

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

EMG TECHNOLOGY, LLC,

Plaintiff,

v.

APPLE, INC.,  
AMERICAN AIRLINES, INC.,  
BLOOMBERG, L.P.,  
CONTINENTAL AIRLINES, INC.,  
UNITED PARCEL SERVICE, INC.,

Defendants.

Case No. 6:08-cv-447-LED

**JURY TRIAL DEMANDED**

**PLAINTIFF EMG TECHNOLOGY, LLC'S FIRST AMENDED PATENT RULE 3-1  
DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

Pursuant to ~~this Court's Order dated April 21, 2009, the agreement of the parties, the Court's Order Granting Agreed Motion for Leave to Amend Infringement Contentions,~~ and Patent Rules 3-1 and 3-6(b) of the Rules of Practice for Patent Cases before the Eastern District of Texas, Plaintiff EMG Technology, LLC ("EMG") hereby serves its First Amended Patent Rule 3-1 Disclosure of Asserted Claims and Infringement Contentions ("Infringement Contentions"). EMG's Infringement Contentions are based upon information available to EMG as of the date hereof without the benefit of discovery in this litigation. Because EMG has not yet received documents, source code, deposition testimony or other discovery relevant to its Infringement Contentions from Defendants Apple, Inc. ("Apple"), American Airlines, Inc. ("AA"), Bloomberg, LP ("Bloomberg"), Continental Airlines, Inc. ("Continental"), or United Parcel Service, Inc. ("UPS")<sup>1</sup>, and because EMG's investigation is ongoing, EMG reserves the

<sup>1</sup> Apple, AA, Bloomberg, Continental, and UPS are referred to collectively herein as "Defendants".

right to supplement and/or modify its Infringement Contentions to the full extent permitted under Patent Rule 3-6 and this Court's Orders.

**I. Patent Rule 3-1(a) - Identification of Asserted Claims**

**A. Apple**

For purposes of Patent Rule 3-1(a), with respect to patents at issue, EMG asserts that Apple infringes the following patent claims directly, contributorily and/or by inducement: claims 1, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 29, 30, 31, and 32 of U.S. Patent No. 7,020,845 ("845 Patent"); and claims 1, 2, 3, 4, 6, 9, 10, 11, 12, 13, 20, 21, 22, 25, 26, 27, 28, 29, 35, 36, 37, 40, 41, 43, 46, 50, 53, 54, 57, 58, 59, 60, 61, 66, 67, 68, 71, 72, and 73 of U.S. Patent No. 7,441,196 ("196 Patent").

**B. AA**

For purposes of Patent Rule 3-1(a), with respect to patents at issue, EMG asserts that AA infringes the following patent claims directly, contributorily and/or by inducement: claims 1, 3, 5, 6, 8, 10, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 29, 30, 31, and 32 of the '845 Patent; and claims 1, 2, 3, 4, 6, 9, 10, 11, 12, 13, 20, 21, 22, 25, 26, 27, 28, 29, 35, 36, 37, 40, 41, 43, 46, 47, 48, 50, 53, 54, 57, 58, 59, 60, 61, 66, 67, 68, 71, 72, and 73 of the '196 Patent.

**C. Bloomberg**

For purposes of Patent Rule 3-1(a), with respect to patents at issue, EMG asserts that Bloomberg infringes the following patent claims directly, contributorily and/or by inducement: claims 1, 3, 5, 6, 8, 10, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 29, and 30 of the '845 Patent; and claims 1, 2, 3, 4, 6, 9, 10, 11, 12, 13, 20, 25, 26, 27, 28, 29, 35, 40, 41, 43, 46, 50, 53, 54, 57, 58, 59, 60, 61, 66, 67, 68, and 71 of the '196 Patent.

#### **D. Continental**

For purposes of Patent Rule 3-1(a), with respect to patents at issue, EMG asserts that Continental infringes the following patent claims directly, contributorily and/or by inducement: claims 1, 3, 5, 6, 8, 10, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 29, and 30 of the '845 Patent; and claims 1, 2, 3, 4, 6, 9, 10, 11, 12, 13, 20, 22, 25, 26, 27, 28, 29, 35, 37, 40, 41, 43, 46, 47, 48, 50, 53, 54, 57, 59, 60, 61, 66, 67, 68, 71, and 73 of the '196 Patent.

#### **E. UPS**

For purposes of Patent Rule 3-1(a), with respect to patents at issue, EMG asserts that UPS infringes the following patent claims directly, contributorily and/or by inducement: claims 1, 3, 5, 6, 8, 10, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 29, and 30 of the '845 Patent; and claims 1, 2, 3, 4, 6, 9, 10, 11, 12, 13, 20, 22, 25, 26, 27, 28, 29, 35, 37, 40, 41, 43, 46, 48, 50, 53, 54, 57, 58, 59, 60, 61, 66, 67, 68, 71, and 73 of the '196 Patent.

The claims identified above are collectively referred to herein as the "Asserted Claims".

### **II. Patent Rule 3-1(b) - Identification of Accused Instrumentalities**

For purposes of Patent Rule 3-1(b), with respect to the patents at issue, EMG asserts that each of the Asserted Claims is infringed by the instrumentalities identified below (collectively referred to herein as the "Accused Instrumentalities"). EMG reserves the right to amend this identification to the full extent permitted under Patent Rule 3-6 and this Court's Orders. Unless otherwise stated, EMG's assertions of infringement apply to all editions, versions, and applications of the Accused Instrumentalities.

#### **A. Apple**

With respect to Apple, the Accused Instrumentalities are identified in Appendices A-B.

**B. AA**

With respect to AA, the Accused Instrumentalities are identified in Appendices C-D.

**C. Bloomberg**

With respect to Bloomberg, the Accused Instrumentalities are identified in Appendices E-

F.

**D. Continental**

With respect to Continental, the Accused Instrumentalities are identified in Appendices

G-H.

**E. UPS**

With respect to UPS, the Accused Instrumentalities are identified in Appendices I-J.

**III. Patent Rule 3-1(c) - Claim Charts**

EMG's investigation and analysis of the Accused Instrumentalities is based upon

information made publicly available by Defendants and EMG's own investigations. Attached as Appendix A is an amended claim chart regarding infringement of the '845 patent by Apple. EMG hereby incorporates by reference from its Infringement Contentions served on June 5, 2009, Exhibits A-H to Appendix A and Appendices B-J, including exhibits thereto. The charts appended hereto and incorporated as Appendices A-J set forth EMG's current contentions with respect to where each element of the Asserted Claims is found in the Accused Instrumentalities. All citations to evidence in EMG's Infringement Contentions are exemplary only and shall in no way limit EMG's reliance on additional evidence obtained in discovery in support of its Infringement Contentions. Some exhibits included in Appendices A-J may have personally identifying information redacted. To the fullest extent permitted under Patent Rule 3-6 and this

Court's Orders, EMG reserves the right to amend and/or supplement its Infringement Contentions for any of the following reasons:

(i) EMG's positions regarding infringement of specific claims will depend on how those claims are construed by the Court. Because claim construction has not yet occurred, EMG cannot take a final position on the bases for infringement of the Asserted Claims; and

(ii) While EMG's investigation and analysis of Defendants' infringement is based upon information made publicly available by Defendants and EMG's own investigations, additional discovery from Defendants is necessary before EMG can take final positions on the bases for infringement of the Asserted Claims.

#### **A. Apple**

Appended hereto as Appendix A, and incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '845 Patent is found in the Apple Accused Instrumentalities. ~~Appended hereto as Appendix B, and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '196 Patent is found in the Apple Accused Instrumentalities.

#### **B. AA**

~~Appended hereto as Appendix C, and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '845 Patent is found in the AA Accused Instrumentalities. ~~Appended hereto as Appendix D, and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '196 Patent is found in the AA Accused Instrumentalities.

#### **C. Bloomberg**

~~Appended hereto as~~ Appendix E, ~~and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '845 Patent is found in the Bloomberg Accused Instrumentalities. ~~Appended hereto as~~ Appendix F, ~~and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '196 Patent is found in the Bloomberg Accused Instrumentalities.

#### **D. Continental**

~~Appended hereto as~~ Appendix G, ~~and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '845 Patent is found in the Continental Accused Instrumentalities. ~~Appended hereto as~~ Appendix H, ~~and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '196 Patent is found in the Continental Accused Instrumentalities.

#### **E. UPS**

~~Appended hereto as~~ Appendix I, ~~and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '845 Patent is found in the UPS Accused Instrumentalities. ~~Appended hereto as~~ Appendix J, ~~and~~ incorporated herein in its entirety, is a preliminary chart identifying specifically where each element of the Asserted Claims of the '196 Patent is found in the UPS Accused Instrumentalities.

Unless otherwise indicated, the information provided that corresponds to each claim element is considered to indicate that each claim element is found within the product, device, process, method, function or act of the Accused Instrumentalities.

#### **IV. Patent Rule 3-1(d) - Literal Infringement/Doctrine of Equivalents**

For purposes of Patent Rule 3-1(d) with respect to the patents at issue, each element of each Asserted Claim is considered to be literally present and present under the Doctrine of Equivalents within each of the Accused Instrumentalities. To the fullest extent permitted under Patent Rule 3-6 and this Court's Orders, EMG reserves the right to amend and/or supplement this disclosure for any of the following reasons:

(i) EMG's positions regarding infringement of specific claims will depend on how those claims are construed by the Court. Because claim construction has not yet occurred, EMG cannot take a final position on the bases for infringement of the Asserted Claims under the Doctrine of Equivalents; and

(ii) While EMG's investigation and analysis of Defendants' products is based upon information made publicly available by Defendants and EMG's own investigations, additional discovery from Defendants is necessary before EMG can take final positions on the bases for infringement of the Asserted Claims under the Doctrine of Equivalents.

#### **V. Patent Rule 3-1(e) - Priority Dates**

The Asserted Claims of the '845 Patent are entitled to a priority date of November 15, 1999, as a continuation-in-part of U.S. Patent No. 6,600,497. The Asserted Claims of the '196 Patent are entitled to a priority date of November 15, 1999, as a continuation-in-part of U.S. Patent No. 6,600,497, and March 3, 2000, as continuation of the '845 Patent.

#### **VI. Patent Rule 3-1(f) - Identification of Instrumentalities Practicing the Claimed Invention**

~~EMG's MallTV portal incorporates or reflects each of the Asserted Claims, EMG's MallTV webpage and sister site accessible via www.malltv.com embody one or more of the Asserted Claims.~~

| DATED: ~~June 5~~July, 2009

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document is being served to the parties named below by e-mail on ~~July 9, 2009~~ July \_\_, 2009, with a copy to follow by U.S. Mail.

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Appendix A to EMG’s P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions  
Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Apple

<b><u>U.S. PATENT NO 7,020,845</u></b>	<b><u>ACCUSED INSTRUMENTALITIES<sup>1</sup></u></b>
Claim 1	
A method comprising	<p><b>iTunes Music Store (ITMS) with iPhone<sup>2</sup>, Apple TV, and Front Row:</b></p> <p>ITMS, together with iPhone, Apple TV and Front Row clients, has computer readable storage media containing executable computer program instructions (“code”) which when executed cause a digital processing system to perform a method comprising the steps below. The code is stored, for example, on the servers running ITMS, on memory resident in the iPhone, Apple TV and Front Row clients, and on disks and drives in servers or other computers used to develop, transport, store, install, and update the code.</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Leopard Server, including Ruby and Rails, stored on internal server memory and also on disks and drives in servers or other computers used to develop, transport , store, install, and update the program, provides computer readable storage media containing code which when executed cause a digital processing system to perform a method comprising the steps below. See <a href="http://developer.apple.com/Tools/developonrailsleopard.html">http://developer.apple.com/Tools/developonrailsleopard.html</a> (“In Leopard and Leopard Server, Ruby and Rails are pre-installed along with a bounty of other useful RubyGems”). (Exhibit D).</p>
providing a webpage associated with a sister site; and	See claim 6, below.
providing a simplified navigation interface for the webpage by the sister site.	See claim 6, below.
<b>Claim 3</b>	
<del>The method of claim 1 further comprising:-  transcoding a hyper text markup language (HTML)- page into an extensible markup language- (XML) page; and</del>	<del>See claim 8, below.</del>

<sup>1</sup> For EMG’s contentions regarding the Bloomberg iPhone application, which is promoted and distributed by Apple, see Appendix E, EMG’s P.R. 3-1 Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Bloomberg.

<sup>2</sup> Unless otherwise noted, the term “iPhone” applies to any and all versions of the Apple iPhone as well as to any and all versions of the Apple iPod touch.

Appendix A to EMG's P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions  
 Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Apple

<p><del>applying a document type definition (DTD) to the XML page.</del></p>	<p>See claim 8, below.</p>
<p>Claim 5</p>	
<p>The method of claim 3 further comprising:  applying a cascading style sheet (CSS) to the XML page.</p>	<p>See claim 10, below.</p>
<p>Claim 6</p>	
<p>A computer readable storage media containing executable computer program instructions which when executed cause a digital processing system to perform a method comprising:</p>	<p><b>iTunes Music Store (ITMS) with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS, together with iPhone, Apple TV and Front Row clients, has computer readable storage media containing code which when executed cause a digital processing system to perform a method comprising the steps below. The code is stored, for example, on the servers running ITMS, on memory resident in the iPhone, Apple TV and Front Row clients, and on disks and drives in servers or other computers used to develop, transport, store, install, and update the code.</p> <p><b>Apple's Mac OS X Leopard Server:</b></p> <p>Leopard Server, including Ruby and Rails, stored on internal server memory and also on disks and drives in servers or other computers used to develop, transport, store, install, and update the program, provides computer readable storage media containing code which when executed cause a digital processing system to perform a method comprising the steps below. See <a href="http://developer.apple.com/Tools/developonrailsleopard.html">http://developer.apple.com/Tools/developonrailsleopard.html</a> ("In Leopard and Leopard Server, Ruby and Rails are pre-installed along with a bounty of other useful RubyGems"). (Exhibit D).</p>
<p>providing a webpage associated with a sister site; and</p>	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides a webpage associated with a sister site.</p> <p>With respect to iPhone, for example, ITMS provides a webpage viewable by a Macintosh or Windows iTunes application browsing ITMS, which is associated with a sister site viewable on an iPhone (see for example, Exhibit C for a Macintosh iTunes view, and Exhibit B for an iPhone view.).</p>

Appendix A to EMG's P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions  
 Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Apple

	<p>With respect to Apple TV, for example, ITMS provides a webpage viewable by a Macintosh or Windows iTunes application browsing ITMS, which is associated with a sister site viewable on Apple TV (see for example, Exhibit H).</p> <p>With respect to Front Row, for example, ITMS provides a webpage viewable by a Macintosh or Windows iTunes application browsing ITMS, which is associated with a sister site viewable on Front Row (see for example, Exhibit C for a Macintosh iTunes view, and Exhibit A for a Front Row view.).</p> <p><b>Apple's Mac OS X Leopard Server:</b></p> <p>Leopard Server provides a webpage associated with a sister site.</p> <p>Leopard server provides a webpage viewable for example by a standard browser, which is associated with a sister site viewable on an iPhone. See "Supporting an iPhone interface" at <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a>. (Exhibit E)</p>
<p>providing a simplified navigation interface for the webpage by the sister site.</p>	<p><b>ITMS (iTunes Music Store) with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides a simplified navigation interface for the webpage by the sister site.</p> <p>For example, ITMS provides a simplified navigation interface for the webpage by the sister site, which is viewable on the iPhone through the iPhone iTunes application, on monitors connected to Apple TV, and on devices displaying Front Row.</p> <p>See Exhibits A, B, and C  <a href="http://www.apple.com/appletv/specs.html">http://www.apple.com/appletv/specs.html</a> (Exhibit F) and  <a href="http://www.apple.com/macosx/features/300.html#frontrow">http://www.apple.com/macosx/features/300.html#frontrow</a> (Exhibit G)</p> <p><b>"Front Row</b>          Enjoy all of your digital media full screen on your Mac with Front Row.          Now built into Mac OS X Leopard.</p> <p><b>Apple TV-style Interface</b>          Sit back and be amazed. Front Row works just like Apple TV. You control it from a distance using the elegant six-button Apple Remote that came</p>

Appendix A to EMG's P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions  
Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Apple

	<p>with your Mac. Simple menus, elegant transitions, and beautiful content previews make your digital media shine.</p> <p><b>Movie Previews</b> Watch previews of Hollywood blockbusters directly from Front Row.”</p> <p><b>Apple's Mac OS X Leopard Server:</b></p> <p>Apple's Mac OS X Leopard server provides a simplified navigation interface for the webpage by the sister site.</p> <p>Leopard server provides a simplified navigation interface for the webpage by the sister site viewable for example on an iPhone. See “Supporting an iPhone interface” at <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which describes how Leopard Server provides a simplified navigation interface for the webpage by the sister site.</p> <p>See also “providing a webpage associated with a sister site” above.</p>
Claim 11	
The method of claim 1, further comprising:	
displaying the navigation interface on a television set, the television set having a remote control.	See claim 14, below.
Claim 12	
The method of claim 1, further comprising:	See claim 15, below.
displaying the simplified navigation interface on a portable wireless device.	
Claim 13	
The method of claim 1, wherein a sister site is a server on a network.	See claim 16, below.
Claim 14	
The computer readable storage media of claim 6, further comprising:	
displaying the navigation interface on a television	<b>ITMS (iTunes Music Store) with Apple TV, and Front Row:</b>

Appendix A to EMG’s P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions  
 Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Apple

<p>set, the television set having a remote control.</p>	<p>ITMS provides displaying the navigation interface on a television set, the television set having a remote control.</p> <p>For example, ITMS provides code which when executed causes the display of the navigation interface on a television set, the television set having a remote control, viewable on monitors connected to Apple TV, and to devices displaying Front Row.</p> <p>See Exhibits A, B, and C,  <a href="http://www.apple.com/appletv/specs.html">http://www.apple.com/appletv/specs.html</a> (Exhibit F) and  <a href="http://www.apple.com/macosx/features/300.html#frontrow">http://www.apple.com/macosx/features/300.html#frontrow</a> (Exhibit G)</p> <p><b>“Front Row</b>                  Enjoy all of your digital media full screen on your Mac with Front Row. Now built into Mac OS X Leopard.</p> <p><b>Apple TV-style Interface</b>                  Sit back and be amazed. Front Row works just like Apple TV. You control it from a distance using the elegant six-button Apple Remote that came with your Mac. Simple menus, elegant transitions, and beautiful content previews make your digital media shine.</p> <p><b>Movie Previews</b>                  Watch previews of Hollywood blockbusters directly from Front Row.”</p> <p><b>Apple’s Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard server provides displaying the navigation interface on a television set, the television set having a remote control, for example, when a television set attached to a web browser, or with an integrated web browser, connects to a Leopard Server that is providing the claimed navigation interface for display.</p>
<p>Claim 15</p>	
<p>The computer readable storage media of claim 6, further comprising:</p>	
<p>displaying the simplified navigation interface on a</p>	<p><b>ITMS (iTunes Music Store) with iPhone and Front Row:</b></p>

Appendix A to EMG's P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions  
Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Apple

<p>portable wireless device.</p>	<p>ITMS provides displaying the simplified navigation interface on a portable wireless device.</p> <p>For example, ITMS provides code which when executed causes the display of the simplified navigation interface on a portable wireless device such as an iPhone and / or a Macintosh running Front Row.</p> <p>For example, Front Row includes code which when executed causes the display of a simplified navigation interface for TV shows, movies, or music, on a MacBook, MacBook Pro, or MacBook Air, each of which comprises a portable wireless device.</p> <p>See Exhibits A, B, and C, <a href="http://www.apple.com/appletv/specs.html">http://www.apple.com/appletv/specs.html</a> (Exhibit F) and <a href="http://www.apple.com/macosx/features/300.html#frontrow">http://www.apple.com/macosx/features/300.html#frontrow</a> (Exhibit G)</p> <p><b>“Front Row</b> Enjoy all of your digital media full screen on your Mac with Front Row. Now built into Mac OS X Leopard.</p> <p><b>Apple TV-style Interface</b> Sit back and be amazed. Front Row works just like Apple TV. You control it from a distance using the elegant six-button Apple Remote that came with your Mac. Simple menus, elegant transitions, and beautiful content previews make your digital media shine.</p> <p><b>Movie Previews</b> Watch previews of Hollywood blockbusters directly from Front Row.”</p> <p><b>Apple's Leopard Server:</b></p> <p>Apple's Leopard Server provides code which when executed causes the display of the simplified navigation interface on a portable wireless device.</p> <p>For example, when an iPhone connects to Leopard Server, Leopard server provides code</p>
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Appendix A to EMG’s P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions  
Claim Chart Regarding Infringement of U.S. Patent 7,020,845 by Apple

	<p>which when executed causes the display of the simplified navigation interface by detecting that the client device is a portable wireless device, and displaying a simplified navigation interface.</p> <p>See, for example: <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which explains “Supporting an iPhone interface”, which comprises displaying the simplified navigation interface on a portable wireless device. (Exhibit E).</p>
Claim 16	
The computer readable storage media of claim 6, wherein a sister site is a server on a network.	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS further provides wherein a sister site is a server on a network. For example, an Apple-provided sister site for iTunes and/or ITMS is a server on a network, such as the Internet.</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server further provides wherein a sister site is a server on a network. For example a sister site provided by Apple’s Mac OS X Leopard Server is a server on a network, such as the Internet.</p>
Claim 17	
The method of claim 1, wherein the webpage contains commercial content.	See claim 18, below.
Claim 18	
The computer readable storage media of claim 6, wherein the webpage contains commercial content.	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides that the webpage contains commercial content, such as for example iTunes / ITMS video, television, or audio content. See, for example, Exhibits A – D.</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server provides that the webpage contains commercial content.</p>
Claim 19	
The method of claim 1, further comprising:	See claim 20, below.



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displaying the navigation interface via a computer system.	
Claim 20	
The computer readable medium of claim 6, further comprising:	
displaying the navigation interface via a computer system.	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides displaying the navigation interface via a computer system.</p> <p>Computer systems provided by Apple include, for example, iPhone, Apple TV, and Apple Macintosh computers running the Front Row application.</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server provides displaying the navigation interface via a computer system, such as any computer system that connects to it for a simplified navigation interface. See, for example: <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which explains “Supporting an iPhone interface”, which comprises displaying the navigation interface via a computer system. (Exhibit E).</p>
Claim 21	
The method of claim 1, further comprising: providing a second webpage associated with the sister site; and	See claim 22, below.
providing the simplified navigation interface for the second webpage by the sister site.	See claim 22, below.
Claim 22	
The computer readable medium of claim 6, further comprising:	
providing a second webpage associated with the sister site; and	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides a second webpage associated with the sister site. See, for example, Exhibit C, Figure 4.</p>

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	<p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server provides a second webpage associated with the sister site. See, for example: <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which explains “Supporting an iPhone interface”, which comprises displaying the navigation interface via a computer system. (Exhibit E).</p>
<p>providing the simplified navigation interface for the second webpage by the sister site.</p>	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides a simplified navigation interface for the second webpage by the sister site. See, for example, Exhibit C, Figure 4.</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server provides a simplified navigation interface for the second webpage by the sister site. See, for example: <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which explains “Supporting an iPhone interface”, which comprises displaying the navigation interface via a computer system. (Exhibit E).</p>
<p>Claim 23</p>	
<p>The method of claim 1, wherein the simplified navigation option includes the use of primary navigation options.</p>	<p>See claim 24, below.</p>
<p>Claim 24</p>	
<p>The computer readable medium of claim 6, wherein the simplified navigation option includes the use of primary navigation options.</p>	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides for the simplified navigation interface to include the use of primary navigation options on, for example, iPhone, Apple TV, and Front Row. See, for example, Exhibits A (FrontRow), B (iPhone), and H (Apple TV).</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server provides the simplified navigation option includes the use of primary navigation options. See, for example: <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which explains</p>

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	“Supporting an iPhone interface”, which comprises displaying the navigation interface via a computer system. (Exhibit E).
Claim 25	
The method of claim 1, wherein the webpage is publicly accessible.	See claim 26, below.
Claim 26	
The computer readable medium of claim 6, wherein the webpage is publicly accessible.	<p><b>iTunes Music Store with iPhone, Apple TV, and Front Row:</b></p> <p>ITMS provides a webpage that is publicly accessible.</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server provides a web server adapted to provide publicly accessible webpages.</p>
Claim 28	
The computer readable medium of claim 6, further comprising:	
displaying purchasing information related to at least one item via the matrix layer.	<p><b>iTunes Music Store with iPhone and Apple TV:</b></p> <p>ITMS provides displaying purchasing information related to at least one item via the matrix layer.</p> <p>For example, iTunes on the iPhone, as well as Apple TV, displays purchasing information related to at least one item via the matrix layer.</p> <p>See, for example, Exhibit B, Figures 5 - 8. See, for example, Exhibit H, Figures 20 - 24</p> <p><b>Apple’s Mac OS X Leopard Server:</b></p> <p>Apple’s Mac OS X Leopard Server provides displaying purchasing information related to at least one item via the matrix layer. See, for example: <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which explains “Supporting an iPhone interface” (Exhibit E) and Exhibit B, Figures 5 – 8.</p>
Claim 29	
The method of claim 1, wherein the simplified	See claim 30, below.

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navigation interface includes a search form.	
Claim 30	
The computer readable medium of claim 6, wherein the simplified navigation interface includes a search form.	<p><b>iTunes Music Store with iPhone and Apple TV:</b></p> <p>ITMS provides the simplified navigation interface including a search form.</p> <p>For example, iTunes on the iPhone, as well as Apple TV, provide for a simplified navigation interface including a search form.</p> <p>See, for example, Exhibit B, Figures 2 – 5. See, for example, Exhibit H, Figures 10 - 19</p> <p><b>Apple's Mac OS X Leopard Server:</b></p> <p>Apple's Mac OS X Leopard Server provides the simplified navigation interface includes a search form. See, for example: <a href="http://developer.apple.com/tools/customizeonrailsleopard.html">http://developer.apple.com/tools/customizeonrailsleopard.html</a> which explains "Supporting an iPhone interface" (Exhibit E) and Exhibit B, Figures 2 – 5.</p>
Claim 31	
The method of claim 1, wherein the simplified navigation interface includes an email form.	See claim 32, below.
Claim 32	
The computer readable medium of claim 6, wherein the simplified navigation interface includes an email form.	<p><b>Apple's Mac OS X Leopard Server :</b></p> <p>Apple's Mac OS X Leopard Server provides the simplified navigation interface to include an email form.</p>