

**SMITH INTERFACE TECHNOLOGIES, LLC'S
PATENT L.R. 3.1 PRELIMINARY INFRINGEMENT CONTENTIONS**

**EXHIBIT A2 - U.S. Patent No. 10,649,578 (iPhone)
Claims 1 and 27**

Smith Interface Technologies, LLC ("Smith Interface") accuses Apple of infringing claims 1 and 27 of U.S. Patent No. 10,649,578 (hereinafter "the '578 Patent"). Pursuant to Patent L.R. 3.1(c), Smith Interface provides the following claim chart.

This claim chart identifies specifically where each element of each Asserted Claim is found within each Accused Instrumentality and provides Apple's notice of identified instrumentalities (including "the Accused System") that incorporate or reflect the recited claim elements. This claim chart is not intended to be an expert report on infringement or provide detailed analysis of the claim terms or infringement. This claim chart includes information related to an assertion of infringement with respect to the '578 Patent Accused Products identified, including diagrams, web page screenshots, and other documentary evidence by way of example and not by way of limitation.

The Asserted Claims include elements that are implemented, at least in part, by instrumentalities described in confidential information not accessible to Plaintiff. In some instances, the precise processes and algorithms used are, at least in part, not publicly available. An analysis of Apple's (or other third parties') technical documentation and/or software source code may be necessary to more fully identify all infringing features and functionality. Accordingly, Smith Interface reserves the right to supplement these contentions once such information is made available to Smith Interface. Furthermore, Smith Interface reserves the right to revise these contentions, as appropriate, upon issuance of the Court's Claim Construction Order.

The claim chart refers to the Accused System and the aforementioned products are included in (or can operate in conjunction with) the Accused System, as noted in the claim chart. To the extent the below claim chart relies on evidence for the Accused System, Smith Interface asserts that, on information and belief, any similarly-functioning system also infringe the charted claim. Smith Interface reserves the right to amend these infringement contentions with other products made, used, sold, imported, or offered for sale by Apple. Smith Interface also reserves the right to amend these infringement contentions by citing other claims of the '578 Patent, not listed in the claim chart, that are infringed by the Accused System. Smith Interface further reserves the right to amend these infringement contentions by adding, subtracting, or otherwise modifying content in the "Accused System" section.

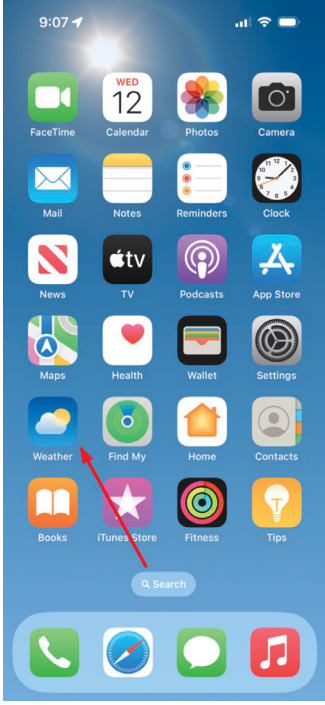
To the extent there are any differences between the accused instrumentalities and the following claim elements, any such differences are insubstantial and are alleged to infringe under the doctrine of equivalents.

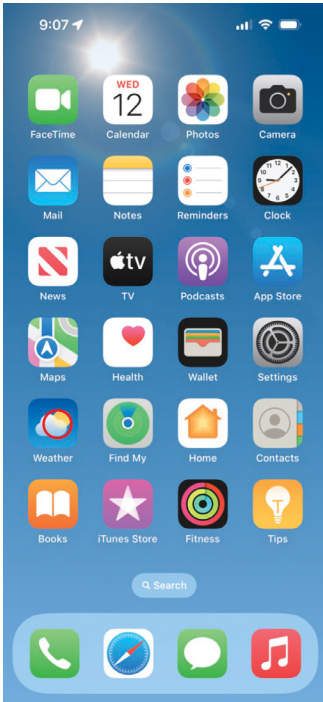
Claim	Claim Elements	Exemplary Accused System (Apple iPhone 14 Pro, iOS 16)
1 ¹	(a) An electronic device, comprising: a display; a touch interface; one or more processors; memory; and one or more programs, wherein the one or more programs are stored in the memory and configured to be executed by the one or more processors, the one or more programs including instructions for: displaying a home screen on the display, the home screen	Apple iPhone 14 Pro smartphones comprise <i>a display</i>; <i>a touch-interface</i> (e.g., Super Retina XDR display, etc.); <i>one or more processors</i> (e.g., A16 Bionic chip, etc.); <i>memory</i> (e.g., 128MB, 256MB, 512MB, or 1TB, etc.); <i>and one or more programs, wherein the one or more programs are stored in the memory and configured to be executed by the one or more processors, the one or more programs including instructions for: displaying a home screen on the display, the home screen including an icon associated with an application</i> (e.g., Weather, any other application, etc.);

¹ Each element of the independent claims incorporates all elements of the independent claim. For example, any evidence provided in claim 1 element (a) incorporates all claim elements 1(b)-(f).

	including an icon associated with an application;	  Super Retina XDR display 6.1-inch (diagonal) all-screen OLED display 2556-by-1179-pixel resolution at 460 ppi <table><tr><td>Capacity¹</td><td>128GB</td><td>128GB</td></tr><tr><td></td><td>256GB</td><td>256GB</td></tr><tr><td></td><td>512GB</td><td>512GB</td></tr><tr><td></td><td>1TB</td><td>1TB</td></tr></table>	Capacity¹	128GB	128GB		256GB	256GB		512GB	512GB		1TB	1TB
Capacity¹	128GB	128GB												
	256GB	256GB												
	512GB	512GB												
	1TB	1TB												

		Chip A16 A16 Bionic chip 6-core CPU with 2 performance and 4 efficiency cores 5-core GPU 16-core Neural Engine https://www.apple.com/iphone-14-pro/specs/
--	--	---

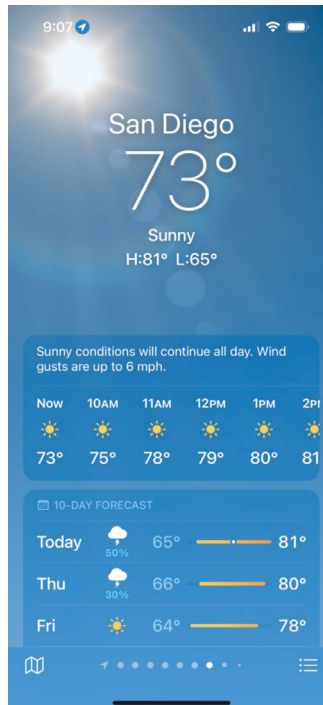
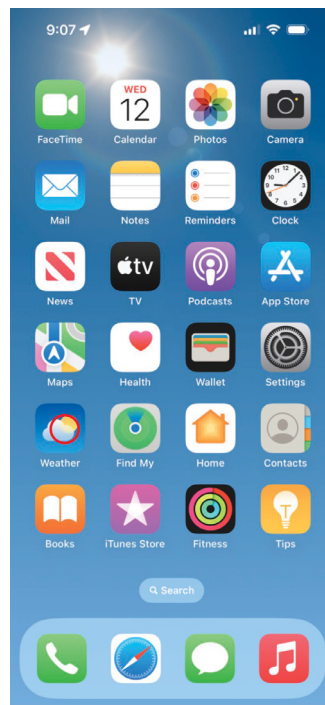
		
	(b) while displaying the home screen, detecting a first input by a first contact on the icon;	Apple iPhone 14 Pro smartphones are designed for, <i>while displaying the home screen, detecting a first input</i> (e.g., user input in the form of a tap or momentary touch, a touch-and-hold or long-press, and/or a slide or drag, etc.) <i>by a first contact on the icon</i> ;

	See the evidence above and below, for example:  A screenshot of an iPhone 14 Pro home screen. The status bar at the top shows the time 9:07, signal strength, Wi-Fi, and battery icons. The home screen features a grid of app icons: FaceTime, Calendar (showing WED 12), Photos, Camera, Mail, Notes, Reminders, Clock, News, TV, Podcasts, App Store, Maps, Health, Wallet, Settings, Weather, Find My, Home, and Contacts. At the bottom is a dock with icons for Phone, Safari, Messages, and Music. A search bar is located above the dock.
(c) in response to detecting the first input,	Apple iPhone 14 Pro smartphones are designed for, <i>in response to detecting the first input</i> (e.g., first user input in the form of a tap or momentary touch, a touch-and-hold or long-press, and/or a slide or drag, etc.),

replacing the home screen with a user interface of the application;

replacing the home screen with a user interface (e.g., open application view, etc.) of the application (e.g., Weather, any other application, etc.);

See the evidence above and below, for example:



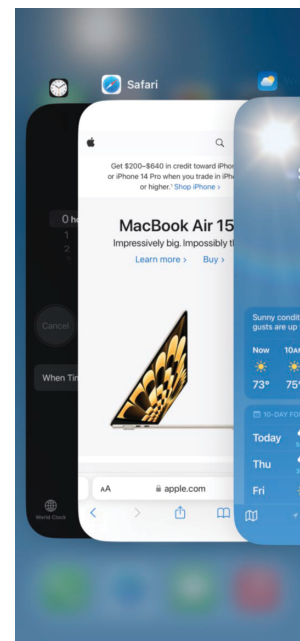
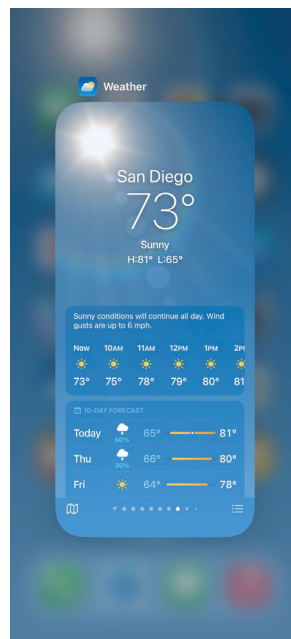
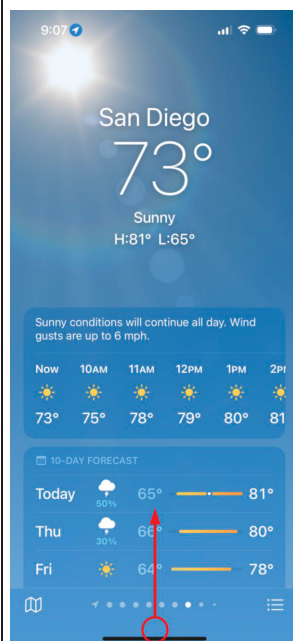
	(d) while displaying the user interface of the application, detecting a second input by a second contact that includes movement across the display in a direction;	Apple iPhone 14 Pro smartphones are designed for, <i>while displaying the user interface</i> (e.g., open application view, etc.) <i>of the application</i> (e.g., Weather, any other application, etc.), <i>detecting a second input</i> (e.g., second user input in the form of a slide or drag, etc.) <i>by a second contact that includes movement across the display in a direction</i>; See the evidence above and below, for example:

		 The image displays two identical screenshots of an iPhone 14 Pro screen showing the weather app for San Diego. The screen shows the current temperature as 73° and a sunny forecast. Below this, there is a section for the 10-day forecast. A red circle is drawn at the bottom of the screen, and a red arrow points from this circle to the '10-DAY FORECAST' section, indicating a user input gesture.
	(e) in response to detecting the second input and in accordance	Apple iPhone 14 Pro smartphones are designed for <i>in response to detecting the second input</i> (e.g., second user input in the form of a slide or drag, etc.) <i>and in accordance with a determination that the second input meets one or more criteria that is met when the second input is detected to include a movement parameter</i>

with a determination that the second input meets one or more criteria that is met when the second input is detected to include a movement parameter that is above a movement threshold, displaying at least a portion of the user interface of the application in a first virtual display layer that appears at a lesser depth as compared to a second virtual display layer, such that the at least portion of the user interface of the application is reduced in size and is further displayed in its entirety when displayed in the first virtual display layer; and

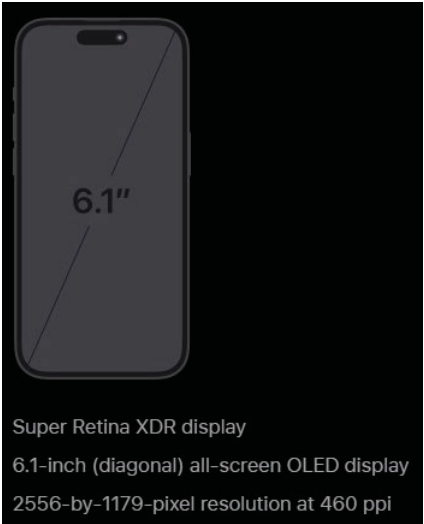
that is above a movement threshold, displaying at least a portion of the user interface (e.g., open application view, etc.) of the application (e.g., Weather, any other application, etc.) in a first virtual display layer that appears at a lesser depth (e.g., foreground, etc.) as compared to a second virtual display layer, such that the at least portion of the user interface of the application is reduced in size and is further displayed in its entirety when displayed in the first virtual display layer; and

See the evidence above and below, for example:

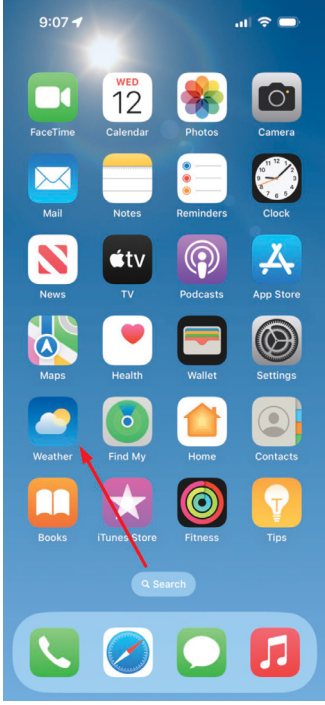


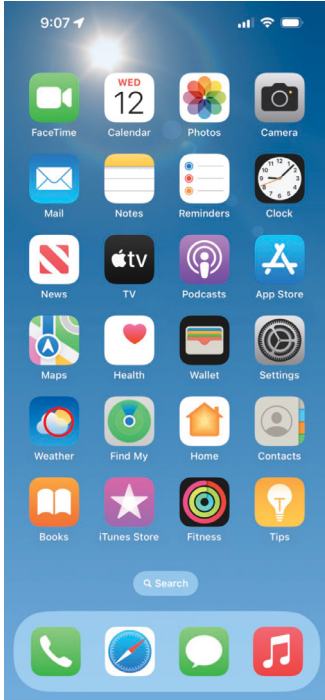
	(f) in response to detecting the second input and in accordance with a determination that the second input does not meet the one or more criteria that is met when the second input is detected to include the movement parameter that is above the movement threshold, replacing the user interface of the application with the home screen including the icon associated with the application.	Apple iPhone 14 Pro smartphones are designed for, <i>in response to detecting the second input</i> (e.g., second user input in the form of a slide or drag, etc.) <i>and in accordance with a determination that the second input does not meet the one or more criteria that is met when the second input is detected to include the movement parameter that is above the movement threshold, replacing the user interface</i> (e.g., open application view, etc.) <i>of the application</i> (e.g., Weather, any other application, etc.) <i>with the home screen including the icon associated with the application.</i> See the evidence above and below, for example:

		
27	(a) A non-transitory computer readable storage medium storing	Apple iPhone 14 Pro smartphones comprise <i>non-transitory computer readable storage medium storing one or more programs, the one or more programs comprising instructions which, when executed by an electronic device with a display and a touch-sensitive surface (e.g., Super Retina XDR display, etc.), cause</i>

	one or more programs, the one or more programs comprising instructions which, when executed by an electronic device with a display and a touch-sensitive surface, cause the electronic device to: display a home screen on the display, the home screen including an icon that corresponds to an application;	<i>the electronic device to: display a home screen on the display, the home screen including an icon that corresponds to an application (e.g., Weather, any other application, etc.);</i>   6.1" Super Retina XDR display 6.1-inch (diagonal) all-screen OLED display 2556-by-1179-pixel resolution at 460 ppi <table> <tr> <td data-bbox="469 1251 760 1304">Capacity¹</td><td data-bbox="760 1251 889 1304">128GB</td><td data-bbox="889 1251 1308 1304">128GB</td></tr> <tr> <td></td><td data-bbox="760 1304 889 1346">256GB</td><td data-bbox="889 1304 1308 1346">256GB</td></tr> <tr> <td></td><td data-bbox="760 1346 889 1388">512GB</td><td data-bbox="889 1346 1308 1388">512GB</td></tr> <tr> <td></td><td data-bbox="760 1388 889 1423">1TB</td><td data-bbox="889 1388 1308 1423">1TB</td></tr> </table>	Capacity¹	128GB	128GB		256GB	256GB		512GB	512GB		1TB	1TB
Capacity¹	128GB	128GB												
	256GB	256GB												
	512GB	512GB												
	1TB	1TB												

		Chip A16 A16 Bionic chip 6-core CPU with 2 performance and 4 efficiency cores 5-core GPU 16-core Neural Engine https://www.apple.com/iphone-14-pro/specs/
--	--	---

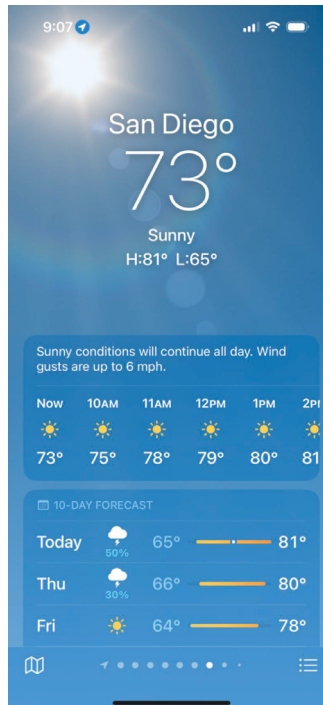
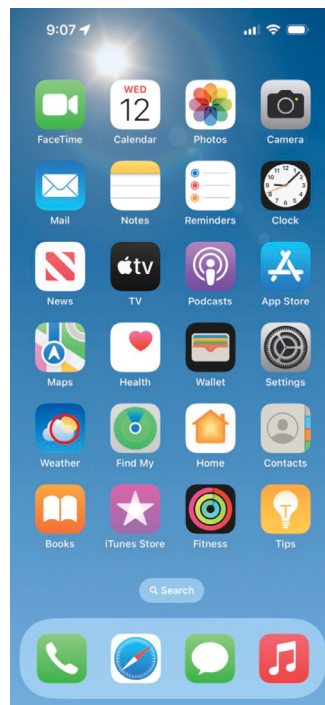
		
	(b) while displaying the home screen, detect a first input by a first contact on the icon;	Apple iPhone 14 Pro smartphones are designed to, <i>while displaying the home screen, detect a first input</i> (e.g., user input in the form of a tap or momentary touch, a touch-and-hold or long-press, and/or a slide or drag, etc.) <i>by a first contact on the icon;</i>

	See the evidence above and below, for example:  A screenshot of an iPhone 14 Pro home screen. The status bar at the top shows the time as 9:07, signal strength, Wi-Fi, and battery. The home screen features a grid of app icons: FaceTime, Calendar (showing WED 12), Photos, Camera, Mail, Notes, Reminders, Clock, News, TV, Podcasts, App Store, Maps, Health, Wallet, Settings, Weather, Find My, Home, and Contacts. At the bottom is a dock with Phone, Safari, Messages, and Music. A search bar is visible above the dock.
(c) in response to detecting the first input	Apple iPhone 14 Pro smartphones are designed for, <i>in response to detecting the first input</i> (e.g., first user input in the form of a tap or momentary touch, a touch-and-hold or long-press, and/or a slide or drag, etc.)

on the icon, replace the home screen with a user interface of the application;

on the icon, replace the home screen with a user interface (e.g., open application view, etc.) of the application (e.g., Weather, any other application, etc.);

See the evidence above and below, for example:

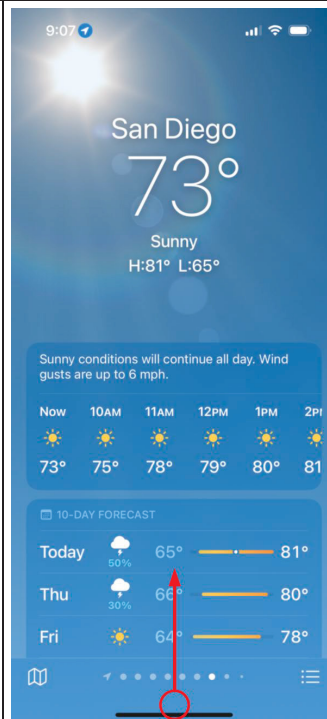


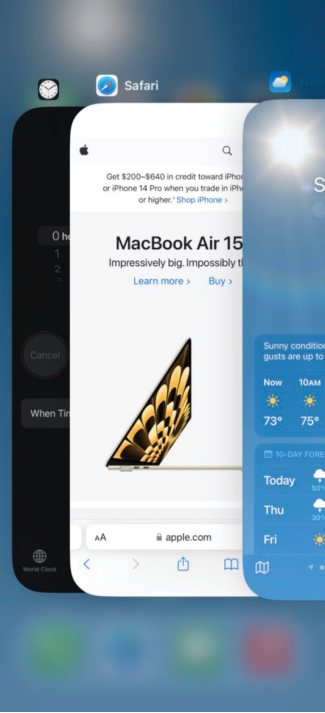
	(d) while displaying the user interface, detect a second input by a second contact that includes movement across the display in a direction;	Apple iPhone 14 Pro smartphones are designed to, <i>while displaying the user interface</i> (e.g., open application view, etc.), <i>detect a second input</i> (e.g., second user input in the form of a slide or drag, etc.) <i>by a second contact that includes movement across the display in a direction</i>; See the evidence above and below, for example:
--	--	--

		 The image displays two identical screenshots of an iPhone 14 Pro screen showing the weather app for San Diego. The status bar at the top shows the time as 9:07, signal strength, Wi-Fi, and battery levels. The main display shows the current temperature as 73° and 'Sunny' conditions with a high of 81° and a low of 65°. Below this is a summary of sunny conditions and a 6-hour forecast. The bottom section shows a 10-day forecast for Today, Thursday, and Friday. In both screenshots, a red circle is drawn on the home indicator bar at the bottom, and a red arrow points from this circle to the '10-DAY FORECAST' section of the app.
	(e) in response to detecting the second input and in accordance	Apple iPhone 14 Pro smartphones are designed to, <i>in response to detecting the second input</i> (e.g., second user input in the form of a slide or drag, etc.) <i>and in accordance with a determination that the second input meets a first one or more criteria that is met when the second input is detected to include a movement</i>

with a determination that the second input meets a first one or more criteria that is met when the second input is detected to include a movement parameter that is above a movement threshold and that the second input that meets a second one or more criteria that is met when the second input is detected to include a duration parameter that is above a duration threshold, display at least a portion of the user interface of the application in a first virtual display layer that appears at a lesser depth as compared to a second virtual display layer, where the at least portion of the user interface of the application is reduced in size and is further displayed in its entirety when displayed	<i>parameter that is above a movement threshold and that the second input that meets a second one or more criteria that is met when the second input is detected to include a duration parameter that is above a duration threshold, display at least a portion of the user interface (e.g., open application view, etc.) of the application (e.g., Weather, any other application, etc.) in a first virtual display layer that appears at a lesser depth (e.g., foreground, etc.) as compared to a second virtual display layer, where the at least portion of the user interface of the application is reduced in size and is further displayed in its entirety when displayed in the first virtual display layer; and</i> See the evidence above and below, for example:
--	---

in the first virtual display layer; and



		
	(f) in response to detecting the second input and in accordance	Apple iPhone 14 Pro smartphones are designed to, in response to detecting the second input (e.g., second user input in the form of a slide or drag, etc.) and in accordance with a determination that the second input meets the first one or more criteria that is met when the second input is detected to include the movement

with a determination that the second input meets the first one or more criteria that is met when the second input is detected to include the movement parameter that is above the movement threshold and that the second input does not meet the second one or more criteria that is met when the second input is detected to include the duration parameter that is above the duration threshold, replace the user interface of the application with the home screen including the icon that corresponds to the application.	parameter that is above the movement threshold and that the second input does not meet the second one or more criteria that is met when the second input is detected to include the duration parameter that is above the duration threshold, replace the user interface (e.g., open application view, etc.) <i>of the application</i> (e.g., Weather, any other application, etc.) with the home screen including the icon that corresponds to the application. See the evidence above and below, for example:
--	--

