

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MULTIFOLD INTERNATIONAL
INCORPORATED PTE. LTD.,

Plaintiff,

v.

MOTOROLA MOBILITY LLC,

Defendant.

Case No. C.A. No. 23-1173 (JLH)

MULTIFOLD INTERNATIONAL
INCORPORATED PTE. LTD.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. C.A. No. 23-1323 (JLH)

**PLAINTIFF MULTIFOLD INTERNATIONAL INCORPORATED PTE. LTD.’S
PROPOSED COUNTER-CONSTRUCTIONS IN RESPONSE TO
DEFENDANTS’ PROPOSED TERMS FOR CLAIM CONSTRUCTION**

Pursuant to the Scheduling Order in this action, Plaintiff Multifold International Incorporated Pte. Ltd. (“Multifold”) hereby attaches as Exhibit A its identification of proposed counter-constructions for the claim term(s)/phrase(s) proposed for construction by Defendants Motorola Mobility LLC (“Motorola”) and Google LLC (“Google”).

Multifold reserves the right to supplement or revise its initial identification of counter-constructions for Defendants’ claim terms, including to revise, modify, supplement, or withdraw

its proposed counter-constructions, in response to any modification by Defendants of its identification of claim terms for construction, any modifications by Defendants of its proposed constructions for its identified terms, and any identification by Defendants of its proposed counter-constructions for Multifold's identified claim terms, as well as in view of any negotiations or briefing between the parties concerning claim construction, and discovery.

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Exhibit A¹

	Term	Patent	Claims	Defendants' Proposed Construction	Multifold's Proposed Counter-Construction
1.	Display	756, 153, 050, 007, 135, 577, 842, 494, 0834	756: 7 135: 3, 6 153: 4, 17 050: 17 007: 17 577: 17 842: 1, 11 494: 1 0834: 1	“a portion of one or more screens used to display the output of a computer to a user, where multiple displays that are part of a single physical screen are managed as separate logical displays.” In the alternative, indefinite.	“a portion of one or more screens used to display the output of a computer to a user”
2.	Screen	756, 050, 007, 135, 577, 842	756: 7 050: 17 007: 17 135: 3 577: 17 842: 1, 11	“a physical structure that includes one or more hardware components that provide the device with the ability to render a user interface and/or receive user input”	“a physical structure that includes one or more hardware components that provide the device with the ability to render a user interface and/or receive user input. A screen can encompass any combination of a gesture capture region, a touch sensitive display, and/or a configurable area.”
3.	Image capture mode	842	842: 1, 11	“a state in which the device can capture images, distinguished from other image capture modes by a	“a mode, including a type of display, for the image capture function”

¹ Terms are presented in a numbered list in the same order and format as presented by Defendants for ease of reference. The position of a term within the list is not intended to imply anything about its relative importance to the claim construction process or the case.

				difference in one or more of the device's configurations"	
4.	Providing	842, 153	842: 1 153: 4	"making available for use"	"supplying, having, preparing, or making available for use"
5.	Wherein in each capture mode a display on the first or second screen is different	842	842: 1, 11	"in each of the device's image capture modes, the contents presented on the first screen or second screen are different"	"the type of display on one or both of the screens is different between different image capture modes"
6.	Wherein the auxiliary page is a child of the primary page	494	494: 1	"wherein the auxiliary page is part of the same application as the primary page and is accessible only through interaction with the primary page" In the alternative, indefinite.	"wherein the auxiliary page is a secondary or ancillary page of the same application as the primary page"
7.	Primary page	494	494: 1	"a page that continues to be displayed after a minimization operation"	"principal, main, or preferred page"
8.	Screen	080, 205	080: 1, 12 205: 15, 19	"displayed image produced on the display"	"the displayed image produced on the display"
9.	Display	080, 205	080: 1, 12 205: 15, 19	"physical hardware that is operable to render a screen"	"physical hardware that is operable to render a screen"

10.	Morphing the icon	080	080: 1	“animating a transition of the icon from a first position, shape, and size to a second position, shape, and size”	“changing the icon”
11.	Wherein the first and second states comprise an open application state	080	080: 1, 12	Indefinite	Not indefinite.
12.	Changing the application to a second display condition	080	080: 1	“Changing whether one or more displays is displaying a screen of the application”	“changing how one or more displays is displaying the application”
13.	Modifying the manner [in which the application is displayed]	080	080: 1	“Changing the appearance of the application”	“changing how the application is displayed”
14.	First screen and second screen	0834	0834: 1	The “first” and “second” screen limitations are two physically separate and distinct components.	Plain and ordinary meaning No construction necessary in view of separate construction of “screen.” <i>i.e.</i>, “a first touch sensitive screen” and “a second touch sensitive screen” do not have to be physically separate and distinct components

15.	Status of any application running on the portable handheld device	0834	0834: 1	“status of every application running on the portable handheld device”	“status of at least one application running on the portable handheld device”
16.	form	0834	0834: 1	“to bring together parts or combine to create”	“have the same look and feel as”
17.	Processing means for...	0834	0834: 1	This term is a means-plus-function term under 35 U.S.C. § 112, ¶ 6 Function: (i) display media across at least one of the first touch sensitive screen, the second touch sensitive screen, and the single contiguous display, (ii) dismiss the action bar to thereby display the media across an entirety of at least one of the first touch sensitive screen, the second touch sensitive screen, and the single contiguous display, (iii) display an overlay control on at least one of the first touch sensitive screen, the second touch sensitive screen, and the single contiguous display, and (iv) when prompted by actuation of the overlay control, dismiss a full screen mode and re-introduce the status bar and the action bar while the media is still displayed across the entirety of	This term is a means-plus-function term under 35 U.S.C. § 112, ¶ 6 Function: displaying media across at least one of the first touch sensitive screens, the second touch sensitive screen, and the single contiguous display Structure: any off the shelf commercially available or application specific processor; an orientation sensing module including any known convenient or application specific tilt sensor including but not limited to an accelerometer, a tilt switch, or the like; and structural equivalents.

				the first touch sensitive screen and the entirety of the second touch sensitive screen as the single contiguous display Structure: Indefinite due to lack of corresponding structure in the specification.	
18.	Display an overlay control	0834	0834: 1	“display a user interface element that is laid over other elements displayed on the screen and that a user can interact with to control the device”	“present a control on a screen or a display that is displaying media”
19.	Reintroduce the status bar	0834	0834: 1	Indefinite	Not indefinite
20.	Desktop	756	756: 7	“a metaphor used to portray systems”	“a ‘surface’ that typically includes pictures, called icons, widgets, folders, etc. that can activate or show applications, windows, cabinets, files, folders, documents, and other graphical items”
21.	Multi-display application	153	153: 4, 17	Indefinite	Not indefinite
22.	Automatically minimizing	153	153: 4, 17	“minimizing without material human input”	“minimizing without subsequent material human input”

23.	“when the first window was displayed on the first and second touch sensitive displays”	153	153: 18	Indefinite	Not indefinite
24.	In focus	050, 007	050: 17 007: 17	“selected for receiving input”	“being active and/or selected to receive input”
25.	A dual screen communication device	050	050: 17	Preamble is limiting.	Preamble is not limiting.
26.	area	050, 007	050: 17 007: 17	“portion of the screen”	“portion”
27.	Configurable area	050, 007	050: 17 007: 17	“an area capable of receiving input and has display or limited display capabilities and is not part of the first or second display that provides content”	“an area capable of receiving input and has display or limited display capabilities”
28.	Gesture capture region	007, 050	007: 20 050: 20	“an area off the display that does not include pixels that can perform a display function or capability and captures a user action expressing an intended idea, action, meaning, result, and/or outcome”	“region that senses or otherwise detects a user action expressing an intended idea, action, meaning, result, and/or outcome”

29.	Separate from	007, 050	007: 20 050: 20	“different regions of the screen controlled by separate modules”	“distinct from”
30.	Open state	135	135: 3, 6	“when the primary screen and the secondary screen are generally on the same plane”	No construction necessary. The claim defines the open state as the first display and second display facing in a same direction.
31.	Pre-configured annunciator window	135	135: 3, 6	“window that spans across both the primary and secondary screens and displays status information about the device”	“a window for displaying announcements (including, e.g., messages, alerts or other information) with an initial shape, size or location”
32.	Degrade	135	135: 3, 6	“obscure a portion of the display that could display application information”	“reduce or lower the quality of”
33.	Changed state	135	135: 3, 6	Indefinite	Not indefinite
34.	Multi-screen device	577	577: 17	“a device with at least two physical screens”	“a device with at least two screens”
35.	Received entirely on the second screen	577	577: 18	“can be received only on the second screen”	“received only on the second screen.”