

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION
Petitioner,

v.

SURFCAST, INC.
Patent Owner

Patent No. 6,724,403

Issued: April 20, 2004

Filed: October 30, 2000

Inventors: Ovid Santoro *et al.*

Title: SYSTEM AND METHOD FOR SIMULTANEOUS DISPLAY OF
INFORMATION SOURCES

Inter Partes Review Nos. IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

**TRANSMITTAL LETTER AND UPDATED EXHIBIT LIST
ACCOMPANYING THE CORRECTED REPLY BRIEF**

IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

During the conference with the Panel on April 16, 2014, Petitioner sought leave to file a corrected Reply Brief for the purpose of correcting three formatting errors. The Panel instructed Petitioner to file a corrected Reply Brief along with an exhibit showing the changes that were made if Patent Owner does not oppose. Patent Owner confirmed that the changes are acceptable.

Pursuant to the Panel's guidance, Petitioner hereby files the corrected Reply Brief and Ex. 1111, which shows the changes made in the corrected Reply Brief. *See* IPR2013-00292, Paper No. 52 at 5-6. Petitioner Microsoft Corporation submits an updated list of exhibits. The updated list appears below:

Exhibit #	Description
1001	U.S. Patent 6,724,403
1002	File History of U.S. Patent 6,724,403
1003	Declaration of David R. Karger
1004	Curriculum Vitae of David R. Karger
1005	U.S. Provisional Application 60/162,522
1006	Declaration by Utah State Library (5/1/2013)
1007	Utah State University Library copy of Microsoft Internet Explorer Resource Kit ("MSIE Kit") (Microsoft Press 1998) (Exhibit 1 to Declaration by Associate Dean for Public Services of Utah State University Library)
1008	Excerpts of North Carolina State University copy of Microsoft Internet Explorer Resource Kit (Microsoft Press 1998)
1009	Excerpts of Library of Congress copy of Microsoft Internet Explorer Resource Kit (Microsoft Press 1998)
1010	Excerpts of Harvard copy of Microsoft Internet Explorer Resource Kit (Microsoft Press 1998)
1011	U.S. Patent 6,832,355
1012	File History of U.S. Patent 6,832,355
1013	U.S. Patent 6,118,493
1014	U.S. Patent 6,456,334

IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

Exhibit #	Description
1015	U.S. Patent 5,432,932
1016	U.S. Patent 5,819,284
1017	U.S. Patent 6,807,558
1018	U.S. Patent 5,959,621
1019	U.S. Patent 5,479,602
1020	U.S. Patent 5,321,750
1021	U.S. Patent 5,712,995
1022	U.S. Patent 5,473,745
1023	U.S. Patent 5,140,678
1024	U.S. Patent 6,104,700
1025	U.S. Patent 5,721,951
1026	U.S. Patent 5,321,808
1027	U.S. Patent 5,550,968
1028	U.S. Patent 4,905,171
1029	U.S. Patent 5,901,228
1030	U.S. Patent 6,278,448
1031	U.S. Patent 5,848,356
1032	U.S. Patent 6,430,405
1033	U.S. Patent 6,047,197
1034	U.S. Patent 6,418,309
1035	U.S. Patent 5,635,980
1036	U.S. Patent 6,061,576
1037	U.S. Patent 5,371,847
1038	U.S. Patent 5,764,972
1039	U.S. Patent 6,363,445
1040	U.S. Patent 5,812,123
1041	U.S. Patent 6,411,275
1042	U.S. Patent 4,831,556
1043	U.S. Patent 5,757,371
1044	U.S. Patent 5,831,664
1045	U.S. Patent 5,838,326
1046	U.S. Patent 5,929,854
1047	U.S. Patent 6,160,553
1048	U.S. Patent 6,166,738
1049	U.S. Patent 6,188,405
1050	EP 0651544
1051	PCT Application WO9926127

IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

Exhibit #	Description
1052	SurfCast's Responses to Microsoft's First Set of Interrogatories (includes SurfCast's Infringement Contentions (Exhibits A and B) (2/14/2013)
1053	SurfCast Proposed Claim Construction (4/12/2013)
1054	SurfCast Rebuttal Proposed Claim Construction (4/26/2013)
1055	Microsoft's Initial Proposed Terms and Constructions (4/12/2013)
1056	SurfCast's Amended Complaint from 2:12-CV-00333-DBH [19]
1057	Amended Scheduling Order, Maine District Court, Case No. 2:12-CV-333-DBH [41]
1058	Excerpts of Dictionary of Computer and Internet Terms (Sixth Ed., 1998)
1059	Excerpts of Microsoft Computer Dictionary (Fourth Ed., 1999)
1060	Nokia 9110 User Guide ("Nokia 9110")
1061	Motorola Envoy Wireless Communicator User's Guide ("Motorola Envoy")
1062	Simon User's Manual ("Simon")
1063	Readings in Human-Computer Interaction: Toward the Year 2000 (1995 2d ed.)
1064	Schneiderman, B., Designing the User Interface (3d ed. 1998)
1065	Cerani, Delivering Push, 1998
1066	Myers, B.A., "The User Interface for Sapphire," CG&A, Vol. 4, No. 12, Dec. 1984, pp.13-23
1067	Myers, B.A., A Taxonomy of Window Manager User Interfaces, CG&A, Sep. 1988, pp. 65-84
1068	<i>Teitelman</i> , A Tour Through Cedar (1984)
1069	OpenStep User Interface Guidelines (1996)
1070	Lane, J.C., <i>et al.</i> , User Interfaces for a Complex Robotic Task: A Comparison of Tiled vs. Overlapped Windows (January 1997)
1071	Bly, <i>et al.</i> , A Comparison of Tiled and Overlapping Windows Proc. SIGCHI, Human Factors in Computing Systems, ACM, New York, 1986, pp. 101-106
1072	<i>Inside Dynamic HTML</i> (Microsoft Press 1997)
1073	E. S. Cohen, E. T. Smith, and L. A. Iverson, "Constraint-Based Tiled Windows," Proc. 1 st Int'l Conf. on Computer Workstations, CS Press, Los Alamitos, Calif., Nov. 1984, pp. 2-11.
1074	M. Gancarz, "Uwm: A User Interface for X Windows," Conf. Proc. Summer Tech. Conf., Usenix, Denver, Jan. 1986, pp/429-440.

IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

Exhibit #	Description
1075	Matthews, M. S., <i>et al.</i> , FrontPage 2000: The Complete Reference (1999) (Excerpts of pages referenced in prosecution history)
1076	Ross, J., ABCs of Internet Explorer 4 (1997) (Excerpts of pages referenced in prosecution history)
1077	McFedries, P., The Complete Idiot's Guide to Windows 95 (Mar. 1997, 2d Ed.) (Excerpts of pages referenced in prosecution history)
1078	http://www.w3.org/submission/1997/5/ (4/11/97)
1079	http://www.w3.org/TR/NOTE-Submission-HDML (5/9/97)
1080	http://www.w3.org/TR/NOTE-Submission-HDML-FAQ.html (4/11/97)
1081	http://www.ncns.com/news/2/uwplanet.html (5/7/97)
1082	Microsoft's 2 nd Supplemental Responses to SurfCast's First Set of Interrogatories (Confidential) (4/8/2013)
1083	Petitioner's Initial Disclosures
1084	Deposition Transcript of Dr. David Karger (signed), dated January 14, 2014
1085	Excerpts of Merriam Webster's Collegiate Dictionary, 10th Ed. (1995) for the term "access"
1086	Excerpts of Microsoft Computer Dictionary, 4th Ed. (1999) for the term "access"
1087	Excerpts of Merriam Webster's Collegiate Dictionary, 10th Ed. (1995) for the term "periodic"
1088	Excerpts of Glenn E. Weadock, Intranet Publishing for Dummies (1997)
1089	Glenn E. Weadock, Windows 98 Registry for Dummies (1998)
1090	GDDM, Base Application Programming Guide, Version 3, Release 2 (September 1996).
1091	U.S. Patent 5,974,567
1092	Glenn E. Weadock, Intranet Publishing for Dummies (1997) – Full version of Ex. 1088
1093	U.S. Patent 5,577,935
1094	U.S. Patent 7,949,687
1095	U.S. Patent 6,616,701

IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

Exhibit #	Description
1096	U.S. Patent 7,139,970
1097	HTML 4.0 Specification (April 24, 1998)
1098	Scott Isaacs, Inside Dynamic HTML (1997)
1099	Thomas E. LaStrange, “swm: An X Window Manager Shell” (1990)
1100	U.S. Patent 5,982,445
1101	Excerpts of The American Heritage Dictionary, Second College Edition (1985) for the term “when”
1102	Deposition Transcript of Richard Bone, dated February 19, 2014
1103	Deposition Transcript of Ovid Santoro, dated February 27, 2014 (Protective Order Material)
1104	Deposition Transcript of Klaus Lagermann, dated March 6, 2014
1105	Deposition Transcript of Tom Dechaene, dated March 11, 2014 (Protective Order Material)
1106	Deposition Transcript of Glenn Weadock, dated March 12, 2014
1107	EP 1,161716B
1108	U.S. Patent 3,760,364
1109	Redacted Deposition Transcript of Klaus Lagermann, dated June 27, 2013 (from Maine)
1110	Reply Expert Declaration of David Karger
1111	Redline for Corrected Reply Brief

IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

Dated: April 22, 2014

Respectfully Submitted,

/Jeffrey P. Kushan/
Jeffrey P. Kushan
Registration No. 43,401
Sidley Austin LLP
1501 K Street NW
Washington, DC 20005
jkushan@sidley.com

IPR2013-00292, IPR2013-00293,
IPR2013-00294, and IPR2013-00295

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of April 2014, a copy of this Transmittal Letter and Updated Exhibit List accompanying the Corrected Reply Brief, along with Exhibit 1111 have been served in its entirety by e-mail on the following counsel of record for Patent Owner, per 37 C.F.R. § 42.6(e)(4)(ii):

Richard G. A. Bone (Lead Counsel)

RBone@VLPLawGroup.com;

Patents@VLPLawGroup.com

James M. Heintz (Backup Counsel)

292_IPR_DLAteam@dlapiper.com

Dated: April 22, 2014

Respectfully submitted,

/Jeffrey P. Kushan/

Jeffrey P. Kushan

Reg. No. 43,401

Sidley Austin LLP

1501 K Street NW

Washington, DC 20005

jkushan@sidley.com

Attorney for Petitioner