

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MASIMO CORPORATION,  
Petitioner,

v.

APPLE INC.,  
Patent Owner.

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Case IPR2023-00664  
Patent 11,106,352

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**PATENT OWNER'S RESPONSE**

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**EXHIBITS**

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| APPLE-2001 | U.S. Patent Publication No. 2020/0333935 (“Tyler”) |
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| APPLE-2003 | Declaration and CV of Dr. Andy Cockburn            |
| APPLE-2004 | Deposition Transcript of Dr. Craig Rosenberg       |

## I. INTRODUCTION

Apple Inc. (“Patent Owner”) submits this Patent Owner’s Response to the Petition for *Inter Partes* Review of U.S. Patent No. 11,106,352 (“the ’352 Patent”) filed by Masimo Corporation (“Petitioner”). The Petition suffers from both factual and legal errors, each of which provides independent bases to uphold the challenged claims. Consequently, Petitioner has failed to carry its burden to show unpatentability of the challenged claims.

As explained in further detail below, Petitioner fails to establish how Chae, alone or in combination with other asserted references, renders obvious independent claims 1, 9, and 17 and their dependent claims. As a preliminary matter, the Petition relies on conclusory statements and broad generalizations in support of its rationale to combine multiple references, and fails to explain how the various gestures in the references could have been combined by a person of ordinary skill in the art (POSITA) without rendering Chae useless for its intended purpose. *Supra* Section IV. In addition, the Petition fails to explain how the systems in the cited references render obvious several claim features, such as a “computer system that is in communication with a display generation component and one or more input devices” or “a power saving state.” *Supra* Section V.

In light of these and other deficiencies in the Petition described below, the Board should uphold the challenged claims.

## **II. OVERVIEW OF THE '352 PATENT**

The '352 Patent is related to “user interfaces (‘UI’) and associated processes that may be implemented on an electronic device, such as portable multifunction device..., with a display[ and] a touch-sensitive surface.” EX1001, 37:31-38; APPLE-2003, ¶22. As described in the '352 Patent, when “the display has transitioned from a screen-off state to a screen-on state,” “wake screen user interface 504 is displayed by the display.” EX1001, 38:14-16. An example of a wake screen user interface 504 is illustrated in FIG. 5B. EX1001, 38:32-33.

wake screen user interface

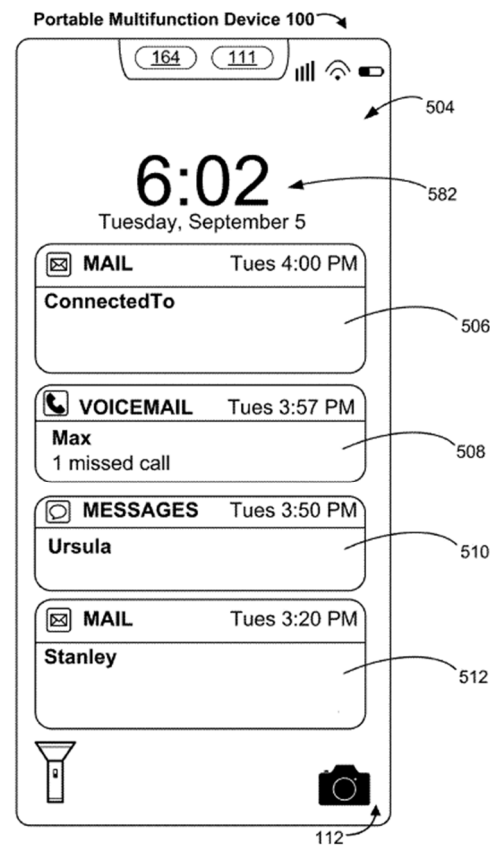


Figure 5B

EX1001, FIG. 5B

As further explained in the '352 Patent, “FIGS. 5CC-5CQ illustrate input for accessing a control center user interface 5138, a mini application user interface 5140, and a user interface underlying wake screen user interface (e.g., home screen user interface 522) from wake screen user interface 504.” EX1001, 44:17-50. For example, in response to “an input (e.g., a leftward swipe) that is initiated by a contact on touch screen,” “wake screen user interface 504 slides to the left and

control center user interface 5138 is revealed.” *Id.* As another example, in response to “an input (e.g., a rightward swipe) that is initiated by a contact on touch screen 112,” wake screen user interface 504 slides to the right and mini application user interface 5140 is revealed.” *Id.* In another example, in response to “an input by a contact on touch screen 112 that is initiated at a lower edge of touch screen 112,” “display of wake screen user interface 504 is replaced by display of home screen user interface 522.” *Id.*; APPLE-2003, ¶23.

The ’352 Patent describes an example of “home screen user interface 522” as “a user interface for a menu of applications.” EX1001, 39:20-22. The ’352 Patent further discloses that “[m]ini application user interface 5140 displays mini application objects 583, 585, 587, and 589 that include a subset of content from application,” and “a pre-defined input on a mini application object launches the corresponding application.” EX1001, 49:34-36, 49:50-52. The ’352 Patent also refers to the “mini application user interface 5140” as “widget user interface 5140.” EX1001, 48:59-49:3, 52:8-41. Examples of home screen user interface 522 and widget user interface 5140 are shown below. APPLE-2003, ¶24.

home screen user interface



Figure 5H

widget screen user interface

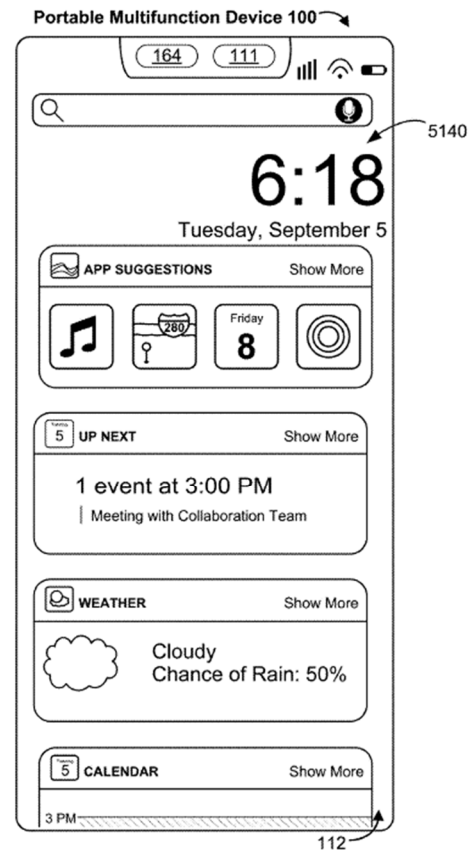


Figure 5CK

EX1001, FIGS. 5H, 5CK

The challenged claims of the '352 Patent recite specific limitations for navigating between particular screens using gestures, based on system state (e.g., “power saving state”), particular criteria (e.g., “display-waking”), and directional inputs and actions (e.g., “detecting a first input that is directed to a portion of the wake screen user interface and includes first movement”). *See, e.g.*, EX1001, Claim 1. The benefits of the '352 Patent include, by way of example and without

limitation, “reduce[d] number, extent, and/or nature of the inputs from a user and produce a more efficient human-machine interface” and arise from the specific arrangement of claimed elements that improve functionality of user interfaces.

EX1001, 1:55-63; APPLE-2003, ¶25.

### **III. CLAIM CONSTRUCTION**

All claim terms in this proceeding are to be construed according to the *Phillips* standard. *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005); 37 C.F.R. §42.100. Although Petitioner offers several constructions in the Petition (pp. 14-26), which Patent Owner does not necessarily agree with, no claim construction is necessary to address the invalidity grounds and uphold the patentability of the claims. Patent Owner’s arguments do not hinge on the outcome of an actual controversy about any claim construction expressed in the Petition and are applicable regardless of whether the Board adopts Petitioner’s constructions. *See Wellman, Inc. v. Eastman Chem. Co.*, 642 F.3d 1355, 1361 (Fed. Cir. 2011) (“[C]laim terms need only be construed to the extent necessary to resolve the controversy.”). As detailed below, the defects and inconsistencies in the Petition are readily identifiable without defining any specific claim term.

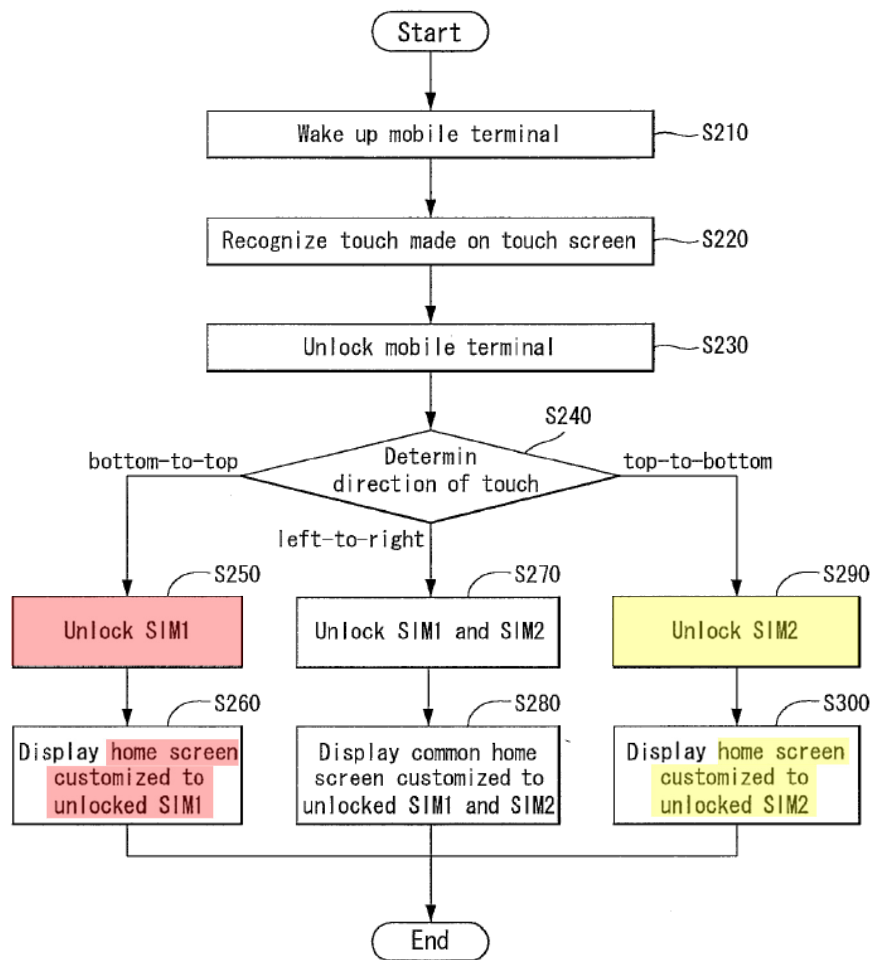
### **IV. A POSITA WOULD NOT HAVE COMBINED CHAE WITH NARENDRA OR ANY OTHER SECONDARY REFERENCE**

#### **A. Overview of Chae**

As noted in Chae’s “Field” of the invention section, Chae is directed to “a

mobile terminal including *a plurality of user-identification modules* and an operating method thereof.” EX1005, [0003]; APPLE-2003, ¶27. Chae’s “mobile terminal 100 includes a first SIM (SIM1) and a second SIM (SIM2).” EX1005, [0003]. As shown in Chae’s FIG. 3 (reproduced below), Chae discloses displaying a home screen associated with one or more SIM cards based on the direction of a detected touch. EX1005, [0101]-[0103], FIG. 3. For instance, a controller 180 of the mobile terminal 100 “unlocks the first SIM (SIM1) when the directivity of the line is from bottom-to-top” and “displays a home screen customized to the first SIM (SIM1) on the touch screen.” EX1005, [0105]. “When the user draws a line in a top-to-bottom direction, the controller 180 unlocks the second SIM (SIM2) at step S290 and displays a home screen customized to the second SIM (SIM2) on the touch screen.” EX1005, [0108]. “When a user draws a line in a left-to-right direction on a touch screen, the controller 180 unlocks both of the first and second SIMs (SIM1 and SIM2) at step S270, and displays a home screen including common items of the first and second SIMs (SIM1 and SIM2) on the touch screen.” EX1005, [0110].

**FIG. 3**



EX1005, FIG. 3.

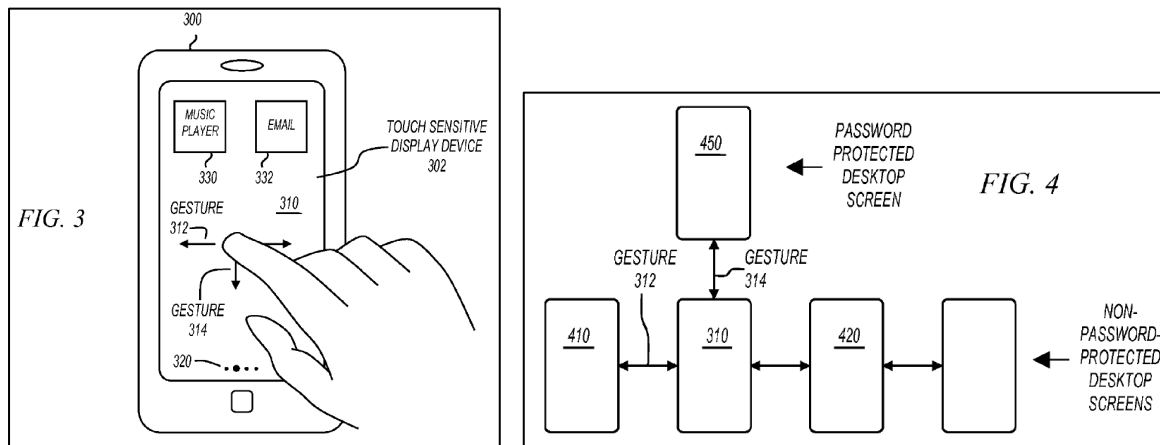
As can be appreciated from the foregoing, Chae's primary objective is to use the direction of touch gesture on the touch screen to determine which home screen associated with one or both of the first and second SIM cards to display. APPLE-2003, ¶128.

## **B. Overview of Narendra**

In contrast, Narendra uses detected touch direction to determine whether or

not a password protected desktop screen should be displayed. APPLE-2003, ¶29.

In particular, Narendra is directed to a mobile device that “includes a user interface that has a plurality of non-password-protected desktop screens and at least one password protected desktop screen.” EX1006, Abstract. Narendra teaches that “[m]obile device 300 may detect multiple different types of gestures. For example, mobile device 300 may detect a first gesture 312 used to navigate between non-password protected desktop screens and may detect a second gesture 314 used to navigate from a non-password-protected desktop screen to a password protected desktop screen.” EX1006, [0024].



EX1006, FIG. 3 (left), FIG. 4 (right).

As shown above, a gesture 314 (such as a vertical touch gesture) is entered to navigate to a password protected desktop screen 450, whereas a different gesture 312 (such as a left-to-right touch gesture) is entered to navigate between non-password protected desktop screens 310, 410, 420. EX1006, [0027]-[0030];

APPLE-2003, ¶30.

**C. A POSITA Would Not Have Combined Chae and Narendra**

If a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984). The Federal Circuit has also held that the “predictable result” discussed in *KSR* refers not only to the expectation that prior art elements are capable of being physically combined, but also that the combination would have worked for its intended purpose. *DePuy Spine, Inc. v. Medtronic Sofamor Danek, Inc.*, 567 F.3d 1314, 90 USPQ2d 1865 (Fed. Cir. 2009).

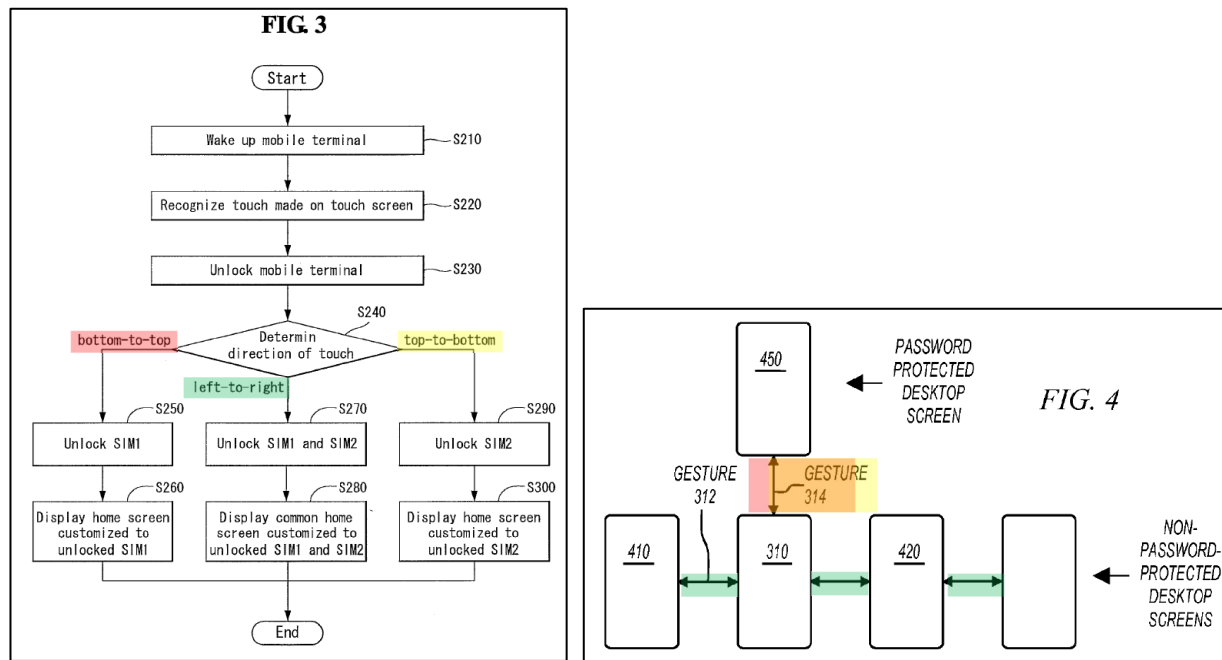
As can be appreciated from Sections IV.A and IV.B above, Chae and Narendra are directed to entirely different purposes and implementations. APPLE-2003, ¶31. Chae’s primary purpose is to provide a method by which a user can navigate to *a desired home screen associated with one or more SIM cards*, and uses gestures as means to retrieve the home screen associated with the desired SIM card(s). EX1005, FIG. 3.

*Narendra has nothing to do with navigating screens associated with SIM cards.* APPLE-2003, ¶32. Rather, Narendra is focused on how gestures can be used to *navigate between non-password protected desktop screens and password-*

*protected desktop screens*. EX1006, [0024], FIGS. 3, 4. In fact, as acknowledged by the Petitioner, Narendra's mobile device only includes a single SIM card. Petition, 6 ("Narendra specifically discloses a single SIM smartphone"), 63. Accordingly, a POSITA would not have turned to Narendra when using Chae's system at least because Narendra provides no guidance on operating a mobile device user interface that has multiple SIM cards. APPLE-2003, ¶32.

Indeed, Petitioner's proposed combination not only neglects the primary purpose of Chae, but would also render Chae unsatisfactory for its intended purpose. APPLE-2003, ¶33. In particular, by incorporating the teachings Narendra into the teachings of Chae, a user may navigate between password protected desktop screens and non-password protected desktop screens, but would not be able to navigate between the home screens of two different SIM cards—the primary purpose of Chae. *Id.* For instance, as shown in Chae and Narendra's figures below, an upward swipe would lead to a password protected desktop screen in Narendra and a right swipe would lead to a non-password protected desktop screen. *Id.* But according to Chae's teachings, an upward swipe would lead to the display of a home screen associated with SIM1 and a right swipe would lead to a customized home screen common to both SIM1 and SIM2. *Id.* Accordingly, if Narendra's teachings were incorporated or even substituted into Chae's system, Chae's primary purpose of a method of navigating between screens associated with

different SIMs would be lost. *Id.*



EX1005, FIG. 3 (left); EX1006, FIG. 4 (right).

Further compounding the problem with the Petitioner's proposed combination is that the petition provides no guidance as to how such different teachings would be resolved in the combined system of Chae and Narendra. APPLE-2003, ¶34. For instance, in the combination of Chae and Narendra, would a left to right gesture result in a customized SIM1 and SIM2 home screen being displayed, as shown in Chae's S280 operation in FIG. 3 above, or would it result in a non-password protected desktop screen being displayed, as shown in Narendra's FIG. 4 above? The Petition's glaring omissions and failure to explain how the Chae and Narendra combination would operate fail to establish why a POSITA would have found combining Chae and Narendra obvious. *See e.g.*, Petition, 28-

33.

To the extent that Narendra is relied upon for additional features such as the implementation of application icons or widgets (Petition, 48-49, 57-58), the Petition provides a few sentences of conclusory statements without any explanation as to why incorporating Narendra's application icons in Chae's system would have had a reasonable expectation of success or would have been predictable. APPLE-2003, ¶35. For at least these reasons, the Petition fails to satisfy its burden of explaining how and why a POSITA would have combined the alleged prior art references. APPLE-2003, ¶36.

**D. The Petition Fails to Establish Why a POSITA Would Have Combined “any two or more of Chae, Narendra, Android, Shuttleworth, Hong, and Karunamuni”**

The Petition provides a one (1)-page explanation for why a POSITA would have combined “*any two or more of* Chae, Narendra, Android, Shuttleworth, Hong, and Karunamuni.” Petition, 32-33. As a preliminary matter, the Petition fails to properly articulate which combination is being asserted, and, instead resorts to a vague “any two or more” of six references statement—which effectively means 15 or more combinations, placing an undue burden on both the Board and Patent Owner to decipher which combinations are being asserted and how. 35 U.S.C. § 322(a)(3) (An IPR petition must “identif[y]... with particularity... the grounds on which the challenge to each claim is based.”); *Henny Penny Corp. v.*

*Frymaster LLC*, 938 F.3d 1324, 1330 (Fed. Cir. 2019) (quoting *Intelligent Bio-Sys., Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359, 1369 (Fed. Cir. 2016)); *see also Adaptics Ltd. v. Perfect Co.*, IPR2018-01596, Paper 20, 18-19 (“a total of seventeen possible combinations... yields an unduly burdensome number of combinations.”), 24, (Mar. 6, 2019) (designated informative: Aug. 2, 2019).

The Petition does not explain what these various combinations would look like. APPLE-2003, ¶37. Indeed, the petition does not even explain which reference modifies another reference, or how and why certain features of a particular reference would have been combined with other features of another reference. *Id.* As an example, there is no explanation as to how an Android, Hong, and Karunamuni combination would be implemented, and, if so, how or why such combination would have been different from a Narendra, Shuttleworth, and Chae combination. *Id.* Indeed, “[i]t is not [the Board’s] role to formulate a ground when Petitioner has not adequately articulated one in the Petition.” *Investors Exchange*, IPR2018- 01796, Paper 11 at 4-5; *see also Amazon.com, Inc., et al. v. Avago Technologies General IP (Singapore) PTE. LTD.*, IPR2017-01112, Paper 11 at 13 (PTAB Aug. 23, 2017) (“Petitioner is inviting us to assume the role of archeologist of the record, which invitation we decline.”); *QuantifiCare, Inc. v. The Proctor & Gamble Co.*, IPR2017-02113, Paper 11 at 10 (PTAB March 16, 2018) (“At most, the asserted ground of unpatentability invites the Board to review each of the

references and determine which of them, ‘either alone or in combination,’ Pet. 13, might render the challenged claims obvious. In these circumstances, we will not ‘attempt to fit evidence together into a coherent explanation that supports an argument that demonstrates a reasonable likelihood that Petitioner would prevail.’” (quoting *Zetec, Inc. v. Westinghouse Elec. Co.*, IPR2014-00384, Paper 10 at 15 (PTAB July 23, 2014))).

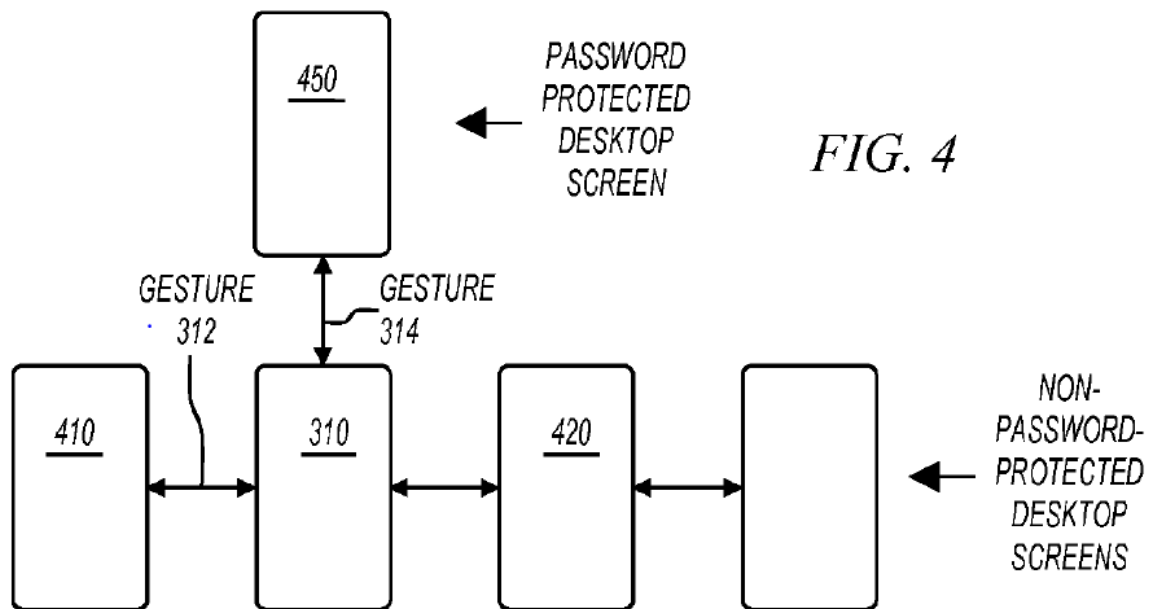
Rather than providing such explanations, the Petition resorts to broad conclusory statements and contends that the references would have been combined simply because they are “compatible with and additive of each other.” Petition, 32. But a POSITA would not combine references simply because they are compatible or even additive (which Patent Owner does not concede). In WBIP, the Federal Circuit explain:

too often the obviousness analysis is framed as an inquiry into whether a person of skill, with two (and only two) references sitting on the table in front of him, would have been motivated to combine (or, in [challenger’s] view, could have combined) the references in a way that renders the claimed invention obvious. The real question is whether that skilled artisan would have plucked one reference out of the sea of prior art [] and combined it with conventional [] elements to address some need present in the field. Whether a skilled artisan would be motivated to make a combination includes whether he would select particular references in order to combine their elements.

*WBIP, LLC v. Kohler Co.*, 829 F.3d 1317, 1337 (Fed. Cir. 2016) (emphasis added); *see also Belden Inc. v. Berk-Tek LLC*, 805 F.3d 1064, 1073 (Fed. Cir. 2015) (“[O]bviousness concerns whether a skilled artisan not only could have made but would have been motivated to make the combinations or modifications of prior art to arrive at the claimed invention.” (emphasis in original)); *PersonalWeb Techs., LLC v. Apple, Inc.*, 848 F.3d 987, 993 (Fed. Cir. 2017) (explaining that it is insufficient to allege “that a skilled artisan, once presented with the two references, would have understood that they could be combined.”). The Petition never attempt to answer this question. Even when explaining the alleged combinations, the Petition does not explain which features are being combined or how they would provide the alleged benefits. APPLE-2003, ¶37. For example, the Petition contends that a “POSITA would have been motivated, by the enhancement to the ease-of-use and user-friendliness of the user interface that each feature would have provided, to combine *any two or more of the disclosed features* to maximize the ease-of-use and user-friendliness of the user interface,” but does bother identifying the features that are being combined. Petition, 32.

One example of Petitioner’s problematic and generic explanation is the combination with Shuttleworth. APPLE-2003, ¶38. For instance, the Petition contends that “Shuttleworth discloses using a consistent directional swipe gesture to access the home screen from any other screen” and, in relying on this disclosure,

contends that “[u]sing a consistent directional swipe gesture to access the home screen, whether from the wake screen or a widget screen, would have been an obvious substitute for a physical or virtual home button.” Petition, 74, 75. Again, the Petition fails to reconcile this teaching with the teachings of the other references. APPLE-2003, ¶38. For example, in Narendra, a right touch gesture is made to transition from screen 410 to the screen 310 and a right touch gesture is made to transition from screen 420 to a screen other than screen 310. EX1006, FIG. 4. But if Shuttleworth’s teachings were applied, a right touch gesture would always lead to the same screen, which is not consistent with Narendra’s teachings. APPLE-2003, ¶38. The Petition fails to explain how it would reconcile the divergent teachings of the references. *Id.*



EX1006, FIG. 4.

For the various foregoing reasons, the Petition fails to establish why the combination of any two or more of Chae, Narendra, Android, Shuttleworth, Hong, and Karunamuni would have been obvious. APPLE-2003, ¶39.

**V. CLAIMS 1, 2, 6, 9, 10, 14, 17, 18, AND 22 ARE NOT RENDERED OBVIOUS BY CHAE ALONE OR ANY COMBINATION OF CHAE, NARENDRA, HONG, AND ANDROID (GROUNDS 1 AND 4)**

**A. Claim 1 is not rendered obvious by Chae alone or in combination with any other asserted reference**

**1. Chae alone and in combination with any other asserted reference do not render obvious a “computer system that is in communication with a display generation component and one or more input devices” (limitation 1b)**

Petitioner fails to address how Chae’s touchscreen is “in communication with” a computer system, and instead just assumes, without explanation, that Chae’s touchscreen is in communication with a computer system. *See* Pet., 34-35; APPLE-2003, ¶¶40-41. An IPR petition “must provide an understandable explanation of the element-by-element specifics of the patentability challenges, including the identification of particular portions of prior art on which the petitioner is relying.” *Corephotonics, Ltd. v. Apple Inc.*, 84 F.4th 990 (Fed. Cir. 2023); 35 U.S.C. § 312(a)(3); 37 C.F.R. §§ 42.22(a)(2), 42.104(b)(3)-(4); *Harmonic Inc. v. Avid Tech., Inc.*, 815 F.3d 1356, 1363-64 (Fed. Cir. 2016); *Ariosa Diagnostics v. Verinata Health, Inc.*, 805 F.3d 1359, 1367 (Fed. Cir. 2015).

Petitioner has the burden to explain how Chae renders claim 1 unpatentable.

Because Petitioner has failed to address every limitation of claim 1, Petitioner has failed to meet its burden of showing that Chae renders claim 1 unpatentable.

Petitioner does not rely on Narendra, Hong, or Android as providing this feature. Accordingly, Petitioner has failed to show that Chae alone or any combination of Chae, Narendra, Hong, and Android renders obvious a “computer system that is in communication with a display generation component and one or more input devices,” as recited in claim 1. As such, Petitioner has failed to carry its burden to show unpatentability of claim 1.

**2. Chae alone and in combination with any other asserted reference do not render obvious “the computer system is in a power saving state” (limitation 1c)**

Limitation 1c requires that “the computer system is in a power saving state.” Petitioner relies on Chae’s disclosure that “the controller 180 of the mobile terminal 100 wakes up the mobile terminal 100” and alleges that “a POSITA would have understood that the mobile terminal was in ‘a power saving state’ prior to waking up.” Pet., 37-38 (citing EX1005, [0094]). According to Petitioner, “the device would use less power” and be in a “power-saving mode” when “the display was turned off.” *Id.* (citing EX1019, 4:39-65; EX1007).

However, the Petition does not cite any disclosure in either Chae or Android that describes a power saving state or the operations of a mobile terminal when in a

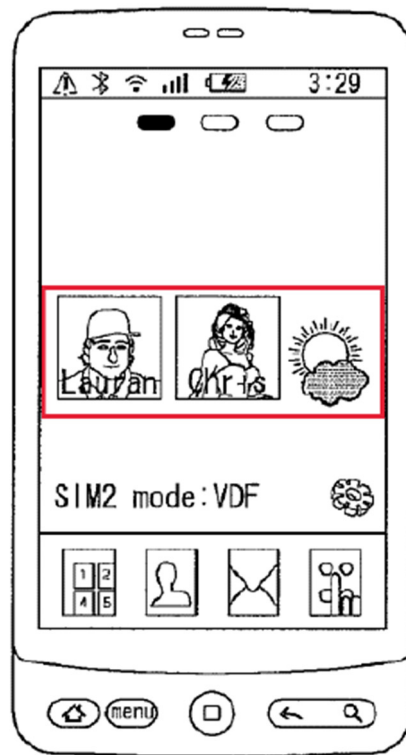
power saving state. *See* Petition, 36-39. The Petition does not address that Chae’s mobile terminal includes wireless communication unit 110, an audio/video (A/V) input unit 120, a user input unit 130, a sensing unit 140, an output unit 150, a memory 160, interface unit 170, a controller 180, and power supply unit 190, any of which could be consuming power while the display is turned off. EX1005, [0044]-[0062]. The Petition does not point to any disclosure in Chae that indicates the power consumption of other components in Chae’s mobile terminal while the display was off. *See* Petition, 36-39. The Petition also points to no disclosure in Android that indicates the power consumption of other components of the mobile terminal while the display was off. *Id.* Therefore, Petitioner has failed to show that Chae or Android renders obvious that the mobile terminal was in a power saving state prior to waking up. APPLE-2003, ¶¶42-43.

Petitioner does not rely on any other reference as providing this feature. Accordingly, Petitioner has failed to show that Chae alone or any combination of Chae, Narendra, Hong, and Android renders obvious “the computer system is in a power saving state,” as required by limitation 1c. As such, Petitioner has failed to carry its burden to show unpatentability of claim 1.

3. **Chae alone and in combination with any other asserted reference do not render obvious “a widget screen user interface that is different from... the home screen user interface” and “a respective user interface object... contains application content” and “when selected, causes display of an application” (limitation 1g)**

Petitioner also fails to show that Chae discloses that “a respective user interface object of the plurality of user interface objects contains application content from an application corresponding to the respective user interface object, and when selected, causes display of an application corresponding to the respective user interface object,” as recited in limitation 1g. APPLE-2003, ¶¶44-49.

Petitioner argues that a “POSITA would have understood that two or more of the objects on the Figure 6(b) screen... each ‘contains application content from an application corresponding to the respective user interface object’” and provides the following annotated figure. Pet., 52-53.



(b)

However, nothing in Chae indicates that the icons displayed in Figure 6(b) are dynamic or change in any way in response to content in the corresponding applications, and that the icons when selected causes display of the corresponding applications. APPLE-2003, ¶46. Petitioner argues, for example, that “the right-most object includes a graphical depiction of weather conditions” and selecting it would cause display of a corresponding application. Pet., 53, 55. However, nothing in Chae suggests that the right-most object is anything other than a generic graphical object, and nothing in Chae states that selecting that graphical object would display a corresponding application. APPLE-2003, ¶46. In fact, the only widgets that are described in Chae are widgets relating to the use state of the

multiple SIM cards. EX1005, [0152] (“widgets that show use-state information of the first and second SIMs (SIM1 and SIM2).”). These widgets described in Chae do not correspond to applications and thus do not cause display of applications when the widgets are selected. APPLE-2003, ¶46.

Chae, in combination with Narendra, Hong, and/or Android, is similarly deficient. APPLE-2003, ¶47. Narendra mentions the word “widgets” only once with no other details suggesting that widgets correspond to applications, contain application content, and cause display of applications. EX1006, [0025]. Hong’s widget provides a preview of a selected application without executing the selected application, but Hong does not teach or suggest displaying the application when the widget is selected as required by limitation 1g. EX1010, [0004]-[0005], [0009]-[0011], [0050], [0066]-[0068], [0071]-[0077], [0082]-[0092]. Android also provides no indication that the application is displayed when the widget is selected, rather than providing a preview of the selection within the widget without executing the application as similarly described in Hong. *See* EX1007.

Petitioner alleges that “[o]ne well-known functionality of widgets was displaying ‘an application corresponding to the respective user interface object’ upon selecting a widget.” Pet., 55. The only support for this assumption is Rosenberg’s declaration parroting the petition. EX1003, ¶91; *Cf. TQ Delta, LLC v. Cisco Systems Inc.*, 942 F.3d 1352, 1362-63 (Fed. Cir. 2019) (reversing a PTAB

finding of obviousness that was based on an “ipse dixit declaration”). But, as explained above, none of the references relied upon by Petitioner discloses this alleged “well-known functionality of widgets.” APPLE-2003, ¶48. Accordingly, Petitioner has failed to show that Chae alone or any combination of Chae, Narendra, Hong, and Android renders obvious “a respective user interface object... contains application content” and “when selected, causes display of an application,” as required by limitation 1g. APPLE-2003, ¶49. As such, Petitioner has failed to carry its burden to show unpatentability of claim 1 because Petitioner has not met its burden to show a teaching in the prior art that satisfies the requirements of claim 1.

**B. Claim 2 is not rendered obvious by Chae alone or in combination with any other asserted reference**

Claim 2 depends on claim 1. For at least the reasons discussed above with respect to claim 1, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 2. APPLE-2003, ¶68.

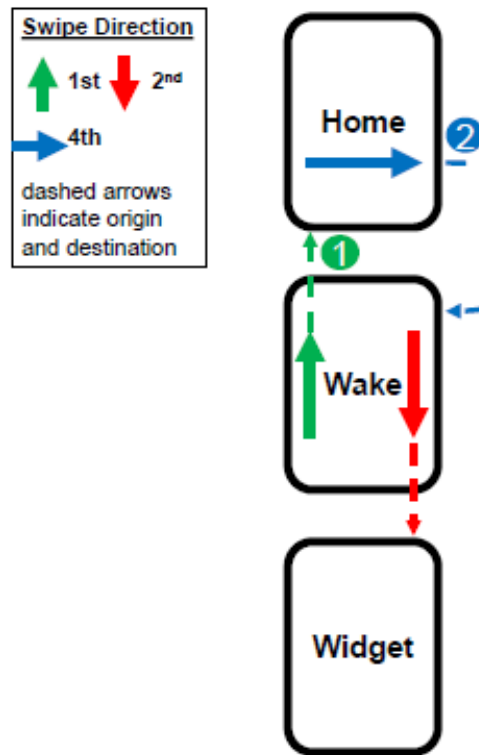
**C. Claim 6 is not rendered obvious by Chae alone or in combination with any other asserted reference**

Claim 6 depends on claim 1. For at least the reasons discussed above with respect to claim 1, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the

requirements of claim 6. APPLE-2003, ¶68.

Additionally, claim 6 recites “while the home screen user interface is displayed..., detecting a fifth input that... includes fifth movement... in a fourth direction that is different from the first direction and the second direction” and “redisplaying the wake screen user interface.” Petitioner argues that a POSITA would have modified Chae to include additional swipe gestures in different directions to allow a user to return to the wake screen. Pet., 66-67. Petitioner also asserts that a “POSITA would have understood that choosing a particular navigational path for moving among the user-interface screens and associating a particular directional swipe gesture with each movement is a simple matter of choosing from a finite number of design choices.” *Id.* Although the universe of possible swipe directions may be limited, the combinations of these directions and the various possible user interface screens is vast. APPLE-2003, ¶50. For the reasons noted below, the claimed navigational path in claim 6 would not have been obvious to a POSITA in view of Chae and Narendra. *Id.*; APPLE-2003, ¶63.

Petitioner provides a graphical representation of the navigational path of claim 6, showing a fourth direction that is perpendicular to the first and second directions, as follows:



Pet., 68. But neither Chae nor Narendra disclose such a navigational path for returning to the wake screen from the home screen. APPLE-2003, ¶63.

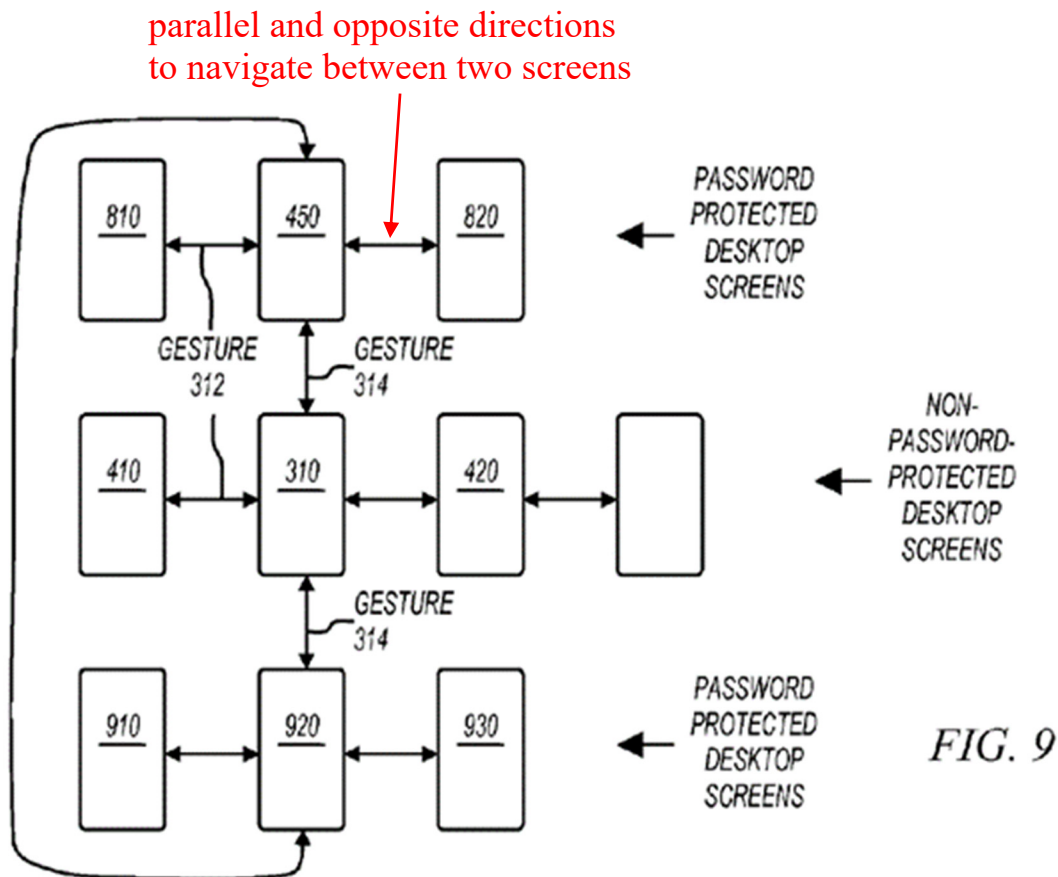
Specifically, Chae already contemplates that swipes left, right, up, and down have pre-assigned actions to facilitate navigation between the multiple user profiles related to the different SIM cards. EX1005, [0103]-[0104] (“At step S250, the controller 180 unlocks the first SIM (SIM1) when the directivity of the line is from **bottom-to-top**.”), [0108]-[0109] (“When the user draws a line in a **top-to-bottom** direction, the controller 180 unlocks the second SIM (SIM2) at step S290 and displays a home screen customized to the second SIM (SIM2) on the touch screen at step S300.”), [0110]-[0111] (“When a user draws a line in a **left-to-right**

direction on a touch screen, the controller 180 unlocks both of the first and second SIMs (SIM1 and SIM2) at step S270, and displays a home screen including common items of the first and second SIMs (SIM1 and SIM2) on the touch screen at step S280.”), [0148] (“when a user draws a line on the touch screen in a *right-to-left* direction, the controller 180 unlocks the first SIM (SIM1). When a user draws a line on the touch screen in a *left-to-right* direction, the controller 180 unlocks the second SIM (SIM2).”), FIGS. 3-4, 6-7, 19. Any new swipe in a cardinal direction added to Chae would already be in a direction that has a pre-assigned action.

APPLE-2003, ¶51. In fact, with the numerous swipe gestures identified in Chae because of its design to make multiple SIM cards accessible on the same device, a POSITA would have understood that adding more swipe gestures for additional actions would have made the device in Chae less user friendly, not least because it would have required the user to determine when certain motions cause different actions. *Id.*

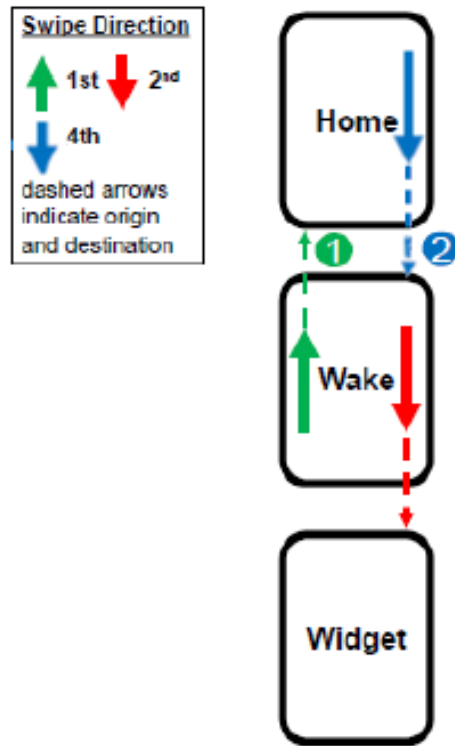
Narendra also does not teach or suggest returning to a previous screen using a swipe direction that is not substantially parallel and opposite, e.g., perpendicular as illustrated in the Petition, to the direction for navigating from the previous screen to the current screen. APPLE-2003, ¶52. Rather, Narendra shows navigating between two screens using parallel and opposite directions, which Petitioner and Rosenberg admits. EX1006, [0027] (“a user may navigate between

desktop screens that are logically oriented side-by-side by using a swipe gesture from left-to-right or from right-to-left such as gesture 312.”), FIG. 9; Petition, 88-89; EX1003, ¶¶150-151.



EX1006, FIG. 9

The combination of Chae and Narendra would not result in “the fifth movement to be in a fourth direction that is different from the first direction and the second direction,” as required by claim 6, but rather the fourth direction would be the same as the second direction, as shown below. APPLE-2003, ¶64.



Further, Petitioner argues that “[i]t would have been obvious to allow the user to return to the wake screen to lock the smartphone.” Pet., 69. This argument does not show that it would have been obvious to a POSITA to include a swipe gesture to return to the wake screen. APPLE-2003, ¶65. A POSITA would have understood that a user can lock the device or return to the wake screen by pressing a button on the device, as Dr. Cockburn explains and Android corroborates. APPLE-2003, ¶65; EX1007; Pet., 37-38; EX1003, ¶77. A POSITA would have understood it to be much more user friendly to simply include a button to return to a wake screen or lock the device in Chae than to confuse a user with a different direction for returning to the wake screen. APPLE-2003, ¶63.

Further, as Dr. Cockburn explains and Narendra (EX1006, [0027], FIG. 9) corroborates, it would not have been obvious to a POSITA to navigate between two screens using directions that are not parallel *and opposite* directions, e.g., perpendicular directions as Petitioner illustrates in the Petition. APPLE-2003, ¶66; Pet., 88-89; EX1003, ¶150 (“It would have been intuitive to a POSITA (and to smartphone users generally) that, if swiping in one direction results in moving from an origin screen to a destination screen, then swiping in the opposite direction should result in moving from the destination screen back to the origin screen. Indeed, the traditional navigational path illustrated by prior-art Figure 2 of Narendra behaves in this intuitive manner.”), ¶151 (“to enhance ease of use and comport with the intuitive notion described above, a POSITA would have been motivated to allow the user to return to the wake screen from the control panel by swiping in the opposite direction from that used to navigate from the wake screen to the control panel”).

Petitioner does not rely on any other reference as providing this feature. Accordingly, Petitioner has failed to show that Chae alone, or in combination with any other reference, renders obvious claim 6. APPLE-2003, ¶67. As such, Petitioner has failed to carry its burden to show unpatentability of claim 6.

**D. Claim 9 is not rendered obvious by Chae alone or in combination with any other asserted reference**

- 1. Chae alone and in combination with any other asserted reference do not render obvious “one or more processors that are in communication with a display generation component and one or more input devices” (limitation 9b1)**

Limitation 9b1 recites “one or more processors that are in communication with a display generation component and one or more input devices.” For at least the reasons discussed above with respect to limitation 1b, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 9. APPLE-2003, ¶¶40-41.

- 2. Chae alone and in combination with any other asserted reference do not render obvious “the computer system is in a power saving state” (limitation 9c)**

Limitation 9c is identical to limitation 1c. For at least the reasons discussed above with respect to limitation 1c, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 9. APPLE-2003, ¶¶42-43.

- 3. Chae alone and in combination with any other asserted reference do not render obvious “a widget screen user interface that is different from... the home screen user interface” and “a respective user interface object... contains application content” and “when selected, causes display of an application” (limitation 9g)**

Limitation 9g is identical to limitation 1g. For at least the reasons discussed above with respect to limitation 1g, Petitioner has not met its burden to show a

teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 9. APPLE-2003, ¶¶44-49.

**E. Claim 10 is not rendered obvious by Chae alone or in combination with any other asserted reference**

Claim 10 depends on claim 9. For at least the reasons discussed above with respect to claim 9, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 10. APPLE-2003, ¶68.

**F. Claim 14 is not rendered obvious by Chae alone or in combination with any other asserted reference**

Claim 14 depends on claim 9. For at least the reasons discussed above with respect to claim 9, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 14. APPLE-2003, ¶68.

Additionally, claim 14 includes limitations identical to claim 6 discussed above. For at least the reasons discussed above with respect to claim 6, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 14. APPLE-2003, ¶¶50-52, 63-67.

**G. Claim 17 is not rendered obvious by Chae alone or in combination with any other asserted reference**

- 1. Chae alone and in combination with any other asserted reference do not render obvious “one or more processors of a computer system that is in communication with a display generation component and one or more input devices” (limitation 17b)**

Limitation 17b recites “one or more processors of a computer system that is in communication with a display generation component and one or more input devices.” For at least the reasons discussed above with respect to limitation 1b, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 17.

APPLE-2003, ¶¶40-41.

- 2. Chae alone and in combination with any other asserted reference do not render obvious “the computer system is in a power saving state” (limitation 17c)**

Limitation 17c is identical to limitation 1c. For at least the reasons discussed above with respect to limitation 1c, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 17. APPLE-2003, ¶¶42-43.

- 3. Chae alone and in combination with any other asserted reference do not render obvious “a widget screen user interface that is different from... the home screen user interface” and “a respective user interface object... contains**

**application content” and “when selected, causes display of an application” (limitation 17g)**

Limitation 17g is identical to limitation 1g. For at least the reasons discussed above with respect to limitation 1g, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 17. APPLE-2003, ¶¶44-49.

**H. Claim 18 is not rendered obvious by Chae alone or in combination with any other asserted reference**

Claim 18 depends on claim 17. For at least the reasons discussed above with respect to claim 17, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 18. APPLE-2003, ¶68.

**I. Claim 22 is not rendered obvious by Chae alone or in combination with any other asserted reference**

Claim 22 depends on claim 17. For at least the reasons discussed above with respect to claim 17, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 22. APPLE-2003, ¶68.

Additionally, claim 22 includes limitations identical to claim 6 discussed above. For at least the reasons discussed above with respect to claim 6, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 22. APPLE-

2003, ¶¶50-52, 63-67.

**VI. CLAIMS 3-5, 11-13, AND 19-22 ARE NOT RENDERED OBVIOUS BY ANY COMBINATION OF CHAE, NARENDRA, SHUTTLEWORTH, HONG, AND ANDROID (GROUNDS 2 AND 5)**

**A. Claims 3, 11, and 19 are not rendered obvious by Chae in combination with any other asserted reference**

Claims 3, 11, and 19 each depend on claims 1, 9, and 17, respectively. For the reasons discussed above with respect to claims 1, 9, and 17, Petitioner has not met its burden to show that Chae in combination with Narendra, Shuttleworth, Hong, and/or Android renders obvious claims 3, 11, and 19. APPLE-2003, ¶68.

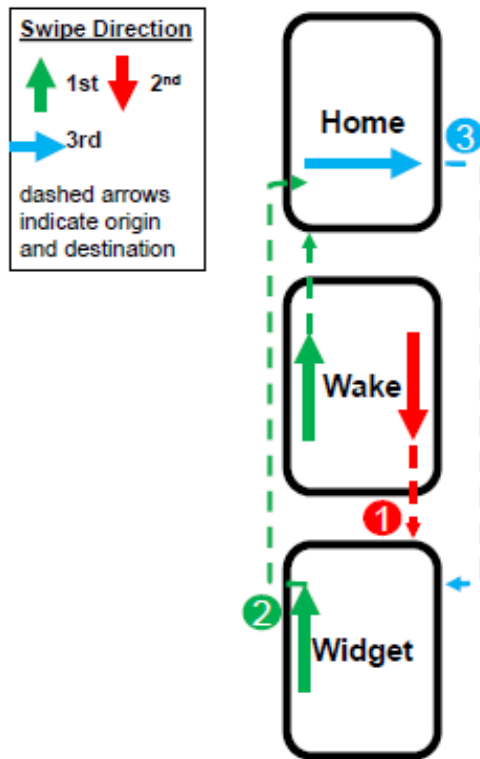
**B. Claims 4, 12, and 20 are not rendered obvious by Chae in combination with any other asserted reference**

Claims 4, 12, and 20 each depend indirectly on claims 1, 9, and 17, respectively. For the reasons discussed above with respect to claims 1, 9, and 17, Petitioner has not met its burden to show that Chae in combination with Narendra, Shuttleworth, Hong, and/or Android renders obvious claims 4, 12, and 20. APPLE-2003, ¶68.

Additionally, claims 4, 12, and 20 each recites “while the home screen user interface is displayed..., detecting a third input that... includes third movement... in a third direction that is different from the first direction and the second direction” and “redisplaying the widget screen user interface.” Petitioner asserts that a “POSITA would have understood that choosing a particular navigational

path for moving among the user-interface screens and associating a particular directional swipe gesture with each movement is a simple matter of choosing from a finite number of design choices.” Pet., 66-67. Although the universe of possible swipe directions may be limited, the combinations of these directions and the various possible user interface screens is vast. APPLE-2003, ¶50. The particular navigational path recited in claims 4, 12, and 20 would not have been obvious to a POSITA in view of Chae and Narendra. *Id.*; APPLE-2003, ¶53.

Petitioner provides a graphical representation of the navigational path of claims 4, 12, and 20, showing a third direction that is perpendicular to the first and second directions, as follows:



Pet., 77. But neither Chae nor Narendra disclose such a navigational path for returning to the widget screen from the home screen. APPLE-2003, ¶¶53-54.

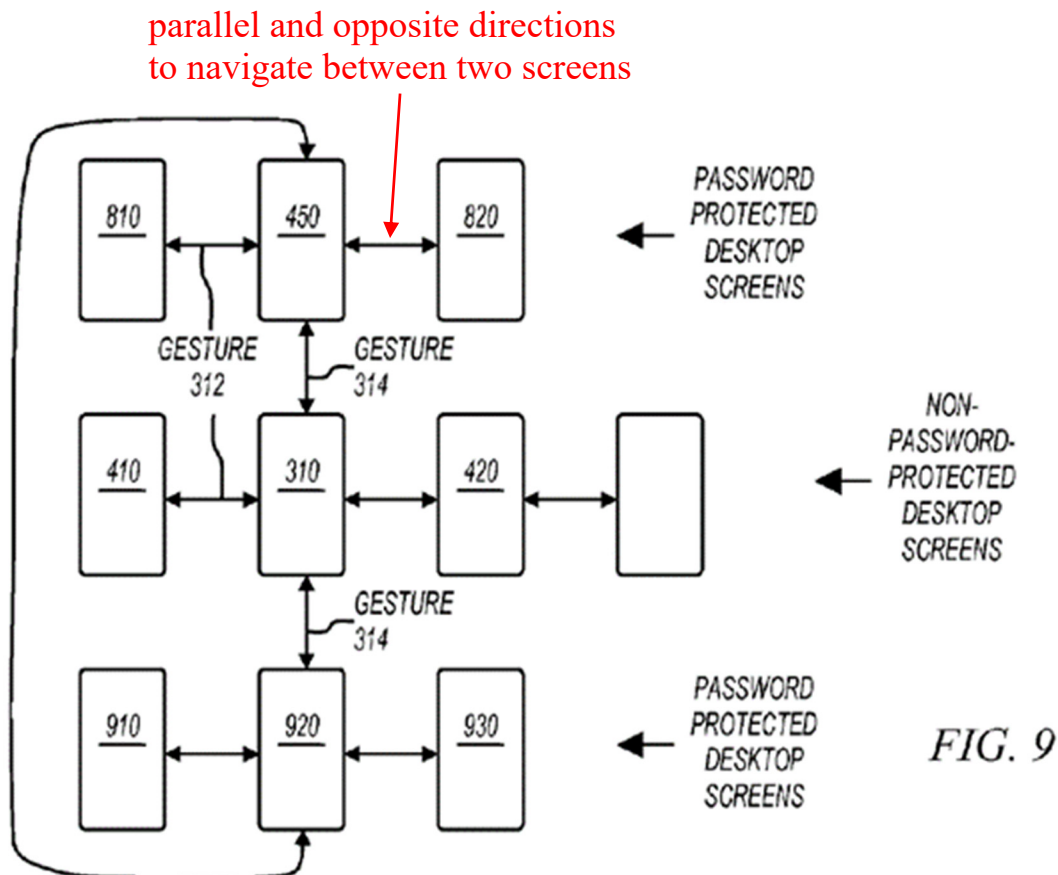
Specifically, Chae already contemplates that swipes left, right, up, and down have pre-assigned actions to facilitate navigation between the multiple user profiles related to the different SIM cards. EX1005, [0103]-[0104] (“At step S250, the controller 180 unlocks the first SIM (SIM1) when the directivity of the line is from *bottom-to-top*.”), [0108]-[0109] (“When the user draws a line in a *top-to-bottom* direction, the controller 180 unlocks the second SIM (SIM2) at step S290 and displays a home screen customized to the second SIM (SIM2) on the touch screen at step S300.”), [0110]-[0111] (“When a user draws a line in a *left-to-right*

direction on a touch screen, the controller 180 unlocks both of the first and second SIMs (SIM1 and SIM2) at step S270, and displays a home screen including common items of the first and second SIMs (SIM1 and SIM2) on the touch screen at step S280.”), [0148] (“when a user draws a line on the touch screen in a *right-to-left* direction, the controller 180 unlocks the first SIM (SIM1). When a user draws a line on the touch screen in a *left-to-right* direction, the controller 180 unlocks the second SIM (SIM2).”), FIGS. 3-4, 6-7, 19. Any new swipe in a cardinal direction added to Chae would already be in a direction that has a pre-assigned action.

APPLE-2003, ¶51. In fact, with the numerous swipe gestures identified in Chae because of its design to make multiple SIM cards accessible on the same device, a POSITA would have understood that adding more swipe gestures for additional actions would have made the device in Chae less user friendly, not least because it would have required the user to determine when certain motions cause different actions. *Id.*

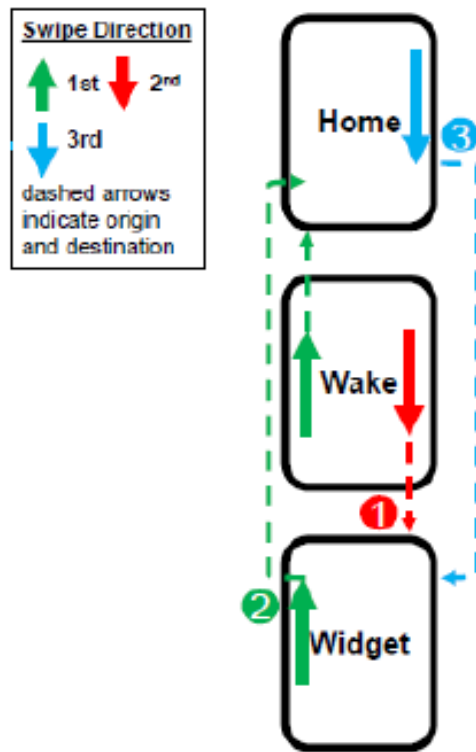
Narendra also does not teach or suggest returning to a previous screen using a swipe direction that is not substantially parallel and opposite, e.g., perpendicular as illustrated in the Petition, to the direction for navigating from the previous screen to the current screen. APPLE-2003, ¶52. Rather, Narendra shows navigating between two screens using parallel and opposite directions, which Petitioner and Rosenberg admits. EX1006, [0027] (“a user may navigate between

desktop screens that are logically oriented side-by-side by using a swipe gesture from left-to-right or from right-to-left such as gesture 312.”), FIG. 9; Petition, 88-89; EX1003, ¶¶150-151.



EX1006, FIG. 9

The combination of Chae and Narendra would not result in “a third direction that is different from the first direction and the second direction,” as required by claims 4, 12, and 20, but rather the third direction would be the same as the second direction, as shown below. APPLE-2003, ¶55.



Further, Petitioner argues that a “POSITA would have understood that such a navigational system is easy to learn and use” and that “[p]roviding a familiar user experience for quickly, efficiently, and easily accessing multiple screens would have motivated a POSITA to configure Chae or Narendra to allow a user to navigate to the widget screen from the wake screen by swiping in one direction but to navigate to the widget screen from the home screen by swiping in a different direction.” Pet., 79. This argument does not show that it would have been obvious to a POSITA to use a swipe direction that is different than the first direction and the second direction, e.g., perpendicular to the direction for navigating from the widget screen to the home screen, as the Petition illustrates. APPLE-2003, ¶56.

As Dr. Cockburn explains and Narendra (EX1006, [0027], FIG. 9) corroborates, it would not have been obvious to a POSITA to navigate between two screens using directions that are not parallel *and opposite* directions, e.g., perpendicular directions as Petitioner illustrates in the Petition. APPLE-2003, ¶56; Pet., 88-89; EX1003, ¶150 (“It would have been intuitive to a POSITA (and to smartphone users generally) that, if swiping in one direction results in moving from an origin screen to a destination screen, then swiping in the opposite direction should result in moving from the destination screen back to the origin screen. Indeed, the traditional navigational path illustrated by prior-art Figure 2 of Narendra behaves in this intuitive manner.”), ¶151 (“to enhance ease of use and comport with the intuitive notion described above, a POSITA would have been motivated to allow the user to return to the wake screen from the control panel by swiping in the opposite direction from that used to navigate from the wake screen to the control panel”). Likewise, a POSITA would have also understood it to be much more user friendly to provide access to the widget screen using a consistent directional swipe gesture, as Dr. Cockburn explains and Shuttleworth (EX1008, [0353]) corroborates, than to confuse a user with a different direction for returning to the widget screen. APPLE-2003, ¶56; EX1003, ¶130 (“Consistent with Shuttleworth’s teaching, a POSITA would have understood that providing the user a consistent mechanism to access the home screen, regardless of which screen the user is

currently viewing, was a well-known and accepted user-interface design practice for enhancing the efficiency and ease of use of the user interface.” “A POSITA would have understood that using a consistent directional swipe gesture to access the home screen enhances ease of use, efficiency, and convenience by allowing the user to learn a single gesture for accessing the home screen.”).

Petitioner does not rely on Shuttleworth, Hong, or Android as providing this feature. Accordingly, Petitioner has failed to show that Chae, in combination with any other reference, renders obvious claims 4, 12, and 20. APPLE-2003, ¶57. As such, Petitioner has failed to carry its burden to show unpatentability of claims 4, 12, and 2.

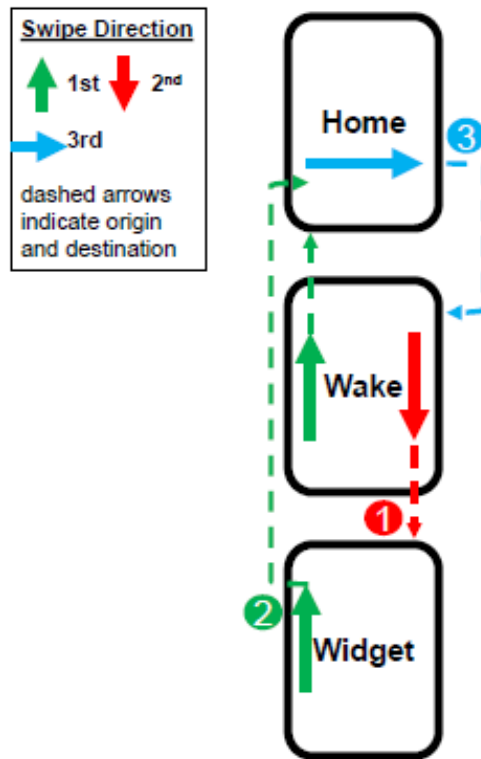
**C. Claims 5, 13, and 21 are not rendered obvious by Chae in combination with any other asserted reference**

Claims 5, 13, and 21 each depend indirectly on claims 1, 9, and 17, respectively. For the reasons discussed above with respect to claims 1, 9, and 17, Petitioner has not met its burden to show that Chae in combination with Narendra, Shuttleworth, Hong, and/or Android renders obvious claims 5, 13, and 21. APPLE-2003, ¶68.

Additionally, claims 5, 13, and 21 each recites “while the home screen user interface is displayed... detecting a fourth input that... includes fourth movement... in a third direction that is different from the first direction and the

second direction” and “redisplaying the wake screen user interface.” Petitioner argues that a POSITA would have modified Chae to include additional swipe gestures in different directions to allow a user to return to the wake screen. Pet., 66-67. Petitioner asserts that a “POSITA would have understood that choosing a particular navigational path for moving among the user-interface screens and associating a particular directional swipe gesture with each movement is a simple matter of choosing from a finite number of design choices.” *Id.* Although the universe of possible swipe directions may be limited, the combinations of these directions and the various possible user interface screens is vast. APPLE-2003, ¶50. The particular navigational path recited in claims 5, 13, and 21 would not have been obvious to a POSITA in view of Chae and Narendra. *Id.*; APPLE-2003, ¶58.

Petitioner provides a graphical representation of the navigational path of claims 5, 13, and 21, showing a third direction that is perpendicular to the first and second directions, as follows:



Pet., 81. But neither Chae nor Narendra disclose such a navigational path for returning to the wake screen from the home screen. APPLE-2003, ¶¶58-59.

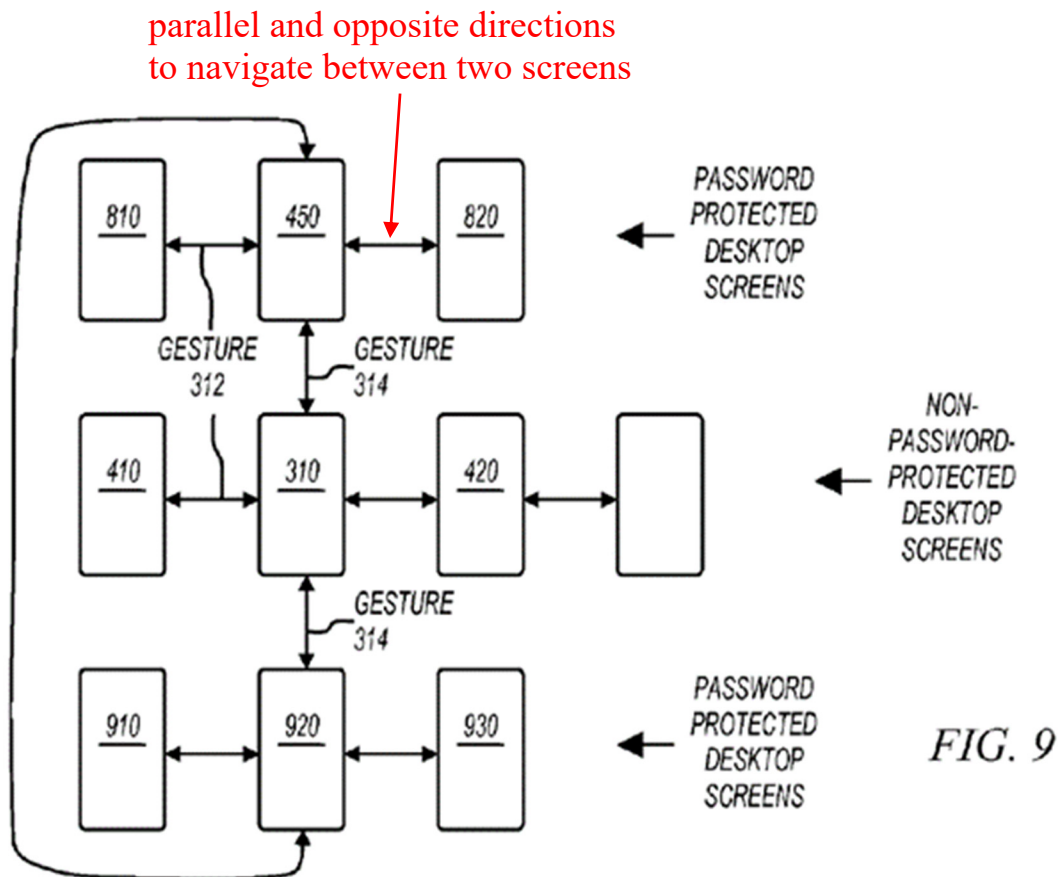
Specifically, Chae already contemplates that swipes left, right, up, and down have pre-assigned actions to facilitate navigation between the multiple user profiles related to the different SIM cards. EX1005, [0103]-[0104] (“At step S250, the controller 180 unlocks the first SIM (SIM1) when the directivity of the line is from *bottom-to-top*.”), [0108]-[0109] (“When the user draws a line in a *top-to-bottom* direction, the controller 180 unlocks the second SIM (SIM2) at step S290 and displays a home screen customized to the second SIM (SIM2) on the touch screen at step S300.”), [0110]-[0111] (“When a user draws a line in a *left-to-right*

direction on a touch screen, the controller 180 unlocks both of the first and second SIMs (SIM1 and SIM2) at step S270, and displays a home screen including common items of the first and second SIMs (SIM1 and SIM2) on the touch screen at step S280.”), [0148] (“when a user draws a line on the touch screen in a *right-to-left* direction, the controller 180 unlocks the first SIM (SIM1). When a user draws a line on the touch screen in a *left-to-right* direction, the controller 180 unlocks the second SIM (SIM2).”), FIGS. 3-4, 6-7, 19. Any new swipe in a cardinal direction added to Chae would already be in a direction that has a pre-assigned action.

APPLE-2003, ¶51. In fact, with the numerous swipe gestures identified in Chae because of its design to make multiple SIM cards accessible on the same device, a POSITA would have understood that adding more swipe gestures for additional actions would have made the device in Chae less user friendly, not least because it would have required the user to determine when certain motions cause different actions. *Id.*

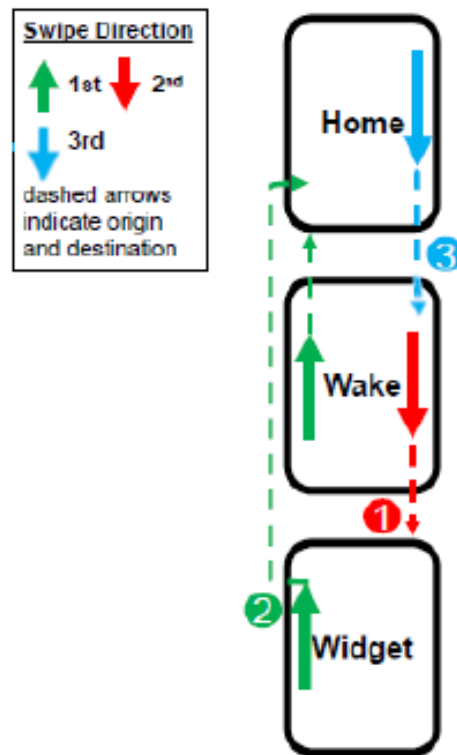
Narendra also does not teach or suggest returning to a previous screen using a swipe direction that is not substantially parallel and opposite, e.g., perpendicular as illustrated in the Petition, to the direction for navigating from the previous screen to the current screen. APPLE-2003, ¶52. Rather, Narendra shows navigating between two screens using parallel and opposite directions, which Petitioner and Rosenberg admits. EX1006, [0027] (“a user may navigate between

desktop screens that are logically oriented side-by-side by using a swipe gesture from left-to-right or from right-to-left such as gesture 312.”), FIG. 9; Petition, 88-89; EX1003, ¶¶150-151.



EX1006, FIG. 9

The combination of Chae and Narendra would not result in “a third direction that is different from the first direction and the second direction,” as required by claims 5, 13, and 21, but rather the third direction would be the same as the second direction, as shown below. APPLE-2003, ¶59.



Further, Petitioner argues that “[i]t would have been obvious to allow the user to return to the wake screen to lock the smartphone.” Pet., 69. This argument does not show that it would have been obvious to a POSITA to include a swipe gesture to return to the wake screen. APPLE-2003, ¶60. A POSITA would have understood that a device can be locked or a wake screen can be reached by pressing a button on the device, as shown in Android. *Id.*; EX1007; Pet., 37-38; EX1003, ¶77. A POSITA would have understood it to be much more user friendly to simply include a button to return to a wake screen or lock the device in Chae than to confuse a user with a different direction for returning to the wake screen. APPLE-2003, ¶60.

Further, as Dr. Cockburn explains and Narendra (EX1006, [0027], FIG. 9) corroborates, it would not have been obvious to a POSITA to navigate between two screens using directions that are not parallel *and opposite* directions, e.g., perpendicular directions as Petitioner illustrates in the Petition. APPLE-2003, ¶61; Pet., 88-89; EX1003, ¶150 (“It would have been intuitive to a POSITA (and to smartphone users generally) that, if swiping in one direction results in moving from an origin screen to a destination screen, then swiping in the opposite direction should result in moving from the destination screen back to the origin screen. Indeed, the traditional navigational path illustrated by prior-art Figure 2 of Narendra behaves in this intuitive manner.”), ¶151 (“to enhance ease of use and comport with the intuitive notion described above, a POSITA would have been motivated to allow the user to return to the wake screen from the control panel by swiping in the opposite direction from that used to navigate from the wake screen to the control panel.”).

Petitioner does not rely on Shuttleworth, Hong, or Android as providing this feature. Accordingly, Petitioner has failed to show that Chae in combination with Narendra, Shuttleworth, Hong, and/or Android renders obvious claims 5, 13, and 21. APPLE-2003, ¶62. As such, Petitioner has failed to carry its burden to show unpatentability of claims 5, 13, and 21.

**D. Claim 22 is not rendered obvious by Chae in combination with any other asserted reference**

Claim 22 depends on claim 17. For at least the reasons discussed above with respect to claim 17, Petitioner has not met its burden to show a teaching in Chae or any combination of Chae, Narendra, Hong, and Android that satisfies the requirements of claim 22. APPLE-2003, ¶68.

Additionally, claim 22 includes limitations identical to claim 6 discussed above. Petitioner does not rely on Shuttleworth as providing this feature. For at least the reasons discussed above with respect to claim 6, Petitioner has not met its burden to show that any combination of Chae, Narendra, Shuttleworth, Hong, and Android renders obvious the requirements of claim 22. APPLE-2003, ¶¶50-52, 63-67.

**VII. CLAIMS 7, 8, 15, 16, 23, AND 24 ARE NOT RENDERED OBVIOUS BY ANY COMBINATION OF CHAE, NARENDRA, KARUNAMUNI, HONG, AND ANDROID (GROUNDS 3 AND 6)**

Claims 7, 8, 15, 16, 23, and 24 each depend on claims 1, 9, and 17, respectively. For the reasons discussed above with respect to claims 1, 9, and 17, Petitioner has not met its burden to show that Chae in combination with any other asserted reference renders obvious claims 7, 8, 15, 16, 23, and 24. APPLE-2003, ¶68.

## VIII. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board confirm the patentability of the challenged claims.

Respectfully submitted,

Date: December 20, 2023

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**CERTIFICATION UNDER 37 C.F.R. §42.24(d)**

Under the provisions of 37 C.F.R. §42.24(d), the undersigned hereby certifies that the word count for the foregoing Patent Owner's Response to Petition totals 8,988, which is less than the 14,000 allowed under C.F.R. §42.24(b)(1).

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on December 20, 2023, a complete and entire copy of this Patent Owner's Response and its supporting exhibits were provided via email, to the Petitioners by serving the correspondence addresses of record as follows:

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