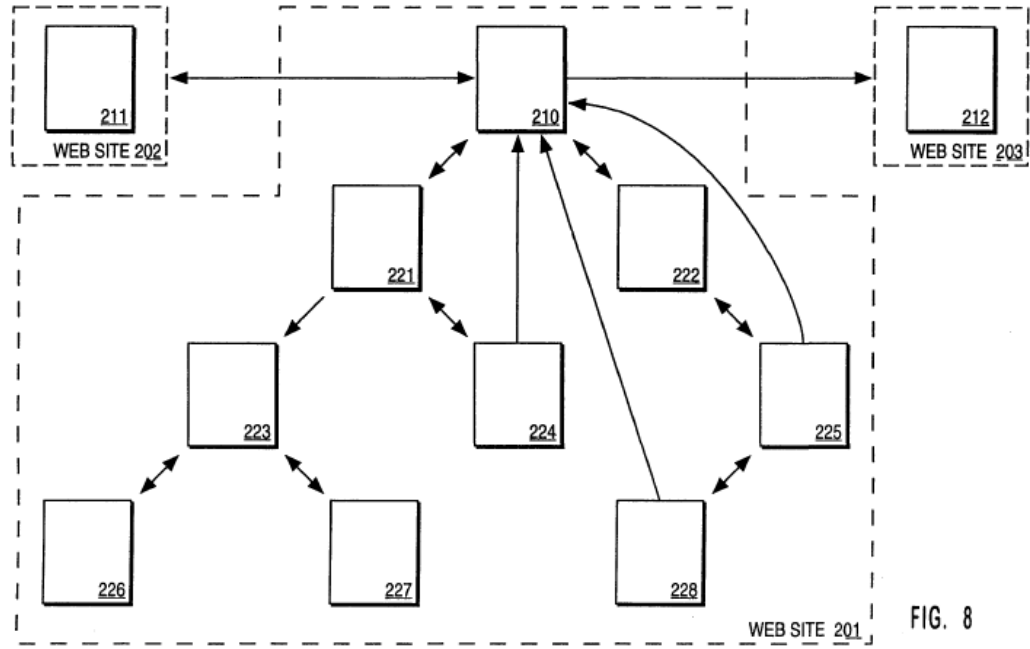
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option;	across the Internet to a server providing the simplified navigation interface.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-J. “WebTV allows a person to access and navigate through Web pages using an ordinary television set and a remote control. More specifically, WebTV is designed so that a person can use a remote control to navigate between hypertext objects on a Web page with little effort or thought, so that a person feels more as if he is simply changing 35 the channels on a television set, rather than using a complex, global computer network.” Leak, 1:31-35. “The remote servers 4 which provide Web pages to other computer systems are commonly referred to as Web “sites.” A Web site can be defined as one or more Web servers that are registered under one or more domain names for public or private information retrieval across a network. Any given site may store a number of Web pages. Figure 8 illustrates three Web sites,

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	i.e., sites 201, 202 and 203. Each of the Web sites 201-203 has a home page, i.e., Web pages 210, 211 and 212, respectively. The Web pages stored on sites 201-203 are arranged in a logical hierarchy, as shown in Web site 201. (Although Figure 8 shows only the home pages 211 and 212 of sites 202 and 203, these Web sites may include other Web pages arranged in similar hierarchies.) The home page of each Web site represents the top level (Level 1) of the hierarchy. The home page of each site contains an number of hypertext links to other Web pages on that Web site; for example, Web site 201 contains links to Web pages 221-228. Web pages 221 and 222, which are directly linked to home page 210, shall be referred to herein as second level (level 2) Web pages on Web site 201. Web pages 223, 224 and 225, which are directly linked to the second level Web pages, shall be referred to as third level Web pages of site 201. Similarly, Web pages 226, 227 and 228, which are directly linked to the third level Web pages, shall be referred to as fourth level Web pages of Web site 201.” Leak, 8:25-9:5.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 The diagram, labeled FIG. 8, illustrates a network structure. It features a central node 210 connected to three external nodes: 211 (labeled WEB SITE 202), 212 (labeled WEB SITE 203), and a large dashed box labeled WEB SITE 201. Inside WEB SITE 201, node 210 is connected to nodes 221, 222, and 225. Node 221 is connected to 223, which is connected to 226 and 227. Node 224 is connected to 221 and 228. Node 225 is connected to 222 and 228. Node 228 is also connected to node 210. The label 'FIG. 8' is located at the bottom right of the diagram. Leak, Fig. 8.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

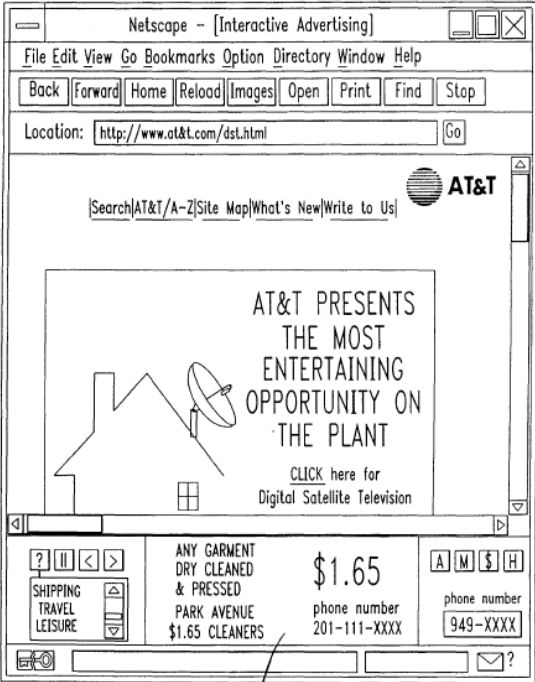
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option was well-known at the time of the alleged invention.
<u>Claim 1,</u> <u>Element L</u>	
and manipulating	Apte, Leak, Reformulating HTML, and AOL disclose “manipulating a region of the screen for

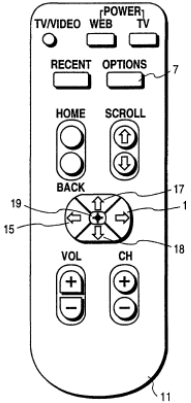
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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.	viewing and zooming and/or scrolling of the displayed on-line content.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1, preamble and Elements A-K.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 10</i>  121 Apte, Fig. 10 (disclosing scroll bars for scrolling displayed content).

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 Leak, Figure 3 and associated disclosure.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 12 Leak, Figure 12 and associated disclosure. “FIG. 12 again illustrates the home page 100 of Company XYZ. In addition, a number of reduced size images 251-258 of Web pages have been displayed over Web page 100 . . . The images 251-258 indicate the context of the currently displayed Web page 100, as indicated by highlighting 260. The other images, 251-253 and 255-258, represent the web pages which are immediately adjacent to web page 100 within the display sequence. The size of the images 251-258 can be appropriately selected to provide the user with a rough indication of the content of the represented Web pages. In addition, the images 251-258 can be made selectable objects, such that the user can randomly access the (full-size) Web page corresponding to any of the reduced size

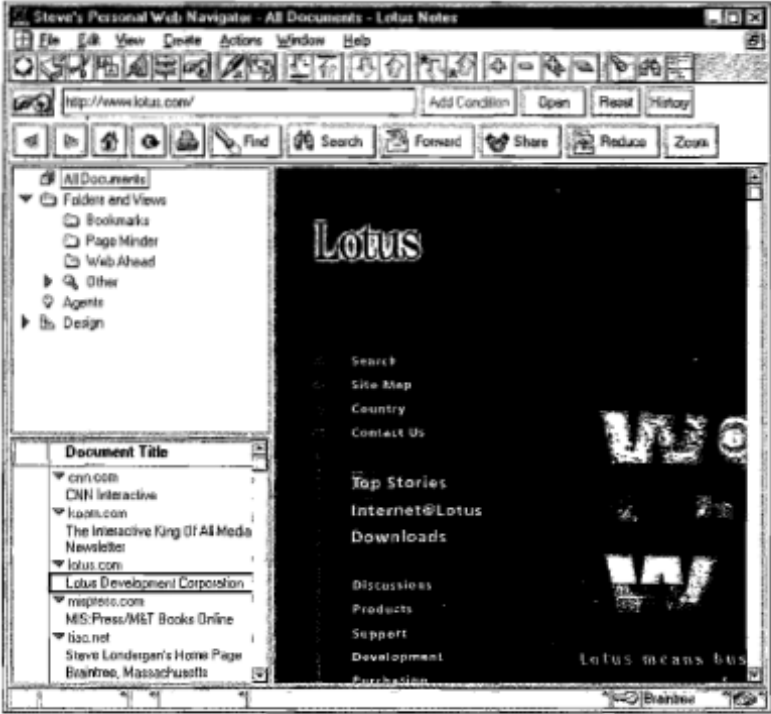
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	images. Specifically, the user may use the directional buttons 15-18 on remote control 11 to highlight the appropriate image and then press Enter button 19 to cause the selected Web page to be displayed.” Leak, 13:22-14:1. FIG. 6.28 AOL's Internet Connection is the entranceway to the global Information Super-highway.  AOL, p. 102. AOL discloses a bar on the rightmost edge of the viewing window for scrolling of the displayed on-line content.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, STEVE LONDERGAN, THE LOTUS DOMINO SERVER (1st ed. 1997)(“DOMINO”); <i>B.B. Bederson et al.</i>, Pad++: A Zoomable Graphical Sketchpad for Exploring Alternative Interface Physics (Sept. 19, 1995) (“Pad++”). The Zoom button simply maximizes the window for the Web page that is currently selected. And, least but not least, the Folder button is used to put the current page into a folder in the database. DOMINO, at p. 291.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The Views and Folders  The screenshot shows the 'Steve's Personal Web Navigator - All Documents - Lotus Notes' window. On the left is a 'Folders and Views' pane with a tree structure: 'All Documents' (expanded), 'Folders and Views', 'Bookmarks', 'Page Minder', 'Web Ahead', 'Other', 'Agents', and 'Design'. Below this is a 'Document Title' list showing various web pages like 'cnn.com', 'CNN Interactive', 'kask.com', 'The Interactive King Of All Media Newsletter', 'Lotus.com', 'Lotus Development Corporation', 'mspress.com', 'MIS Press/MET Books Online', and 'tiao.net'. The main area displays the 'Lotus' website with links for 'Search', 'Site Map', 'Country', 'Contact Us', 'Top Stories', 'Internet@Lotus', 'Downloads', 'Discussions', 'Products', 'Support', 'Development', and 'Publication'. The bottom right corner of the web page says 'Lotus means bus'. Figure 16.9 The Views and Folders in the Personal Web Navigator database. DOMINO, Fig. 16.9.

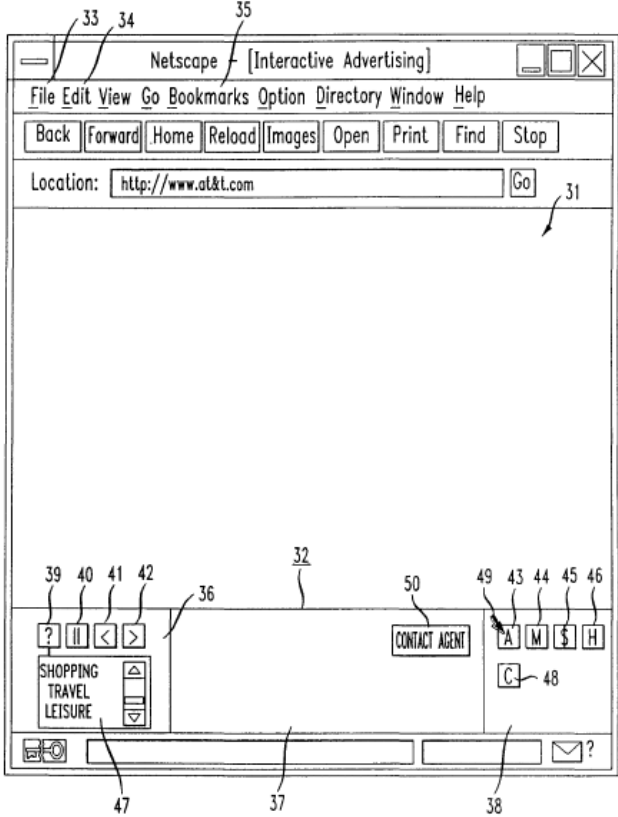
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“The user controls where they look on this vast data surface by panning and zooming. Portals are objects on the Pad++ data surface that can see anywhere on the surface, as well as filter data to represent it differently than it normally appears. Panning and zooming allow navigation through a large information space via direct manipulation.” Pad++, at p. 2. “Using an interactive zoomable surface, however, allows very different methods of visually representing large data structures. The fact that there is always more room to put information “between the cracks” gives many more options. Pad++ is particularly well suited to visualizing hierarchical data because information that is deeper in the hierarchy can be made smaller. Accessing this information is accomplished by zooming.” Pad++, at p. 9. “Pad++ also can follow links across the internet. Figure 5 shows a snapshot where several hypertext links have been followed. Two views show the same tree focused on different nodes. The Pad++ user interface for accessing hypertext is similar to traditional systems, but zooming mechanisms are employed.” Pad++, at p. 10.
<u>Claim 2,</u>	
2. The method of claim 1, further comprising: displaying one or	Apte, Leak, Reformulating HTML, and AOL disclose “displaying one or more advertisements on the screen; receiving a user selection of a displayed advertisement; and displaying second content accessed via the Internet, wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
more advertisements on the screen; receiving a user selection of a displayed advertisement; and displaying second content accessed via the Internet, wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for	navigation with the unique inputs.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation with the unique inputs.	<i>FIG. 5</i>  Apte, Fig. 5. “FIG 5 shows an embodiment of a graphical user interface in accordance with the present

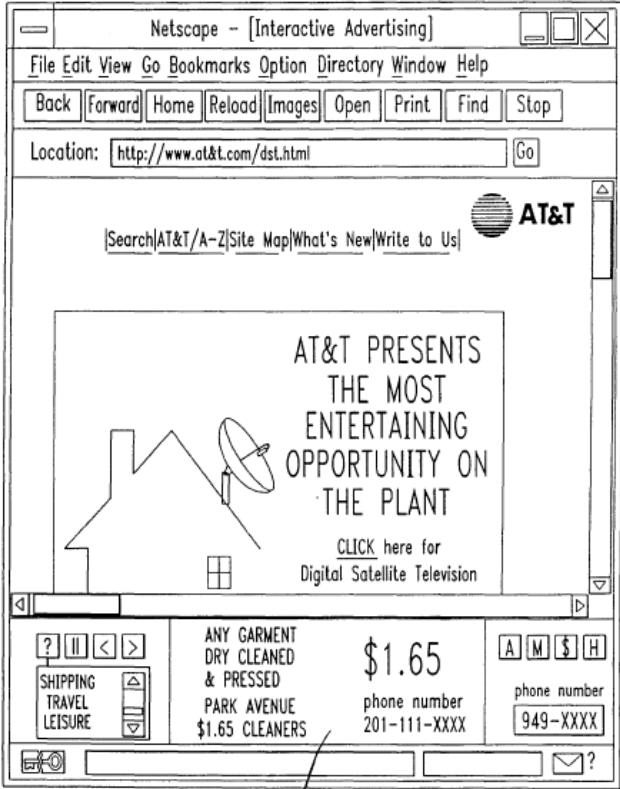
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	invention” Apte, c. 5 ll. 26-28. “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. “A predetermined number of advertisements shown in the display area are cached on the client computer. 55 The present invention provides the capability of stepping back to previously displayed advertisements by selecting the step back button 41. When this button is selected, the

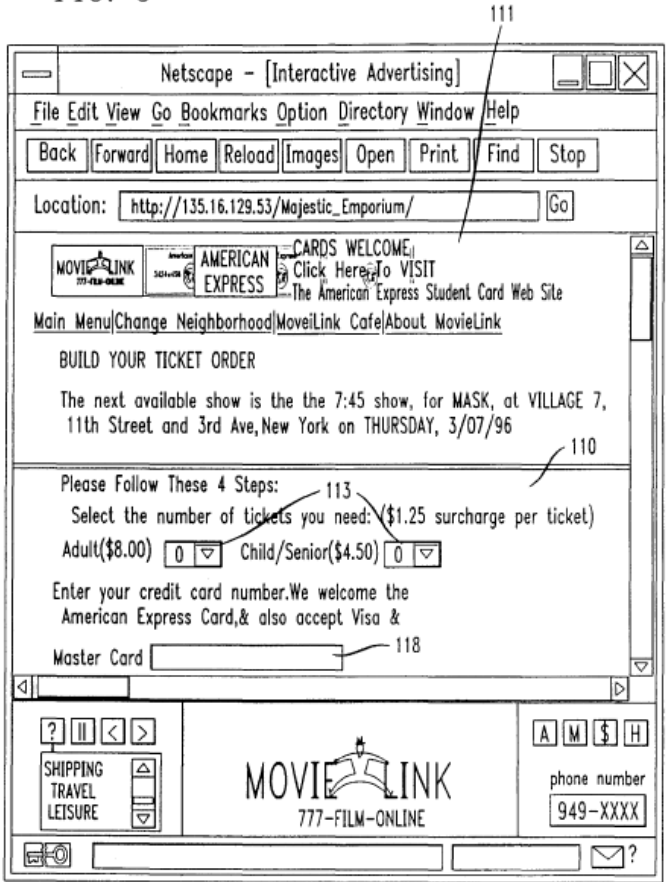
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	progression of advertisements shown in the display area 37 is suspended, and the user may review previously displayed advertisements one at a time. The progression may be resumed at any time by selecting the pause button 40.” Apte, 7:54-8:5.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 10</i>  Apte, Fig. 10.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 9</i>  Apte, Fig. 9.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Marketplace Keyword: Marketplace The marketplace is your AOL center for shopping galore! Whether you are looking for America Online goodies, such as T-shirts and coffee mugs, wanting to buy or sell a car, or looking for computer training aids, AOL's Marketplace channel offers you these things and more (see fig. 6.15). FIG. 6.15 Time to go shopping and save some cash right on America Online. 

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, pp. 90-91. Moreover, displaying one or more advertisements on the screen; receiving a user selection of a displayed advertisement; and displaying second content accessed via the Internet, wherein the second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs was well-known at the time of the alleged invention.
<u>Claim 3</u>	
3. The method of claim 1, wherein the on-line content is selected based, at least in part, on a navigation path of a user.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the on-line content is selected based, at least in part, on a navigation path of a user.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1.

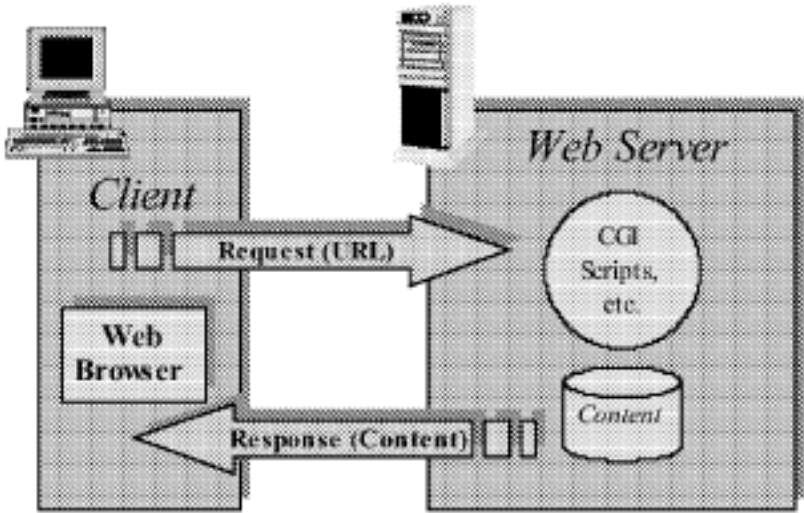
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“Because the advertisements are streamed from a server rather than downloaded as a set and played to the user in a loop, the present invention can make choices about which advertisements to display to the user that are responsive to the user's current viewing habits. Thus, if a user is selecting and viewing pages in the browser area 31 concerning outdoor activities, the present invention can select advertisements for camping gear, which are streamed from the server to the client for display to the user. This advantageous capability to dynamically target advertisements is not provided by known advertising services that download predetermined advertisements in sets. This dynamic targeting capability is in part due to the capability of the present invention to operate with a browser such that the progression of advertisements in no way interferes with the independent operation of the browser.” Apte, 8:34-51. “Referring to Figure 9, in step 901, the client system 1 initially receives a Web page (i.e., the top level Web page). The Web page may be received in response to the user of the client system 1 activating a hypertext link in another Web page, 15 for example. In step 902, the client system 1 identifies URIs that are referred to by the received Web page. As noted above, the client system 1 is able to identity URIs based on the tags in an HTML document. In step 903, the client system 1 uses the identified URIs to request and receive each of the Web pages that are directly linked to the current Web page (i.e., the second level of Web pages). In step 904, the client system 1 displays these 20 additional Web pages in a sequence, displaying each Web page for a defined period of time. In one embodiment, the period of time is defined based on the content of the current Web page and is therefore variable. For example, a Web page which has an audio file associated with it (e.g., music) may be displayed longer than other Web pages to allow the user to hear the entire audio file. In another embodiment, the defined period of time may 25 be fixed

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	(e.g., 10 seconds per page). Note that the order of steps 903 and 904 may be varied to accommodate the memory limitations of the client system 1. Specifically, the memory limitations of the client system 1 may prevent retrieval of all Web pages at the same time; therefore, it may be necessary to defer retrieval of some Web pages until other Web pages have been received and displayed.” Leak, 9:12-29. ■ <i>World Wide Web.</i> Much of the content of the Internet is in text form, but it’s easy to navigate through America Online’s friendly, helpful interface. The World Wide Web is the newest Internet feature that combines text, pictures, and even sound into a single, unified presentation. Using hypertext links, you are able to click a topic and jump right to the material related to that subject. (Macintosh users familiar with HyperCard have already had somewhat of a sample of what the World Wide Web looks like.) AOL, p. 103. Moreover, on-line content selected based, at least in part, on a navigation path of a user was well-known at the time of the alleged invention. <i>See, e.g.,</i> WAP.

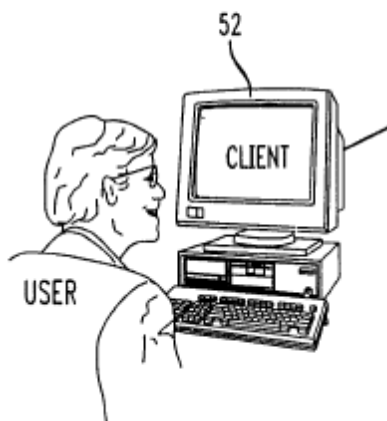
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 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  Figure 1. World-Wide Web Programming Model WAP, p. 11.
<u>Claim 4</u>	4. The method of Apte, Leak, Reformulating HTML, and AOL disclose “wherein the user selection of one of the

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
claim 1, wherein the user selection of one of the navigation options is received any one of a remote control, a pointer device, a keypad, and a keyboard.	navigation options is received any one of a remote control, a pointer device, a keypad, and a keyboard.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1. “The system of the present invention, shown in FIG 3, comprises a server 51 and client computer 52 that has a browser, with the server 51 and client computer 52 interconnected through a network 53. The client computer 52 comprises a microprocessor, a display device such as a screen, storage devices such as a hard disk drive and random access memory, and input devices such as a keyboard and mouse.” Apte, 6:15-22.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 3</i>  A line drawing of a person labeled 'USER' in profile, looking at a computer system. The computer system includes a monitor displaying the word 'CLIENT', a base unit, and a keyboard. A label '52' with a leader line points to the monitor. The entire diagram is titled 'FIG. 3' at the top. Apte, Fig. 3.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 3 Leak, Fig. 3.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Understanding How Your Computer Links with America Online When you connect to America Online, it seems like such a simple process. For you it involves a single click of the mouse, but behind that simple action is a complex process of data transfers and computer processing. You generally hook up to America Online with two electronic boxes: your computer and a device called a modem. A modem is a small computer that converts a stream of digital ones and zeros into audible tones that are fed through telephone lines and received by another modem at a remote location. AOL, p. 4. Moreover, the user selection of one of the navigation options received by any one of a remote control, a pointer device, a keypad, and a keyboard was well-known at the time of the alleged invention. <i>See, e.g.</i>, WAP. “Because of fundamental limitations of power and form-factor, mass-market handheld devices tend to have: Less powerful CPUs, Less memory (ROM and RAM), Restricted power consumption, Smaller displays, and Different input devices (eg, a phone keypad).” WAP, p. 9.
<u>Claim 5</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
5. The method of claim 1, wherein a wireless Internet appliance comprises a voice recognition system, the method further comprising receiving one or more navigation input selections through the voice recognition system.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein a wireless Internet appliance comprises a voice recognition system, the method further comprising receiving one or more navigation input selections through the voice recognition system.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	How to Let AOL Talk to You Beginning with version 2.6, AOL's Mac software supports Apple's Speech Manager technology. Apple's Speech Manager (and PlainTalk speech recognition software) can read text back to you. This provides for some fascinating possibilities during your AOL sessions. At the very least, you don't have to be in front of your computer during a conference, because the text can be read back to you as it appears on your screen. CAUTION Sound capabilities are only available in your AOL Mac software if you have a Macintosh with PlainTalk or Speech Manager software installed. Otherwise, this feature, which appears in the Edit menu, won't work. NOTE Apple's speech technology (and similar features used on other computing platforms) is not advanced enough to provide perfect speech-to-text capability. Some words may not be enunciated properly by your computerized speaker, making those words difficult to understand. In other cases, when the way a word is pronounced varies by its context, you may have difficulty figuring out what the computer is trying to tell you. The talking computer that many of you know from <i>Star Trek</i> episodes is something we shouldn't expect to see for quite some time. □ AOL, p. 41. Moreover, receiving one or more navigation input selections through the voice recognition

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	system was well-known at the time of the alleged invention. <i>See, e.g.</i>, DRAGON SYSTEMS, DRAGON NATURALLY SPEAKING (August 1998) (“Dragon”). “Dragon NaturallySpeaking scripting commands provide you with a powerful set of tools for controlling Dragon “NaturallySpeaking, the Windows environment, and your applications. With them, a voice command script can: · Launch and control applications on the desktop, including changing the active application. · Control applications by using DDE commands and DLL calls, sending keystrokes to an application, selecting a window control, and selecting a menu item. · Control Dragon NaturallySpeaking by putting it into and out of sleep mode and turning the microphone on and off. · Control script execution by displaying a confirmation box, running another voice command script, and making the script pause. · Control the mouse, including clicking the mouse buttons, dragging the mouse, controlling mouse motion, and controlling the MouseGrid™.” Dragon, p. 12. “Windows lets you interact with applications by:· Using the keyboard · Using the mouse · Selecting menus, menu items, buttons, and other controls directly · Using DDE commands· Calling functions in DLL files. Dragon NaturallySpeaking lets you use all these methods of interacting with Windows applications in your voice commands.” Dragon, p. 26. “The scripting language lets you access and select windows, menus, and controls in several ways: · You can send shortcut keystrokes. For example, the global Copy All to Clipboard command is a keystroke command that sends the {Ctrl+a}{Ctrl+c} key combination to select the entire document and copy it to the clipboard. However, global commands that use shortcut keys may

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	have unexpected results in applications that do not follow standard Windows shortcut key conventions. · You can send {Tab} keystrokes to tab through controls such as text fields and buttons. This technique is useful for accessing controls that do not have shortcut (accelerator) keys. You can also send the {Space} or {Enter} keystroke to activate a control. · If the application can function as a DDE server, you can use the DdeExecute and DdePoke commands to send Windows DDE requests directly to an application. You may prefer this method to using keystrokes with applications, such as Microsoft Word, where you can change key assignments.” Dragon, p. 28.
<u>Claim 6</u>	
6. The method of claim 1, wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claim 1.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
regions.	“The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area. The browser area 31 retains all of the controls originally provided by the browser, including the file features 33, the edit feature 34, the bookmarks feature 35, and so on. Thus, the browser area continues to function essentially as the original browser (before the advertising software was downloaded and executed). In this embodiment, the area for viewing pages 31 has been decreased to accommodate the advertiser area 32. The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button.” Apte, 7:9-34. “The advertising software operates as an overlay to a conventional, known browser, such as the Netscape browser, dividing the user's client computer display into an advertising area and a browser area.” Apte, 4:7-10. “The browser area retains the original functionality of the underlying browser and operates independently of the advertising area, except that certain buttons (e.g., control buttons and electronic transaction buttons) in the advertising area cause pages to load and display in the

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	browser area when selected. The independent operation of the browser area means that several advertisements may be displayed to a user in the advertising area while the user browses a single page in the browser area. This is superior to known systems 30 wherein only one fixed advertisement may be shown on each browsed page.” Apte, 4:20-31. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  The screenshot shows the AOL 3.5a GUI. At the top, it says 'Welcome, AOL 3.5a GUI'. Below this, there are several sections: 'AMERICA Online' logo, 'CHANNELS', 'WHAT'S HOT', 'YOU HAVE MAIL', 'PEOPLE CONNECTION', 'INTERNET', and a 'TOP NEWS STORY' section. On the right side, there are three vertical advertisements: 'Cars, trucks, suvs and motorcycles - Come to the Wheels Exchange!', 'The Quoting 500 auto rates. Keyword: SpeedNet', and 'Make the most of your time online. Get your Top Tips today!'. At the bottom right, there is a 'TOP NEWS STORY' section with the headline 'Marine Choppers Collide; 16 Dead or Missing'. AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions were well-known at the time of the alleged invention.
<u>Claim 7</u>	
7. The method of claim 6, further	Apte, Leak, Reformulating HTML, and AOL disclose “further comprising tabbing to focus on different one of the regions.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
comprising tabbing to focus on different one of the regions.	1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claims 1 and 6. “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References																										
	until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. Table 4.1 Keyboard Shortcuts for Windows <table> <tr> <th>Function</th><th>Keyboard Short</th></tr> <tr> <td>Access Download Manager</td><td>Ctrl+T</td></tr> <tr> <td>Cancel an action</td><td>Esc</td></tr> <tr> <td>Cascade windows</td><td>Shift+F5</td></tr> <tr> <td>Close a window</td><td>Ctrl+F4</td></tr> <tr> <td>Copy</td><td>Ctrl+C</td></tr> <tr> <td>Cut</td><td>Ctrl+X</td></tr> <tr> <td>Find a member, file, area</td><td>Ctrl+F</td></tr> <tr> <td>Get member profile</td><td>Ctrl+G</td></tr> <tr> <td>Locate a member online</td><td>Ctrl+L</td></tr> <tr> <td>Move to next button</td><td>Tab</td></tr> <tr> <td>Move to next window</td><td>Ctrl+F6</td></tr> <tr> <td>Move to previous button</td><td>Shift+Tab</td></tr> </table> AOL, p. 63.	Function	Keyboard Short	Access Download Manager	Ctrl+T	Cancel an action	Esc	Cascade windows	Shift+F5	Close a window	Ctrl+F4	Copy	Ctrl+C	Cut	Ctrl+X	Find a member, file, area	Ctrl+F	Get member profile	Ctrl+G	Locate a member online	Ctrl+L	Move to next button	Tab	Move to next window	Ctrl+F6	Move to previous button	Shift+Tab
Function	Keyboard Short																										
Access Download Manager	Ctrl+T																										
Cancel an action	Esc																										
Cascade windows	Shift+F5																										
Close a window	Ctrl+F4																										
Copy	Ctrl+C																										
Cut	Ctrl+X																										
Find a member, file, area	Ctrl+F																										
Get member profile	Ctrl+G																										
Locate a member online	Ctrl+L																										
Move to next button	Tab																										
Move to next window	Ctrl+F6																										
Move to previous button	Shift+Tab																										

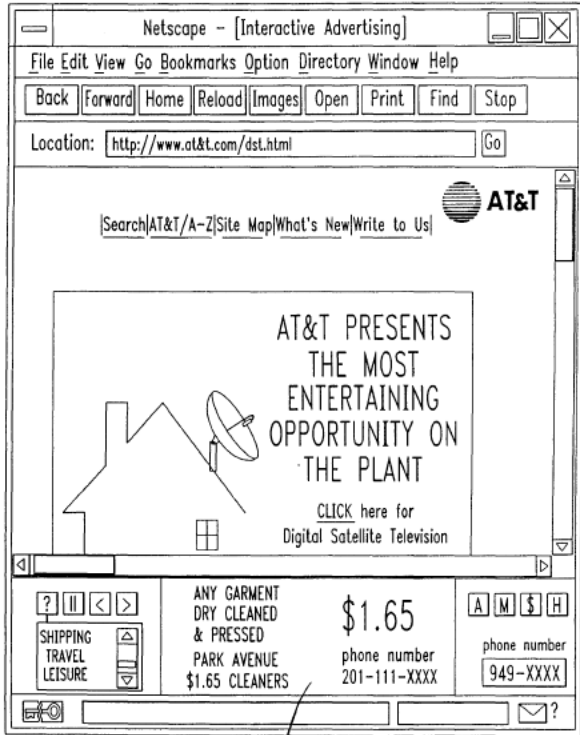
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	A quick way to navigate from one data-entry point (field) to another is to press Tab. To return to the preceding field, press Shift+Tab. AOL, p. 841. Moreover, tabbing to focus on different one of the regions was well-known at the time of the alleged invention.
<u>Claim 8</u>	
8. The method of claim 6, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, support cited herein for claims 1 and 6.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area. The browser area 31 retains all of the controls originally provided by the browser, including the file features 33, the edit feature 34, the bookmarks feature 35, and so on. Thus, the browser area continues to function essentially as the original browser (before the advertising software was downloaded and executed). In this embodiment, the area for viewing pages 31 has been decreased to accommodate the advertiser area 32. The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button.” Apte, 7:9-34. “The advertising software operates as an overlay to a conventional, known browser, such as the Netscape browser, dividing the user's client computer display into an advertising area and a browser area.” Apte, 4:7-10. “The browser area retains the original functionality of the underlying browser and operates independently of the advertising area, except that certain buttons (e.g., control buttons and electronic transaction buttons) in the advertising area cause pages to load and display in the browser area when selected. The independent operation of the browser area means that several

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	advertisements may be displayed to a user in the advertising area while the user browses a single page in the browser area. This is superior to known systems 30 wherein only one fixed advertisement may be shown on each browsed page.” Apte, 4:20-31. <i>FIG. 10</i>  121

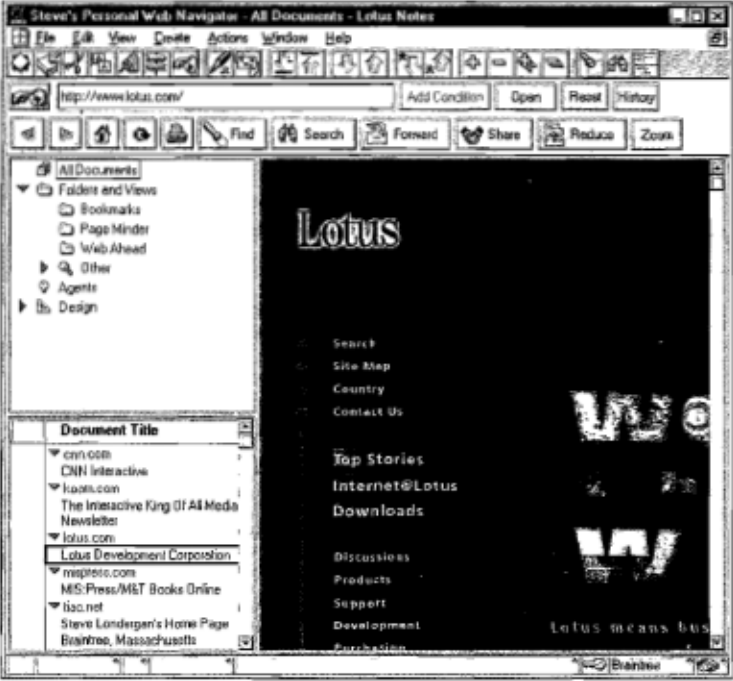
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Apte, Fig. 10. FIG. 6.28 AOL's Internet Connection is the entranceway to the global Information Super-highway.  AOL, p. 102. AOL discloses a bar on the rightmost edge of the viewing window for scrolling of the displayed on-line content. Moreover, regions adapted to be zoomed and/or scrolled independently of other ones of the regions were well-known at the time of the alleged invention. See, e.g., STEVE LONDERGAN, THE LOTUS DOMINO SERVER (1st ed. 1997) (“DOMINO”); B.B. Bederson et al., Pad++: A Zoomable Graphical Sketchpad for Exploring Alternative Interface Physics (Sept. 19, 1995) (“Pad++”).

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The Zoom button simply maximizes the window for the Web page that is currently selected. And, least but not least, the Folder button is used to put the current page into a folder in the database. DOMINO, at p. 291.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	The Views and Folders  Figure 16.9 The Views and Folders in the Personal Web Navigator database. DOMINO, Fig. 16.9. “The user controls where they look on this vast data surface by panning and zooming. Portals are

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	objects on the Pad++ data surface that can see anywhere on the surface, as well as filter data to represent it differently than it normally appears. Panning and zooming allow navigation through a large information space via direct manipulation.” Pad++, at p. 2. “Using an interactive zoomable surface, however, allows very different methods of visually representing large data structures. The fact that there is always more room to put information “between the cracks” gives many more options. Pad++ is particularly well suited to visualizing hierarchical data because information that is deeper in the hierarchy can be made smaller. Accessing this information is accomplished by zooming.” Pad++, at p. 9. “Pad++ also can follow links across the internet. Figure 5 shows a snapshot where several hypertext links have been followed. Two views show the same tree focused on different nodes. The Pad++ user interface for accessing hypertext is similar to traditional systems, but zooming mechanisms are employed.” Pad++, at p. 10.
<u>Claim 9,</u> <u>Preamble</u>	
9. A method comprising:	Apte, Leak, Reformulating HTML, and AOL disclose “A method of navigating the Internet.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 1, Preamble.</i>
<u>Claim 9,</u> <u>Element A</u>	
displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, displaying a first content via the internet	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified	<i>See, e.g.</i>, claim 1, Preamble and Element A; claim 9, Preamble. “The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area. The browser area 31 retains all of the controls originally provided by the browser, including the file features 33, the edit feature 34, the bookmarks feature 35, and so on. Thus, the browser area continues to function essentially as the original browser (before the advertising software was downloaded and executed). In this embodiment, the area for viewing pages 31 has been decreased to accommodate the advertiser area 32. The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button.” Apte, 7:9-34. “The advertising software operates as an overlay to a conventional, known browser, such as the Netscape browser, dividing the user's client computer display into an advertising area and a browser area.” Apte, 4:7-10. “The browser area retains the original functionality of the underlying browser and operates independently of the advertising area, except that certain buttons (e.g., control buttons and

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation interface,	electronic transaction buttons) in the advertising area cause pages to load and display in the browser area when selected. The independent operation of the browser area means that several advertisements may be displayed to a user in the advertising area while the user browses a single page in the browser area. This is superior to known systems 30 wherein only one fixed advertisement may be shown on each browsed page.” Apte, 4:20-31. Marketplace Keyword: Marketplace The marketplace is your AOL center for shopping galore! Whether you are looking for America Online goodies, such as T-shirts and coffee mugs, wanting to buy or sell a car, or looking for computer training aids, AOL's Marketplace channel offers you these things and more (see fig. 6.15).

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  The screenshot shows the AOL Marketplace web page. At the top, it says 'Marketplace' and 'MARKETPLACE'. Below this is a 'Spotlight' section with three promotional banners: 'Win a trip to Atlanta or \$3000 Cash with Travelers Advantage!', 'Make us like STEAK! Omaha Steaks are great for the grill. Free gift with purchase.', and 'Tower Records: It's a Global Thing. Our Special Offers will allow you to find...'. To the right is a 'Online Shopping' sidebar with a search bar and a list of categories: Apparel & Accessories, Automobile Services, Beauty, Health & Personal Care, Books, Education, & Subscriptions, Classifieds Online, Computing & Office Needs, Download AOL, Entertainment & Music, Flowers & Greetings, Food & Beverage, Gifts, Home & Garden, Kids, and Outdoor & Sports. At the bottom of the sidebar are buttons for 'Keyword: Marketplace', 'Discover Products', 'Rules', 'About AOL', and 'Shopping Cart'. AOL, pp. 90-91. Today America Online is a publicly owned company that offers an online community for over five million members (with millions more joining each year). The service offers online shopping, information services such as daily newspapers and magazines, and even virtual reference books such as encyclopedias. In addition, America Online lets you reach out beyond the borders of its service, by providing a direct gateway to the Internet, which serves tens of millions of computer users across the world. AOL, p. 2.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Moreover, displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, and displaying a first content via the internet and through the simplified navigation interface were well-known at the time of the alleged invention.
<u>Claim 9,</u> <u>Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified navigation interface on any one of a television, web appliance, console device,	Apte, Leak, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-B; claim 9, Preamble and Element A.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
handheld device, wireless device or cellular phone,	
<u>Claim 9,</u> <u>Element C</u>	
the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells,	Apte, Leak, Reformulating HTML, and AOL disclose “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the first content displayed in one or more of the plurality of cells.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.
the first content displayed in one or more of the	<i>See, e.g.</i> , claim 1, Preamble and Elements A-C; claim 9, Preamble and Elements A-B.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
plurality of cells,	
<u>Claim 9, Element D</u>	
the two-dimensional layer in a form of a navigation matrix,	Apte, Leak, Reformulating HTML, and AOL disclose “the two-dimensional layer in a form of a navigation matrix.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-D ; claim 9, Preamble and Elements A-C.
<u>Claim 9, Element E</u>	
each cell in the navigation matrix associated with a specific unique input, each cell is a	Apte, Leak, Reformulating HTML, and AOL disclose “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
division of a screen and exclusive to a separate single navigation option,	determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-E; claim 9, Preamble and Elements A-D.
<u>Claim 9, Element F</u>	
the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs,	Apte, Leak, Reformulating HTML, and AOL disclose “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-F; claim 9, Preamble and Elements A-E.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
<u>Claim 9, Element G</u>	
navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer;	Apte, Leak, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-G; claim 9, Preamble and Elements A-F.
<u>Claim 9, Element H</u>	
displaying a hyperlink on the sister site to navigate to the web page, or displaying a	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
hyperlink on the web page to navigate to the sister site;	HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-H; claim 9, Preamble and Elements A-G. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element H; <i>see also</i> Internet 96, White House, Teplitz, Sun, Infouse, Yahoo, NASA.
<u>Claim 9, Element I</u>	
receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation	Apte, Leak, Reformulating HTML, and AOL disclose “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this

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matrix;	limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1, Preamble and Elements A-I; claim 9, Preamble and Elements A-H.
<u>Claim 9, Element J</u>	
forwarding the first input across the internet to a server providing the simplified navigation interface;	Apte, Leak, Reformulating HTML, and AOL disclose “forwarding the first input across the internet to a server providing the simplified navigation interface.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1, Preamble and Elements A-J; claim 9, Preamble and Elements A-I.
<u>Claim 9, Element K</u>	
receiving a next deeper	Apte, Leak, Reformulating HTML, and AOL disclose “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input.” <i>See, e.g.</i> , Apte, c. 1

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation layer of the simplified navigation interface in response to receiving the first input; and	- 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-J.
<u>Claim 9,</u> <u>Element L</u>	
manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.	Apte, Leak, Reformulating HTML, and AOL disclose “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a

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	person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-J. Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element L, DOMINO, Pad++.
<u>Claim 10</u>	
10. The method of claim 9, further comprising: customizing the display of the simplified navigation interface based on a navigation path of the user.	Apte, Leak, Reformulating HTML, and AOL disclose “customizing the display of the simplified navigation interface based on a navigation path of the user.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “Because the advertisements are streamed from a server rather than downloaded as a set and

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	played to the user in a loop, the present invention can make choices about which advertisements to display to the user that are responsive to the user's current viewing habits. Thus, if a user is selecting and viewing pages in the browser area 31 concerning outdoor activities, the present invention can select advertisements for camping gear, which are streamed from the server to the client for display to the user. This advantageous capability to dynamically target advertisements is not provided by known advertising services that download predetermined advertisements in sets. This dynamic targeting capability is in part due to the capability of the present invention to operate with a browser such that the progression of advertisements in no way interferes with the independent operation of the browser.” Apte, 8:34-51. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online. AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, customizing the display of the simplified navigation interface based on a navigation path of the user was well-known at the time of the alleged invention.
Claim 11	11. The method of claim 9, wherein the first Apte, Leak, Reformulating HTML, and AOL disclose “wherein the first input selects a primary navigation option.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and

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input selects a primary navigation option.	AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  The screenshot shows the AOL 3.0a GUI. At the top left is the 'AMERICA Online' logo. Below it are buttons for 'CHANNELS' and 'WHAT'S HOT'. To the right is a 'NetOn' icon with text 'NetOn talks to people like you about how we live and love online.' Further right are several rectangular buttons: 'Cars, trucks, suvs and motorcycles - Come to the Wheels Exchange!', 'The Dueling 500 auto races. Keyword: SpeedNet', 'Make the most of your time online. Get your Top Tips today!', and 'TOP NEWS STORY: Marine Choppers Collide; 16 Dead or Missing:'. At the bottom are icons for 'YOU HAVE MAIL', 'PEOPLE CONNECTION', and 'INTERNET'. AOL, p. 82.

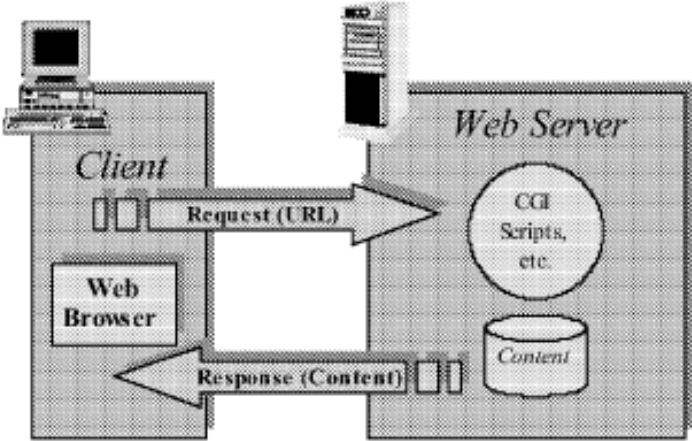
Appendix 3 to the Declaration of Robert J. Sherwood
 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, a first input selecting a primary navigation option was well-known at the time of the alleged invention. <i>See, e.g.,</i> WAP.

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 '196 Invalidity Chart – Apte, Leak, Reformulating HTML, AOL, and Knowledge

<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	6.1 The World-Wide Web Model The Internet World-Wide Web (WWW) architecture provides a very flexible and powerful programming model (Figure 1). Applications and content are presented in standard data formats, and are <i>browsed</i> by applications known as <i>web browsers</i>. The web browser is a networked application, ie, it sends requests for named data objects to a network server and the network server responds with the data encoded using the standard formats.  Figure 1. World-Wide Web Programming Model WAP, p. 11.
<u>Claim 12</u>	
12. The method of claim 9, further	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the first content simultaneous with the first advertisement.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
comprising: displaying the first content simultaneous with the first advertisement.	HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i>, claim 9. “A user may select advertising topics, whereupon advertisements in the selected topics are transmitted to the user. Advertisements may also be selected by deducing user areas of interest based upon the content of pages on the web selected by the user for viewing.” Apte, 4:56-5:2. “The advertising software operates as an overlay to a conventional, known browser, such as the Netscape browser, dividing the user's client computer display into an advertising area and a browser area.” Apte, 4:7-10. “The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area.” Apte, 7:10-17.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, displaying the first content simultaneous with the first advertisement was well-known at the time of the alleged invention.
<u>Claim 13</u>	
13. The method of claim 9, wherein the first input is received	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the first input is received from any one of a remote control, a pointer device, a keypad, and a keyboard.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation,

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
from any one of a remote control, a pointer device, a keypad, and a keyboard.	then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9 and claim 4.
<u>Claim 14</u>	
14. The method of claim 9, further comprising: displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
a cell or matrix.	“The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. “The media clip button 44 generates a multimedia 25 display shown in the browser area, when selected. In an embodiment shown in FIG 7, an advertisement 91 for movie information is shown in the advertising area 92. While it is displayed, the multimedia clip button 93 is selected by a user. As shown in FIG 8, a video clip 101 of a scene from the movie is shown to the user in the browser area 102, accompanied by audio of the actors’ voices.” Apte, 9:25-33.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 36.2 Here's a WWW site where you can definitely say it with flowers.  AOL, p. 670. Moreover, displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix was well-known at the time of the alleged invention.
<u>Claim 15</u>	

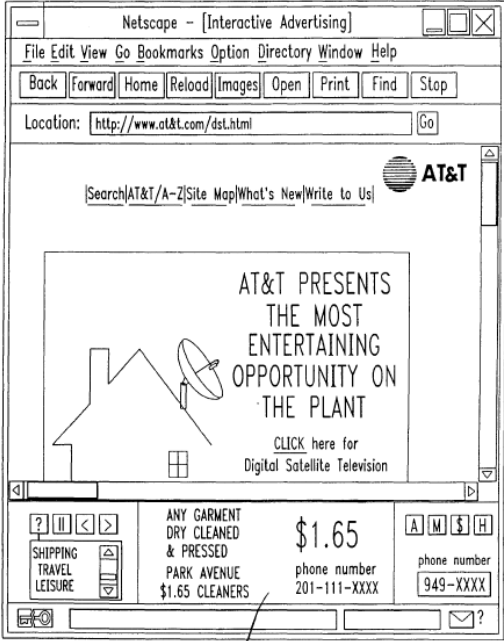
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
15. The method of claim 14, further comprising: displaying the simplified navigation interface as an overlay over the second advertisement.	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the simplified navigation interface as an overlay over the second advertisement.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9 and claim 14. “The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area. The browser area 31 retains all of the controls originally provided by the browser, including the file features 33, the edit feature 34, the bookmarks feature 35, and so on. Thus, the browser area continues to function essentially as the original browser (before the advertising software was downloaded and executed). In this embodiment, the area for viewing pages 31 has been decreased to accommodate the advertiser

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	area 32. The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button.” Apte, 7:9-34. “The advertising software operates as an overlay to a conventional, known browser, such as the Netscape browser, dividing the user's client computer display into an advertising area and a browser area.” Apte, 4:7-10. “The browser area retains the original functionality of the underlying browser and operates independently of the advertising area, except that certain buttons (e.g., control buttons and electronic transaction buttons) in the advertising area cause pages to load and display in the browser area when selected. The independent operation of the browser area means that several advertisements may be displayed to a user in the advertising area while the user browses a single page in the browser area. This is superior to known systems 30 wherein only one fixed advertisement may be shown on each browsed page.” Apte, 4:20-31.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 10</i>  121 Apte, Fig. 10.

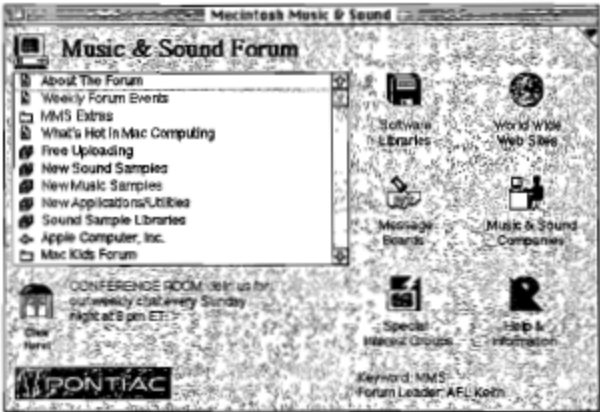
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.19 2Market is also available in CD-ROM form, so you can view colorful, interactive demonstrations on new products.  AOL, p. 517. Moreover, displaying the simplified navigation interface as an overlay over the second advertisement was well-known at the time of the alleged invention.
<u>Claim 16</u>	
16. The method of claim 9, wherein the first content includes one or more of	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the first content includes one or more of audio content and video content from the web page.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
audio content and video content from the web page.	determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 9.</i> “The advertisements shown in the display area 37 may be links, may contain links, and/or may function as image maps with selectable areas. Image maps are known in the art. The advertisements comprise at least one of textual, graphic, animation, video, audio and virtual object media.” Apte, 8:28-33.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Exploring the Music & Sound Forums Keyword: MMS (Macintosh), PC Music (Windows) <i>From Keith Jablonski (AFL Keith)</i> The Macintosh Music & Sound Forum on America Online (see fig. 19.24) is the place to go to learn about music, sound, digital audio, MIDI, MOD, samplers, synthesizers, and anything else that causes noise to come from your Macintosh. FIG. 19.24 The Macintosh Music & Sound Forum is for professional musicians and amateurs alike.  AOL, p. 335. Moreover, content including one or more of audio content and video content from the web page was well-known at the time of the alleged invention.
Claim 17	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
17. The method of claim 9, further comprising: receiving navigation input selections for the simplified navigation interface from a voice recognition system.	Apte, Leak, Reformulating HTML, and AOL disclose “receiving navigation input selections for the simplified navigation interface from a voice recognition system.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 9 and claim 5.
<u>Claim 18</u>	
18. The method of claim 9, further comprising: maintaining a database of sister site web pages by a content partner.	Apte, Leak, Reformulating HTML, and AOL disclose “maintaining a database of sister site web pages by a content partner.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i>, claim 9. “A tour can also be generated by the server system 5. For example, the server system 5 may provide a list of URIs to the client system, which the client system 1 then displays based on sequence information within the list. Alternatively, the server system 5 may download each page to the client system based on its own list. If the tour is generated on the server system 5, the tour may also be prepared manually, i.e., by a human being (such as WebTVNetwork staff). Specialized, pre-packaged tours can be prepared to accommodate the interests of particular WebTV customers. For example, tours relating to a specific subject may be prepared by compiling a list of appropriate URIs.” Leak, 10:24-31.

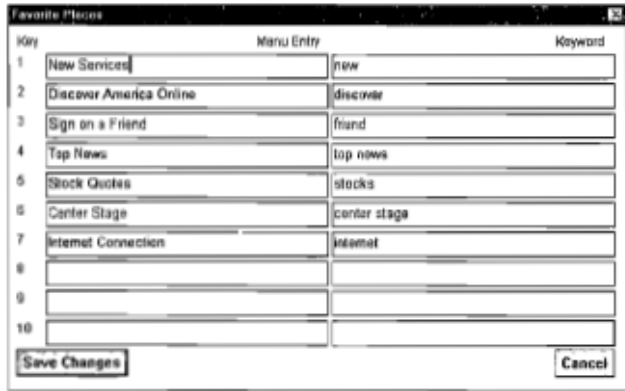
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Cowles/SIMBA Media Information Network Keyword: CowlesSIMBA The word <i>media</i> connotes a variety of industries, from advertising agencies to broadcasting and publishing businesses. The Cowles/SIMBA Media Information Network is a major resource for information about this challenging and ever-changing field (see fig. 24.19). FIG. 24.19 If you're a media watcher (and a lot of us are), Cowles/SIMBA is your source for the latest information. Whether you want to know about the latest deal to acquire a big entertainment conglomerate, or about how your favorite magazine is faring, consult Cowles/SIMBA for current information in an easy-to-read form. AOL, p. 441. Moreover, maintaining a database of sister site web pages by a content partner was well-known at

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	the time of the alleged invention.
Claim 19	
19. The method of claim 9, further comprising: accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.	Apte, Leak, Reformulating HTML, and AOL disclose “accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.” See ,e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 9. “In one embodiment, the present invention carries out this content-sensitive advertising by conducting a keyword search of a page requested to be displayed on the client computer by the user. Keywords are obtained by noting words that appear between TITLE headers in HTML documents. For example, a page that contains the code: <TITLE>Bill's Favorite Surfing Spots on Molokai<TITLE> the keywords "surfing" and "Molokai" would be extracted as keywords. After extracting the keywords, the keywords are compared to a database index, which cross-references keywords with topic names. Thus, in the present example, the keyword "surfing" matches topics

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References																																	
	"outdoor adventure" and "water sports." "Molokai" matches the topic "Hawaii." Each topic in the database is correlated with a series of URLs for advertisements that relate to the topic. Thus, the topic "Hawaii" corresponds advertisements for the "Airline Deals to Hawaii by Travel Now" and "Luau Hawaiian Hotels," which are now streamed to the user and displayed in the advertising area 37. In this way, the user's viewing habits are used to effectively target advertisements to the user that are pertinent to the user's interests.” Apte, 11:42-12:9. Using the Edit Go To Menu Option When you install your America Online software, you have a list of 10 regular spots to which you can travel by pressing two keys (Ctrl plus a number from 0 to 9). Editing the Go To Menu is a simple task. Just proceed with the following steps if you want to change the default destinations shown in figure C.30, which are set by the software. FIG. C.30 You can list your favorite places on this window for fast access. <table><tr><th>Key</th><th>Menu Entry</th><th>Keyword</th></tr><tr><td>1</td><td>New Services</td><td>new</td></tr><tr><td>2</td><td>Discover America Online</td><td>discover</td></tr><tr><td>3</td><td>Sign on a Friend</td><td>friend</td></tr><tr><td>4</td><td>Top News</td><td>top news</td></tr><tr><td>5</td><td>Stock Quotes</td><td>stocks</td></tr><tr><td>6</td><td>Center Stage</td><td>center stage</td></tr><tr><td>7</td><td>Internet Connection</td><td>internet</td></tr><tr><td>8</td><td></td><td></td></tr><tr><td>9</td><td></td><td></td></tr><tr><td>10</td><td></td><td></td></tr></table> Save Changes Cancel	Key	Menu Entry	Keyword	1	New Services	new	2	Discover America Online	discover	3	Sign on a Friend	friend	4	Top News	top news	5	Stock Quotes	stocks	6	Center Stage	center stage	7	Internet Connection	internet	8			9			10		
Key	Menu Entry	Keyword																																
1	New Services	new																																
2	Discover America Online	discover																																
3	Sign on a Friend	friend																																
4	Top News	top news																																
5	Stock Quotes	stocks																																
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 863. Moreover, accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value was well-known at the time of the alleged invention.
<u>Claim 20</u>	
20. The method of claim 9, wherein the simplified navigation interface includes a search form.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “When selected by a user, the help button 39 loads and displays an advertising service help page in the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user.” Apte, c. 7 ll. 35-43. “Step 901 may be preceded or replaced by a step of receiving search results from a conventional search engine. Such search results normally are in the form of a "hit list", which generally includes brief descriptions of Web sites that meet the search criteria as well as the URIs of the found Web pages (although the URIs may not be displayed to the user). Hence, the URIs identified in step 902 may be identified from a hit list resulting from a Web search rather than from a single Web page.” Leak, c. 10 ll. 3-8. “Figure 2 illustrates a WebTV client system 1 according to one embodiment. The client system 1 includes an electronics unit 10 (hereinafter referred to as "the WebTV box 10" or "the box 10"), an ordinary television set 12, and a hand-held remote control 11. In an alternative embodiment (not shown), the WebTV box 10 is built into the television set 12 as an integral unit. The box 10 includes hardware and software for providing the user with a graphical user interface, by which the user can access the WebTV Network services, i.e., browse the Web, send e-mail, etc.” Leak, 4:25-31.

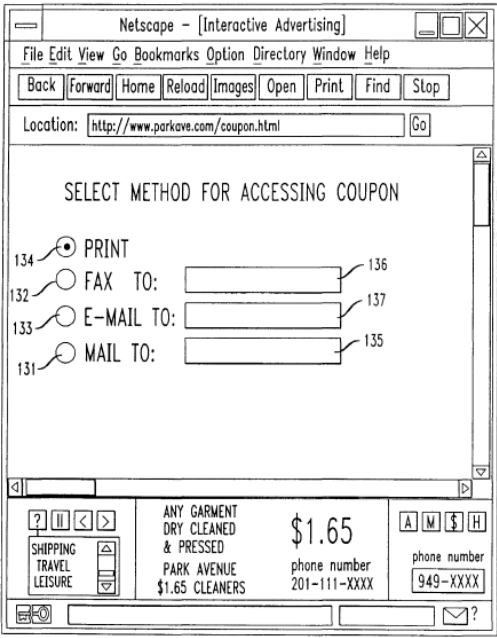
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Using the Find Option The Find feature on the Go To menu lets you search for members, software, and services, all from a convenient interface. Just enter the member name or the topic you want to learn more about, and AOL's handy search engine will get to work to look up the information you requested. AOL, p. 862. Moreover, a simplified navigation interface which includes a search form was well-known at the time of the alleged invention.
<u>Claim 21</u>	
21. The method of claim 9, wherein the simplified navigation interface includes an email form.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

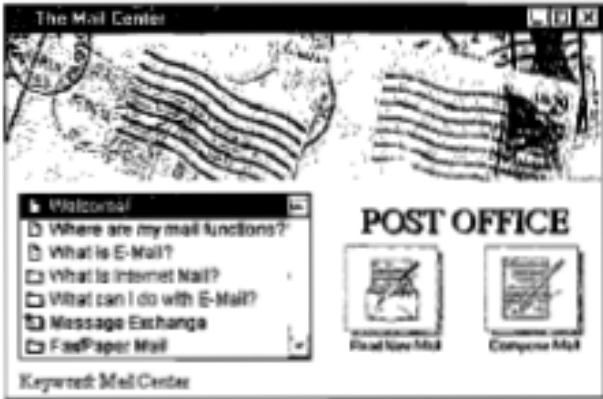
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>See, e.g.</i>, claim 9. “Figure 2 illustrates a WebTV client system 1 according to one embodiment. The client system 1 includes an electronics unit 10 (hereinafter referred to as "the WebTV box 10" or "the box 10"), an ordinary television set 12, and a hand-held remote control 11. In an alternative embodiment (not shown), the WebTV box 10 is built into the television set 12 as an integral unit. The box 10 includes hardware and software for providing the user with a graphical user interface, by which the user can access the WebTV Network services, i.e., browse the Web, send e-mail, etc.” Leak, 4:25-31. “If the user selects the e-mail option 133, the user is prompted for his email address 137, and a copy of the coupon is transmitted to the user via e-mail.” Apte, 10:54-57.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 11</i>  Apte, Fig. 11. AOL's Mail Center AOL's Mail Center (see fig. C.32) is an information center that helps guide you to writing e-mail on AOL and via the Internet. You can also click the handy icons to read and write e-mail.

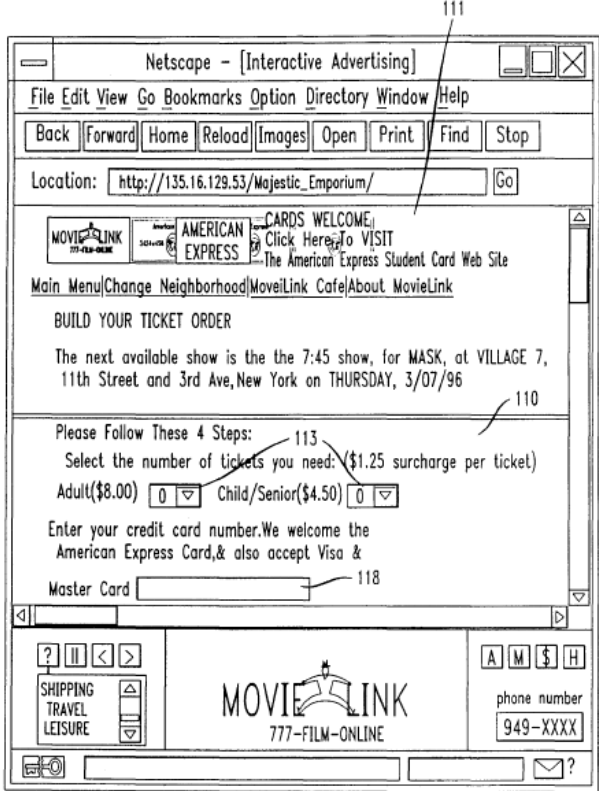
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	AOL, p. 864. FIG. C.32 AOL's convenient Mail Center helps you manage your e-mail tasks.  AOL, p. 865. Moreover, a simplified navigation interface which includes an email form was well-known at the time of the alleged invention.
Claim 22	
22. The method of claim 9, further comprising: displaying a	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the first input.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
purchasing interface in response to receiving the first input.	determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 9.</i>

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	<i>FIG. 9</i>  Apte, Fig. 9.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	“In an embodiment shown in FIG 9, the present invention presents the user with a form 110 in the 55 browser area 111 by which the user provides secure purchase information such as credit card number 112 and number of items to be purchased 113 to the <i>advertiser</i>. The contents of the form are forwarded to the advertiser using in a secure fashion. Numerous techniques for transmitting such data via secure means are known in the art. These techniques protect the confidentiality and integrity of the transmitted data, and generally provide means for authenticating the sender of the data. The advertiser then debits the user's credit card and ships the selected product. In another embodiment, the user has pre-registered secure purchase information with the advertising service of the present invention. This information includes the user's name, shipping address, credit card number, credit card expiration date, and authentication password. When the user selects the secure purchase button 45 (FIG 5), he is prompted to enter his password through a form shown in the browser area 31. If the password is correct, a secure purchase order indicating the product and the user secure purchase information is forwarded to the advertiser, which debits the user's credit card and ships the product to the user.” Apte, 9:54-10:20.

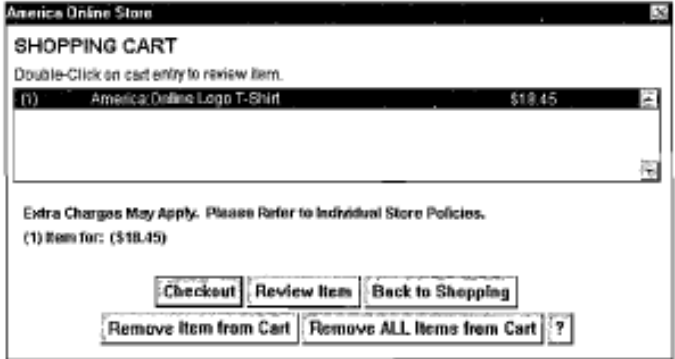
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.3 AOL's graphical interface lets you see the product before you buy. FIG. 28.3 AOL's graphical interface lets you see the product before you buy. The descriptive window gives you the very same sort of information you'd find in a mail-order catalog. The description is enticing enough to give you a pretty fair picture of what the shirt really looks like. I think I'm going to order one, so let's select the Click Here To Order button to bring up the screen shown in figure 28.4. Choose the shirt size you want by double-clicking the entry in the directory window. AOL, p. 507.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.4 Ready to order? Select the size you want here.  In the next screen, you'll choose the number of shirts you want. After you select the merchandise you want to order, you will probably want to double-check your shopping cart to make sure that you've selected the correct item. AOL's software does this automatically for you by displaying a confirmation that the product you want has been added to your shopping cart (see fig. 28.5). AOL, p. 508.

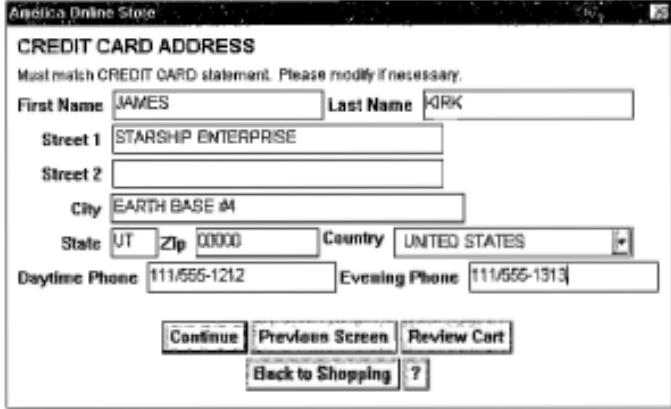
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.5 Your selection is confirmed as you add items to your shopping cart.  Click the Checkout icon once to bring up a window that allows you to enter billing and shipping information, and then place your order (see fig. 28.6). AOL, p. 508.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 28.6 Enter your billing information.  The screenshot shows a web browser window titled 'America Online Store'. The main heading is 'CREDIT CARD INFORMATION'. Below it, the text reads: 'Please enter the following credit card information. America Online Store accepts: MasterCard, VISA, American Express, Discover'. There are four input fields: 'Credit Card Number' (with a placeholder '9999-9999-9999-9999'), 'Expires (mm-yy)' (with a placeholder '07/08'), 'Name As It Appears On Credit Card' (with a placeholder 'Roger Rabbit'), and a 'Continue' button. Below these fields are three buttons: 'Continue', 'Previous Screen', and 'Review Cart'. At the bottom, there is a 'Back to Shopping' button and a question mark icon. AOL, p. 508.

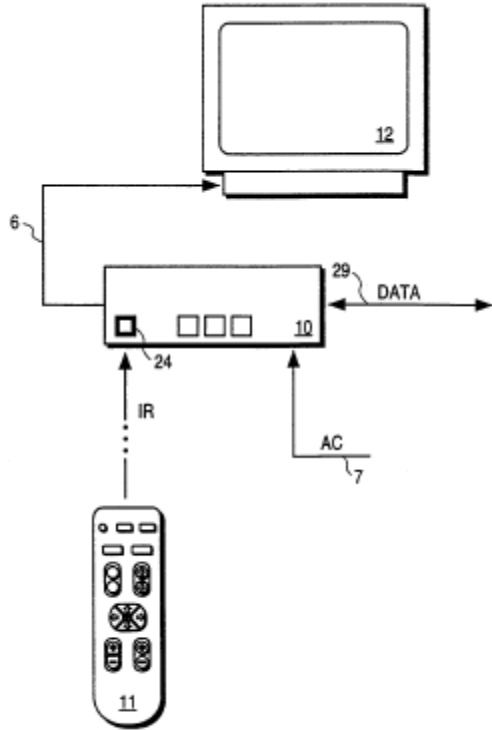
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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	After you've entered your billing information, enter your correct shipping address. By default, the address recorded for your online account is listed as the billing address (see fig. 28.7). You can have the same address automatically entered for shipping or enter a different shipping location. Click the Continue button to add your shipping information. FIG. 28.7 Complete the order. The second Street line is designed to accommodate a longer street address.  AOL, p. 509. Moreover, displaying a purchasing interface in response to receiving the first input was well-known at the time of the alleged invention.
Claim 23	
23. The method of claim 9, wherein the	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
simplified navigation interface is not presented through a standard web browser.	Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “In one embodiment, the present invention is included in a system known as WebTV(hereinafter "WebTV"), which uses a standard television set as a display device for browsing the Web and which connects to the Internet using a standard telephone, ISDN, Ethernet, or other similar communication path.” Leak, 3:33-36.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	 FIG. 2 Leak, Fig. 2. “The WebTV Network services are used in conjunction with software running in a WebTV client

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	system to browse the Web, send electronic mail, and to make use of the Internet in various other ways. The WebTV servers generally function as proxies by retrieving Web pages and other data requested by a WebTV client system from remote Web servers and then providing the information to the WebTV client system.” Leak, 4:1-6 Some Nuts and Bolts Information About America Online Our daily press and broadcast news outlets commonly refer to communicating online as being a part of the Information Superhighway, and this is likely an apt expression. But it’s an expression designed to represent the entire global information network, not just a single service, and I like to think of that network as more akin to a planet than a highway. So let’s consider America Online as one large city (or country) that exists on that planet. Let’s take that description of a city a bit further. Besides all those people, you can find neighborhoods, highways, stores, libraries, and schools. You interact with that community from your own computer and modem, using America Online’s unique graphical interface, which transports you from one place to another when you click an icon or type a simple keyboard command. AOL, p. 3.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Using AOL's Macintosh Web Browsers Keyword: WWW Depending on the version of AOL's Mac software you're using, you may see a different type of WWW browser. For version 2.6 and 2.7, it comes as a separate application that you can launch in two ways: ■ Enter a URL in your AOL software's keyword field (or just WWW). AOL is busy integrating WWW content into the service behind the scenes. So simply accessing an online forum might automatically take you to the corresponding WWW page instead. If the WWW browser isn't open, it will open, and then the site will be accessed. ■ Choose Switch to Browser from the Windows menu of your AOL software. N O T E The Macintosh Web browser provided for versions 2.6 and 2.7 of your AOL software consists of a separate application that's linked to your AOL software. Before you use this application, it must first be installed. If you did not receive a disk containing the Web browser software, you'll want to use the keyword Upgrade to obtain the latest version of the Web browser. □ AOL, p. 644.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Using AOL with Another WWW Browser Although AOL's regular WWW browser can meet most of your needs, you may have already become accustomed to using another browser on another service. You may be surprised to learn, then, that AOL contracts with other publishers to deliver browser technology to its members. For example, as I explained in my introduction to version 3.0 of the Mac browser (see "Mac 3.0 Web Browser Features," earlier in this chapter), it's based on Microsoft's Internet Explorer. As this book went to press, AOL was preparing to deliver a Windows version of the same browser with version 3.0 of its Windows software. Again, while the underlying technology will change, the interface that you see as a member will not change significantly. If you'd rather use another browser anyway, that's no problem. All you have to do is log on to AOL, and then launch the other Internet program. You'll find more information about it in Chapter 33, "Internet Chats." AOL, p. 654. Moreover, simplified navigation interfaces not presented through a standard web browser were well-known at the time of the alleged invention. <i>See, e.g.</i>, WAP. "WAP content and applications are specified in a set of well-known content formats based on the familiar WWW content formats. Content is transported using a set of standard communication

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	protocols based on the WWW communication protocols. A <i>micro browser</i> in the wireless terminal co-ordinates the user interface and is analogous to a standard web browser.” WAP, p. 12.
<u>Claim 24</u>	
24. The method of claim 9, further comprising: displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option.	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9. “The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area. The browser area 31 retains all

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	of the controls originally provided by the browser, including the file features 33, the edit feature 34, the bookmarks feature 35, and so on. Thus, the browser area continues to function essentially as the original browser (before the advertising software was downloaded and executed). In this embodiment, the area for viewing pages 31 has been decreased to accommodate the advertiser area 32. The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button.” Apte, 7:9-34. “The advertiser software acts with the browser to present to the user a display, an embodiment of which is shown in FIG 5. The user's screen is divided into two areas: the browser area 31 and the advertisement area 32. The browser area and the advertising area operate essentially independently so that several advertisements may advantageously be displayed to the user while the user is browsing a single page displayed in the browser area.” Apte, c. 7 ll. 10-17.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.1 See the highlights and check your new mail when you first log on to America Online.  AOL, p. 82.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.2 AOL's virtual city is divided into channels, reflecting different areas of the online experience.  AOL, p. 83.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	FIG. 6.15 Time to go shopping and save some cash right on America Online.  AOL, p. 91. Moreover, displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option was well-known at the time of the alleged invention.
<u>Claim 25,</u> <u>Preamble</u>	

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
25. A machine readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations comprising:	Apte, Leak, Reformulating HTML, and AOL disclose “A machine readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and claim 9, Preamble.
<u>Claim 25, Element A</u>	
displaying a first advertisement, the displaying of the first advertisement being via	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a first advertisement, the displaying of the first advertisement being via an internet and through a simplified navigation interface, displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
an internet and through a simplified navigation interface, displaying a first content via the internet and through the simplified navigation interface, the first content reformatted from a web page in a hypertext markup language (HTML) format into an extensible	Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 1, Preamble and Element A; claim 9, Preamble and Element A. “The present invention includes steps which, in one embodiment, are encoded in machine-executable software instructions, such that the present invention is carried out in a processing system by a processor executing the instructions. In other embodiments, hardwired circuitry may be used in place of, or in combination with, software instructions to implement the present invention.” Leak, c. 3 ll. 28-32.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
markup language (XML) format to generate a sister site to be displayed and navigable through the simplified navigation interface,	
<u>Claim 25,</u> <u>Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified	Apte, Leak, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through the simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone,	the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-B; claim 9, Preamble and Elements A-B.
<u>Claim 25, Element C</u>	
the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of	Apte, Leak, Reformulating HTML, and AOL disclose “the simplified navigation interface presenting advertisements and content through a plurality of layers and a plurality of cells, the first content displayed in one or more of the plurality of cells.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
cells, the first content displayed in one or more of the plurality of cells,	in the art at the relevant time. <i>See, e.g.</i> , claim 1, Preamble and Elements A-C; claim 9, Preamble and Elements A-C.
<u>Claim 25,</u> <u>Element D</u>	
the two- dimensional layer in a form of a navigation matrix,	Apte, Leak, Reformulating HTML, and AOL disclose “the two-dimensional layer in a form of a navigation matrix.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1, Preamble and Elements A-D; claim 9, Preamble and Elements A-D.
<u>Claim 25,</u>	

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
<u>Element E</u>	
each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option,	Apte, Leak, Reformulating HTML, and AOL disclose “each cell in the navigation matrix associated with a specific unique input, each cell is a division of a screen and exclusive to a separate single navigation option.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-E; claim 9, Preamble and Elements A-E.
<u>Claim 25, Element F</u>	
the first advertisement formatted for display in one of the plurality of cells and	Apte, Leak, Reformulating HTML, and AOL disclose “the first advertisement formatted for display in one of the plurality of cells and formatted to be selected for navigation by one of the unique inputs.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak,

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
formatted to be selected for navigation by one of the unique inputs,	Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-F; claim 9, Preamble and Elements A-F.
<u>Claim 25, Element G</u>	
navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer;	Apte, Leak, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-G; claim 9, Preamble and Elements A-G.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
<u>Claim 25,</u> <u>Element H</u>	
displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site;	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 1, Preamble and Elements A-H; claim 9, Preamble and Elements A-H. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. See, e.g., claim 1, Element H; see also AOL, Internet 96, White House, Teplitz, Sun, Infouse, Yahoo, NASA.
<u>Claim 25,</u> <u>Element I</u>	

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix;	Apte, Leak, Reformulating HTML, and AOL disclose “receiving a first input, the first input received as the specific unique input that is uniquely coupled with an associated cell in the navigation matrix.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-I; claim 9, Preamble and Elements A-I.
<u>Claim 25, Element J</u>	
forwarding the first input across the internet to a server providing the simplified navigation interface;	Apte, Leak, Reformulating HTML, and AOL disclose “forwarding the first input across the internet to a server providing the simplified navigation interface.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
	Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-J; claim 9, Preamble and Elements A-J.
<u>Claim 25,</u> <u>Element K</u>	receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input; and Apte, Leak, Reformulating HTML, and AOL disclose “receiving a next deeper navigation layer of the simplified navigation interface in response to receiving the first input.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-K.
<u>Claim 25,</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
<u>Element L</u>	
manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.	Apte, Leak, Reformulating HTML, and AOL disclose “manipulating a selected region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-L; claim 9, Preamble and Elements A-L. Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element L, DOMINO, Pad++.
<u>Claim 26</u>	
26. The machine readable medium of claim 25,	Apte, Leak, Reformulating HTML, and AOL disclose “customizing the display of the simplified navigation interface based on a navigation path of the user.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: customizing the display of the simplified navigation interface based on a navigation path of the user.	Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 10.
<u>Claim 27</u>	
27. The machine readable medium of claim 25, wherein the first input selects a primary	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the first input selects a primary navigation option.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
navigation option.	view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 11.
<u>Claim 28</u>	
28. The machine readable medium of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying the first content simultaneous with the first	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the first content simultaneous with the first advertisement.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 12.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
advertisement.	
<u>Claim 29</u>	
29. The machine readable medium of claim 25, wherein the first input is received from any one of a remote control, a pointer device, a keypad, and a keyboard.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the first input is received from any one of a remote control, a pointer device, a keypad, and a keyboard.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 4.
<u>Claim 30</u>	
30. The machine readable medium of claim 25, having further instructions stored therein, which when	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or

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executed cause the machine to perform further operations, comprising: displaying a second advertisement in the simplified navigation interface, the second advertisement not displayed in a cell or matrix.	implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 25 and claim 14.
<u>Claim 31</u>	
31. The machine readable medium of claim 30, having further instructions stored therein, which when	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the simplified navigation interface as an overlay over the second advertisement.” See, <i>e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
executed cause the machine to perform further operations, comprising: displaying the simplified navigation interface as an overlay over the second advertisement.	Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 25 and claim 15.
<u>Claim 32</u>	
32. The machine readable medium of claim 25, wherein the first content includes one or more of audio content and video content from the web page.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the first content includes one or more of audio content and video content from the web page.” See, <i>e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill

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	in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 16.
Claim 33	
33. The machine readable medium of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: receiving navigation input selections for the simplified navigation interface from a voice recognition	Apte, Leak, Reformulating HTML, and AOL disclose “receiving navigation input selections for the simplified navigation interface from a voice recognition system.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 5.

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
system.	
<u>Claim 34</u>	
34. The machine readable medium of claim 25, the machine readable medium further comprising: accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.	Apte, Leak, Reformulating HTML, and AOL disclose “accepting an alphanumeric value as the first input to indicate selection of a corresponding first cell, the first cell including a display of the alphanumeric value.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 19.
<u>Claim 35</u>	
35. The machine readable medium	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML

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of claim 25, wherein the simplified navigation interface includes a search form.	§§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 20.
<u>Claim 36</u>	
36. The machine readable medium of claim 25, wherein the simplified navigation interface includes an email form.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 21.

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<u>Claim 37</u>	
37. The machine readable medium of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying a purchasing interface in response to receiving the first input.	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the first input.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 25 and claim 22.
<u>Claim 38</u>	
38. The machine readable medium of claim 25,	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that

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wherein the simplified navigation interface is not presented through a standard web browser.	Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 23.
<u>Claim 39</u>	
39. The machine readable medium of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising:	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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displaying a third advertisement embedded within the on-line content, the third advertisement corresponding to a third navigation option.	See, e.g., claim 25 and claim 24.
<u>Claim 40</u>	
40. The method of claim 1, wherein at least some of the plurality of cells correspond to primary navigation options.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein at least some of the plurality of cells correspond to primary navigation options.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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	<i>See, e.g., claim 1 and claim 11.</i>
<u>Claim 41</u>	
41. The method of claim 1, further comprising using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.	Apte, Leak, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 1.</i> “The advertisement area 32 comprises a control area 36, a display area 37, and a transaction area 38. The control area is provided with a help button 39, a pause button 40, a step back button 41, and a step forward button 42. Each button acts as a link. In one embodiment, when the user places the mouse arrow 49 over a button, an explanatory bubble 50 appears nearby that comprises a short description of the functionality of the button. When selected by a user, the help button 39 loads and displays an advertising service help page in

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	the browser area 31. In one embodiment, the help page has a table of contents, a searchable index, and general information about using the present invention. The table of contents and index comprise links to other help pages that provide detailed information on specific topics of interest concerning the advertising service to the user. The pause button 40 halts the progression of the advertisements shown in the display area 37, which are streamed to the client computer in sequence from a server. The advertisement shown in the display area 37 at the time the user selected the pause button 40 persists in the display area 37 until the user again selects the pause button 40, at which time the next advertisement is shown in the display area 37 , and the progression is resumed. In this way, the pause button functions as a toggle.” Apte, 7:26-53. Selecting the Right Channel Finding the right place to visit on AOL is similar to selecting a channel on your TV set, except you click an icon rather than push a button. Once you've signed on to AOL and learned how to get the most out of its highly flexible software, you'll want to do more than just get your feet wet. AOL, p. 82. Moreover, using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen was well-known at the time of the alleged invention.
Claim 42	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
42. The method of claim 1, further comprising: maintaining a database of sister site webpages by a content partner.	Apte, Leak, Reformulating HTML, and AOL disclose “maintaining a database of sister site webpages by a content partner.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1 and claim 18.
<u>Claim 43</u>	
43. The method of claim 1, further comprising: displaying the on-line content concurrently with one or more advertisements.	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the on-line content concurrently with one or more advertisements.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak,

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	Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1 and claim 12.
<u>Claim 44</u>	
44. The method of claim 43, further comprising: displaying the simplified navigation interface as an overlay over the one or more advertisements.	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the simplified navigation interface as an overlay over the one or more advertisements.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 43 and claim 15.
<u>Claim 45</u>	
45. The method of claim 1,	Apte, Leak, Reformulating HTML, and AOL disclose “accepting an alphanumeric value as the user selection of the first navigation option, the first navigation option corresponding to a cell

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further comprising: accepting an alphanumeric value as the user selection of the first navigation option, the first navigation option corresponding to a cell including a display of the alphanumeric value.	including a display of the alphanumeric value.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 1 and claim 19.
<u>Claim 46</u>	
46. The method of claim 1, wherein the simplified navigation interface includes a search	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML,

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form.	and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1 and claim 20.
<u>Claim 47</u>	
47. The method of claim 1, wherein the simplified navigation interface includes an email form.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1 and claim 21.
<u>Claim 48</u>	
48. The method of claim 1,	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the first navigation option.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23;

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further comprising: displaying a purchasing interface in response to receiving the first navigation option.	Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g., claim 1 and claim 22.</i>
<u>Claim 49</u>	
49. The method of claim 1, wherein the simplified navigation interface is not presented through a standard web browser.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill

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	in the art at the relevant time. <i>See, e.g.</i>, claim 1 and claim 23.
<u>Claim 50</u>	
50. The method of claim 9, wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 9 and claim 6.
<u>Claim 51</u>	
51. The method of claim 50,	Apte, Leak, Reformulating HTML, and AOL disclose “tabbing to focus on different one of the regions.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876.

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further comprising tabbing to focus on different one of the regions.	Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 50 and claim 7.
<u>Claim 52</u>	
52. The method of claim 50, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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	See, e.g., claim 50 and claim 8.
<u>Claim 53</u>	
53. The method of claim 9, further comprising using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.	Apte, Leak, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 9 and claim 41.
<u>Claim 54</u>	
54. The machine readable medium of claim 25, wherein the	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte,

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screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.	Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 25 and claim 6.
<u>Claim 55</u>	
55. The machine readable medium of claim 54, having further instructions stored therein, which when executed cause the machine to perform further	Apte, Leak, Reformulating HTML, and AOL disclose “tabbing to focus on different one of the regions.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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operations, comprising: tabbing to focus on different one of the regions.	<i>See, e.g.</i> , claim 54 and claim 7.
<u>Claim 56</u>	
56. The machine readable medium of claim 54, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 54 and claim 8.
<u>Claim 57</u>	
57. The machine readable medium	Apte, Leak, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1

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of claim 25, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.	- 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 25 and claim 41.
<u>Claim 58, Preamble</u>	
58. A machine readable medium having instructions	Apte, Leak, Reformulating HTML, and AOL disclose “A machine readable medium having instructions stored therein, which when executed cause a machine to perform a set of operations.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to

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stored therein, which when executed cause a machine to perform a set of operations comprising:	explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble; claim 9, Preamble; claim 25, Preamble.
<u>Claim 58, Element A</u>	
displaying on- line content accessed via the Internet, the on- line content reformatted from a webpage in a hypertext markup language (HTML) format into an	Apte, Leak, Reformulating HTML, and AOL disclose “displaying on-line content accessed via the Internet, the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a

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extensible markup language (XML) format to generate a sister site,	person of ordinary skill in the art at the relevant time. See, e.g., claim 1, Preamble and Element A; claim 9, Preamble and Element A; claim 25, Preamble and Element A.
<u>Claim 58,</u> <u>Element B</u>	
the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device,	Apte, Leak, Reformulating HTML, and AOL disclose “the sister site including a portion or a whole of content of the web page reformatted to be displayed and navigable through a simplified navigation interface on any one of a television, web appliance, console device, handheld device, wireless device or cellular phone.” See, e.g., Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, e.g., claim 1, Preamble and Elements A-B; claim 9, Preamble and Elements A-B; claim 25, Preamble and Elements A-B.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
handheld device, wireless device or cellular phone,	
<u>Claim 58, Element C</u>	
the simplified navigation interface displayed in a form of a two- dimensional layer of cells from a plurality of layers and a plurality of cells,	Apte, Leak, Reformulating HTML, and AOL disclose “the simplified navigation interface displayed in a form of a two-dimensional layer of cells from a plurality of layers and a plurality of cells.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-C; claim 9, Preamble and Elements A-C; claim 25, Preamble and Elements A-C.
<u>Claim 58, Element D</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
the two-dimensional layer in a form of a navigation matrix,	Apte, Leak, Reformulating HTML, and AOL disclose “the two-dimensional layer in a form of a navigation matrix.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-D; claim 9, Preamble and Elements A-D; claim 25, Preamble and Elements A-D.
<u>Claim 58,</u> <u>Element E</u>	
each cell is a division of a screen and exclusive to a separate single navigation option associated	Apte, Leak, Reformulating HTML, and AOL disclose “each cell is a division of a screen and exclusive to a separate single navigation option associated with a specific unique input.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
with a specific unique input,	implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-E; claim 9, Preamble and Elements A-E; claim 25, Preamble and Elements A-E.
<u>Claim 58, Element F</u>	
the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs,	Apte, Leak, Reformulating HTML, and AOL disclose “the on-line content formatted to be displayed in one or more of the plurality of cells and formatted to be selected for navigation by one or more of the unique inputs.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time.

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
	<i>See, e.g.</i> , claim 1, Preamble and Elements A-F; claim 9, Preamble and Elements A-F; claim 25, Preamble and Elements A-F.
<u>Claim 58, Element G</u>	
navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer;	Apte, Leak, Reformulating HTML, and AOL disclose “navigation options to change between layers of the simplified navigation interface from general to more specific in each deeper layer.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-G; claim 9, Preamble and Elements A-G; claim 25, Preamble and Elements A-G.
<u>Claim 58, Element H</u>	
displaying a	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a hyperlink on the sister site to

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site;	navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1, Preamble and Elements A-H; claim 9, Preamble and Elements A-H; claim 25, Preamble and Elements A-H. Moreover, displaying a hyperlink on the sister site to navigate to the web page, or displaying a hyperlink on the web page to navigate to the sister site was well-known at the time of the alleged invention. <i>See, e.g.,</i> claim 1, Element H; <i>see also</i> AOL, Internet 96, White House, Teplitz, Sun, Infouse, Yahoo, NASA.
<u>Claim 58, Element I</u>	
receiving a user	Apte, Leak, Reformulating HTML, and AOL disclose “receiving a user selection of one of the

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
selection of one of the navigation options	navigation options.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-I; claim 9, Preamble and Elements A-I; claim 25, Preamble and Elements A-I.
<u>Claim 58, Element J</u>	
forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface;	Apte, Leak, Reformulating HTML, and AOL disclose “forwarding the selected navigation option across the Internet to a server providing the simplified navigation interface.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte,

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<u>Claim Language From U.S. Patent No. 7,441,196</u>	Location of Limitations Within References
	Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-J; claim 9, Preamble and Elements A-J; claim 25, Preamble and Elements A-J.
<u>Claim 58, Element K</u>	
receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option;	Apte, Leak, Reformulating HTML, and AOL disclose “receiving a next deeper navigation layer of the simplified navigation interface corresponding to the selected navigation option.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-K; claim 9, Preamble and Elements A-K; claim 25, Preamble and Elements A-K.
<u>Claim 58, Element L</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
and manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.	Apte, Leak, Reformulating HTML, and AOL disclose “manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 1, Preamble and Elements A-L; claim 9, Preamble and Elements A-L; claim 25, Preamble and Elements A-L. Moreover, manipulating a region of the screen for viewing and zooming and/or scrolling of the displayed on-line content was well-known at the time of the alleged invention. <i>See, e.g.</i>, claim 1, Element L, DOMINO, Pad++.
<u>Claim 59</u>	
59. The machine readable medium of claim 58,	Apte, Leak, Reformulating HTML, and AOL disclose “displaying one or more advertisements on the screen; receiving a user selection of a displayed advertisement; and displaying second content accessed via the Internet, wherein the second content is associated with the selected

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having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying one or more advertisements on the screen; receiving a user selection of a displayed advertisement; and displaying second content accessed via the Internet, wherein the	advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs..” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 2.

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second content is associated with the selected advertisement, and wherein the second content accessed via the Internet is formatted for navigation with the unique inputs.	
<u>Claim 60</u>	
60. The machine readable medium of claim 58, wherein the on-line content is selected based, at least in part, on a navigation path of a user.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the on-line content is selected based, at least in part, on a navigation path of a user.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak,

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	Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 58 and claim 3.
<u>Claim 61</u>	
61. The machine readable medium of claim 58, wherein the user selection of one of the navigation options is received from any one of a remote control, a pointer device, a keypad, and a keyboard.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the user selection of one of the navigation options is received from any one of a remote control, a pointer device, a keypad, and a keyboard.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 58 and claim 4.
<u>Claim 62</u>	
62. The machine readable medium of claim 58, having further	Apte, Leak, Reformulating HTML, and AOL disclose “receiving one or more navigation input selections through a voice recognition system.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak,

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instructions stored therein, which when executed cause the machine to perform further operations, comprising: receiving one or more navigation input selections through a voice recognition system.	Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 58 and claim 5.
<u>Claim 63</u>	
63. The machine readable medium of claim 58, wherein the screen includes individual regions adapted to be brought	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the screen includes individual regions adapted to be brought into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.” See, <i>e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of

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into focus and further adapted such that the on-line content can be manipulated within a selected one of the regions.	Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 58 and claim 6.
<u>Claim 64</u>	
64. The machine readable medium of claim 63, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: tabbing to focus on different one	Apte, Leak, Reformulating HTML, and AOL disclose “tabbing to focus on different one of the regions.” See, <i>e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. See, <i>e.g.</i> , claim 63 and claim 7.

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of the regions.	
<u>Claim 65</u>	
65. The machine readable medium of claim 63, wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the focused one of the regions is adapted to be zoomed and/or scrolled independently of other ones of the regions.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 63 and claim 8.
<u>Claim 66</u>	
66. The machine readable medium of claim 58, wherein at least some of the plurality of cells correspond to	Apte, Leak, Reformulating HTML, and AOL disclose “wherein at least some of the plurality of cells correspond to primary navigation options.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
primary navigation options.	Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 11.
Claim 67	
67. The machine readable medium of claim 58, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: using a pointer device to select one or more of the plurality of	Apte, Leak, Reformulating HTML, and AOL disclose “using a pointer device to select one or more of the plurality of cells and/or to manipulate the screen.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 41.

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cells and/or to manipulate the screen.	
<u>Claim 68</u>	
68. The machine readable medium of claim 58, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying the on-line content concurrently with one or more advertisements.	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the on-line content concurrently with one or more advertisements.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 12.
<u>Claim 69</u>	
69. The machine	Apte, Leak, Reformulating HTML, and AOL disclose “displaying the simplified navigation

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readable medium of claim 68, having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying the simplified navigation interface as an overlay over the one or more advertisements.	interface as an overlay over the one or more advertisements.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i> , claim 68 and claim 15.
<u>Claim 70</u>	
70. The machine readable medium of claim 58, the machine	Apte, Leak, Reformulating HTML, and AOL disclose “accepting an alphanumeric value to indicate selection of the first navigation option, the first navigation option corresponding to a cell including a display of the alphanumeric value.” <i>See, e.g.</i> , Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte,

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readable medium further comprising: accepting an alphanumeric value to indicate selection of the first navigation option, the first navigation option corresponding to a cell including a display of the alphanumeric value.	Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 58 and claim 19.
<u>Claim 71</u>	
71. The machine readable medium of claim 58, wherein the simplified navigation	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes a search form.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is

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interface includes a search form.	obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 58 and claim 20.
<u>Claim 72</u>	
72. The machine readable medium of claim 58, wherein the simplified navigation interface includes an email form.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface includes an email form.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 58 and claim 21.
<u>Claim 73</u>	
73. The machine readable medium of claim 58,	Apte, Leak, Reformulating HTML, and AOL disclose “displaying a purchasing interface in response to receiving the selection of the first navigation option.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made

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having further instructions stored therein, which when executed cause the machine to perform further operations, comprising: displaying a purchasing interface in response to receiving the selection of the first navigation option.	that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 58 and claim 22.
<u>Claim 74</u>	
74. The machine readable medium of claim 58, wherein the simplified	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the simplified navigation interface is not presented through a standard web browser.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a

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navigation interface is not presented through a standard web browser.	determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 58 and claim 23.
<u>Claim 75</u>	
75. The method of claim 1, wherein the on-line content includes one or more of audio content and video content from the web page.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the on-line content includes one or more of audio content and video content from the web page.” <i>See, e.g.,</i> Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.,</i> claim 1 and claim 16.
<u>Claim 76</u>	

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<u>Claim</u> <u>Language From</u> <u>U.S. Patent No.</u> <u>7,441,196</u>	Location of Limitations Within References
76. The machine readable medium of claim 58, wherein the on-line content includes one or more of audio content and video content from the web page.	Apte, Leak, Reformulating HTML, and AOL disclose “wherein the on-line content includes one or more of audio content and video content from the web page.” <i>See, e.g.</i>, Apte, c. 1 - 20; Leak, c. 1 - 23; Reformulating HTML §§ 1-5; AOL pp. 3-876. Moreover, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to explicitly disclose this limitation, then Apte, Leak, Reformulating HTML, and AOL implicitly disclose this limitation. Furthermore, if a determination is made that Apte, Leak, Reformulating HTML, and AOL fail to disclose this limitation, then this limitation is obvious in view of the explicit and/or implicit disclosure of Apte, Leak, Reformulating HTML, and AOL and the knowledge of a person of ordinary skill in the art at the relevant time. In addition, this limitation is obvious in view of Apte, Leak, Reformulating HTML, and AOL in combination with the knowledge of a person of ordinary skill in the art at the relevant time. <i>See, e.g.</i>, claim 58 and claim 16.