

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

SMITH INTERFACE TECHNOLOGIES, LLC

Patent Owner

IPR2024-01115

IPR2024-01116

IPR2024-01119

10,656,754

PATENT OWNER SUR-REPLY

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PATENT OWNER'S EXHIBIT LIST

Exhibit	Shorthand	Description
2001		Withdrawn
2002		Withdrawn
2003	JCC	Excerpt of Joint Claim Construction Chart Exhibit A.
2004	Stay Order	October 2, 2024, Order Granting in Part Apple's Motion to Stay in <i>Smith Interface Technologies, LLC v. Apple Inc.</i> , 3-23-cv-01187, S.D. Cal (Dkt. No. 127).
2005	Ahn EP	European Publication App. No. EP08101835.0 to Hye Sang Ahn et al. ("Ahn EP")
2006	Reexam Order	November 14, 2024, Order Granting Request For Ex Parte Reexamination in Control No. 90/019,646
2007	EPR Request	September 5, 2024, REQUEST FOR EX PARTE REEXAMINATION OF U.S. PATENT NO. 10,656,754 UNDER 35 U.S.C. § 302 AND 37 C.F.R. § 1.510
2008	EPR Office Action	March 7, 2025 Office Action in Ex Parte Reexamination Control No. 90/019,646
2009	Terveen	Transcript of the Deposition of Loren Terveen, Ph.D.
2010	Sakar I	Manojit Sarkar and Marc H. Brown. <i>Graphical fisheye views of graphs</i> . In Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (CHI '92). Association for Computing Machinery, New York, NY, USA, 83–91 (1992).
2011	Sakar II	Manojit Sarkar, Scott S. Snibbe, Oren J. Tversky, and Steven P. Reiss. <i>Stretching the rubber sheet: a metaphor for viewing large layouts on small screens</i> . In Proceedings of the 6th annual ACM symposium on User interface software and technology (UIST '93). Association for Computing Machinery, New York, NY, USA, 81–91. (1993)
2012	Rapp	U.S. Patent Publication No. 2011/0074697 to Peter William Rapp <i>et. al.</i>
2013	Leggett	David Leggett, <i>Tip: Use The Grid in Photoshop</i> , Photoshop Tutorials (Archived January 10, 2011 and

		available online at https://web.archive.org/web/20110110073302/http://www.tutorial9.net/tutorials/photoshop-tutorials/tip-use-the-grid-in-photoshop/)
2014	Jaeger	U.S. Patent Publication No. 2005/0068290 to Denny Jaeger.
2015	918 Provisional	Provisional Patent Application 61/581,918
2016	Osnaps	Kate Morrical, <i>Drafting Settings Part 3 - Object Snaps</i> , LT Unlimited (Archived May 08, 2010 and available online at https://web.archive.org/web/20100508130049/http://ltunlimited.typepad.com/my_weblog/2009/01/drafting-settings-part-3-object-snaps.html)
2017		U.S. Patent 7,657,849 to Imran Chaudhri <i>et al.</i>
2018	Rosenberg	Declaration of Craig Rosenberg, Ph.D.
2019	Rosenberg CV	CV of Craig Rosenberg, Ph.D.
2020		September 23, 2025, Tentative Claim Construction Order in <i>Smith Interface Technologies, LLC v. Apple Inc.</i> , 3-23-cv-01187, S.D. Cal
2021	CC Order	October 3, 2025, Claim Construction Order in <i>Smith Interface Technologies, LLC v. Apple Inc.</i> , 3-23-cv-01187, S.D. Cal
2022		Transcript of September 11, 2025 Deposition of Loren Terveen, Ph.D.

I. INTRODUCTION

For each of the independent claims, Petitioner advances theories that require interpreting references in a manner inconsistent with their plain disclosures. And, instead of explaining why its initial interpretation was correct, Petitioner now attempts to prove its case with new misinterpretations and new theories that were never advanced in the Petition.

For every dependent claim, Petitioner advances theories that are contradicted by its own mappings to the independent claims. To fix its self-created inconsistencies, Petitioner now advances new obviousness theories that are neither timely nor logical.

Ultimately, none of Petitioner's arguments are sufficient to show obviousness of any of the claims.

II. CLAIM 2

A. Sliding Menu Theory

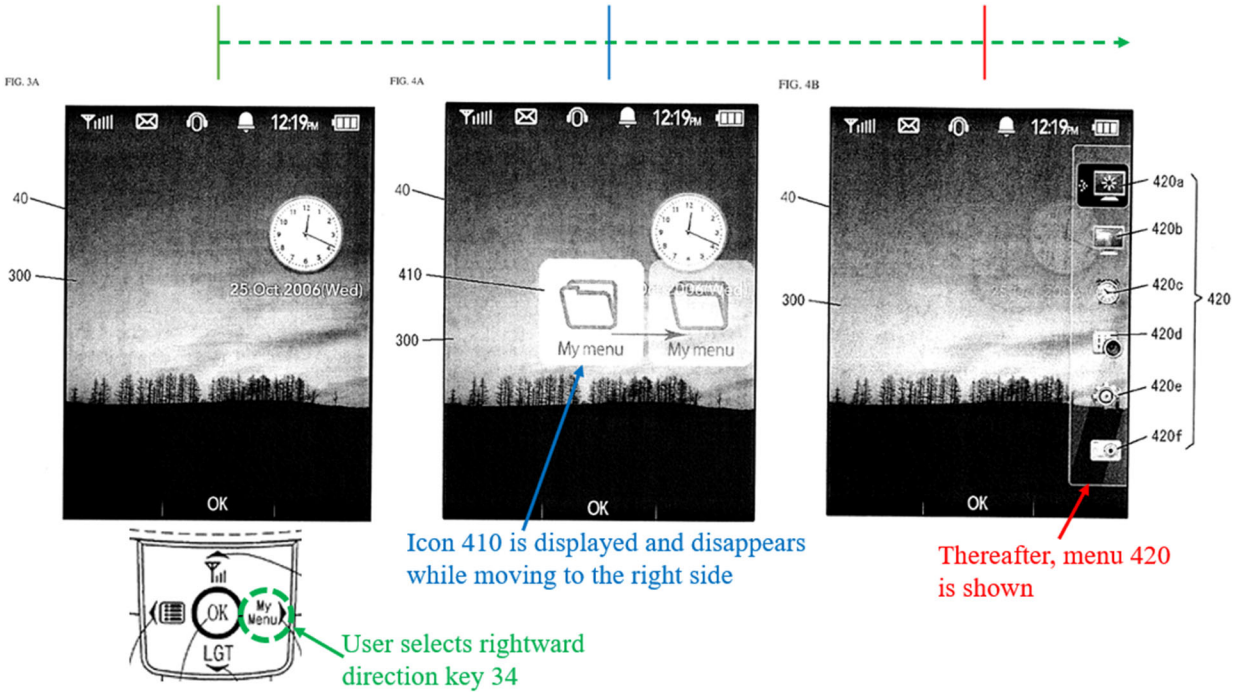
For Petitioner's first theory, Petitioner must establish that Ahn's menu would progressively slide in with or follow the user's dragging gesture. As explained in the POR, Ahn's directional key operations must operate in a binary manner (EX2018, ¶¶52-53) and Ahn's description of its touch and drag gesture also indicate such a binary operation (*id.*, ¶¶54-61). *See also* EX2009, 42:3-16 (the word "if" makes it more plausible that the menu "would **not** be displayed" before the distance

is met); EX1004, ¶¶[0102]-[0103], [0109]-[0112], [0118]-[0119] (using “if”). The Petition’s theory relies on a misinterpretation of the term “drag,” which Ahn unequivocally used to describe an external object. POR, 30-32. Petitioner now relies on a misinterpretation of the term “as” and new modifications that were never advanced in the Petition.

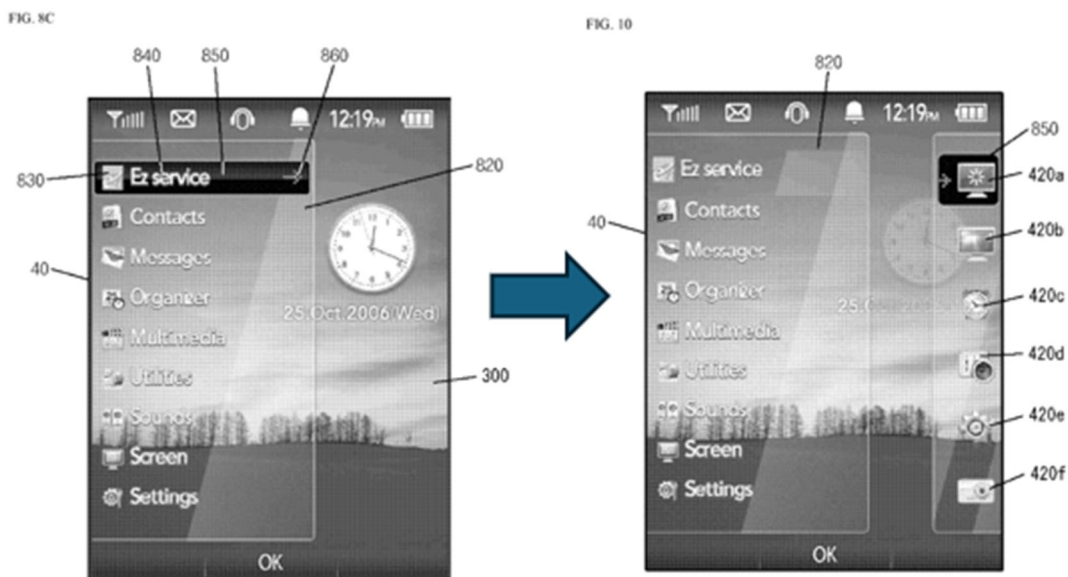
1. Temporal descriptions are consistent with Ahn’s binary operations

Petitioner contends Ahn’s menu follows the user’s finger because of the temporal descriptions (e.g., “as”) used to describe FIGs 18(a)-(b). Reply, 3.

First, Petitioner misconstrues Ahn’s use of the term “**as**” for meaning *during*. See POR, 16 n.6. But this is inconsistent with Ahn’s disclosure. EX2018, ¶57 (Ahn’s use of “as” means “after”). For example, Ahn describes the Directional Key embodiment where “the user setting menu 420 is displayed ... **as the user selects** the rightward direction key 34.” EX1004, ¶[0094]. However, it is undisputed this Directional Key embodiment operates in a binary manner (POR, 13-15) and Ahn’s menu is displayed *after* the user completes the selection of the right direction key—not *during* the user’s selection (as illustrated below). EX2018, ¶57; EX1004, [0050]-[0051], [0094].



Ahn's use of "as" consistently means *after*, not during. In another example shown in FIG. 10, the curser (illustrated by the black highlight) can be moved from the left menu 820 to the right menu 420 to select one of the items in the right menu. EX1004, ¶¶[0090]-[0092]



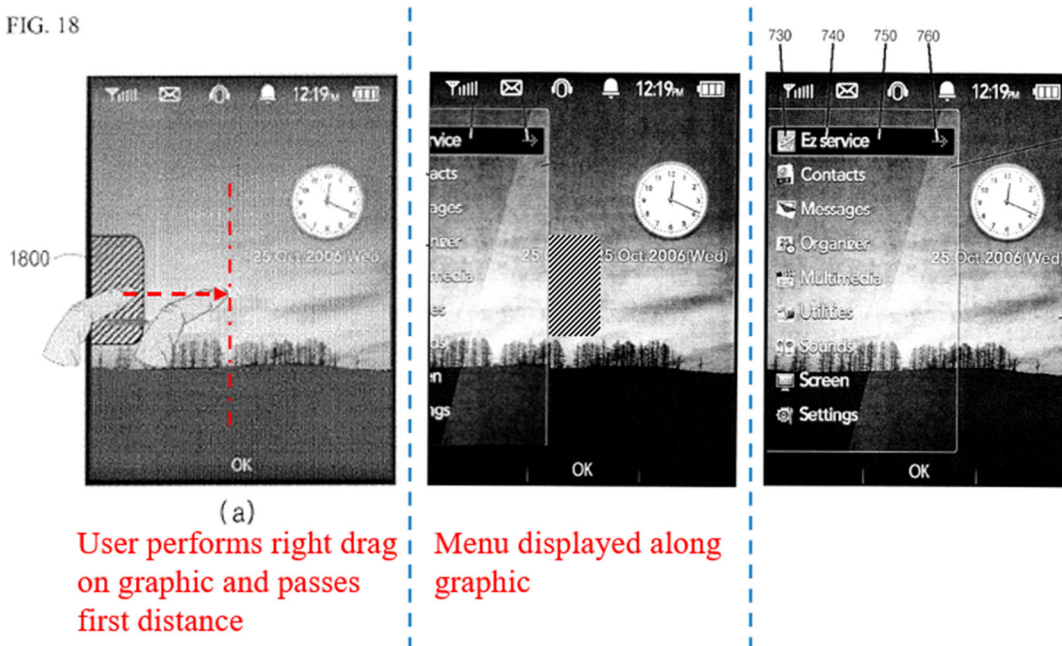
Ahn states that “[a]s the cursor 850 is moved to the user setting menu 420, the user can select one of the [items of] user setting menu 420.” *Id.* However, it is clear that the selection of the item (e.g., 420a) is not performed **during** the movement of the cursor from menu 820 to menu 420, but only **after** the cursor has already been moved (e.g., by further manipulating the direction keys). *Id.*

Second, Petitioner’s citations to FIG. 18(b) and paragraph [0119] cannot support its theory since the menu emerges based on a “press” of graphic 1800—which cannot follow the user’s finger. EX1004, ¶[0119]. Regardless, this operation is consistent with all of Ahn’s other embodiments; the user will “press” (e.g., tap) the graphic and a menu will be displayed **after** completion of the gesture. EX2018, ¶60. A POSITA would not understand (nor does Petitioner allege) that Ahn’s menu emerges progressively based on the duration of the “press.” EX2018, ¶60. Thus, like all of Ahn’s other embodiments, the menu is displayed **after** the user completes the press gesture—not **during** and progressively with the user’s press.

Finally, for the same reasons as above, Petitioner cannot show the use of “as” in Ahn’s paragraph [0119] results in an operation inconsistent with every other described embodiment. *See* EX2018, ¶¶51-61. Ahn is capable of describing simultaneous operations (e.g., a menu emerging “while” a graphic disappears). EX1004, ¶[0119]; *see also id.*, [0050]. But Ahn fails to use this language to describe the menu opening **while** the user performs the drag gesture. EX1004, ¶[0118];

Ahn's temporal descriptions are consistent with its binary operation and Ahn would display its menu along the graphic *after* the gesture is completed. *See id.*, FIG. 18(a) (depicting finger moving without menu following); EX2018, ¶¶58-61

FIG. 18



To conclude otherwise would require introducing several inconsistencies into Ahn's disclosure, which Petitioner does not rebut. EX2018, ¶94. Instead, a POSITA would have understood Ahn's use of the allegedly temporal descriptions (e.g., "as") are consistent with the binary operations of all of its described embodiments and depicted examples.

2. *The Petition does not modify Ahn's menu to follow a user's finger*

Petitioner's Sliding Theory does not propose a modification to Ahn, and Petitioner's reference to Chaudhri-842 does not include a modification of Ahn for

moving the menu. *Compare* Pet., 27-28¹ (no articulated modification of Ahn) *with* Pet., 30 (addressing second theory and stating “a POSITA would have found it obvious to apply Chaudhri-842’s user interface state transition techniques ... in the context of Ahn’s mobile communication terminal 100”); *see* Pet., 15 (combination “[a]pplying Chaudhri-842’s teachings about user interface state transition”).

The Petition stated that “[a] POSITA would have found obvious from these teachings that, in at least implementations *like those described referencing FIG. 18*, Ahn’s menu list would have been graphically displayed as sliding onto the display based on a change in a magnitude of the ‘touch and drag’ gesture being detected on the touch screen.” Pet., 28. But, as described above, *the implementation described referencing FIG. 18* does **not** disclose a menu following a user’s finger. And the Petition does not modify Ahn to do so.

Petitioner’s statement that “Chaudhri-842 describes moving displayed graphics” does not articulate a modification of Ahn or any motivation supporting any modification. Pet., 27-28. Chaudhri is solely used in Petitioner’s combination to vary the optical intensity of the clock widget. Pet., 15 (the “Ahn-Chaudhri combination is a mobile device that changes an optical intensity of ... objects”), 16 (“Chaudhri-842 provides details for utilizing transitions in optical intensity during transitions in user interface state” and “provides additional details about the use of

¹ All references are to the -01119 Petition unless otherwise noted.

varying optical intensity for user interface objects that a POSITA would have found helpful to implement”), 17 (“change in optical intensity”), 19 (“varying optical intensity for a user interface object”).

As there is no motivation/modification for sliding Ahn’s menu before a gesture is completed, Petitioner cannot establish obviousness. Regardless, Chaudhri also fails to disclose moving a menu in with a finger. Like Ahn, the transitions in Chaudhri’s interface occurs only *after* the gesture is complete. *See infra*, §II.B. Further, the “visual cue(s)” Petitioner references in Chaudhri are distinguished from the unlock image 402 that the Reply relies upon as moving with the finger. EX1005, ¶¶[0062], [0064]-[0065] (“unlock image is displayed in addition to the visual cues”), [0071] (visual cues include channel 404 and arrows 406, *not* unlock image 402). Accordingly, any modification to move the menu based on Chaudhri’s visual cues is misplaced.

The Reply cites to several new references that were not relied on in the Petition and that are not used to modify Ahn’s menu opening operation. Hinckley (EX1006), Nan (EX1010), and Hisatomi (EX1011) were not cited as evidence for modifying Ahn and, in fact, were only cited in a completely different ground. Pet., 46 (analyzing claim 1 for Ground 1B). Ahn’s menu does not move with the finger and these references are not part of Ground 1A. Finally, Petitioner’s assertion of a “straightforward design choice” (Reply, 21) is also absent from the Petition. Pet.,

48-49 (only reference of “design choice” in Ground 1B). These shifts in theories are too late. *Intelligent Bio-Systems, Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359, 1369 (Fed. Cir. 2016) (“the expedited nature of IPRs bring with it an obligation for petitioners to make their case in their petition to institute.”); 35 U.S.C. § 312(a)(3).

B. Fading Clock Theory

Petitioner points to Chaudhri’s “fade in” and “fade out” animation effect²—which occurs *after* the gesture is complete—to support its combination. This cannot establish ‘blurring’ as a function of a magnitude of the first gesture. EX1005, ¶[0079] (describing a fade “as the user transitions” between applications “over a predetermined time interval,” not as a function of the gesture), ¶[0076] (transitioning “[u]pon completion” of the gesture in FIGs. 5C-5D), FIG. 3 (depicting transition *after* unlock gesture is complete—annotated below).

² The effect is described in Chaudhri’s paragraph [0079] which was never cited in Petitioner’s analysis of claim 2 (Pet., 19-33) and is in a separate section of Chaudhri. Compare EX1005, ¶[0052]-[0079] with *id.*, ¶[0080]-[0096].

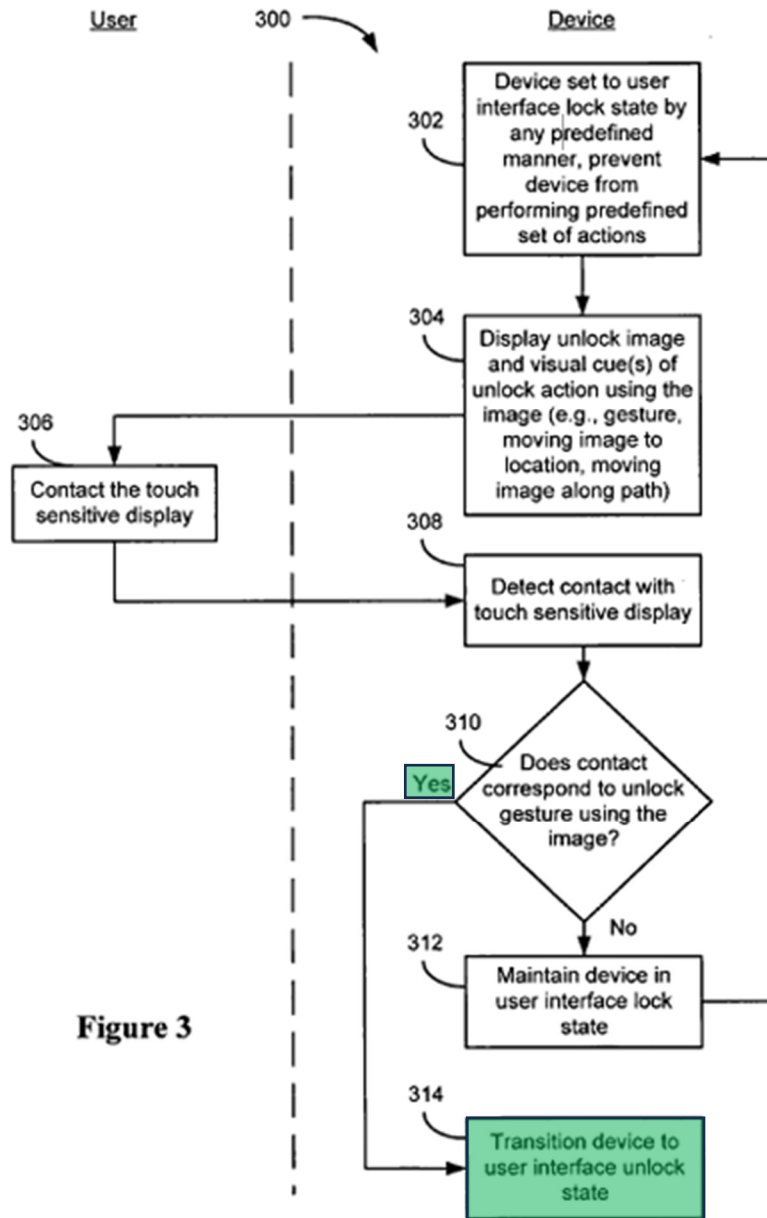


Figure 3

This animation occurs after the gesture is completed and cannot show progress of the gesture as Petitioner's motivation contends. *Id.*

Additionally, Petitioner's 'obvious to try' analysis is deficient. "To prove obviousness under an obvious to try theory, [Petitioner] must show (1) a design or market need to solve a particular problem, *and* (2) that 'there are a finite number of

identified, predictable solutions’ that would lead to an expectation of success.” *Grunenthal GMBH v. Alkem Labs. Ltd.*, 919 F.3d 1333, 1345 (Fed. Cir. 2019); *Uber Technologies, Inc. v. X One, Inc.*, 957 F. 3d 1334, 1339 (Fed. Cir. 2020) (Petitioner established (1) the prior art references and the challenged patent “***all attempt to solve the same problem***” and (2) there existed only two possible methods of achieving the identified solution). Here, Petitioner fails to articulate a design need or problem (Pet., 19), rendering its analysis legally deficient. *Virtek Vision Int’l ULC v. Assembly Guidance Sys., Inc.*, 97 F.4th 882, 888 (Fed. Cir. 2024) (rev’g PTAB obviousness finding based on “no evidence of a design need or market pressure”). Further, Ahn’s “problem” cannot be how to implement blurring, which Ahn already achieves in “at least two ways.” Pet., 8.

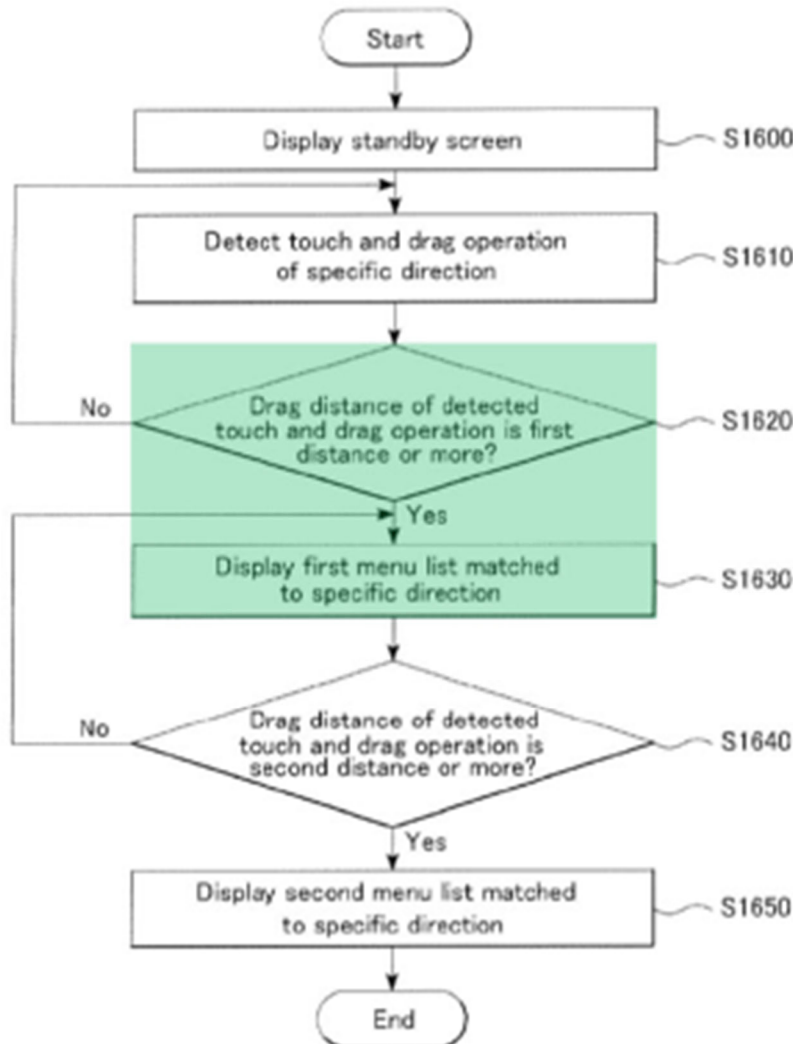
Further, Dr. Terveen’s framing of blurring as being ‘binary’ (EX1003, ¶67) is incorrect and unsupported. There are numerous ways to ‘blur’ an object that are not progressively as a function of the user’s gesture. For example, blurring after a keypad input (EX1004, ¶¶[0049]-[0051]); providing an intermediate animation before the blurring operation (EX1004, FIG. 4A); blurring the object instantaneously at the start of the gesture, during the gesture, or after the gesture is complete; blurring gradually at the start of the gesture or after the gesture, blurring over a predetermined time (EX1005, ¶[0079]) at the start, during, or after the gesture. Dr. Terveen’s blatant neglect of alternatives does not somehow narrow the choices to two.

Moreover, if the problem/solution is viewed without hindsight narrowing (e.g., diminishing an objects presence when opening a menu), there are countless alternatives to blurring which further undermine Dr. Terveen's false binary.

III. DEPENDENT CLAIMS

“Both [Petitioner's] theories [for claim 2] rely upon the obviousness of the menus in the Ahn-Chaudhri combination following a user's finger [while] the user performs the dragging gesture to open the menu.” Reply, 2. However, Petitioner's analysis for *every* dependent claim relies on the FIG. 16 operation of Ahn where the menu is not depicted until *after* the gesture is completed (i.e., the menu does not follow the finger). POR, §VII.B; 1116-Pet., 40-43, 68; EX2009, 32:14-33:3 (Petitioner's expert confirming “the process of displaying the first menu list *doesn't happen* until the distance traveled has exceeded the first distance”)

FIG. 16



On Reply, Petitioner attempts to avoid its reliance on two contradictory embodiments of Ahn by asserting that its citations were in the context of the Ahn-Chaudhri combination. But this is plainly not the case. Outside of the conclusory sentence that “[t]he Ahn-Chaudhri combination renders obvious Claim [27 or 186],” the Petition clearly references what “Ahn describes” and concludes that “Ahn

[alone] teaches .. [the limitations] as recited in Claim[s] [27 and 186.b].” 1116-Pet., 40-41, 43-44; *See id.*, 68 (incorporating same for claim 230).

Petitioner further asserts there is no contradiction because the application of the dependent claims refer back to “the gesture” recited in claim 2. To be clear, the contradiction in Petitioner’s theory (as explained in §VI.B of the POR) is the response to the gesture—not the gesture itself. For claim 2, Petitioner asserts the menu (and shadow 1800) are displayed as being dragged in with the drag gesture. Pet., 27-28; EX2022, 73:2-12. But, for claims 27, 186, and 230, Petitioner asserts the menu is displayed only after the drag gesture reaches a predetermined distance. 1116-Pet., 40-41, 43-44; EX2009, 32:14-33:3 (Dr. Terveen describing cited portions of Ahn). These mutually exclusive responses to the same gesture must be inconsistent and, therefore, cannot simultaneously teach both the limitations of independent claim 2 and dependent claims 27, 186, and 230.

Further, as Petitioner provides no motivation to combine these two disparate approaches, its theory must fail. *See Net MoneyIn, Inc. v. Verisign, Inc.*, 545 F.3d 1359, 1369 (Fed. Cir. 2008) (“it is not enough [in an anticipation rejection] that the prior art reference discloses part of the claimed invention, which an ordinary artisan might supplement to make the whole, or that it includes multiple, distinct teachings that the artisan might somehow combine to achieve the claimed invention.”); *Microsoft Corp. v. Biscotti, Inc.*, 878 F.3d 1052, 1068-70 (Fed. Cir. 2017).

A. Reply's Obviousness Theories are Wrong

Petitioner advances two obviousness theories to try to fix the inconsistencies in the Petition's theory—which relied solely on Ahn's disclosure. These theories are both untimely and substantively incorrect.

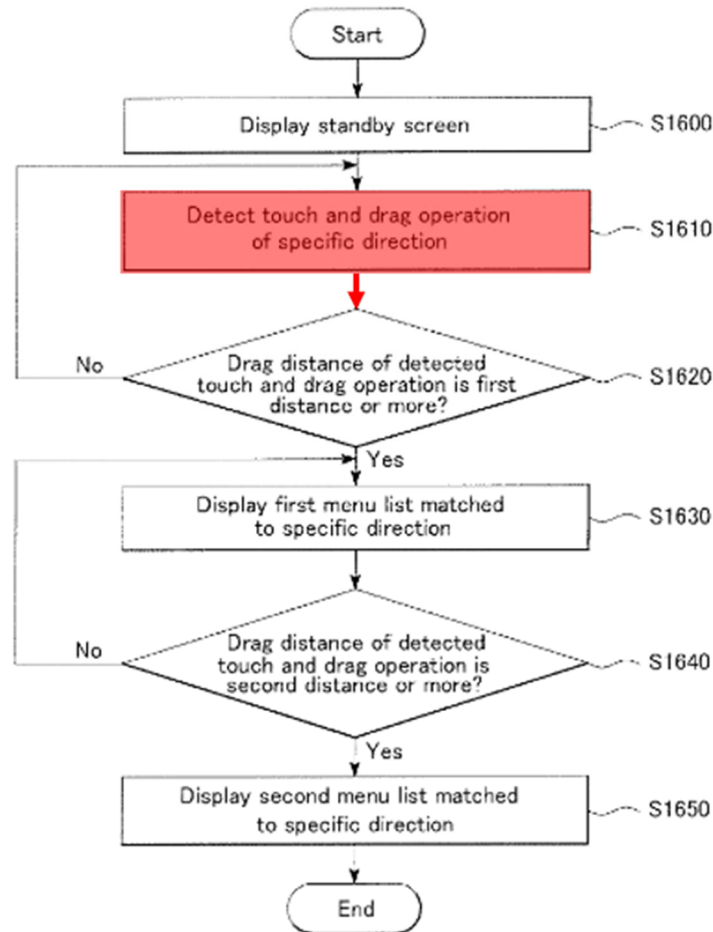
1. *De minimus* threshold

First, Petitioner contends a “POSITA *would have found obvious* that the ‘first distance’ would be a *de minimus* distance used to distinguish a drag gesture from other gestures, such as a ‘tap.’” Reply, 17 (citing EX1025 which was absent from the Petition). This obviousness theory is unquestionably a different theory than the one advanced in the Petition. See 1116-Pet., 40-41 (“*Ahn teaches* [the limitation], as recited in Claim [27].”), 43-44 (“Ahn teaches ... Element [186.b].”). This shift from “Ahn teaches” to what “a POSITA would have found obvious” from Ahn is too late. *Apple Inc. v. eWatch, Inc.*, IPR2015-00412, Paper 50, 44 (PTAB May 6, 2016) (“‘Respond,’ in the context of 37 C.F.R. § 42.23(b), does not mean embark in a new direction with a new approach as compared to the position originally taken in the Petition. Accepting such belatedly presented new arguments would be unjust to the Patent Owner and we decline to do so.”).

Nevertheless, Petitioner's theory also fails substantively. To the extent necessary to distinguish between a tap and swipe, Ahn would have already done so

in S1610, where Ahn “detect[s] [the] touch and drag operation.” EX1004, ¶[0109], FIG. 16 (inset below).

FIG. 16



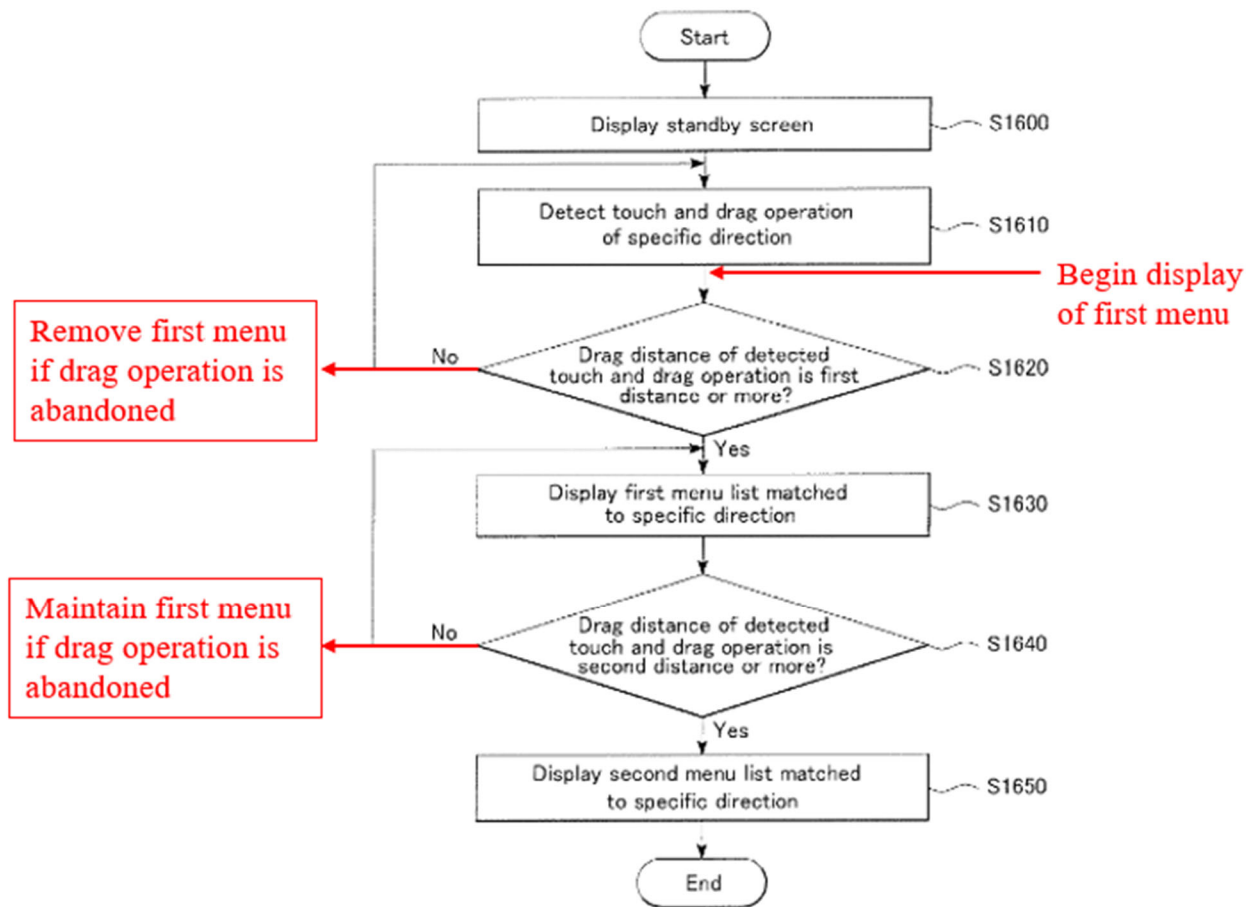
Ahn discloses comparing a “drag distance of [a] *detected* touch and drag operation” to a “first distance” only after the drag operation has already been detected. *Id.* As the drag gesture is already “detected” at S1620, the “first distance” must be longer than any threshold to determine between a tap and Ahn’s drag operation (i.e., swipe). *Id.* ¶[0109]-[0110]; see Reply, 17 (tap is a small movement). Petitioner’s assertion that the first distance would be used to distinguish taps and swipes is therefore

superfluous and nonsensical in view of Ahn's explicit disclosure of first detecting the touch and drag operation.

2. Complete opening of the menu

As explained in the POR, a POSITA would have understood Ahn's FIG. 16 to be an "if/then" operation in which the menu is displayed only if the drag distance is a first distance or more. POR, 15, 29. Petitioner's second theory is based on the "alternative[]" interpretation that "display a first menu" (in step S1630) means to complete the display of the entire menu such that the menu remains displayed after the gesture has ended. Reply, 18-19 ("only after the user's finger has traveled a certain distance would the menu be and remain fully opened when the user's finger lifts from the screen").

FIG. 16



For support, Petitioner cites to Dr. Terveen’s interpretation of FIG. 17—a different figure than FIG. 16—which was not relied upon in the Petition. 1116-Pet., 40-41, 43-44, 68. This too fails.

First, this theory was not advanced in the Petition and is new. Petitioner cannot switch its anticipation theory to an obviousness one on Reply. *Compare* 1116-Pet., 40-41 (“*Ahn teaches* ... Claim [27].”) with Reply 18-19 (“One *obvious way* this would work is for Ahn’s menu to ... either close or remain open” depending

on the distance the finger travels) (citing EX1011), 20-21 (POSITA “would not have seen FIG. 16 as precluding any *obvious* implementation details”).

Second, Petitioner’s expert concedes the Reply’s alternative interpretation is less plausible than the “if/then” interpretation advanced in the POR. EX2009, 32:9-16 (confirming FIG. 16 discloses “if/then” operation), 32:17-33:11 (confirming “at S1630” the “process of displaying the first menu list doesn’t happen until the distance traveled has exceeded the first distance”), 38:9-44:1 (discussing FIG. 17’s operation and stating “I do think that the word ‘if’ does make [the if/then interpretation] more plausible, that is with the word ‘if,’ it’s more plausible that if ... you haven’t reached the distance D2, that the second menu list would not be displayed”). Because Petitioner’s own expert admits its “alternative” interpretation is less likely than the “if/then” interpretation advanced in the POR, the Reply theory must fail. *Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.*, 800 F.3d 1375 (Fed. Cir. 2015) (“*burden never shifts to patent owner.*”).

B. Additional Arguments

1. Dependent claims 37, 64, 75-79, 187, 189, and 223,

Petitioner’s citation to *Randall*—in which the Board “ignore[ed] the additional record evidence” and the Fed. Cir. found “[t]he Board’s failure to consider that evidence ... was plainly prejudicial” (733 F. 3d 1355, 1362-63)—is misplaced. Reply, 39. PO does not ask the Board to ignore any background references. Instead,

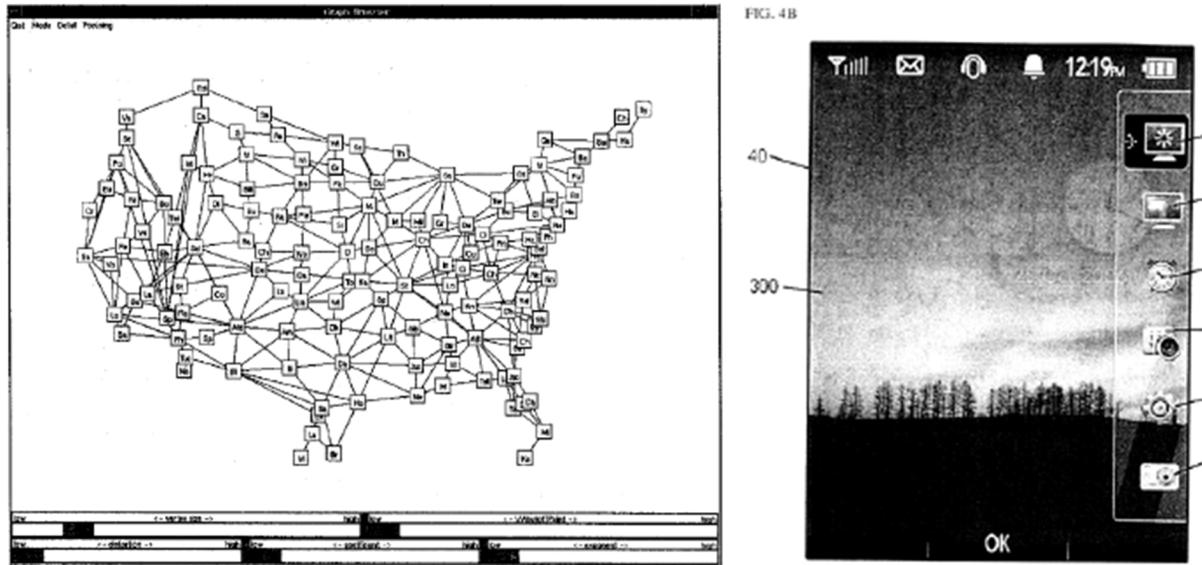
PO merely exposes Petitioner's modifications and reasoning as conclusory and unsupported. *Randall* certainly does not relieve a Petitioner of the burden to present and support cogent theories in the Petition itself.

For claims 75-79 and 187, Petitioner asserts that “[a] POSITA would have understood and found obvious that selecting the ‘message notification icon 330b’ and/or ‘background music setting icon 330c’ would have launched an application associated with that functionality.” 1116-Pet., 55, 68-72. But Ahn explicitly contradicts this understanding as Ahn teaches the selection of the “message notification icon 330b” and/or “background music setting icon 330c” launch pop-up menus—*not* applications. POR, 51-53.

For claim 189, Patent Owner explained that Ahn's swipe down gesture does not perform the blurring operation as recited in Limitation [2d], which Petitioner's expert conceded. POR, 55 (citing EX2009, 22: 14-20). That is, Petitioner fails to explain any modification in which a swipe down gesture would perform each and every limitation in claims 2 and 186. *Randall* does not hold that Petitioners no longer need to explain their theory in the Petition as required by statute. *Harmonic v. Avid Tech*, 815 F.3d at 1363 (“[T]he petitioner has the burden from the onset to show with particularity why the patent ... is unpatentable.”).

For claim 37, Petitioner contends a POSITA would magnify Ahn's menu based on techniques for “exploration and analysis of very large data-sets” that “are

far too large to be displayed on a screen.” EX1008, 1. But the “focus” techniques for exploring such data-sets is an entirely different context than Ahn’s menu. EX2018, ¶¶144-151.



EX2010, 2; EX1004, FIG. 4B. PO does not ignore the background references cited by Petitioner, PO instead explains that the Petition failed to provide any logical explanation to explain why a POSITA would have made the proposed modification. POR, 59-61.

2. *Dependent claims 67-74, 197, 201-204, and 216*

Petitioner contends the arguments for these dependent claims rely on argument made with respect to other claims. Reply, 39-40. As explained above, Petitioner’s *de minimus* threshold and complete menu opening *obviousness* theories are untimely and cannot remedy the inconsistencies with Petitioner’s combination. *Supra*, §III.A.

3. *Dependent claims 199 and 210*

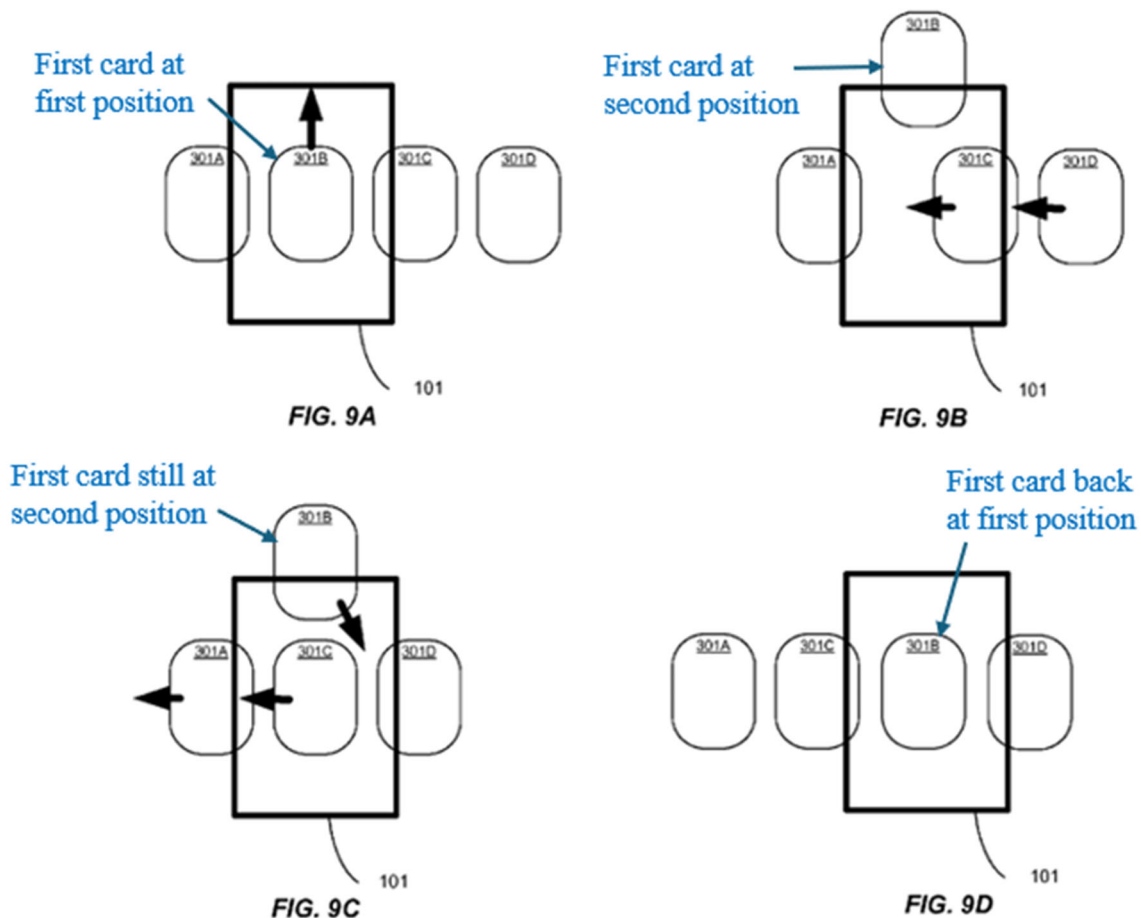
Petitioner contends that PO's argument focus solely on "varying the optical intensity of the clock widget." Reply, 40. But this was Petitioner's position. 1116-Pet., 62 ("a POSITA would have at least found it obvious to vary the optical intensity (e.g., the blur) of the standby screen 300 or at least the clock widget portion thereof"). Regardless, Petitioner's reliance on varying the standby screen does not fix the inconsistencies in its theory or explain how its modification would arrive at the claimed features. POR, 57, 95.

IV. CLAIM 1

Limitations [1.d]-[1.e] requires instructions that (1) detect a first contact moving across the display, and **while** the first contact is detected moving across the display, operate to move two user interface elements (UIEs) at different speeds.

Shiplacoff does not disclose such instructions. Pet., 48 (Petitioner conceding that "Shiplacoff does not specify the speed at which cards 301C and 301D move"). Instead, the Petition relies on Shiplacoff's shuffling operation as allegedly rendering this feature obvious because the "speed of card 301B [that the user is moving] would have been slower than cards 301C and 301D as they 'snap' to fill the gap" and that the use of the word 'snap' meant that "the cards 301C-D could move quickly on the display." Pet., 49. But this fails to teach the claimed operation.

Shiplacoff discloses rearranging cards by “tapping and holding a card ... and then dragging a card 301 from one position to another.” EX1013, ¶[0104]. FIGs. 9A-9B shows an example where card 301B is at a first position and a user “drags card 301B upward” to a second position. *Id.* As depicted in FIGs. 9B-9C³, card 301B remains at the second position while the other cards move to fill the gap. *Id.*



³ Petitioner’s citation to EX2009, 82:9-83:3 is a misstatement in PO’s question—stating “9C” instead of “9D”—that cannot rebut Dr. Terveen’s interpretation that “301B would not be moving” between “Figures 9B and 9C.” EX2009, 81:4-15.

As shown in FIG. 9C-9D, the user can continue to drag card 301B in *another* direction (e.g., downward) to place the card back at the first position. *Id.*

Petitioner contends card 301C moves faster than card 301B as they snap to fill the gap as depicted in the time between FIGs. 9B and 9C⁴. Pet., 48. However, Shiplacoff's card 301B and the user's finger are not moving during this time period as is clearly depicted in FIGs. 9B-9C. Thus, this operation does not occur “while the first contact is detected moving” and does not show “moving the first [UIE] in a first direction,” as claimed.

A. Shiplacoff's Snapping Does Not Meet the Claim

The Petition relies on the ‘snapping’ of the card to mean the cards 301C-D are moving faster than card 301B—which the user is moving. Pet., 48-49. This is premised on the assumption that snap means to move quickly. Specifically, Petitioner concedes that Shiplacoff does not disclose the claimed movement. Pet.,

⁴ Although not articulated or advanced by Petitioner, movement of card 301B downward (from FIGs. 9C-9D) would also fail to meet the claims as the card 301C will out of the way at the same speed that card 301B is introduced (EX2018, ¶178) and any snapping of the cards would apply movement equally to all cards 301A-301D (EX1013, ¶[0086] (“Other cards 301 snap into place accordingly to maintain the same positional sequence” and “all cards 301 snap”)).

48 (“Shiplacoff *does not specify* ... the speed at which cards 301C and 301D move when fillings the gap”). To fill this gap, Petitioner relies on an obviousness theory to have the cards 301C-D moving faster, which it expressly articulates as: “Based on the use of the word “snap,” a POSITA would have at least found obvious that the cards 301C and 301D could move quickly on the display.” But this misinterpretation of “snap” is inconsistent with a POSITA’s understanding and cannot support Petitioner’s theory. POR, 74-78.

1. Snap means align

Petitioner argues that “Shiplacoff’s use of the word “snap” is evidence in and of itself that the speed intended by Shiplacoff is quick.” Reply, 22. A POSITA understood the term snap was related to alignment, not speed. EX2018, ¶¶181-182.

Petitioner attempts to rebut this understanding by mischaracterizing the references cited in the POR. Reply, 23. Specifically, Petitioner asserts that Rapp (EX2012) does not “suggest this ‘snapping’ ... happens anything other than quickly” (i.e., Rapp does *not* say that snapping does *not* happen quickly). See Reply, 23. Petitioner’s theory essentially shifts the burden to require PO to prove a negative. *Id.* (arguing the references “do not ... limit the speed at which the snap occurs”). But this is legally incorrect. It is, and always remains, Petitioner’s burden to show that snap means quick movement. *In re Magnum Oil Tools Int’l, Ltd.*, 829 F.3d 1364, 1376 (Fed. Cir. 2016) (“*no burden shifts from the patent challenger to the*

patentee. This is especially true where the only issues to be considered are what the prior art discloses”). Shiplacoff’s failure to connect ‘snap’ with a speed only means Petitioner cannot meet its burden. And Petitioner’s reliance on Rapp’s *unrelated disclosure* of “faster” methods of manipulating objects (Reply, 23) fails to recognize that automatically aligning an object (*i.e.*, snapping) would be faster than the trial and error of a user attempting to exactly align objects, regardless of the speed at which the snapping would be done.

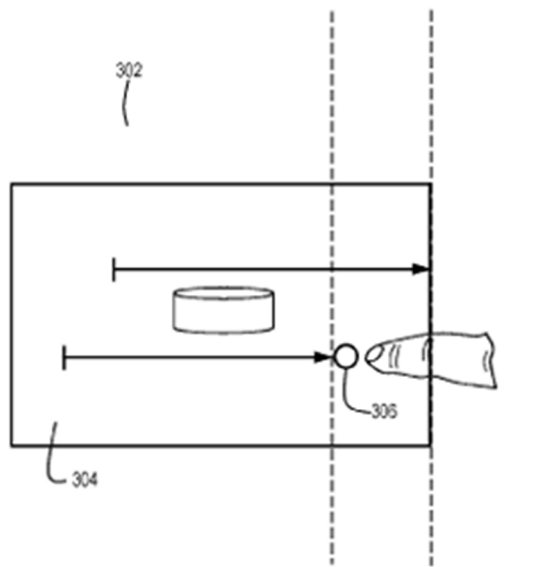
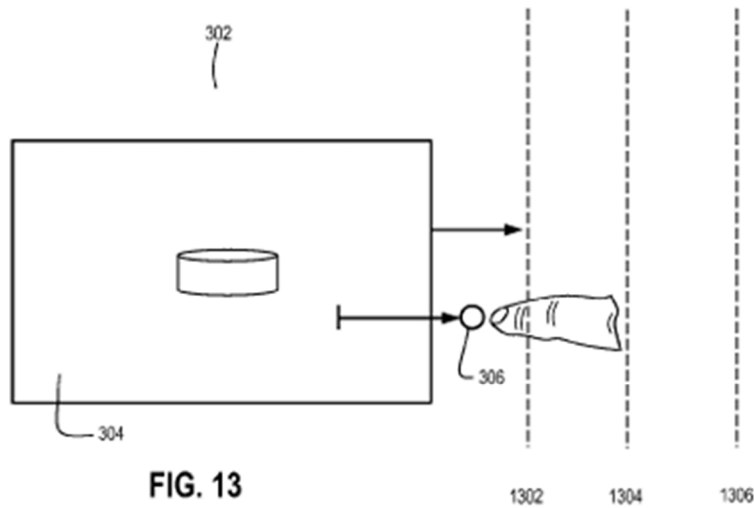
Similarly, Petitioner misconstrues Jaeger (EX2014) by alleging that the use of the term “jump” means an object is moving quickly across the display. Reply, 24. When an object “jumps from one position to another” that item instantaneously changes the objects position on the display as opposed to depicting the object moving across the display from one position to another. EX2014, ¶[0008] (distinguishing ‘jumps’ from the continuous and smooth movement of an object). This is explicitly not the type of ‘snap’ used in Petitioner’s Shiplacoff ground. Pet., 49 (“Shiplacoff describes that ‘a transition effect is performed to enhance the *smoothness* of the transition as cards 301 move and/or snap into place.”) (quoting EX1014, ¶[0094]). Nor does this instantaneous jumping (e.g., teleporting) meet the claimed feature of “moving” the UIE “on the display at a first speed.” Instantaneous movement of an object is independent of time and cannot have a speed (*i.e.*, distance

over time). Thus, this ‘jumping’ cannot meet the claims and is not what Shiplacoff discloses.

2. *Hoover’s ‘snap’ means align and is irrelevant to Petitioner’s theory*

Petitioner cites to Hoover disclosure of an element manipulated by the user can align with a snap position once a user has passes a snap threshold—consistent with the understanding that “snap” means to align an object. EX1027, ¶¶[0007] (“‘snap’ an element ... to a border”), [0008] (“causes the element to snap to a border”), [0011] (“[w]hen the element reaches the snap threshold (such as a position on screen), it is snapped to a snap position.”); EX2018, ¶180. Thus, Hoover merely confirms the understanding of “snap” advanced in the POR. Further, any reliance on Hoover’s specific snap operation fails to provide any evidence to support the Petition’s theory—that a POSITA would understand Shiplacoff’s snap as moving quickly.

Nevertheless, Petitioner’s reliance on Hoover is misplaced and irrelevant to Petitioner’s alleged modification. Hoover discloses an example of a video 304 moving with a user’s finger and aligning with a position 1304 after the finger moves past a snapping threshold 1302. EX1027, ¶¶[0062]-[0063], FIGs. 13-14.



In FIG. 13, “there is a linear relationship between the rate and distance at which the finger 306 has moved and at which the video 304 has moved.” *Id.*, ¶[0062]. Once the user’s finger passes the snapping threshold 1302 (FIG. 14), the video 304 is snapped to snap position 1304 where “the video has moved a larger amount *than the finger.*” *Id.*, ¶[0063].

“FIG. 6 depicts an example graph that compares the movement of a user's finger(s) over time and the position of an element manipulated by the user.” *Id.*, ¶[0048], FIG. 6 (annotated below).

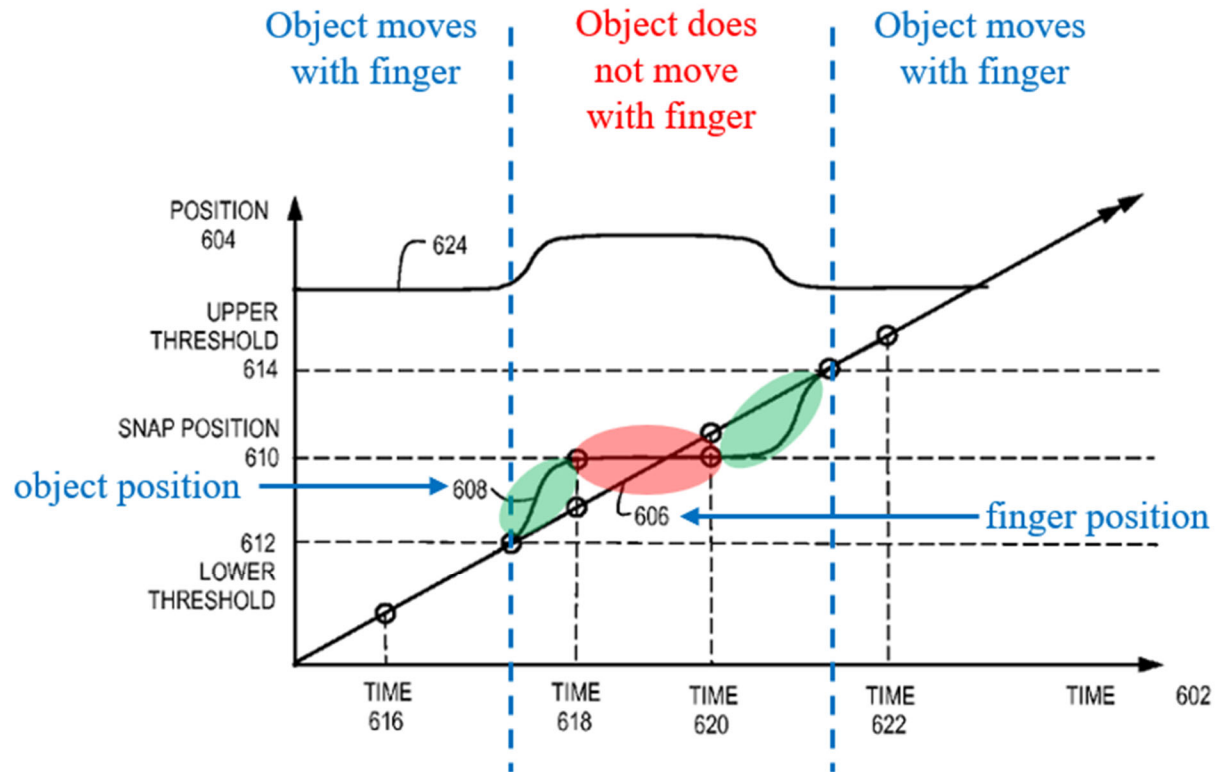
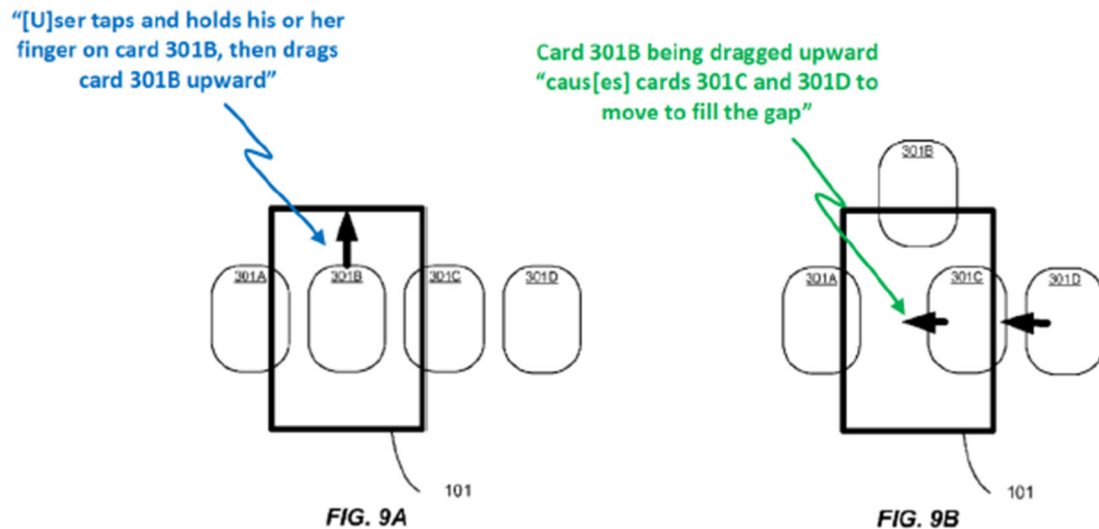


FIG. 6

Referring to FIG. 6, Hoover discloses that the object that is moving with the finger can move at a different speed *relative to the finger* after reaching a snap threshold. *Id.*, ¶[0049], [0053]. However, this merely shows that an object can be accelerated (green area annotated above) and decelerated (red area annotated above) relative to the finger that is manipulating it, not that the object moves at a faster speed than *another moving object*.

Petitioner's theory requires establishing that Shiplacoff's card 301C is moving faster than card 301B, but Hoover only establishes that a card may accelerate relative to the finger moving it when its 'snaps' into position. The fact that an object can move relatively faster *than a user's finger* is irrelevant in proving Petitioner's case—which requires card 301C to move faster than card 301B.



Pet., 54.

B. Non-Snap Theory

On Reply Petitioner seeks to abandon its snap means quick theory—the sole reason for its modification to move cards 301C faster. Pet., 49. However, the Reply's assertions cannot change what is written in the Petition.

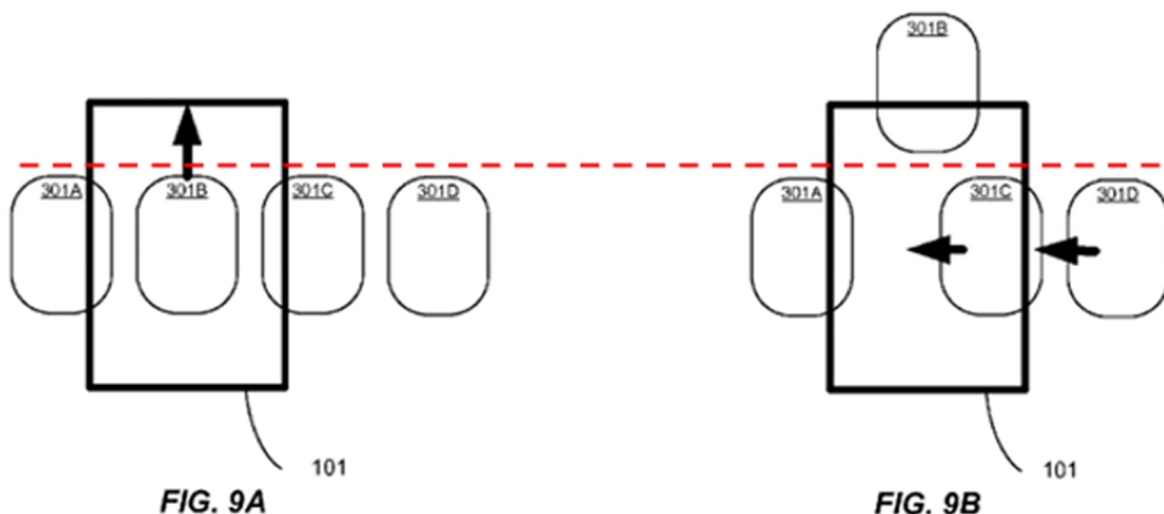
<u>Pet., 49</u>	<u>Reply, 21</u>
“Based on the use of the word ‘snap,’ a POSITA would have at least found obvious that the cards 301C and 301D could move quickly on the display.”	“First, the theory does not rely upon Shiplacoff intending for the word ‘snap’ to mean that the cards move quickly.”

Petitioner now appears to suggest that Shiplacoff inherently discloses Limitations [1.d]-[1.e] because the cards 301C-D move with a particular speed and a user can vary the speed of card 301B “including coming to or nearly to a stop.” Reply, 22. Petitioner then contends that any speed “would obviously be faster than a “near stop” to which a user would bring card 301B.” *Id.* Petitioner’s theory therefore relies on the user moving card 301B as slowly as possible such that *any* movement of cards 301C-D would be faster than the user’s finger movement. This theory must also fail.

Claim 1 requires “one or more programs ... configured to be executed by the one or more processors” and these “programs include[e] instructions for” performing operations. As explained in the POR, Limitations [1.d]-[1.e] requires execution of the instructions to detect a first contact and (1) **while** the first contact is detected moving across the display, operate to (2) move a first UIE in a first direction at a first speed; and (3) move a second UIE at a second speed greater than the first speed. That is, while the contact is moving, the instructions cause the first UIE to move at

a first speed and cause the second UIE to move at a second speed that is greater than the first speed.

Petitioner's user-moving-very-slowly theory is untimely and also fails to meet the claims, at least because it does not contemplate *instructions* whose execution causes the recited actions. To illustrate, Petitioner's theory first assumes that the "cards 301C and 301D move with a particular [predetermined] speed" and that a user can move card 301B slower than predetermined speed. Reply, 22. This theory necessary means that the user can move card 301B at a first speed that is ***faster than*** the predetermined speed of cards 301C and 301D and, in such a scenario, the operation would fail to meet the claims as the second speed would ***not*** be greater than the first speed. As a further example, Shiplacoff illustrates a scenario in which cards 301C and 301D may remain stationary until card 301B has vacated the space into which card 301C moves as shown in FIG. 9B. EX2018, ¶185.



Thus, for the vast majority of the movement of card 301B, cards 301C and 301D do not move at all.

As such, Petitioner *at best* alleges it is theoretically possible that a user *might* move card 301B at a speed that *could be* slower than the speed of movement of card 301C for a tiny subpart of the first contact. But the mere *possibility* of such a coincidence of user input does not assert that, much less explain why, a POSITA would have modified Shiplacoff to include **instructions** for achieving the respective speeds required by Limitations [1.d]-[1.e].

V. CLAIM 208

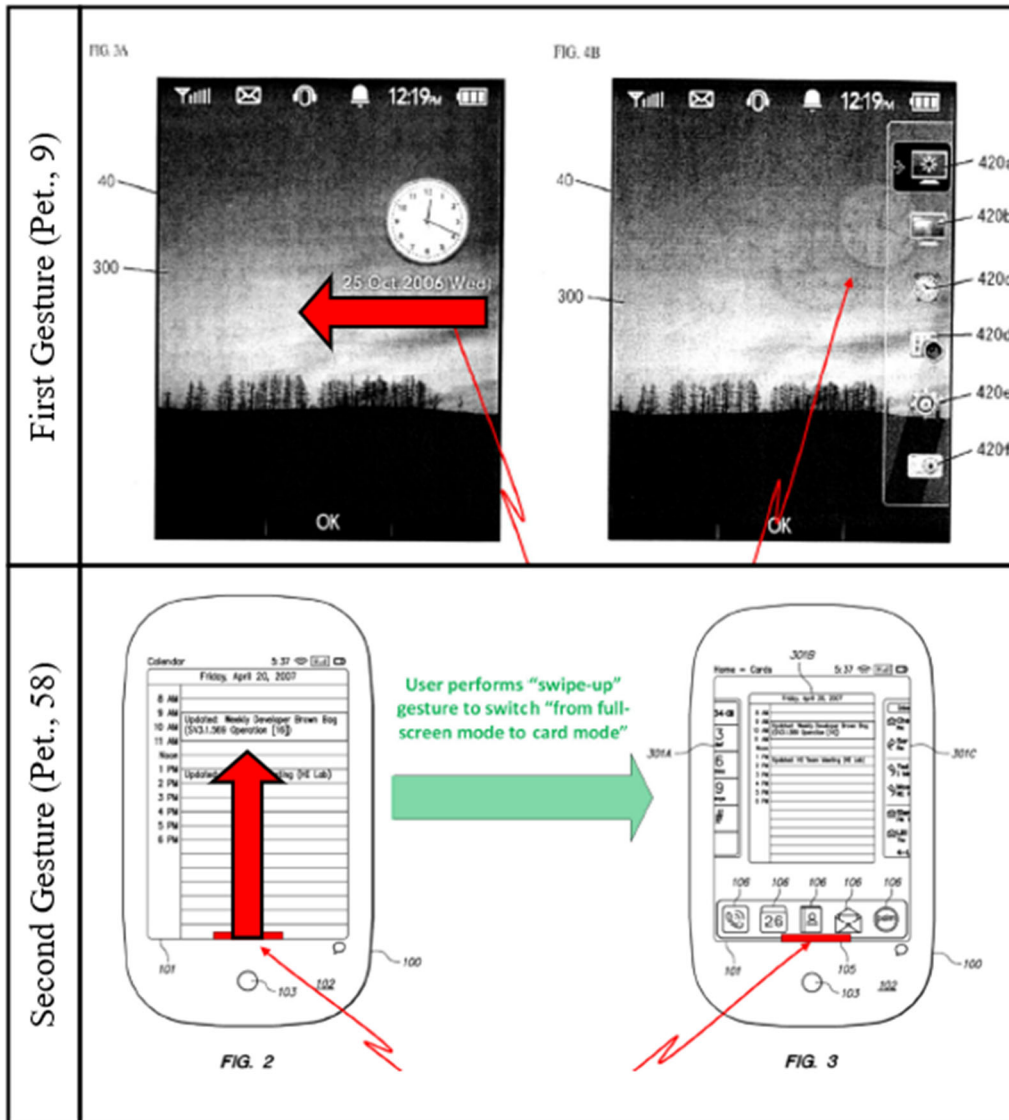
A. Petitioner Maps Multiple, Distinct Gestures to the Claimed “Gesture”

Claim 2 requires to “blur” the object during detection of (and based on a change in magnitude of) the gesture. To meet claim 2, Petitioner relies on Ahn’s left swipe for allegedly blurring the clock widget. It is undisputed that any other swipe gesture would not blur Ahn’s clock widget. EX2009, 22:17-20 (top menu doesn’t blur clock); 26:21-27:2 (bottom menu doesn’t blur clock); 27:3-6 (left menu doesn’t blur clock); EX1004, ¶[0101]-[0104] (swipe direction opens corresponding menu).

Although the Reply asserts the Petition described Ahn’s blurring operation “without restricting the analysis to any singular menu or embodiment” (Reply, 30), the **only** menu that allegedly blurs an object is Ahn’s right menu—which is **only** opened with a left swipe. For claim 208, Petitioner identifies a “swipe up” gesture

as the claimed gesture. Pet., 55-59; Reply, 31 (the gesture is “a swipe up”). Thus, Petitioner relies on two distinct gestures (a swipe-up and a swipe-left gesture) in mapping to the claimed gesture. This plainly fails to meet the claimed Limitations as antecedent basis requires “the gesture” in claim 208 to be the same gesture in claim 2. *Baldwin Graphic Sys., Inc. v. Siebert, Inc.*, 512 F.3d 1338, 1342–43 (Fed. Cir. 2008) (“the” is an “anaphoric phrase[], referring to the initial antecedent phrase”).

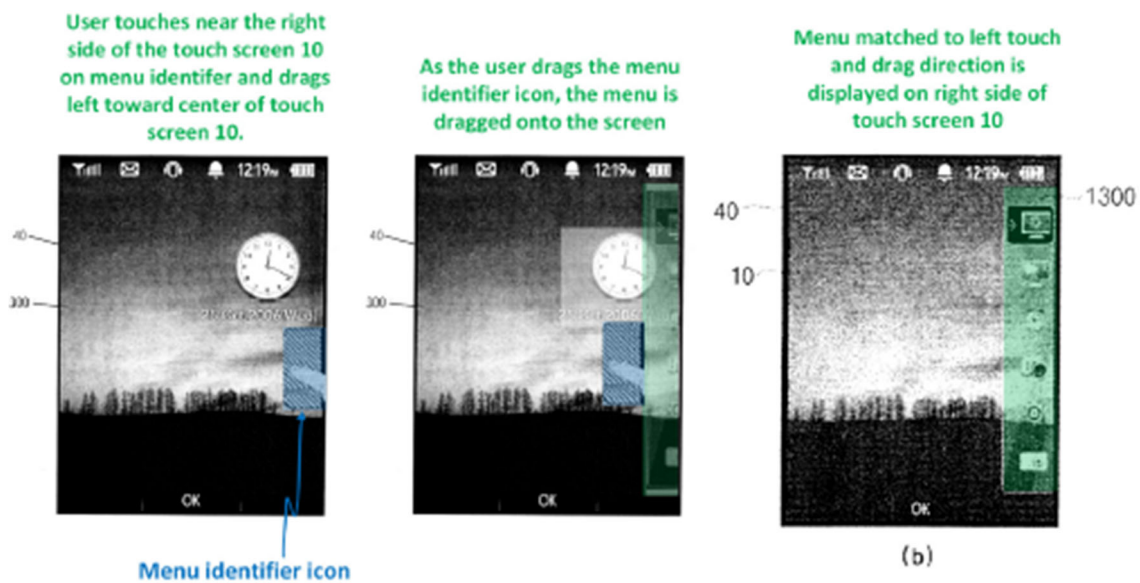
Not only does Petitioner rely on two distinct gestures (swipe-up v. swipe-left), Petitioner’s admits these gestures must also occur on two distinct interfaces at different points in time. Reply, 32 (Claim 2 analysis relies on “Ahn’s standby screen as an *example starting point* for the detected gesture” and claim 208 analysis “*turn[s] to* Shiplacoff’s full screen mode as an *example starting point* for the detected gesture”); Pet., 9, 58 (below).



Petitioner contends its reliance on two distinct gestures on separate interfaces is acceptable because claim 2 fails to “dictate[] what is displayed at the time that the gesture is detected.” Reply, 32. But claim 208 states that “*the* gesture on the touch screen is detected when a particular application interface ... is displayed” and antecedent basis requires “the gesture” in claim 208 to be the same gesture recited in claim 2.

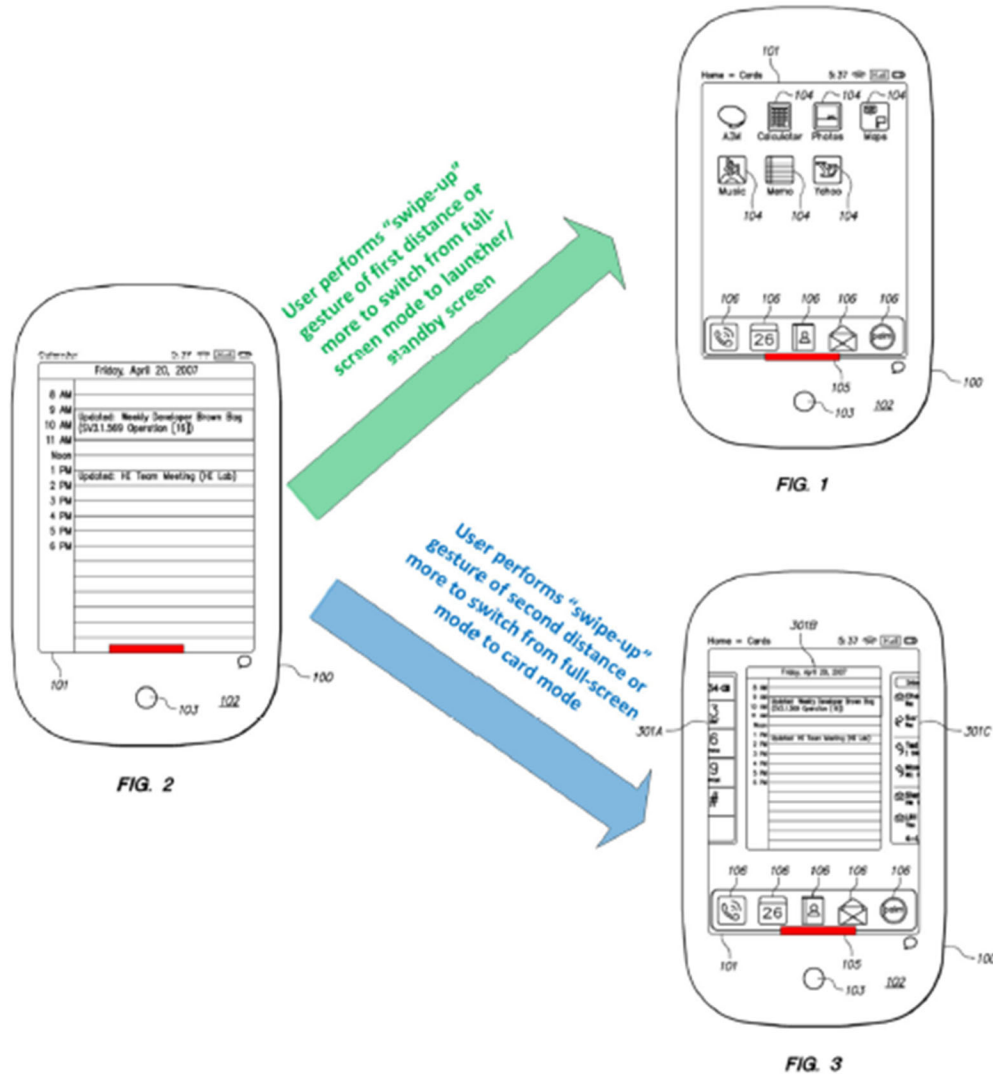
B. Petitioner's Combination is Unarticulated and Contradictory

Petitioner concedes it “leav[es] intact the Petition’s explanation with respect to Element [2d].” Reply, 32-33. However, Petitioner’s analysis of Limitation [2d] requires the menu to follow the finger during a swipe gesture. Reply, 2 (“Both theories rely upon the obviousness of the menus in the Ahn-Chaudhri combination following a user’s finger”).



Reply, 6.

On the other hand, Petitioner’s analysis of Limitation [208.f] requires determining whether the swipe-up gesture is a first distance or greater to either (1) “transition from a full screen mode to a launcher screen” or (2) “transition from a full screen mode to a card mode.” Pet., 59-60 (illustrated below).



Pet., 59.

As shown above, no menu follows the finger during the swipe-up. Indeed, the red object Petitioner includes to mirror Ahn's shadow 1800—which must slide in with the menu for claim 2 (Reply, 6)—does **not** follow the finger for Petitioner's claim 208 theory. Instead, the shadow must stay in place at the bottom of the screen. Pet., 59. Further, Petitioner's reliance on the thresholds shown in Ahns' FIG. 16 (*id.*) is inconsistent with the progressive following of the menu advanced for claim

2. *Supra*, III. Further still, Ahn's menus only emerge during gestures on its standby screen but Petitioner must rely on a gesture starting on Shiplacoff's full-screen application.

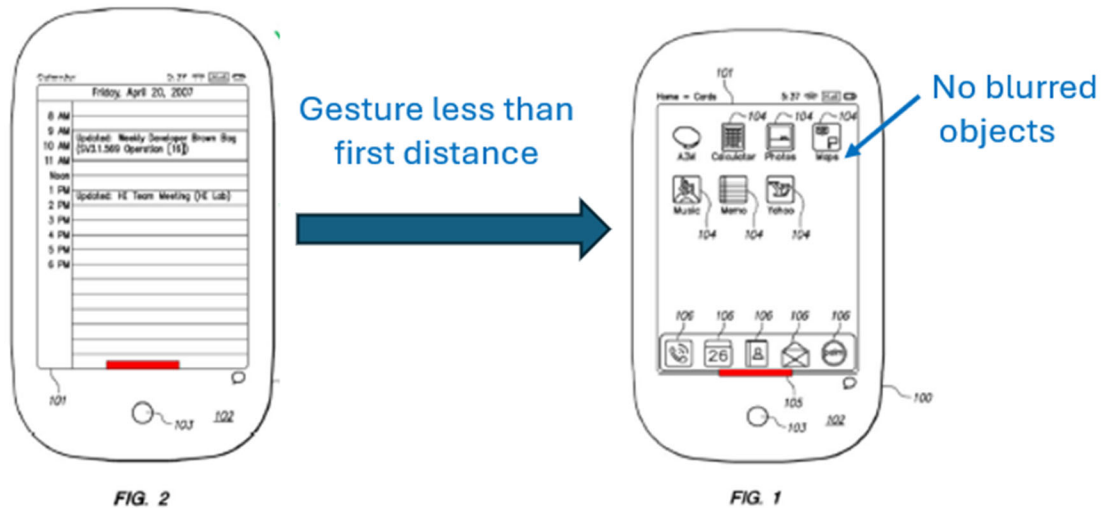
By "leaving intact the Petition's explanation with respect to Element [2d]" (Reply, 32-33), Petitioner creates inconsistencies in its combination that cannot coexist. A translucent menu cannot slide onto the screen if Petitioner's combination requires transitioning from a full-screen application to the launch/standby screen when the gesture is less than a first distance and when transitioning from a full-screen application to the card mode only when the gesture is greater than a first distance.

C. Swipe-up Gesture Cannot Meet the Claimed Features

The Reply confirms that the analysis in claim 208 "maintains" that "the elements of [Ahn's] standby screen 300" correspond to the object that is progressively blurred. Reply, 31; *see id.*, 32-33. As there is only one element/object (e.g., clock widget) on Ahn's standby screen 300 (EX1004, FIG. 3A), Petitioner must show the clock widget is progressively blurred based on a change in magnitude of the swipe-up gesture that starts on Shiplacoff's full-screen application. But Petitioner fails to do so.

1. *Gesture less than first distance*

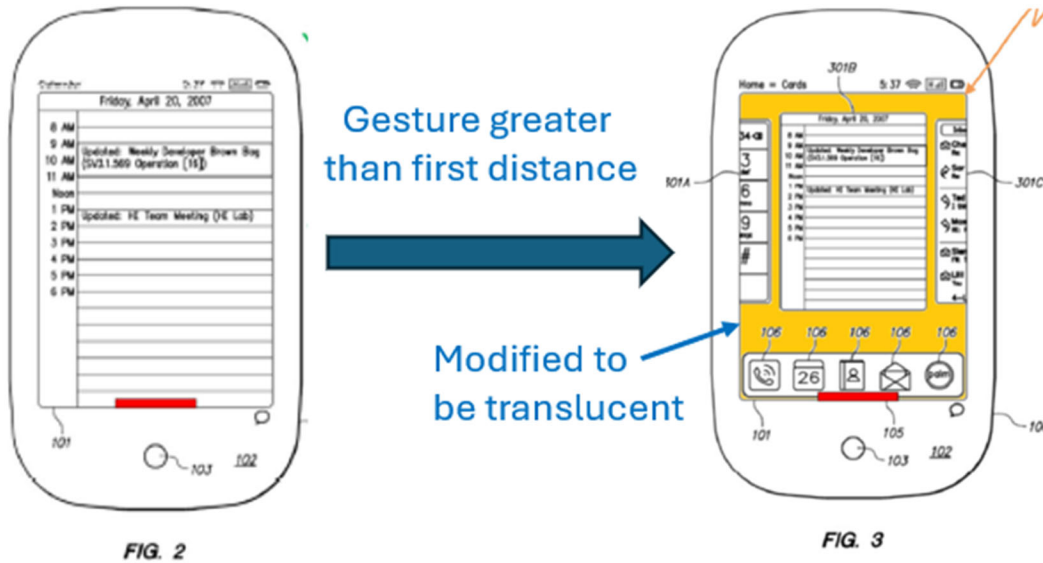
Petitioner's combination requires the display to "transition from a full screen mode to a launcher screen" if the gesture is below a first distance. Reply, 59-60.



Petitioner does not allege that any blurring occurs during the swipe-up gesture before reaching the first distance. Pet., 59-67. Nor would any blurring function make sense as the elements are not displayed in the full-screen mode and are fully displayed when the gesture is complete—an operation contrary to Petitioner's meaning of blur. Pet., 26-27 ("blur" means "make or become unclear or less distinct").

2. *Gesture greater than first distance*

Petitioner's combination also requires the display to "transition from a full screen mode to a card mode" if the gesture is greater than the first distance. Reply, 59-60. Petitioner also states that the area between the displayed cards would be translucent. Pet., 65-66.



Assuming, *arguendo*⁵, that Ahn's clock would be displayed behind the translucent area between the cards, Petitioner fails to explain how this would meet Limitation [2d] (to "blur, based on a change in a magnitude of the gesture being detected"). In analyzing Limitation [2d], Petitioner relies on a menu following a user's finger and covering more of the clock widget the further the user moves its finger. Reply, 6. But, as explained and illustrated above, Petitioner's modification does not have a menu following a user's finger and progressively covering more of the object. *Supra*, §V.B.

⁵ Petitioner's premise is based on the unevicenced assumption that Shiplacoff's launcher screen is displayed *behind* the card mode interface. Pet., 65 (conclusory assertion citing no evidence); *contra* EX2018, ¶195; EX1013, FIGs. 6A-6E (depicting background icons from launcher screen not displayed behind cards).

For claim 208, the object (e.g., clock) is not displayed at the start of the gesture and Shiplacoff's card 'menu'⁶ does not slide in from an edge like Ahn's menu. Pet., 62-66. In fact, the card 'menu' is not displayed until the gesture exceeds the first distance. *Id.* Thus, only after the gesture has exceeded a first distance, the combination requires the full-screen application (EX1004, FIG. 2) to become smaller while other *opaque* cards are introduced on the screen (*Id.*, FIG. 3). But these opaque cards cannot blur the clock widget and the area between the cards does not transition to blur any background object "based on the magnitude of the gesture." Pet., 64 (opaque not asserted as blurring).

As explained in the POR, there is no credible explanation as to how the transition from full-screen to card mode would blur the clock widget "based on a change in a magnitude of the gesture being detected" like Ahn's menu allegedly does when sliding in with the user's finger. POR, 85-88; EX2018, ¶¶193-195. Petitioner only provides that the area between the cards would be translucent but that is not sufficient to explain how such blurring would be based on a change in magnitude.

⁶ Petitioner provides no evidence that Shiplacoff's card mode is a menu (Pet., 64) and Petitioner's definition (providing the user with options) would render virtually every user interface a menu. *See e.g.*, EX1005, FIG. 10 (lock screen with options); EX1013, FIGs. 1, 5, 6F (depicting various interfaces with options).

Instead of providing any explanation, Petitioner's Reply states that its theory relies on "the Petition's explanation with respect to Element [2.d]" because "as a translucent menu slides onto the screen in correspondence with the magnitude of the touch and drag[] gesture, the translucent menu would correspondingly progressively blur the portion of the background." Reply, 32-33⁷ (quoting Pet., 28). But, as explained above, Petitioner's analysis for claim 208 does not have a "translucent menu slid[ing] onto the screen in correspondence with the magnitude of the" gesture. Pet., 53-68.

A determination of obviousness cannot be reached where the record lacks "explanation as to how or why the references would be combined to produce the claimed invention." *Trivascular, Inc. v. Samuels*, 812 F.3d 1056, 1066 (Fed. Cir. 2016). Petitioner's hand-waving and cross-citing cannot explain how its combination would operate to meet each and every claimed feature and falls far short of its burden. *In re Magnum Oil Tools Int'l*, 829 F.3d 1364, 1380–81 (Fed. Cir. 2016) (A petitioner cannot "satisfy its burden of proving obviousness" by "employ[ing] mere conclusory statements" and "must instead articulate specific reasoning, based on evidence of record" to support an obviousness determination.);

⁷ The Reply's citation to rearranging Shiplacoff's cards (Reply, 33-34) cannot save its contradictory and unexplained theory.

In re Nuvasive, Inc., 842 F.3d 1376, 1381–82 (Fed. Cir. 2016) (The “factual inquiry” into the reasons for “combin[ing] references must be thorough and searching, and the need for specificity pervades”) (internal quotations and citations omitted).

D. Limitations [208b], [208d]

Petitioner’s modification to have an object permanently displayed on the screen (shown below) introduces several deficiencies that are left unrebutted.

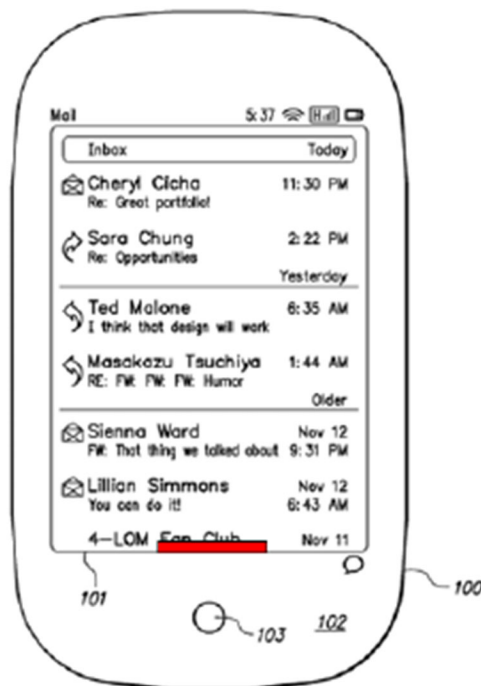


FIG. 5

First, Petitioner’s modification must eliminate Ahn’s bottom menu. EX2018, ¶203. Second, as shown above, Petitioner’s modification would diminish readability by obscuring a portion of the screen. EX2018, ¶204. Third, a swipe-up on the screen would be used to scroll the application (EX2009, 68:5-69:2), thus, a swipe-up would result in user errors (e.g., scrolling inadvertently triggering the card mode during

scrolling or interfering with selections of objects). EX2018, ¶¶202-204. All of these disadvantages are now undisputed.

Shiplacoff's only description of a swipe-up gesture is a "gesture beginning in gesture area 102," not on the display screen. EX1013, ¶[0127]. Notably, by beginning the gesture in gesture area 102, Shiplacoff avoids the disadvantages of Petitioner's modification. EX2018, ¶203. Nevertheless, Petitioner must modify Shiplacoff's swipe-up functionality to begin on an object that is permanently on the screen. Yet, Petitioner provides no logical motivation for doing so, particularly in light of the resulting disadvantages.

VI. DR. ROSENBERG IS CREDIBLE

Petitioner provides no evidence that Dr. Rosenberg's declaration testimony is different than his deposition interpretations. Reply, 8-13(not citing EX2018).

Dr. Rosenberg did not testify about the boundaries of graphic shadow 1800 emphasized by Petitioner's first two 'inconsistencies' (Reply, 9-10). EX1024, 70:20-71:17 ("not something I analyzed"). Further, Dr. Rosenberg's interpretation of the "ambiguity"⁸ in Ahn's paragraph [0118]-[0119] is consistent with his opinion

⁸ Dr. Terveen confirms this language is "funny" (EX1028, 74:7-75:4), could have been "written clearer" (*id.*, 81:1-82:9), and required him to *not* interpret the disclosure literally (*id.*, 76:8-16).

that Ahn’s menus do not progressively slide. EX1024, 107:5-109:6; EX2018, ¶80-91. With no real argument, Petitioner must selectively quote the transcript to manufacture inconsistencies. For example, Petitioner casts Dr. Rosenberg’s testimony regarding a tap on graphic shadow as inconsistent (Reply, 10 (citing EX1024, 88:4-9, 88:14-93:12)); however, Dr. Rosenberg clearly states “tapping” is not an example of opening the menu “*described in [paragraph] [0118]*” and then clarifies that “in reading further, actually [paragraph] [0119] ... is describing a press operation.” EX1024, 87:8-90:1. There is nothing inconsistent or inaccurate about this testimony. *See* EX2022, 70:10-22 (paragraphs [0118]-[0119] disclose “two different operations”).

Additionally, Petitioner asserts Dr. Rosenberg’s testimony is improper because he does not consider background knowledge, inferences, and creative steps a POSITA would employ. Reply, 13. This is false. EX1024, 74:11-77:5 (explaining a POSITA would use “their education and training ... to interpret what they are reading”), 86:5-87:17 (“POSITAs can be creative”); EX2018, ¶32-33 (providing understanding of a POSITA used in his declaration).⁹

⁹ A single imprecise formulation of the legal construct of a POSITA—an individual evaluating conflicting ideas—as multiple individuals evaluating conflicting ideas is not a credible basis to discard the entirety of Dr. Rosenberg’s testimony. *See*

At no point did Petitioner ask Dr. Rosenberg about any modifications or motivations at issue. Instead, Petitioner advanced incomplete hypotheticals and asked Dr. Rosenberg to determine the obviousness—a legal conclusion—of modifications not disclosed in Ahn without providing any underlying reasoning to evaluate such a determination. *See e.g.*, EX1024, 70:7-9 (Q: “***Just looking at Ahn***, what would a POSITA have found obvious when looking at Ahn with respect to the graphical shadow”); 70:20-71:2 (Q: “would a POSITA have found it obvious to give some leeway ... about where the start position is with respect to the graphical shadow”). Consistent with the obviousness framework, Dr. Rosenberg responds that there is no motivation to change Ahn in Petitioner’s incomplete hypotheticals. EX1024, 120:13-124:19 (distinguishing undisclosed possibilities of what a POSITA ***could*** do from motivations); *Belden Inc. v. Berk-Tek LLC*, 805 F.3d 1064, 1073 (Fed. Cir. 2015) (“Obviousness 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).

EX1024, 66:13-67:1 (“we need to go back go back to just a [singular] POSITA with the qualifications that are described in terms of their educational background and their experience.”)

VII. CONCLUSION

For the foregoing reasons, the Petition should be denied in its entirety.

Dated: October 28, 2025

Respectfully submitted,

/Eagle H. Robinson/

Eagle H. Robinson

Reg. No. 61,361

Lead Counsel for Patent Owner

CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. § 42.24(a)(i), the undersigned certifies that this Paper—exclusive of the table of contents, table of authorities, certificate of service, and this certificate of word count—includes 7,505 words—which is less than the 8,000 allowed under the Board’s April 8, 2025 Order (Paper 18). The undersigned relies upon the word count generated by Microsoft Word.

/Eagle H. Robinson/
Eagle H. Robinson (Reg. No. 61,361)

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on October 28, 2025, complete copies of this Patent Owner Sur-Reply and EX2022 were served on Petitioner via email (by consent), at the following email address(s):

IPR50095-0166IP7@fr.com

IPR50095-0166IP3@fr.com

IPR50095-0166IP4@fr.com

/Eagle H. Robinson/
Eagle H. Robinson, Reg. No. 61,361