

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO. LTD.,
AND SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner

v.

MULTIMODAL MEDIA LLC,
Patent Owner.

Case No. IPR2024-00064
U.S. Patent No. 10,552,030

**JOINT REQUEST TO KEEP SEPARATE PURSUANT TO
35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c)**

LIST OF EXHIBITS¹

Ex-1001	U.S. Patent No. 10,552,030
Ex-1002	Declaration of Dr. Benjamin B. Bederson
Ex-1003	Curriculum Vitae of Dr. Benjamin B. Bederson
Ex-1004	File History of U.S. Patent No. 10,552,030
Ex-1005	INTENTIONALLY LEFT BLANK
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Ex-1008	INTENTIONALLY LEFT BLANK
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Ex-1011	INTENTIONALLY LEFT BLANK
Ex-1012	INTENTIONALLY LEFT BLANK
Ex-1013	INTENTIONALLY LEFT BLANK
Ex-1014	U.S. Patent No. 8,812,041 (“Lee’041”)
Ex-1015	U.S. Patent No. 8,948,804 (“Lee’804”)
Ex-1016	INTENTIONALLY LEFT BLANK
Ex-1017	U.S. Patent Publication No. 2012/0229410 (“Ohashi”)
Ex-1018	U.S. Patent Publication No. 2012/0014684 (“D’Souza”)
Ex-1019	INTENTIONALLY LEFT BLANK

¹ Four-digit pin citations that begin with 0 are to the branded numbers added by Petitioner in the bottom right corner of the exhibits. All other pin citations are to original page, column, paragraph, or line numbers.

Ex-1020	Claim Mapping Table
Ex-1021	<i>Multimodal Media LLC v. Guangdong Oppo Mobile Telecommunications Corp., Ltd.</i> , 2:21-cv-00436, D.I. 65 (E.D. Tex. Apr. 24, 2023) (Claim Construction Order) (“ <i>Oppo</i> Litigation”)
Ex-1022	<i>Multimodal Media LLC v. TCL Technology Group Corporation et al.</i> , 2:22-cv-00463, D.I. 23 (E.D. Tex. Feb. 22, 2023) (Stay Order) (“ <i>TCL</i> litigation”)
Ex-1023	<i>Multimodal Media LLC v. Samsung Electronics Co., Ltd. et al.</i> , 2:22-cv-00462, Infringement Contentions (E.D. Tex. May 30, 2023) (“ <i>Samsung</i> Infringement Contentions”)
Ex-1024	INTENTIONALLY LEFT BLANK
Ex-1025	INTENTIONALLY LEFT BLANK
Ex-1026	Benjamin B. Bederson & James D. Hollan, Pad++: A Zooming Graphical Interface for Exploring Alternate Interface Physics, UIST ‘94 Proceedings of the 7th Annual ACM Symposium on User Interface Software and Technology 17 (1994), DOI: http://dx.doi.org/10.1145/192426.192435
Ex-1027	INTENTIONALLY LEFT BLANK
Ex-1028	INTENTIONALLY LEFT BLANK
Ex-1029	INTENTIONALLY LEFT BLANK
Ex-1030	INTENTIONALLY LEFT BLANK
Ex-1031	David Dearman, Amy Karlson, Brian Meyers, and Ben Bederson, Multi-modal text entry and selection on a mobile device (2010), In Proceedings of Graphics Interface 2010 (GI ‘10), Canadian Information Processing Society, CAN, 19–26
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Ex-1041	INTENTIONALLY LEFT BLANK
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Ex-1045	Ben Shneiderman & Catherine Plaisant, <i>Designing the User Interface</i> (4th ed., 2005)
Ex-1046	<i>Multimodal Media LLC v. Guangdong Oppo Mobile Telecommunications Corp., Ltd.</i> , 2:21-cv-00436, D.I. 74 (E.D. Tex. Sept. 6, 2023) (Order of Dismissal)
Ex-1047	INTENTIONALLY LEFT BLANK
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Ex-1056	Ivan Edward Sutherland, Sketchpad: A man-machine graphical communication system, University of Cambridge Technical Report UCAM-CL-TR-574, ISSN 1476-2986, Number 574 (2003), available at: https://www.cl.cam.ac.uk/techreports/UCAM-CL-TR-574.pdf
Ex-1057	S.K. Lee, William Buxton, & K.C. Smith, A multi-touch three-dimensional touch-sensitive tablet, Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (CHI '85), 21-25 (Apr. 1985), available at: DOI: https://doi.org/10.1145/317456.317461
Ex-1058	U.S. Patent No. 3,482,241
Ex-1059	U.S. Patent No. 10,140,301
Ex-1060	U.S. Patent Publication No. 2013/0019175
Ex-1061	U.S. Patent No. 9,767,681
Ex-1062	Tarmo Anttalainen, Introduction to Telecommunications Network Engineering, 77-84 (2d ed., 2003), available at: https://ieeexplore.ieee.org/document/9106127
Ex-1063	U.S. Patent Publication No. 2013/0227456
Ex-1064	U.S. Patent Publication No. 2014/0063313
Ex-1065	Rick Broida & Dave Johnson, How to Do Everything Palm® Pre™ (2010)
Ex-1066	Ken Hinckley et al., Design and Analysis of Delimiters for Selection-Action Pen Gesture Phrases in Scriboli, CHI 2005 (Apr. 2-7, 2005)
Ex-1067	PCT Publication WO2011/151501 (“Dolenc”)
Ex-1068	Kay Hofmeester & Jennifer Wolfe, Self-Revealing Gestures: Teaching New Touch Interactions in Windows 8, CHI 2012 (May 5-12, 2012)
Ex-1069	Xiangshi Ren & Shinju Moriya, Improving selection performance on

	pen-based systems: a study of pen-based interaction for selection tasks, 7 ACM Trans. Comput.-Hum. Interact. 3, 384-416 (Sept. 2000), available at: https://doi.org/10.1145/355324.355328
Ex-1070	Andrew Sears & Ben Shneiderman, High Precision Touchscreens: Design Strategies and Comparisons with a Mouse (Jan. 23, 1989), available at: https://api.drum.lib.umd.edu/server/api/core/bitstreams/9352f26a-e793-429a-80f8-65f606f41969/content
Ex-1071	Seon Joo Kim et al., Brush-and-Drag: A Multi-touch Interface for Photo Triaging, MobileHCI'12 (Sept. 21-24, 2012)
Ex-1072	U.S. Patent No. 9,195,330
Ex-1073	U.S. Patent Publication No. 2009/0015703
Ex-1074	U.S. Patent Publication No. 2013/0063645
Ex-1075	U.S. Patent Publication No. 2014/0078371
Ex-1076	U.S. Patent Publication No. 2010/0177157
Ex-1077	Microsoft Computer Dictionary 499 (5th ed., 2002)
Ex-1078	U.S. Patent Publication No. 2011/0099513
Ex-1079	U.S. Patent Publication No. 2012/0072866
Ex-1080	Newsroom, Apple Presents iPhone 4 (June 7, 2010), available at: https://www.apple.com/newsroom/2010/06/07Apple-Presents-iPhone-4/
Ex-1081	Wikipedia, Walkie-talkie, available at: https://en.wikipedia.org/wiki/Walkie-talkie
Ex-1082	Stipulation Regarding Invalidity Challenges, <i>Multimodal Media LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.</i> , Case No. 2:22-cv-00462-JRG-RSP (E.D. Tex. Apr. 9, 2024)
Ex-1083	Google's Settlement and Patent License Agreement and Samsung's Settlement and Patent License Agreement

Petitioners Google LLC, Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Petitioners”) and Patent Owner Multimodal Media LLC (“Patent Owner”) have reached a settlement. The settlement agreement resolves the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 10,552,030 (“Patent-in-Suit”). The parties jointly request that the Board treat the settlement agreement as business confidential information and keep it separate from the files of this proceeding and the files of the Patent-in-Suit. The parties were authorized to file this Joint Request by the Board (via email) on July 26, 2024.

I. Statement of Precise Relief Requested

The parties jointly request that the Board treat the settlement agreement as business confidential information and keep it separate from the files of this proceeding and the files of the Patent-in-Suit. The parties request that the settlement agreement “be made available only to Federal Government agencies on written request, or to any person on a showing of good cause” in accordance with 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74.

II. Reasons Why Relief Is Appropriate

The terms of the settlement agreement require the parties to treat the settlement agreement as confidential information and limit their ability to share the

settlement agreement or disclose its content with third parties. The parties have filed a copy of the settlement agreement with the Board, as required by 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74. The confidential settlement agreement was filed in the PTAB E2E system to provide availability only to the Board.

Dated: July 29, 2024

Respectfully submitted,

/s/ Ben Haber

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6(E)(4)

The undersigned hereby certifies that on July 29, 2024 the foregoing **JOINT REQUEST TO KEEP SEPARATE** was served via electronic mail, in its entirety, on Patent Owner's attorneys of record in IPR2024-00064.

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