

**Exhibit C-20**  
**Chart for U.S. Patent No. 9,063,755 (“the ’755 patent”)**  
**U.S. Patent Appl. Publ. No. 2007/0118844 (“Huang”)**

As shown in the chart below, all asserted claims of the ’755 patent are invalid under (1) 35 U.S.C. § 102<sup>1</sup> (a), (b), (e), and (g) because Huang meets each element of those claims, and (2) 35 U.S.C. § 103 because Huang renders those claims obvious either alone, or in combination with the knowledge of a person having ordinary skill in the art, and in further combination with the references specifically identified in the following claim chart and/or one or more references identified in Google’s Preliminary Invalidity Contentions. As used herein, “Huang” refers to U.S. Patent Appl. Publ. No. 2007/0118844 and includes material incorporated by reference, including without limitation U.S. Patent Appl. Ser. No. 11/241,073, subsequently published on April 5, 2007 as U.S. Patent Appl. Publ. No. 2007/0079282 to Nachnani (“Nachnani”). Huang constitutes prior art under 35 U.S.C. § 102(a), (b), (e) and (g) because it was published by the U.S. Patent Office on May 24, 2007 prior to the alleged priority date of the ’755 patent (January 12, 2008)..

Motivations to combine the disclosures of Huang with disclosures of other systems available to the public and publications known in the art, as shown in this chart, include at least the similarity in subject matter between the references to the extent they concern information input devices. Insofar as the references cite other patents or publications, or suggest additional changes, one of ordinary skill in the art would look beyond a single reference to other references in the field. One of ordinary skill in the art would have been motivated to combine Huang with references and systems such as: U.S. Patent App. Pub. No. 2006/0271537 (“Chandrasekharan”), U.S. Patent Publication No. 2007/0067421 (“Angelov”), U.S. Patent Publication No. 2006/0129972 (“Tyburski”). Chandrasekharan, Angelov, and Tyburski are in the same or similar technical field as the Huang and the ’755 patent, and addresses the same or similar technical problem (e.g., providing software that interfaces to a web service) as the ’755 patent. Accordingly, a POSITA would have had reason to consider the teachings of Chandrasekharan, Angelov, and/or Tyburski when implementing the Huang’s system. A person of ordinary skill in the art would be motivated to combine Huang with any of these references in order to create more effective systems to create displays on devices..

These invalidity contentions are based on Google’s present understanding of the ’755 patent claims and Express Mobile’s theories of infringement against Google. Google expressly does not agree that, under a correct construction or reading of the claims, that Google’s accused products meet the limitations of the asserted claims of the ’755 Patent or that the claims satisfy the requirements of 35 U.S.C. § 112. Google’s contentions herein are not, and should in no way be seen as, admissions as to or adoptions of any particular

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<sup>1</sup> The ’755 patent is subject to pre-AIA 35 U.S.C. §102.

claim scope or construction, or as an admission that any particular element is met by any accused product in any particular way. Google objects to any attempt to imply claim construction from this chart. Google’s invalidity contentions do not represent Google’s agreement or view as to the meaning, definiteness, written description support for, or enablement of any claim contained therein. However, at least under Express Mobile’s apparent application of the claims for the purposes of infringement (which Google expressly disagrees with), Huang would have rendered the asserted claims of the ’755 patent invalid.

The following contentions are subject to revision and amendment pursuant to Federal Rule of Civil Procedure 26(e), the Local Rules of the Western District of Texas, and the Orders of record in this matter subject to further investigation and discovery regarding the prior art and the Court’s construction of the claims at issue. For example, discovery is ongoing, and Google reserves the right to supplement these contentions with references to additional materials and evidence obtained in discovery describing Huang.

**Chart for U.S. Patent 9,063,755 (“the ’755 patent”)**

<b>Patent No. 9,063,755</b>	<b>Exemplary Citations to Huang</b>
<b>Claim 1</b>	
[pre] 1. A system for generating code to provide content on a display of a device, said system comprising:	To the extent the preamble is limiting, Huang discloses a system for generating code to provide content on a display of a device.  <i>See</i> Exhibit D-20, claim 1, [preamble].
[a] computer memory storing a registry of:	Huang discloses a computer memory storing a registry.  <i>See</i> Exhibit D-20, element [a].
[b] a) symbolic names required for evoking one or more web components each related to a set of inputs and outputs of a web service obtainable over a network, where the symbolic names are character strings that do not contain either a persistent address or pointer to an output value accessible to the web service, and	Huang discloses a registry of symbolic names required for evoking one or more web components each related to a set of inputs and outputs of a web service obtainable over a network, where the symbolic names are character strings that do not contain either a persistent address or pointer to an output value accessible to the web service.  <i>See</i> Exhibit D-20, claim 1, element [b].
[c] b) the address of the web	Huang discloses a registry of the address of the web service.

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service;	<i>See</i> Exhibit D-20, claim 1, element [c].
[d] an authoring tool configured to:	Huang discloses an authoring tool.  <i>See</i> Exhibit D-20, claim 1, element [d].
[e] define a user interface (UI) object for presentation on the display, where said UI object corresponds to the web component included in said registry selected from the group consisting of an input of the web service and an output of the web service,	Huang discloses an authoring tool configured to define a user interface (UI) object for presentation on the display, where said UI object corresponds to the web component included in said registry selected from the group consisting of an input of the web service and an output of the web service.  <i>See</i> Exhibit D-20, claim 1, elements [d] and [e].
[f] access said computer memory to select the symbolic name corresponding to the web component of the defined UI object,	Huang discloses an authoring tool configured to access said computer memory to select the symbolic name corresponding to the web component of the defined UI object.  <i>See</i> Exhibit D-20, claim 1, element [f].
[g] associate the selected symbolic name with the defined UI object,	Huang discloses an authoring tool configured to associate the selected symbolic name with the defined UI object.  <i>See</i> Exhibit D-20, claim 1, element [g].
[h] produce an Application including the selected symbolic name of the defined UI object, where said Application is a device-independent code, and	Huang discloses an authoring tool configured to produce an Application including the selected symbolic name of the defined UI object, where said Application is a device-independent code.  <i>See</i> Exhibit D-20, claim 1, element [h].
[i] produce a Player, where said Player is a device-dependent code;	Huang discloses an authoring tool configured to produce a Player, where said Player is a device-dependent code.  <i>See</i> Exhibit D-20, claim 1, element [i].

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[j] such that, when the Application and Player are provided to the device and executed on the device, and when a user of the device provides one or more input values associated with an input symbolic name to an input of defined UI object, 1) the device provides the user provided one or more input values and corresponding input symbolic name to the web service,	Huang discloses that, when the Application and Player are provided to the device and executed on the device, and when a user of the device provides one or more input values associated with an input symbolic name to an input of defined UI object, the device provides the user provided one or more input values and corresponding input symbolic name to the web service  <i>See Exhibit D-20, claim 1, element [j].</i>
[k] 2) the web service utilizes the input symbolic name and the user provided one or more input values for generating one or more output values having an associated output symbolic name,	Huang discloses that the web service utilizes the input symbolic name and the user provided one or more input values for generating one or more output values having an associated output symbolic name.  <i>See Exhibit D-20, claim 1, element [k].</i>
[l] 3) said Player receives the output symbolic name and corresponding one or more output values and provides instructions for a display of the device to present an output value in the defined UI object.	Huang discloses that said Player receives the output symbolic name and corresponding one or more output values and provides instructions for a display of the device to present an output value in the defined UI object.  <i>See Exhibit D-20, claim 1, element [l].</i>
Claim 2	
2. The system of claim 1, where said registry includes definitions of input and output related to said web service.	Huang discloses that said registry includes definitions of input and output related to said web service.  <i>See Exhibit D-20, claim 2.</i>
Claim 7	
7. The system of claim 1, where said web component is an output of	Huang discloses that said web component is an output of a web service, is the text provided by one or more simultaneous chat sessions, is the video of a video chat session, is a video, an

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a web service, is the text provided by one or more simultaneous chat sessions, is the video of a video chat session, is a video, an image, a slideshow, an RSS display, or an advertisement.	image, a slideshow, an RSS display, or an advertisement.  <i>See Exhibit D-20, claim 7.</i>
Claim 11	
11. The system of claim 1, where said code is provided over said network.	Huang discloses that said code is provided over said network.  <i>See Exhibit D-20, claim 11.</i>