

Petition for *Inter Partes* Review of
U.S. Patent No. 9,134,756

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA MOBILITY LLC, AND GOOGLE, LLC,
Petitioners,

v.

MULTIFOLD INT'L INC. PTE. LTD.,
Patent Owner

Case IPR2025-00040

Patent No. 9,134,756

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 9,134,756**

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LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Pat. No. 9,134,756 to da Paz
1002	Fil History for U.S. Patent No. 9,134,756 to da Paz
1003	Declaration of Dr. Jeffrey J. Rodriguez
1004	U.S. Pub. 2010/0248788 A1 to Yook
1005	U.S. Pub. 2007/0085759 A1 to Lee
1006	U.S. Patent No. 8,677,284 to Aguilar
1007	U.S. Pub. 2007/0024645 A1 to Purcell
1008	Features at a Glance - Windows XP Professional Features for IT Professionals, Microsoft Learn (Sep. 11, 2009); available at https://learn.microsoft.com/en-us/previous-versions/windows/it-pro/windows-xp/bb490858(v=technet.10) .
1009	Asus EEE PC computer review with Windows XP, guerillabill, YouTube (Dec. 28, 2007); available at https://www.youtube.com/watch?v=Z3gHRWXqguw .
1010	Curriculum Vitae of Dr. Jeffrey J. Rodriguez
1011	Scheduling Order in the Google and Motorola Actions, dated April 29, 2024

LIST OF CHALLENGED CLAIMS

Limitation	Claim Language
1[P]	A method of displaying a plurality of desktops and/or applications, each having at least one window, on a multi-display device, comprising:
1[A]	receiving, by a processor, a first input that represents an instruction to reveal one of a desktop or application on a first display of the multi-display device; selecting, by the processor, a first desktop or application to display on the first display;
1[B]	receiving, by the processor, a second input that represents an instruction to reveal one of a desktop or application on a second display of the multi-display device; selecting, by the processor, a second desktop or application to display on the second display;
1[C]	receiving, by the processor, a third input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays; and displaying, by the processor, the selected one of the first or second desktops or applications in a maximized condition.
2	The method of claim 1, wherein at least one of the first, second, and third inputs is achieved by at least a user input gesture.
3	The method of claim 1, wherein the third input is a user gesture comprising at least one of a tap or long hold gesture.
4	The method of claim 1, wherein at least one of the first or second displays has a visual indicator displayed thereon and signifying that a desktop or application appearing on that display can be maximized by a user gesture.
5	The method of claim 4, wherein the visual indicator has a wave shape.
6	The method of claim 1, wherein a fourth input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays.
7[P]	A non-transitory computer-readable medium having stored thereon instructions that cause a computing system to execute a method, the instructions comprising:

7[A]	instructions configured to receive a first predetermined input that represents an instruction to determine and reveal a first desktop or application on a first display of the multi-display device;
7[B]	instructions configured to receive a second predetermined input that represents an instruction to determine and reveal a second desktop or application on a second display of the multi-display device;
7[C]	instructions configured to respond to the first and second predetermined inputs with outputs that cause the first desktop or application to be displayed on the first display and cause the second desktop or application to be displayed on the second display:
7[D]	instructions configured to receive a third predetermined input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays according to the instructions configured to respond to the third predetermined input; and instructions configured to respond to the third predetermined input that causes displaying of the selected one of the first or second desktops or applications in a maximized condition.
8	The computer-readable medium of claim 7, wherein at least one of the first or second displays has a visual indicator displayed thereon and signifying that a desktop or application appearing on that display can be maximized by a user gesture according to the instructions configured to receive a third predetermined input.
9	The computer-readable medium of claim 7 wherein a fourth predetermined input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays according to the instructions configured to respond to the third predetermined input.

I. Introduction

Petitioners Motorola Mobility LLC and Google LLC (“Petitioners”) respectfully request *inter partes* review of claims 1-9 (the “Challenged Claims”) of U.S. Patent No. 9,134,756 (Ex. 1001, “’756 patent”), which is assigned to Multifold International Incorporated Pte. Ltd. (“Multifold” or “Patent Owner”).

The ’756 patent presents the case of an applicant’s attempt to broaden and reach for claims that beyond the scope of the purported invention. The problem is exacerbated in the Challenged Claims because the purported invention was for a multi-**screen** device, which requires two separate physical screens. But the Challenged Claims attempted to claim a ***single physical screen***, that could be “logically” divided. Worse yet, the applicants *deleted* the multi-screen limitation *after* the claims were already allowed. This is part of the admitted prior art and found in dozens of prior art references. Petitioners present four of those references in this Petition, which undoubtedly invalidate the fatally overbroad claims.

II. Mandatory Notices

A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioners identify Motorola Mobility

LLC¹ and Google LLC² as the real parties-in-interest.

B. Related Matters

The '756 patent is currently the subject of patent infringement lawsuits brought by Patent Owner, which includes Case No. 1-23-cv-01173 against Google LLC in the District Court for the District of Delaware (Google Action) and Case No. 1-23-cv-01323 against Motorola Mobility LLC in the District Court for the District of Delaware (Motorola Action). Motorola Mobility LLC was served with the complaint on October 18, 2023 and Google LLC was served with the complaint on November 20, 2023. Thus, this petition is timely under 35 U.S.C. § 315(b). The '756 patent was previously asserted in Multifold International Incorporated Pte. Ltd.

¹ Petitioner Motorola Mobility LLC is a direct, wholly owned subsidiary of Motorola Mobility Holdings LLC, which is indirectly a wholly-owned subsidiary of Lenovo Group Ltd. Motorola Mobility Holdings LLC and Lenovo Group Ltd. are not real parties-in-interest to this proceeding.

² Google LLC is a subsidiary of XXVI Holdings Inc., which is a subsidiary of Alphabet Inc. XXVI Holdings Inc. and Alphabet Inc. are not real parties-in-interest to this proceeding.

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v. Samsung Electronics Co., Ltd. et al, Case No. 2-21-cv-00371 (E.D. Tex.), which
was dismissed on June 2, 2022, with the court's grant of a joint motion to dismiss.

C. Notice of Counsel and Service Information

Petitioners designate the following counsel:

Counsel For Petitioner Motorola: (1) Christopher J. Higgins (lead counsel)
(Registration No. 66,422), (2) T. Vann Pearce (backup counsel) (Registration No.
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vice to be filed), (5) Quadeer Ahmed (backup counsel) (Registration No. 60,835,
quadeerahmed@paulhastings.com), and (6) David Valente (backup counsel) (Reg.
No. 76,287, davidvalente@paulhastings.com).

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Service Information for Petitioner Google: Paul Hastings LLP, 2050 M
Street NW, Washington, D.C. 20036, Tel.: 202.551.1700, Fax: 202.551.1705,
email: PH-Google-Multifold-IPR@paulhastings.com.

Petitioners' Powers of Attorney are attached.

The USPTO is authorized to charge the filing fee and any other fees incurred
by Petitioners to the deposit account of Orrick, Herrington, & Sutcliffe LLP: 15-
0665.

III. Requirements for IPR

A. Standing

Petitioners certify that the '756 patent is available for IPR, and that Petitioners
are not barred or estopped from requesting this review.

B. Challenge and Relief Requested

Petitioners rely on the following references:

U.S. Patent App. Pub. No. 2010/0248788 ("Yook"), published on September
30, 2010 (Ex. 1004).

U.S. Patent App. Pub. No. 2007/0085759 ("Lee"), published on April 19,
2007 (Ex. 1005).

U.S. Patent No. 8,677,284 ("Aguilar"), filed on November 4, 2009 and issued
on March 18, 2014 (Ex. 1006).

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U.S. Patent Pub. No. 2007/0024645 (“Purcell”), filed on May 19, 2006 and published on February 1, 2007 (Ex. 1007).

These references all predate the Challenged Claims’ earliest possible priority date of October 1, 2010³ and are prior art at least under pre-AIA 35 U.S.C. § 102(a), (b), and/or (e).

Petitioners requests that the Challenged Claims be determined unpatentable and cancelled on the following grounds:

Ground 1: Yook anticipates claims 1-4 and 6-9 under pre-AIA 35 U.S.C §102(a).

Ground 2: Yook renders the Challenged Claims obvious under pre-AIA 35 U.S.C §103.

Ground 3: Lee anticipates claims 1-3, 6, 7, and 9 under pre-AIA 35 U.S.C §102(b).

Ground 4: Lee renders claims 1-3, 6, 7, and 9 obvious under pre-AIA 35 U.S.C §103.

³ Petitioners do not concede that the ’756 patent is entitled to such a priority date and reserve the right to challenge such priority claim in this proceeding and other proceedings.

Ground 5: Aguilar anticipates claims 1-3, 6, 7, and 9 under pre-AIA 35 U.S.C §102(e).

Ground 6: Aguilar renders claims 1-3, 6, 7, and 9 obvious under pre-AIA 35 U.S.C §103.

Ground 7: Purcell anticipates claims 1-3, 6, 7, and 9 under pre-AIA 35 U.S.C §102(b).

Ground 8: Purcell in view of Yook renders the Challenged Claims obvious under pre-AIA 35 U.S.C §103.

This Petition is supported by the Declaration of Dr. Jeffrey Rodriguez (Ex. 1003).

IV. Discretionary Denial is Unwarranted

A. 35 U.S.C. § 314(a)

The factors set forth in *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (PTAB Mar. 20, 2020) (precedential) (“*Fintiv*”) strongly favor institution here.

1. Possibility of a stay

Petitioners may request a stay of the Litigation if institution is granted. The district court has not indicated how it will rule on such a motion. Thus, this factor is neutral. *See, e.g., Sand Revolution II, LLC v. Continental Intermodal Group – Trucking LLC*, IPR2019-01393, Paper 24 at 7 (PTAB June 16, 2020) (“*Sand Revolution*”) (the Board will not attempt to predict how the district court litigation

will proceed).

2. *The court's trial date*

This factor favors institution. Trial in the *Motorola* Action is scheduled for August 3, 2026. Ex. 1011, ¶23. Trial in the *Google* Action is scheduled for November 16, 2026. *Id.* This IPR should conclude months before either trial. Accordingly, this factor weighs heavily against a discretionary denial.

3. *Investment in the parallel proceeding*

This factor favors institution. To date, the parties and Court have invested relatively little in the Google and Motorola Actions, particularly as to invalidity. Discovery recently commenced and the parties have served their respective contentions. The claim construction process has not begun, and the claim construction hearing is scheduled for June 27, 2025, after the expected date of the institution decision. No depositions have occurred, no expert discovery has been conducted, and no summary judgment motions have been filed. *See Sand Revolution* at 11.

Moreover, Petitioners proceeded with reasonable diligence. Patent Owner has asserted sixteen patents and initially over 100 asserted claims in the litigation. Petitioners filed this Petition within three months of receiving Patent Owner's infringement contentions and just two weeks after Patent Owner was required to narrow the number of Asserted Claims from 100 to 40. "[I]t is often reasonable for

a petitioner to wait to file its petition until it learns which claims are being asserted against it in the parallel proceeding.” *Fintiv* at 11.

4. Overlap of issues with the parallel proceeding

This factor favors institution. Petitioners are challenging claims 1-9, but only claim 7 is asserted in the district court litigation. Moreover, because this proceeding will conclude prior to any trial in the district court and prior to pretrial proceedings, even if the claims were the same, this factor would favor institution. *Medtronic, Inc. v. Teleflex Innovations S.À.R.L.*, IPR2020-00138, Paper 20 (PTAB Jun. 26, 2020) (granting institution despite “an overlap of issues and parties,” because the fact that “trial date is *after* the due date for our final written decision” favored institution).

5. Overlap of parties

Petitioners and Patent Owner are parties in the *Motorola* Action and *Google* Action. This, however, is of little moment as the parties overlap in most situations where the patent-at-issue is both the subject of an IPR petition and asserted in district court.

6. Other circumstances that impact the Board’s exercise of discretion, including the merits

The strength of this Petition strongly favors institution. *See Fintiv* at 14-15 (instituting particularly meritorious petitions is favored because it “may serve the interest of overall system efficiency and integrity”). Petitioners present four grounds

of anticipation in this Petition, which demonstrates the strength of the prior art with respect to the Challenged Claims. Moreover, the prior art presented by Petitioners was not before the examiner during prosecution, further strengthening the invalidity grounds presented.

B. 35 U.S.C. § 325(d)

Denial under Section 325(d) also would be inappropriate. The petition relies upon prior art references that were not of record during prosecution of the '756 patent. *See generally* Ex. 1002. More importantly, following amendments during prosecution, none of the prior art references was compared to the claims that were broadened in post-allowance amendments. The arguments made for patentability during prosecution related to prior art references not including multiple displays in a single device, which all of the prior art relied upon herein includes. Accordingly, denial under 325(d) would be inappropriate.

V. Overview Of The '756 Patent

A. Admitted Prior Art

It is well known that “handheld computing devices, such as cellular phones, tablets, and E-readers, make use of a touch screen display....” Ex. 1001, 1:22-24. The '756 Patent further notes that through the proliferation of touch screen devices and the increasing complexity of user interface options, screen space was at a premium. *Id.*, 1:26-29. The specification further notes that an interface for user

input would obscure portions of a touch screen display and cause visual clutter. *Id.*, 1:29-32. The patent notes how this is particularly a problem for “single display touch screen devices” because of “their limited screen space,” *Id.*, 1:41-48, while also disclosing that dual screen devices are already present in the prior art. *Id.*, page 3.

B. The Patent’s Alleged Invention

The ’756 Patent describes the alleged invention as addressing “a need for a dual multi-display handheld computing device that provides enhanced power and/or versatility compared to conventional single display handheld computing devices.” Ex. 1001, 1:52-53. One aspect is displaying two applications, one on each display, where either of the applications can be maximized across both displays. Ex. 1001, Abstract; 1:60-2:10. The Challenged Claims are directed to resizing a window to display across two displays where it previously occupied only one display. In other words, the Challenged Claims are directed to exactly what the ’756 Patent describes as the prior art.

C. Relevant Prosecution History

The Challenged Claims were subject to several rejections during their pendency. In a January 31, 2014 Office Action, the claims were rejected as directed to unpatentable subject matter and rejected under §102(e) as anticipated by Jones (U.S. Patent Pub. No. 2011/0230178). At the time of the initial rejection, the

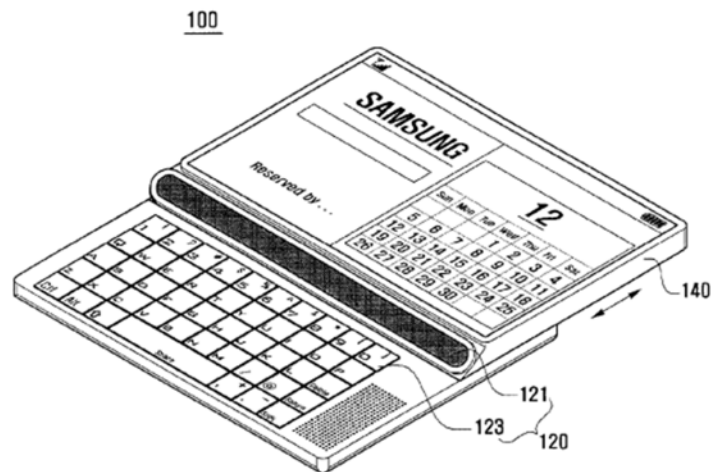
pending claims all recited a “multi-screen device” and not the currently present “multi-display device.” The applicant argued that Jones used two distinct devices, each with its own screen, and not a single device with two screens. April 30, 2014 Response at 8-9. In an August 27, 2014 Office Action, the examiner again rejected the claims as anticipated by a new reference Clark (U.S. Patent No. 5,835,090). The applicant argued that Clark did not present applications or desktops on separate logical displays and that Clark did not teach revealing an application through its “hidden form” of windows. November 25, 2014 Response at 9-10. A Notice of Allowance with an examiner’s amendment was issued on March 23, 2015. However, like in Patent No. 9,058,153 (co-petitioned for *inter partes* review), Patent Owner amended the claims post-allowance to swap the “multi-screen device” for a “multi-display device.” April 21, 2015 Response. While the applicants stated this did not change the scope of the claims, this contradicts arguments made during prosecution regarding the scope of the term “display.”

VI. Prior Art Overview

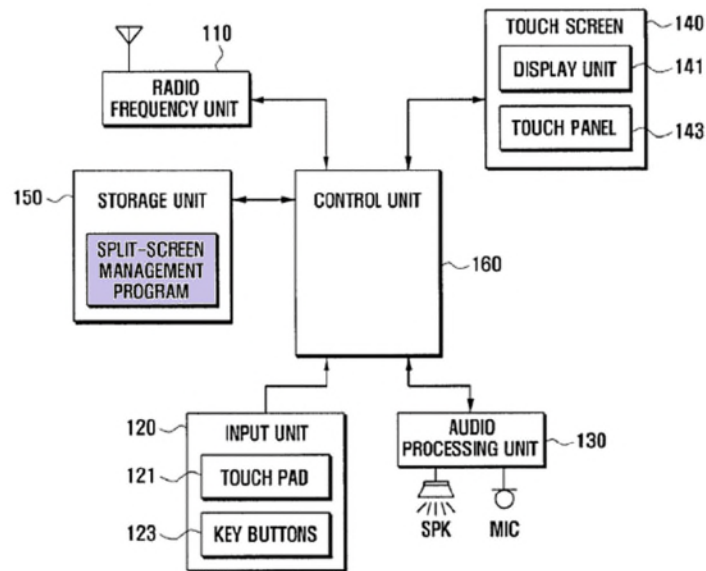
A. Yook

U.S. Patent Application Publication No. 2010/0248788 A1 to Yook was filed on March 22, 2010, claiming priority to provisional application number 61/163,259 filed on March 25, 2009, and published on September, 30, 2010. Yook qualifies as prior art under at least pre-AIA 35 U.S.C. § 102(a) and (e).

Yook is directed to a multi-display and multi-screen device that includes a touch screen user interface. Ex. 1003, ¶52; Ex. 1004, Figs. 1-13, ¶¶[0006]-[0009]. As part of the mobile terminal depicted in Fig. 1, Yook further describes how the touchscreen can be controlled to display multiple applications at once across its two logical displays. See, *e.g.*, Ex. 1003, ¶52; Ex. 1004, Abstract. In particular, Yook discloses a split-screen management program (purple) in Fig. 2 that is stored on the device for the purpose of controlling the two or more logical displays of the screen to divide the screen into logical displays if requested by a user. Ex. 1003, ¶52; Ex. 1004, ¶[0026].



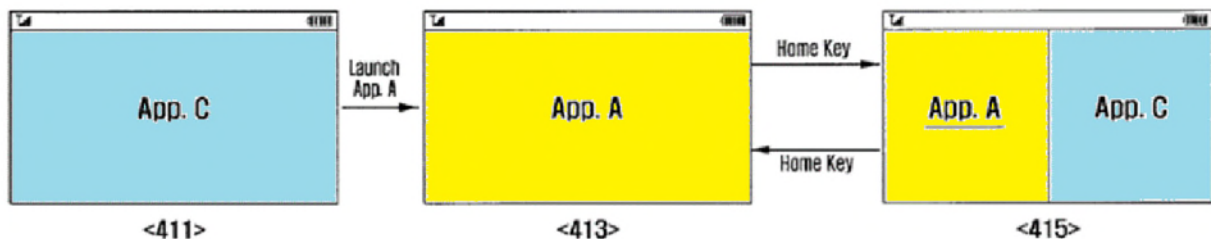
Ex. 1004, Fig. 1.



Id., Fig. 2.

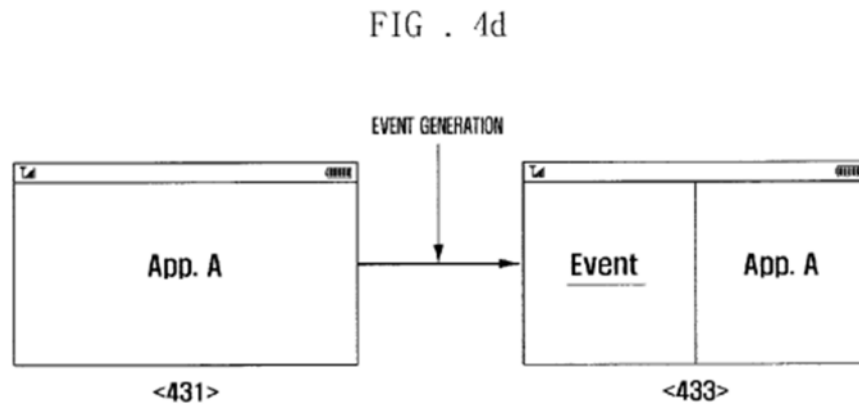
Based on the disclosed mobile device and split-screen management program, Yook provides several examples of how a user of the device can interact with the device and stored program in order to display multiple applications at once. Ex. 1003, ¶52. Fig. 4 provides one example of Yook's use of a divided display to show two open applications across both displays. *Id.*

FIG . 4b



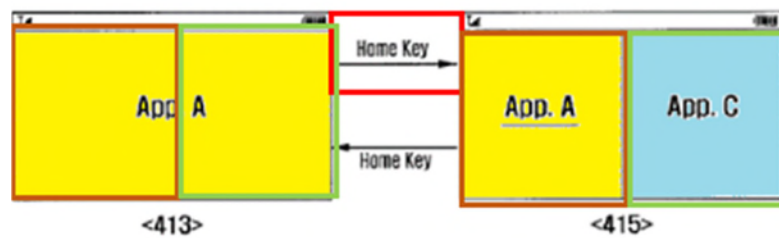
Yook provides multiple examples of opening two applications on two separate displays and switching between split-screen mode and full-screen mode. Ex. 1003,

¶52; Ex. 1004, ¶¶[0046]-[0047]. As shown below in Fig. 4d, when one application is displayed across both displays and an event occurs, the main application is automatically minimized to a single display and the event occupies the second display. Ex. 1004, ¶[0051].



Yook further discloses that a user can “generate[s] an input signal corresponding to one of a particular key and a touch event like the ‘Home’ key in screen 413...can simultaneously output two functional view areas App.C and App.A.” Ex. 1003, ¶ 52; *Id.*, ¶[0047]. One of the applications may be maximized using a touch event, e.g., the Home Key, resulting in that application being displayed on both of the first and second displays. *Id.*, ¶[0046], Fig. 4b. This application can then be minimized again to one of the first or second displays by touching the Home Key again. Ex. 1003, ¶ 52, *Id.*

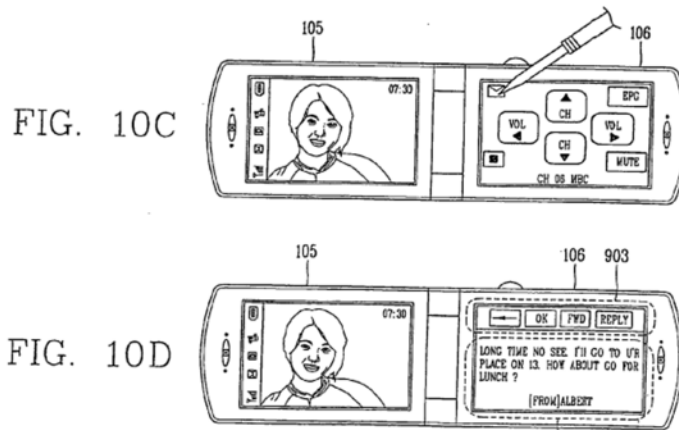
FIG . 4b



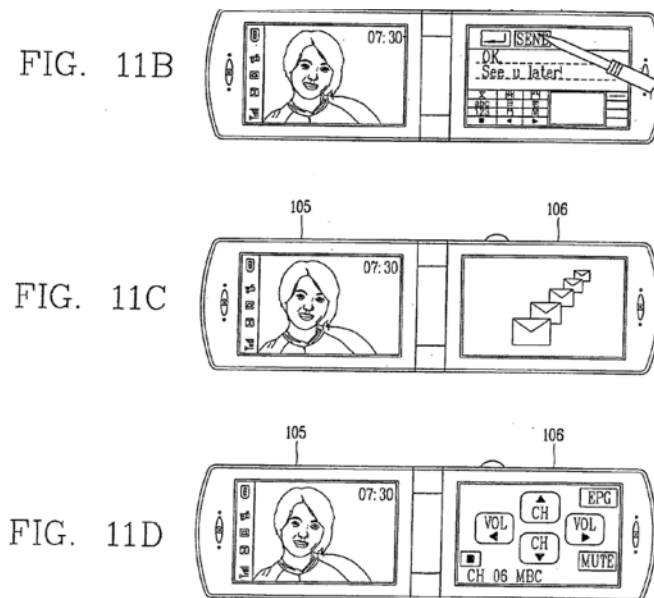
B. Lee

U.S. Patent Application Publication No. 2007/0085759 A1 to Lee was filed on October 12, 2006 and published on April 19, 2007. Lee qualifies as prior art under at least pre-AIA 35 U.S.C. §102(a) and (b).

Lee is directed to a multi-display and multi-screen device that includes a touch screen user interface. Ex. 1003, ¶53; Ex. 1005, Figs. 1-11, ¶¶[0002]-[0009]. Lee provides an example of displaying one application, and then instructing a second application to open on a second display. *Id.*, ¶¶[0053]-[0054]. As shown below in Figs. 10C-10D, Lee discloses that when one application is initially displayed and an event occurs, such as an incoming text message, the event is revealed on the second display. Ex. 1003, ¶53; *Id.*



Lee further discloses that one application may be maximized, resulting in the application being displayed on both of the first and second displays. *Id.*; Ex. 1005, ¶[0054], Figs. 11B-D.

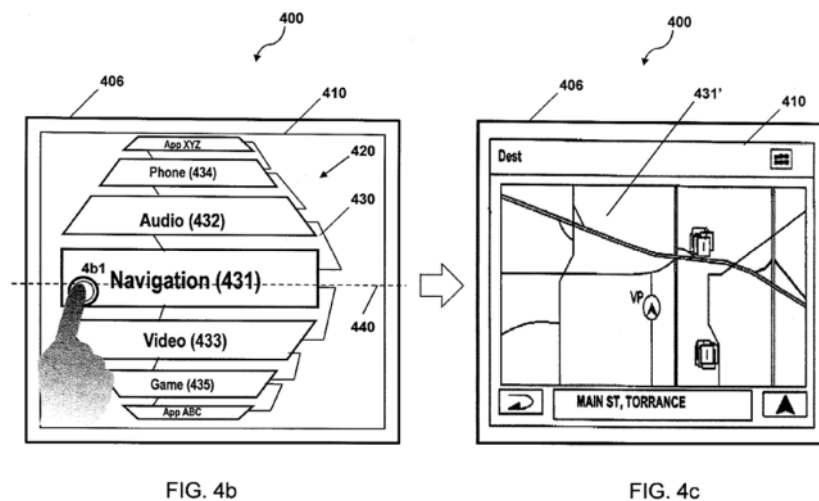


C. Aguilar

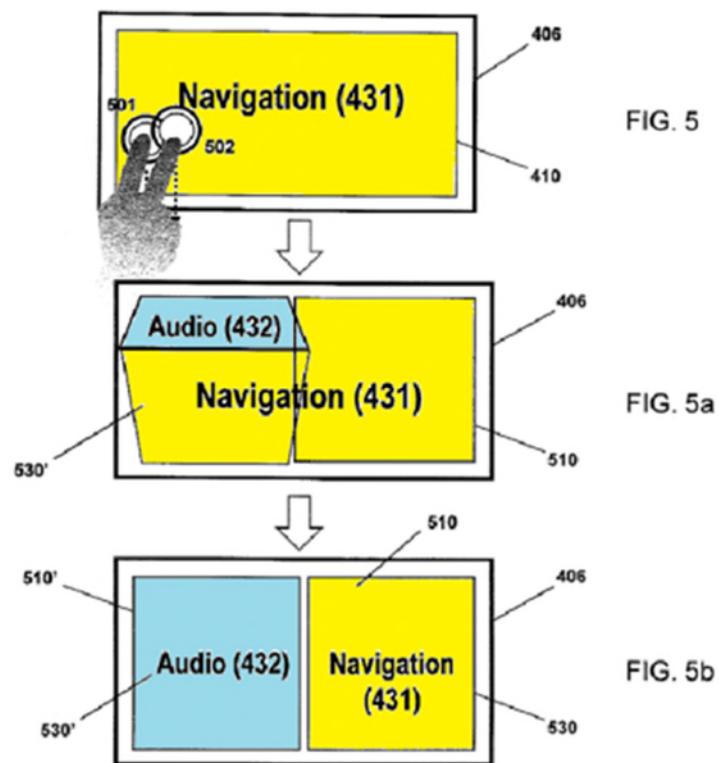
U.S. Patent No. 8,677,284 A1 to Aguilar was filed on November 4, 2009, published on May 5, 2011, and issued on March 18, 2004. Aguilar qualifies as prior art under at least pre-AIA 35 U.S.C. § 102(a) and (e).

Aguilar is directed to a multi-display device that is able to display a single application across the entire screen, or divide the screen into multiple displays for multiple applications. Ex. 1003, ¶54; Ex. 1006, Abstract, Figs. 4-9. Aguilar is directed to overcoming drawbacks in computer technologies that have placed limitations on the use and functionality of smaller touchscreen devices. Ex. 1006, 1:14-22. Aguilar describes a touchscreen device that can be divided into multiple logical displays and display content from different applications at once, allowing a user to multitask. Ex. *Id.*, 2:1-5, 26-41, 5:5-19, 6:48-7:63.

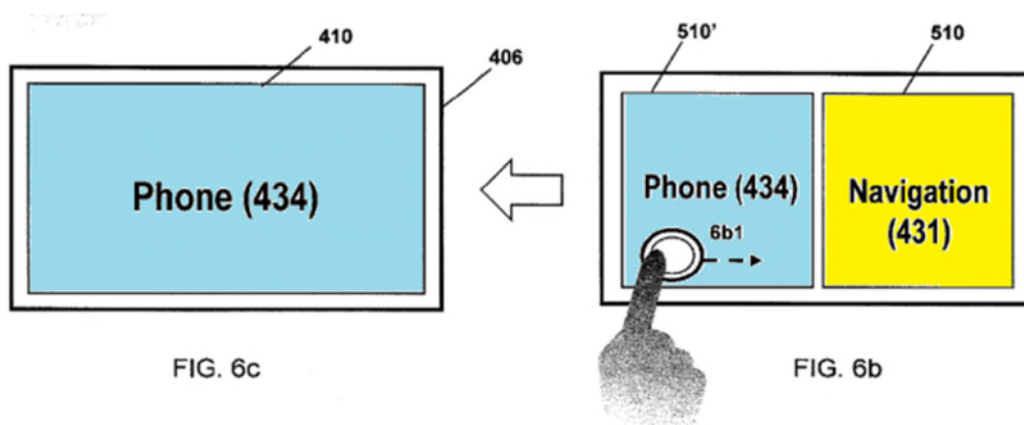
Aguilar demonstrates in Fig. 4 how its device can display a single application across the entire screen (all of the logical displays). Ex. 1006, 5:56-6:22.



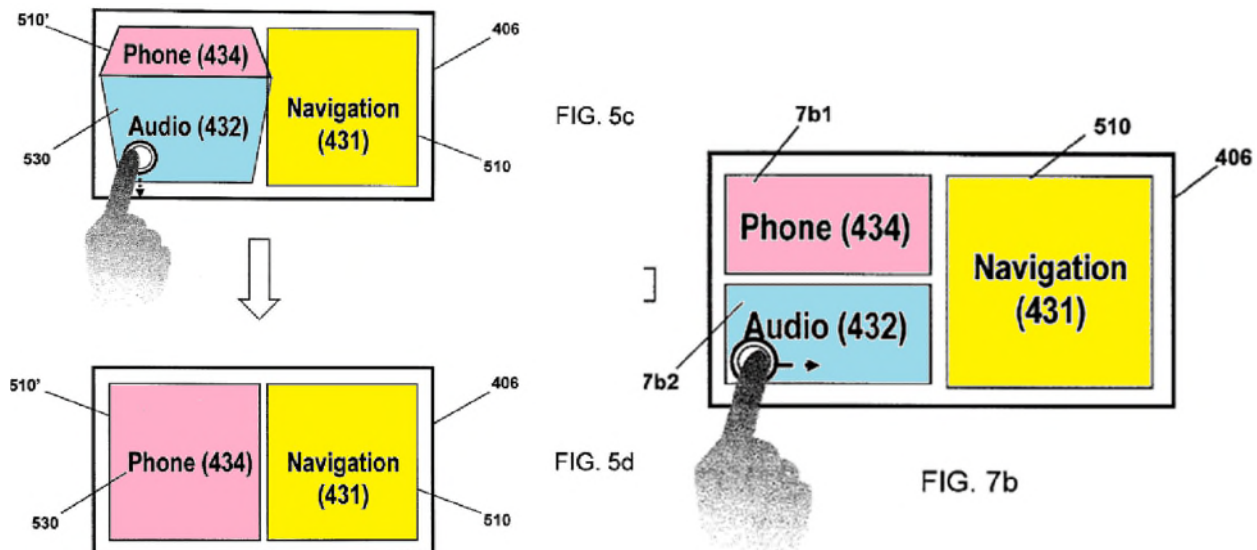
Aguilar then demonstrates in Fig. 5 how its software and controller interface can permit a user to divide the screen into two displays and launch a second application on one of the two displays. Ex. 1006, 6:48-67.



Demonstrating additional functionality, Aguilar also describes how a user can revert back from the two display and two application arrangement to a single application covering both displays in Figs. 6b and 6c. Ex. 1006, 7:42-54.



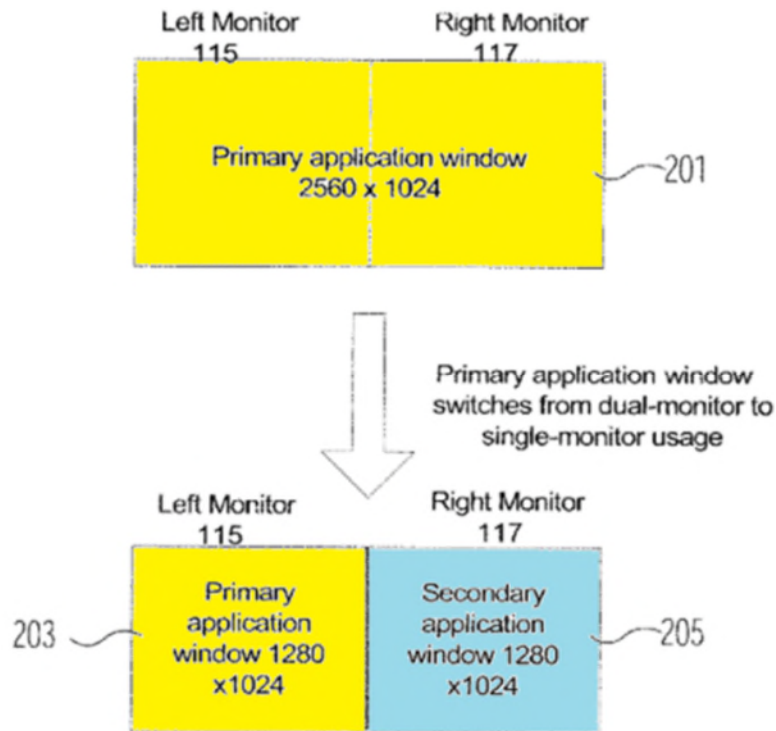
Aguilar also describes how a user can launch a third application window that can either be displayed on one of the two displays (Figs. 5c and 5d below) or be launched in a third display window (Figs. 7b). Ex. 1006, Fig. 7b, 7:65-8:18.



A. Purcell

U.S. Patent Application Publication No. 2007/0024645 A1 to Purcell was filed on May 19, 2006, and published on February 1, 2007. Purcell qualifies as prior art under at least pre-AIA 35 U.S.C. § 102(b).

Purcell is directed to a system with multiple display monitors that is used to display multiple applications at the same time to a user. Ex. 1003, ¶55; Ex. 1007, Abstract. Purcell notes that its multiple display system may be operated with the Windows operating system, which supported multiple application displays. *Id.*; Ex. 1007, ¶[0003]. Fig. 2 of Purcell is illustrative of its system:



Purcell explains that a primary application window 201 (yellow) can run with a single window and span both monitors/displays. *Id.*, ¶[0016]. Purcell then notes “to permit another application to execute concurrently and display an image window adjacent to an image window of the primary application, system 100 dynamically changes the primary application image window size to match that of a left monitor (monitor 115).” *Id.* The system then “initiates execution of a secondary application that displays an associated image window on the right monitor (117).” *Id.*

VII. Level of Ordinary Skill in the Art and Claim Construction

A POSITA at the time of the alleged invention would have had an undergraduate degree in electrical engineering, computer engineering, computer

science or a related field along with two years of experience in the field of user interface technologies, including e.g., graphical user interface technologies, or a related field. Ex. 1003, ¶42.

The specification of the '756 patent includes definitions for many of the terms that appear in the Challenged Claims. See Ex. 1001, 3:44-6:39. For purposes of this proceeding only, Petitioners have applied the definitions set forth in the '756 patent and do not believe any further construction is necessary in order to determine that the Challenged Claims are invalid over the prior art.

VIII. How the Challenged Claims Are Unpatentable

A. Ground 1: Claims 1-4 and 6-9 Are Anticipated by Yook

1. Claim 1

1[P] A method of displaying a plurality of desktops and/or applications, each having at least one window, on a multi-display device, comprising:

If the preamble is limiting, Yook discloses this limitation. Ex. 1003, ¶60.

The '756 patent provides the following definition for “display:”

The term “display” refers to a portion of one or more screens used to display the output of a computer to a user. A display may be a single-screen display or a multi-screen display, referred to as a composite display. A composite display can encompass the touch sensitive display of one or more screens. *A single physical screen can include multiple displays that are managed as separate logical displays. Thus, different content can be*

displayed on the separate displays although part of the same physical screen.

Ex. 1001, 5:1-9. Yook’s split-screen display meets this definition because it can display multiple applications on its multi-display device. Ex. 1003, ¶61.

Yook discloses a “method of supporting divided screen areas” on a mobile terminal. *Id.*; Ex. 1004, Abstract. Yook discloses a device that comprises two displays (always signified by orange and green outlines) and a processor for controlling the two displays in order to divide a screen into logical portions.⁴ *Id.*, Figs. 1, 2, 4b; Ex. 1003, ¶¶61, 67. As shown in annotated Figs. 1 and 4b below, Yook discloses two displays, a first display (orange outline) and a second display (green outline), each of which is a portion of one or more screens that is used to display an application window to a user.⁵ *Id.*

⁴ The outlines from Yook for each logical display have been exemplarily drawn to encompass a portion of a screen, but could encompass more or less of the screen without affecting Yook’s disclosure of each claim element in the ‘756 patent.” (See *e.g.*, Ex. 1001, 5:1-9.)

⁵ An **orange** outline refers to a first display and a **green** outline refers to a second display. The locations of the first and second displays may vary in different examples because they are logical displays.

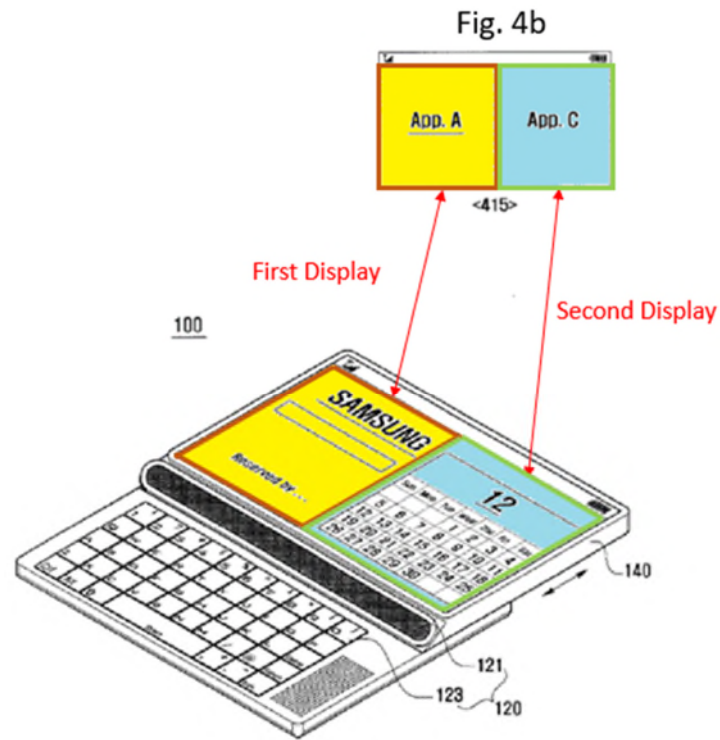
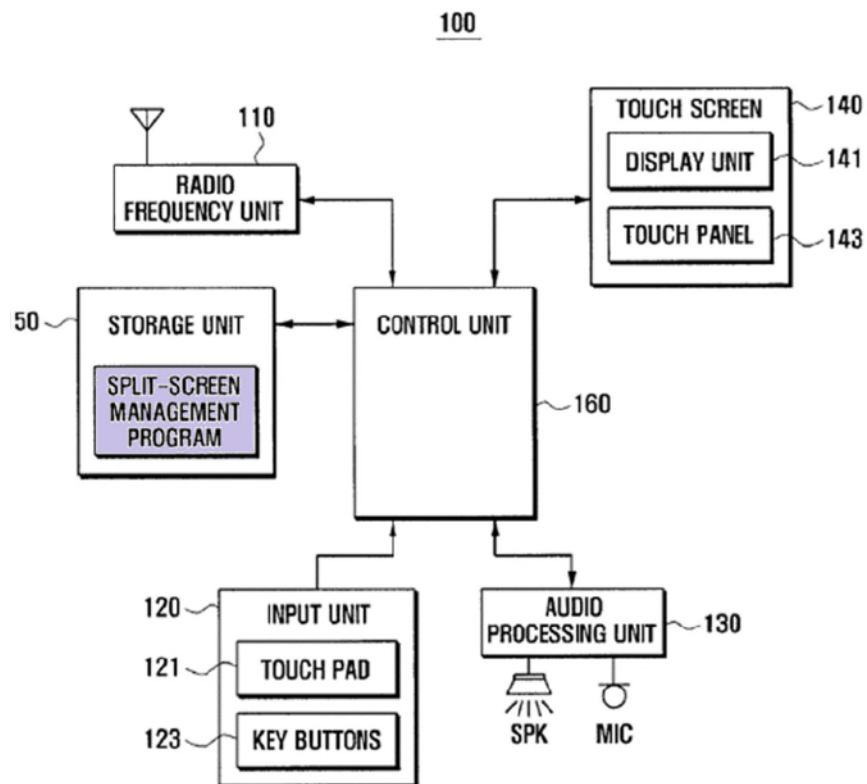


Fig. 1



Ex. 1004, Figs. 1, 2, 4b (annotated). As shown in annotated Figs. 1 and 4b above, Yook discloses two displays, each of which is a portion of one or more screens that is used to display an image or window of an application to a user. Ex. 1004, ¶¶[0024]-[0037]; Ex. 1003, ¶62, 63.

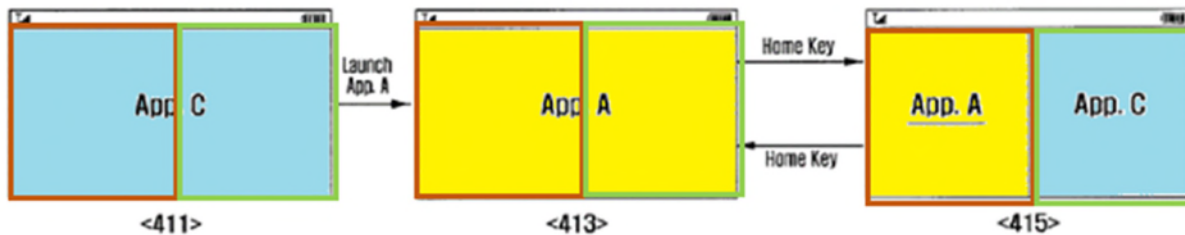
Yook provides examples of how a user can perform various operations on this device to view a single application window across both displays, or how a user can divide the screen into multiple displays in order to view information from multiple applications at the same time. *See id.*, Figs. 3-13; Ex. 1003, ¶64. All of these examples of “user interaction” with the device in Fig. 1 are different examples of using the apparatus disclosed in Yook. Ex. 1003, ¶64. For each claim element below, Petitioners may refer to several of these examples performed on the device in Yook, but all constitute the same embodiment of Yook.

1[A] receiving, by a processor, a first input that represents an instruction to reveal one of a desktop or application on a first display of the multi-display device; selecting, by the processor, a first desktop or application to display on the first display;

Yook discloses receiving, by a processor, a first input that represents an instruction to reveal one of a desktop or application on a first display of the multi-display device and selecting, by the processor, a first desktop or application to display on the first display. Ex. 1003, ¶65.

As shown in Fig. 4b, Yook's device utilizes a split-screen mode for two applications in which an application (App.A) is revealed on the first display (orange box). Ex. 1003, ¶66; Ex. 1004, ¶[0046]-[0047]..

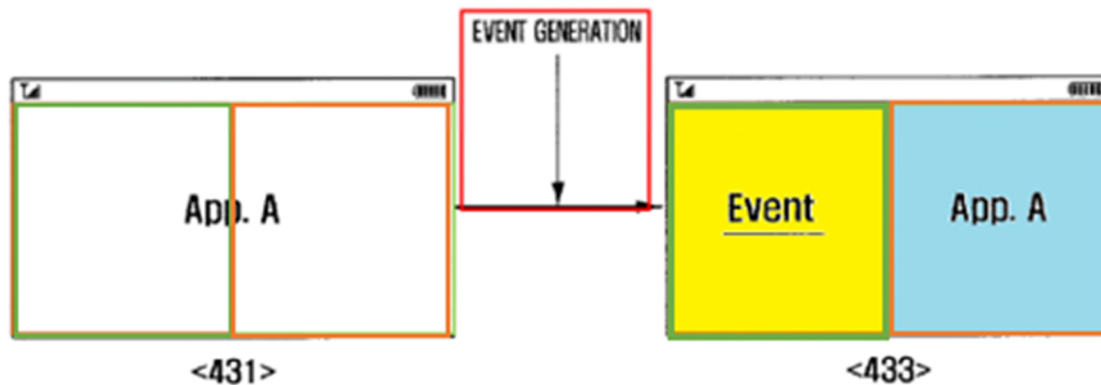
FIG . 4b



In such a scenario, Yook teaches that user input can cause an application (e.g., App.A or App.C) to be revealed and displayed to the user. *Id.*

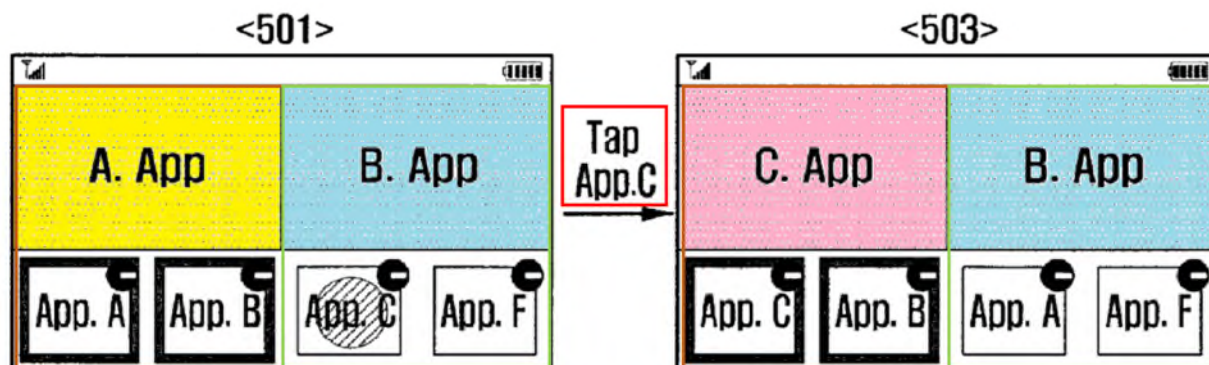
Yook provides further examples of its split-screen programming in Fig. 4d, which demonstrates how App.A is revealed only on the first (orange) display area and the second application that is revealed is displayed on the second (green) display area. Ex. 1004, ¶[0051]; Ex. 1003, ¶67.

FIG . 4d



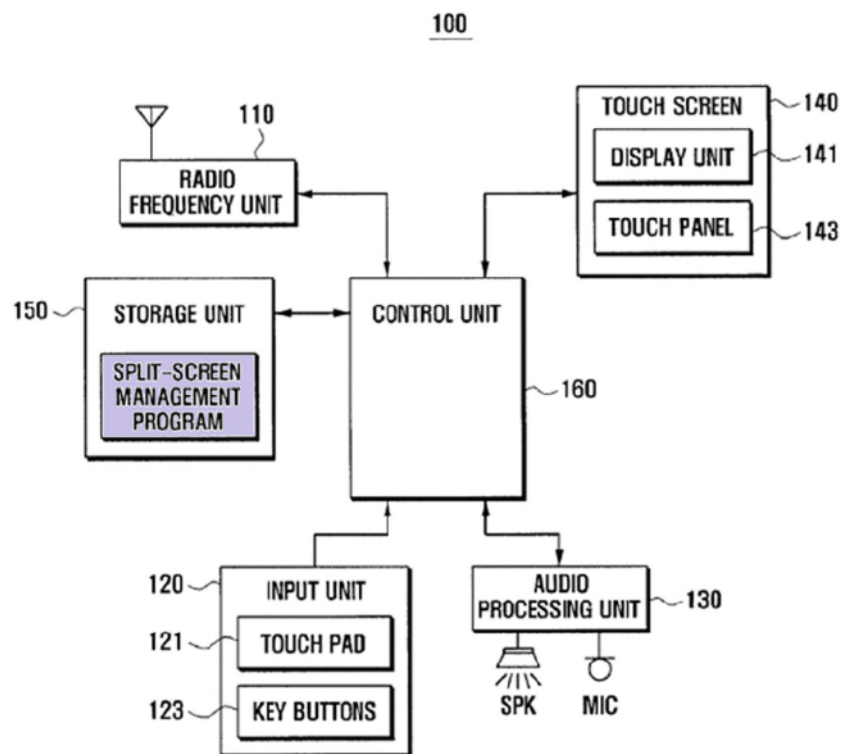
Yook also discloses how a user can select one out of multiple running applications to reveal on each display. Ex. 1003, ¶68. For example, as shown in Fig. 5, a user can select by the touchscreen one of App.A, App.B, App.C, or App.F from a stack in order to display on the first display. Ex. 1003, ¶68; Ex. 1004, ¶[0058].

FIG . 5a



Yook further discloses that a processor manages the multiple displays as separate logical displays through the use of a split-screen management program

(purple below) that is stored on the device for the purpose of controlling the two or more logical displays of the screen to divide the screen into the logical displays if requested by a user. Ex. 1004, Fig. 1, ¶[0035]-[0040]; Ex. 1003, ¶69. The split-screen or screen area management program is executed in a series of instructions or commands by the Control Unit processor. *Id.*



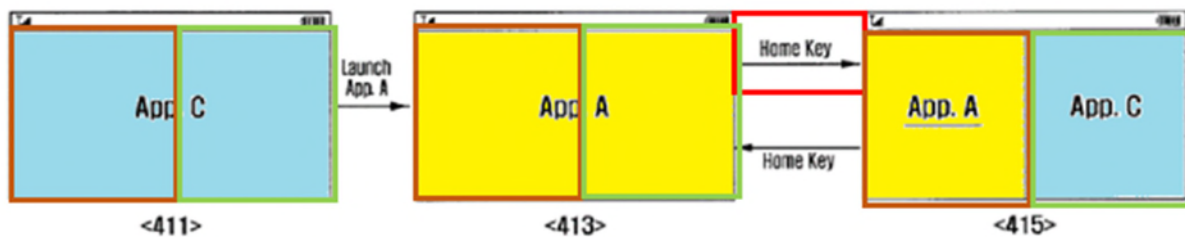
1[B] receiving, by the processor, a second input that represents an instruction to reveal one of a desktop or application on a second display of the multi-display device; selecting, by the processor, a second desktop or application to display on the second display;

Yook discloses this limitation. Ex. 1003, ¶70.

With reference again to Fig. 4b, Yook discloses that a user can “generate[s] an input signal corresponding to one of a particular key and a touch event like the

‘Home’ key in screen 413...can simultaneously output two functional view areas App.C and App.A.” Ex. 1004, ¶[0047], Ex. 1003, ¶71. In response to receiving the input from touching the ‘Home’ key, the processor reveals a second application, App.C on the second display (green box). *Id.* The Home Key input is shown in the red box in annotated Fig. 4b below, and demonstrates how Yook can reveal the second application to the user when it may have been in the background prior to the reveal. *Id.*

FIG . 4b

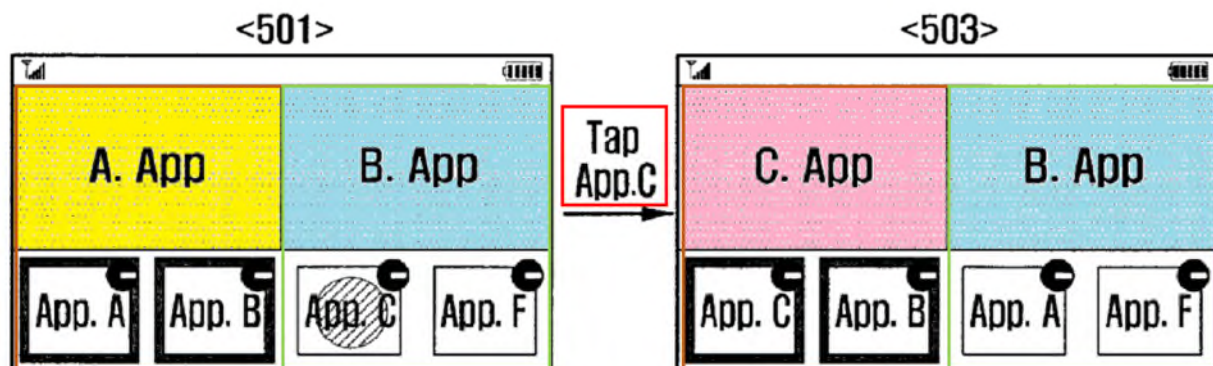


As another example, Yook describes in Fig. 10 below how a user can provide an input for an instruction to reveal a first application (e.g., web browser) and Yook’s device will respond by revealing a second application (e.g., Twitter) on the second display. Ex. 1003, ¶72; Ex. 1004, ¶[0096]-[0101].



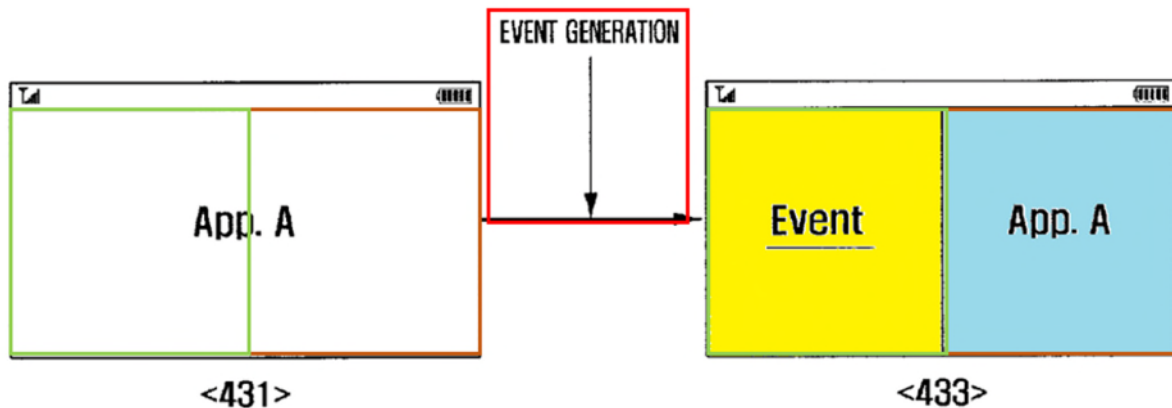
Yook also discloses how a user can select one out of multiple running applications to reveal on each display. Ex. 1003, ¶73. For example, as shown in Fig. 5, a user can select by the touchscreen one of App.A, App.B, App.C, or App.F from a stack in order to display on the second display. Ex. 1003, ¶73; Ex. 1004, ¶[0058].

FIG . 5a



As another example, Fig. 4d, demonstrates how an “Event Generation” input is used to launch a second application, which is then displayed on the second display (green box). Ex. 1004, ¶[0051], Ex. 1003, ¶74.

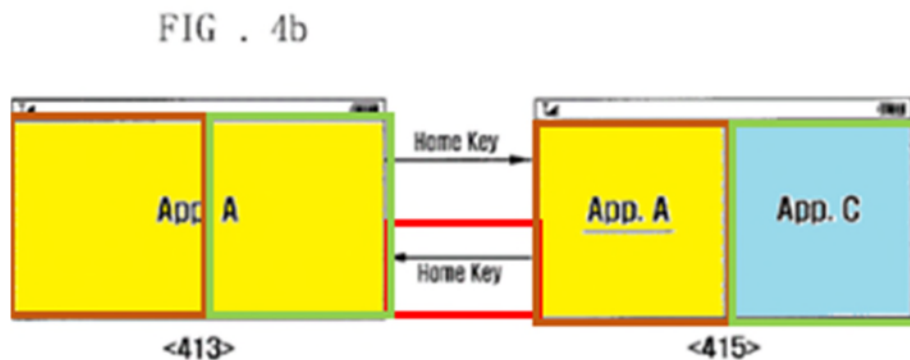
FIG . 4d



1[C] receiving, by the processor, a third input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays; and displaying, by the processor, the selected one of the first or second desktops or applications in a maximized condition.

Yook discloses this limitation. Ex. 1003, ¶75.

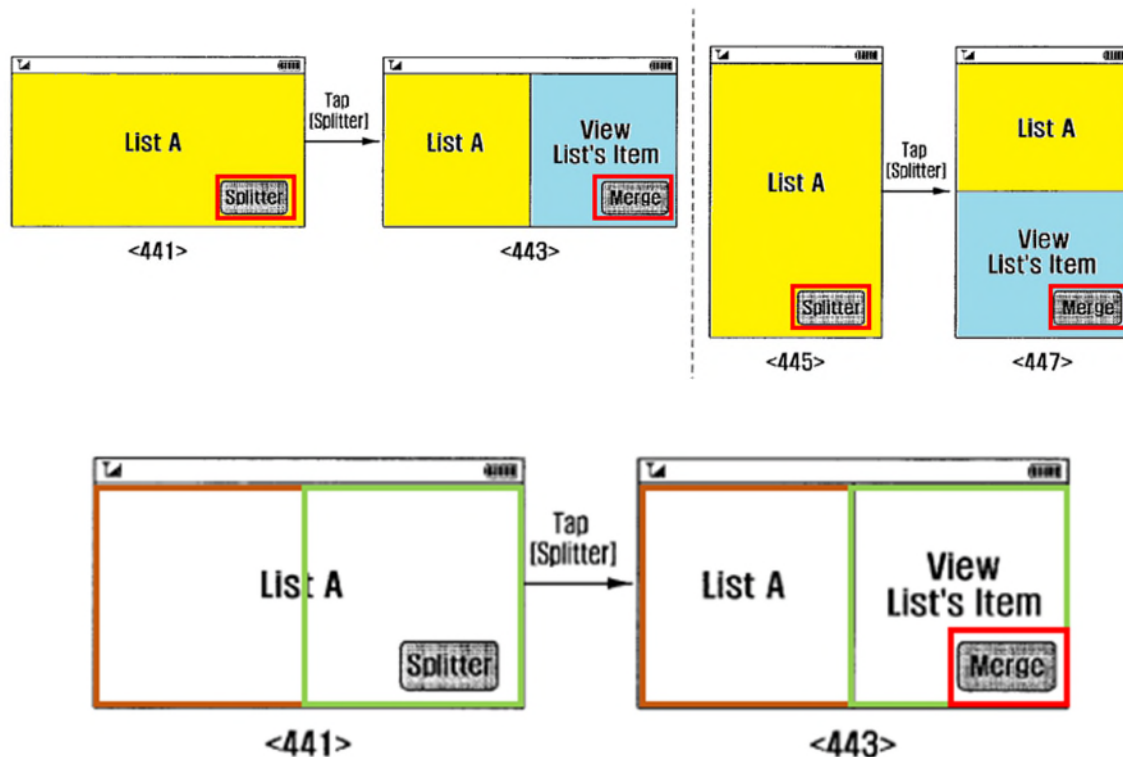
As shown in Fig. 4b, Yook’s device can switch to full screen mode for a single application from split-screen mode for two applications. Ex. 1003, ¶76; Ex. 1004, Fig. 4b, ¶[0046]. When this transition occurs, one of the two applications is maximized, increasing to its largest size to be displayed on both displays. *Id.*



Ex. 1004, Fig. 4b; Ex. 1003, ¶76. When App.A is in split-screen mode (413), a user can provide an input with the “Home” key, and direct the processor to respond by initiating full screen mode for App.A. *Id.* App.A then displays in a maximized condition on both the first display and the second display. Ex. 1003, ¶76.

Yook also provides examples of how a user can display the first application window on both the first and second displays. Ex. 1004, ¶[0055]; Ex. 1003, ¶77. For example, Fig. 4e shows a splitter and merge input buttons that can cause a second application to be displayed on the first display. *Id.* As annotated Fig. 4e shows below, an application (yellow) can be displayed on two displays in full screen mode. Upon touching the “Splitter” button, application “A” is divided into two windows each displayed on its own display. Upon touching the “Merge” button, indicated with a red box, application “A” converges back into one window displayed on two displays in full screen mode. *Id.*

FIG . 4e

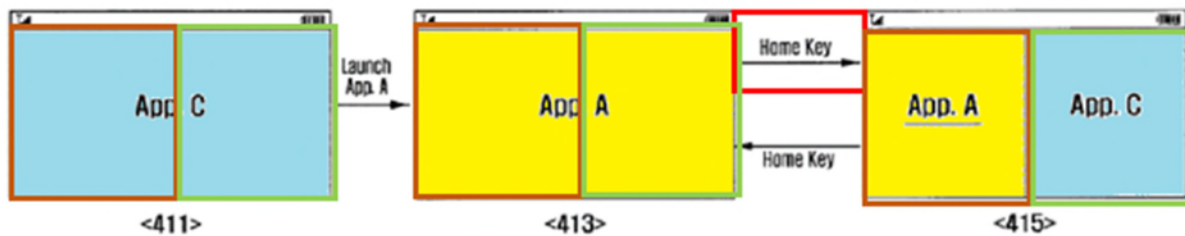


2. **Claim 2 - The method of claim 1, wherein at least one of the first, second, and third inputs is achieved by at least a user input gesture.**

Yook discloses that at least one of the first, second, or third inputs is a user input gesture. Ex. 1003, ¶78. As explained in the preceding claim, a user may touch the “Home Key,” which can be either the second or the third input that switches between split-screen mode and full screen mode for one of the displayed applications. Ex. 1003, ¶79; Ex. 1004, ¶[0046]. Yook refers to the input for the

Home Key as a “touch event,” which would be a tap by a user (input gesture) on the touchscreen interface. Ex. 1004, ¶[0047]; Ex. 1003, ¶79.

FIG . 4b



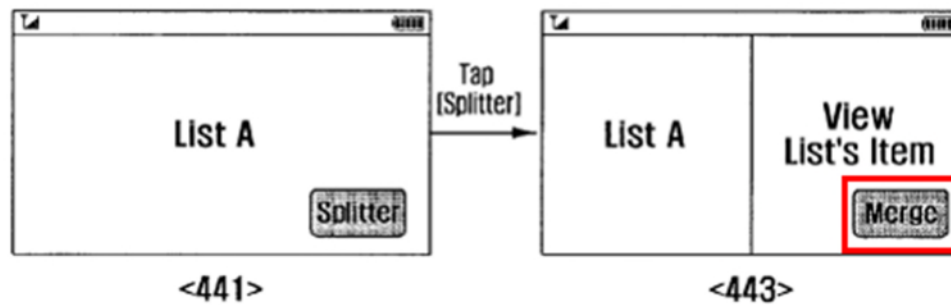
3. **Claim 3 - The method of claim 1, wherein the third input is a user gesture comprising at least one of a tap or long hold gesture.**

Yook discloses this limitation. Ex. 1003, ¶80. As explained in claim 2, a user can “tap” the Home Key as the third input to cause the application to be maximized on both displays. Ex. 1003, ¶¶80-81. Yook refers to the input for the Home Key as a “touch event,” which would be a tap on the touchscreen interface. Ex. 1004, ¶[0047]; Ex. 1003, ¶¶80-81.

4. **Claim 4 – The method of claim 1, wherein at least one of the first or second displays has a visual indicator displayed thereon and signifying that a desktop or application appearing on that display can be maximized by a user gesture.**

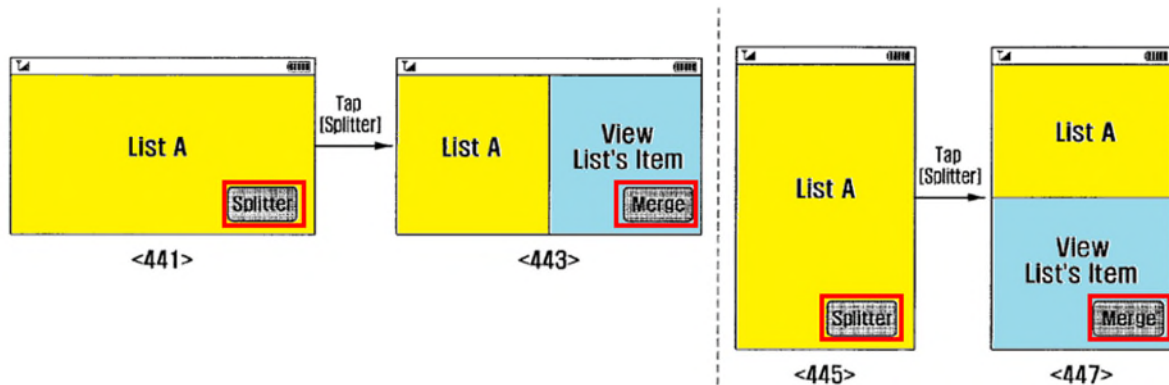
Yook discloses this limitation. Ex. 1003, ¶82. For example, Yook displays a visual indicator “merge” button that a user can tap with an input gesture and that will return

the split-screen display back into one application displayed on both the first and second displays. Ex. 1004, ¶¶[0055]-[0056]; Ex. 1003, ¶83.



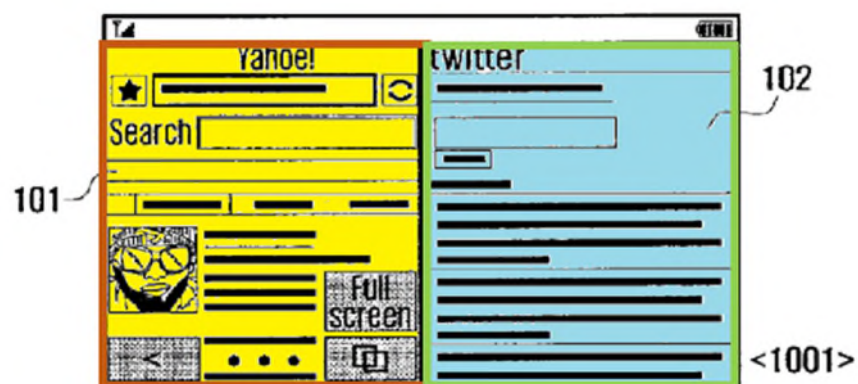
Yook also shows in Fig. 4e that a merge button can cause a second application to be displayed on the first display. Ex. 1003, ¶84. As annotated Fig. 4e shows below, application (yellow) can be displayed on two displays in full screen mode. Upon touching the “Splitter” button, application “A” is divided into two windows each displayed on its own display. Upon touching the “Merge” button, indicated with a red box, application “A” converges back into one window displaying two displays in full screen mode. Ex. 1003, ¶84.

FIG . 4e



Ex. 1004, Fig. 4e.

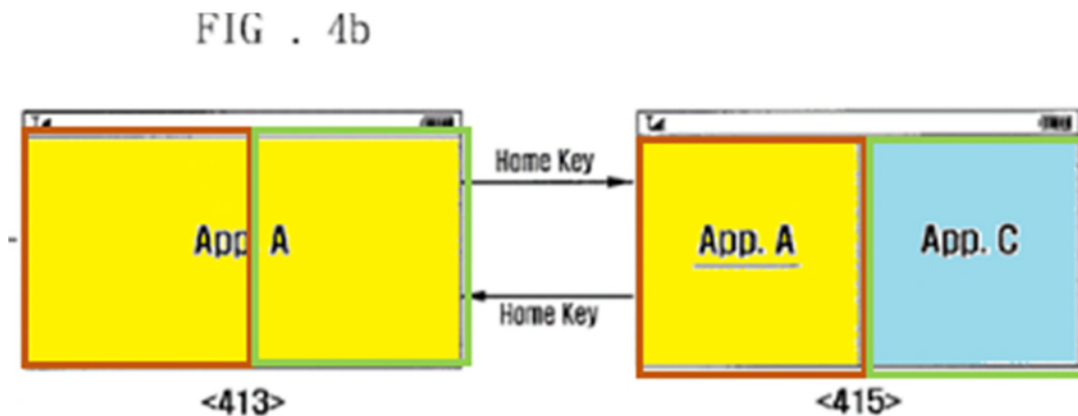
Yook further describes how a user can press on a visual indicator button labeled “Full Screen” on a display and maximize that display, as shown in Fig. 10 below. Ex. 1003, ¶85.



Ex. 1004, Fig. 10; Ex. 1003, ¶85. As Yook describes, a user can press the “Full screen” input button and maximize the web browser application that is displayed on that display to then be displayed on both the first and the second display. *Id.*

5. **Claim 6 - The method of claim 1, wherein a fourth input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays.**

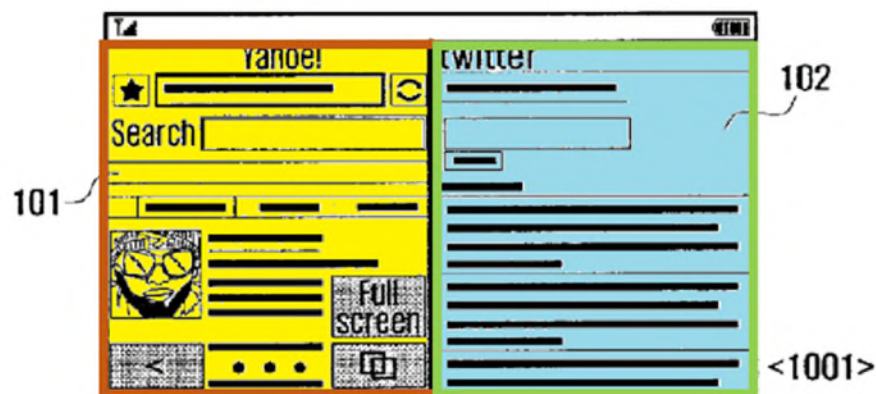
Yook discloses this limitation. Ex. 1003, ¶86-89. As shown in Fig. 4b, Yook's device can switch between full screen mode for a single application and split-screen mode for two applications in which a window is displayed across one or both displays:



Ex. 1004, Fig. 4b; Ex. 1003, ¶87. When App.A is in full screen mode (415), a user can provide an input with the “Home” key, and direct the processor to respond by initiating full screen mode for App.A. *Id.* App.A then displays in a minimized condition on both the first display and the second display. Ex. 1003, ¶76. Yook discusses throughout its specification that when the split-screen mode is entered, the first window is “resiz[ed]” to fit the new and smaller first display of the split screen display. Ex. 1004, ¶[0051]; Ex. 1003, ¶89. For example, and with respect to Fig. 4d, Yook describes that “as illustrated in screen 433, the mobile terminal

100 can display the functional view area App.A as to the function ‘A’ on one divided screen area through resizing, and display a functional view area Event as to the event handling application program on the other divided screen area.” *Id.*

An example of a user inputting an instruction to minimize an application that is initially displayed on two displays is Fig. 10. App.A (web browser) is shown displayed on a minimized window. Ex. 1003, ¶85; Ex. 1004, ¶[0110]. As explained for claim 4, a user can maximize App.A. Upon touching the “Home Key,” as shown in Fig. 4b, a user can then resize the web browser window to a single display. Ex. 1003, ¶87; *Id.*



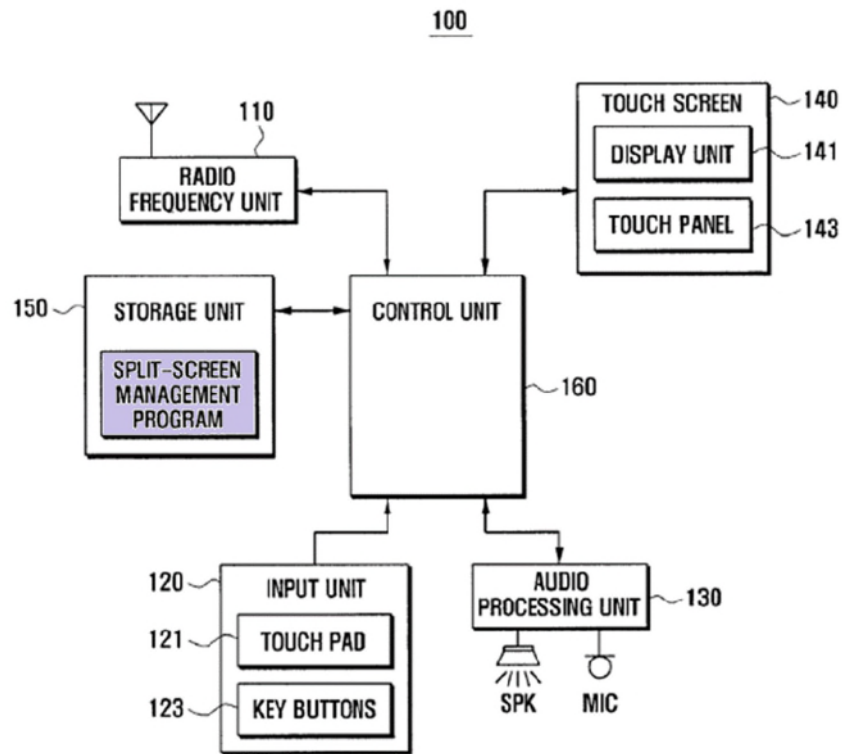
6. Claim 7

7[P] A non-transitory computer-readable medium having stored thereon instructions that cause a computing system to execute a method, the instructions comprising:

If the preamble is limiting, Yook discloses this limitation. Ex. 1003, ¶90-91.

In particular, Yook discloses a split-screen management program, including a ROM,

that is stored on the device for the purpose of controlling the two or more logical displays of the screen to divide the screen into the logical displays if requested by a user. *Id.*; Ex. 1004, ¶¶[0026],[0117].



7[A] instructions configured to receive a first predetermined input that represents an instruction to determine and reveal a first desktop or application on a first display of the multi-display device;

See Claim 1[A].

7[B] instructions configured to receive a second predetermined input that represents an instruction to determine and reveal a second desktop or application on a second display of the multi-display device;

See Claim 1[B].

7[C] instructions configured to respond to the first and second predetermined inputs with outputs that cause the first desktop or application to be displayed on the first display and cause the second desktop or application to be displayed on the second display:

See Claim 1[A] and 1[B].

7[D] instructions configured to receive a third predetermined input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays according to the instructions configured to respond to the third predetermined input; and instructions configured to respond to the third predetermined input that causes displaying of the selected one of the first or second desktops or applications in a maximized condition.

See Claim 1[C].

- 7. Claim 8 - The computer-readable medium of claim 7, wherein at least one of the first or second displays has a visual indicator displayed thereon and signifying that a desktop or application appearing on that display can be maximized by a user gesture according to the instructions configured to receive a third predetermined input.**

See claim 4; Ex. 1003 ¶¶96-98.

- 8. Claim 9 - The computer-readable medium of claim 7 wherein a fourth predetermined input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays according to the instructions configured to respond to the third predetermined input.**

See Claim 6.

B. Ground 2: Claims 1-9 are Obvious Over Yook

Claims 1-9 are anticipated by Yook. Because Yook anticipates the Challenged Claims, Yook also renders those claims obvious. “[A] disclosure that anticipates under § 102 also renders the claim invalid under § 103, for ‘anticipation is the epitome of obviousness.’” *Realtime Data, LLC v. Iancu*, 912 F.3d 1368, 1373 (Fed. Cir. 2019).

To the extent Patent Owner argues that Yook does not anticipate, then the claims would have been, at a minimum, obvious in light of Yook when considered in view of the knowledge of a POSITA for at least the reasons set forth above. Ex. 1003, ¶100. As described above, Yook is from the same field of endeavor and directed to the same purported problem as the Challenged Claims, so it is analogous art.

First, any differences in terminology between Yook and the ’756 patent are, at most, no more than obvious variants and not patentable distinctions. Ex. 1003, ¶101. For example, a “functional view area” (Yook) can encompass a display as claimed in the ’756 patent. Ex. 1003, ¶101-103; Ex. 1004, ¶[0039] (“When two instances of a user function are activated, the control unit 160 can control the display unit 141 to divide the screen into two areas, and cause two functional view areas to be displayed. . . .”); Ex. 1001, 5:1-9 (“The term “display” refers to a portion of one

or more screens used to display the output of a computer to a user. “). The same is true for other terminology differences between Yook and the ’756 patent. *Id.* Accordingly, Yook discloses the claimed functionality of the claims and renders them invalid. Ex. 1003, ¶101-103.

Second, to the extent Patent Owner argues that the various “examples” of how a user may interact with Yook’s disclosed system constitute separate embodiments, Petitioners disagree. As described above, Yook discloses a system and associated components and then provides various examples of the many functionalities a user can implement. These are not separate embodiments. Ex. 1003, ¶104-108. However, if the Board accepts Patent Owner’s potential view, then a POSITA would have been motivated to try each and every one of Yook’s disclosed “examples” on the disclosed system in Yook. Ex. 1003, ¶104.

For example, a POSITA would have understood that selecting applications for various logical display areas as depicted in Fig. 5a could be extended to Fig. 4d, where App.C may be selected for viewing in place of the generated event/function. Ex. 1004, ¶¶[0059]-[0061]; Ex. 1003, ¶105. Even if Yook discloses teachings of different embodiments – it does not – it would have been obvious to a POSITA to combine those teachings. Ex. 1003, ¶104-105. “Combining two embodiments disclosed adjacent to each other in a prior art patent does not require a leap of

inventiveness.” *Boston Scientific Scimed, Inc. v. Cordis Corp.*, 554 F.3d 982, 991 (Fed. Cir. 2009).

With respect to claims 4 and 8, to the extent it is not already expressly disclosed by Yook, a POSITA would find it routine and obvious to display the “merge” button on either display and maximize either application on either display. *Boston Scientific*, 554 F.3d at 991; Ex. 1003, ¶107-108. Indeed, Yook teaches in other examples of different application windows can be maximized to be displayed in Figs. 4 and 5. This is also expressly shown in Fig. 10 of Yook where the “Full screen” button allows a user to maximize that display on both the first and the second screens. As shown below, a POSITA would find this claim disclosed by Yook, but at a minimum, obvious to implement the Full Screen button as the Merge button and achieve the same results of one application shown on both displays. Ex. 1003, ¶108. Therefore, claims 4 and 8 would have been obvious to a POSITA at the time of the alleged invention.



With respect to claim 5, which requires that the visual indicator have a “wave shape,” this is rendered obvious by Yook. Ex. 1003, ¶109. Yook discloses many different types of “icons” that are used to receive user gesture inputs. *See, e.g.*, Figs. 1, 4e, 5a, 5c, 5d, 6, 7a, 7b, 7c, 8, 9, 10, 11, 12, 13. Examples of these icons are displayed below:



A POSITA would understand that the shape taken by a visual indicator, or icon, is merely a matter of common and routine design choice. Ex. 1003, ¶109; *Tesla, Inc.*

v. *Charge Fusion Techs., LLC*, IPR2022-01217, Paper 11 (PTAB Feb. 1, 2023) (as part of an obvious finding, noting that a visual charging indicator “would be a matter of routine design choice”). The icons in Yook are providing the claimed functionality of claim 5, and their visual appearance is irrelevant to providing the visual indication of permitting the application to be maximized. Yook’s multiple different icons that accomplish this claimed purpose render the claim obvious. Ex. 1003, ¶109.

C. Ground 3: Claims 1-3, 6, 7, and 9 Are Anticipated by Lee

1. Claim 1

1[P] A method of displaying a plurality of desktops and/or applications, each having at least one window, on a multi-display device, comprising:

If the preamble is limiting, Lee discloses this limitation. Lee discloses systems and methods for performing the steps below. Ex. 1003, ¶113.

Lee discloses a device with a first display (orange box) and a second display (green box). Ex. 1005, ¶¶[0014]-[0017]; Ex. 1003, ¶114. Lee discloses a mobile device that has two touch screens, where each touch screen display can display content. Figs. 4 and 6 show two examples of the display of two different applications (yellow and blue) on both displays (Fig. 4) and one application spread across both displays (Fig. 6). *Id.*

FIG. 4

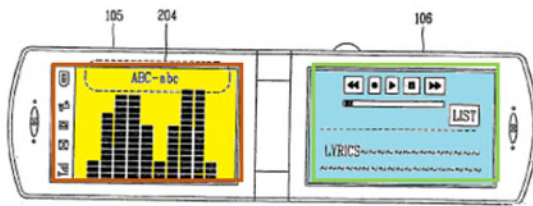
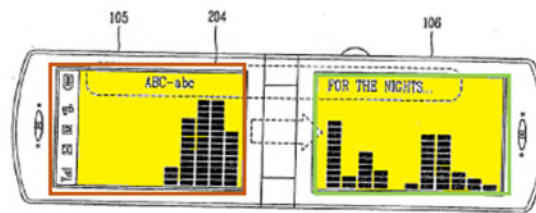
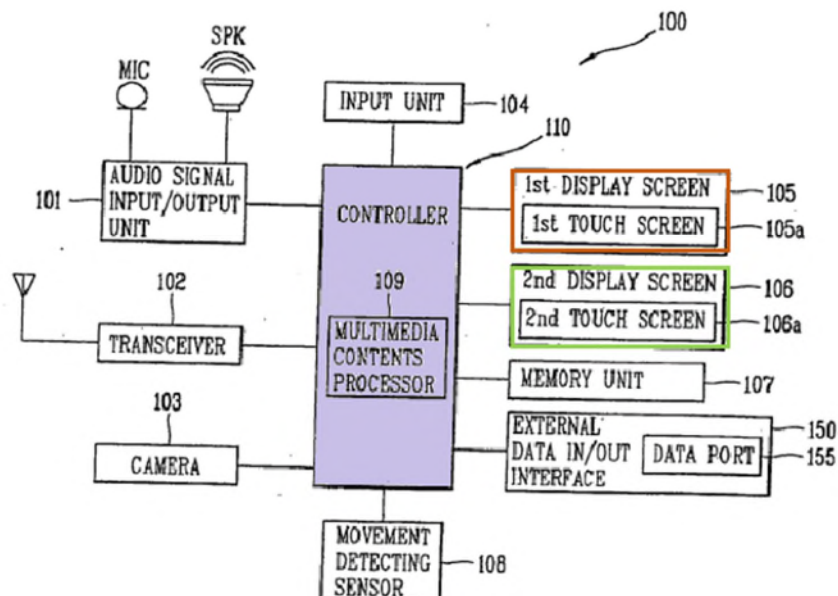


FIG. 6



In addition to the figures showing the two displays with different content, Lee describes in more detail how its device includes a Controller with a Multimedia Contents Processor (purple) that controls a first display screen (orange box) and a 2nd display screen (green box). Ex. 1005, ¶¶[0027], [0029-32], Fig. 1; Ex. 1003, ¶115.

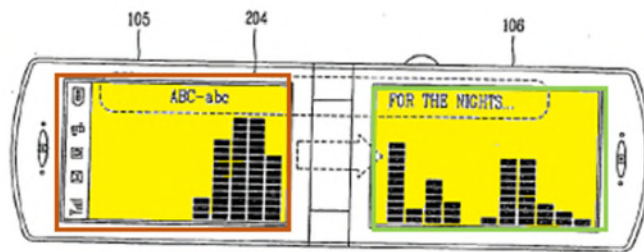
FIG. 1



1[A] receiving, by a processor, a first input that represents an instruction to reveal one of a desktop or application on a first display of the multi-display device; selecting, by the processor, a first desktop or application to display on the first display;

Lee discloses that this limitation. Ex. 1003, ¶116. As shown in Fig. 6, Lee's device receives an input for an instruction to reveal an application, and in response to that input, reveals the application on both the first display and the second display, which displays the application (yellow) on the first display. Ex. 1003, ¶117.

FIG. 6

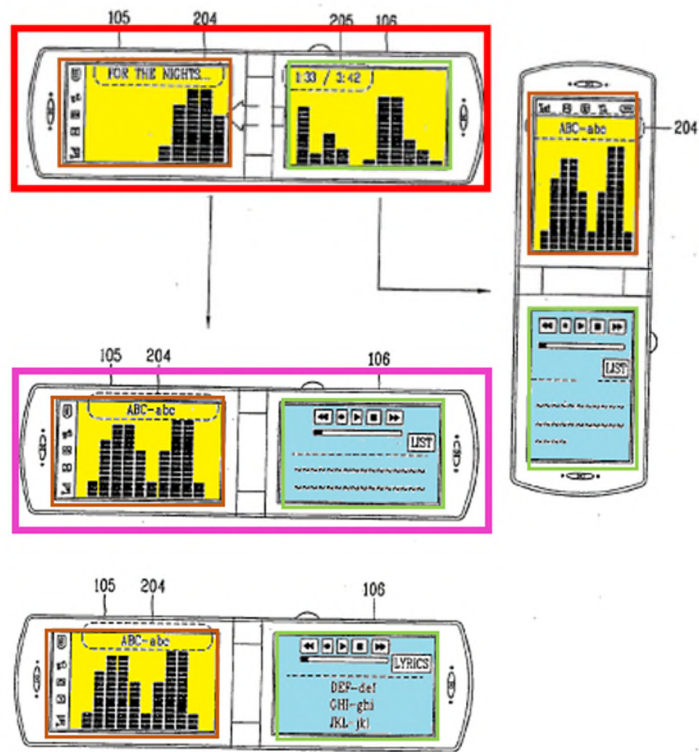


Ex. 1005, Fig. 6, ¶¶[0042],[0048]; Ex. 1003, ¶118. Lee describes Fig. 6 as showing when “a main image of the first display screen expands to the second display screen...” *Id.* Lee notes that one reason this is done in its device is because when an application is relegated to a single display, it may only display a “portion or the original image.” *Id.* Lee further describes how the first application may be shown only on the first display, which would also meet this claim element. *See, e.g.,* Ex. 1005, Fig. 9; Ex. 1003, ¶118.

1[B] receiving, by the processor, a second input that represents an instruction to reveal one of a desktop or application on a second display of the multi-display device; selecting, by the processor, a second desktop or application to display on the second display

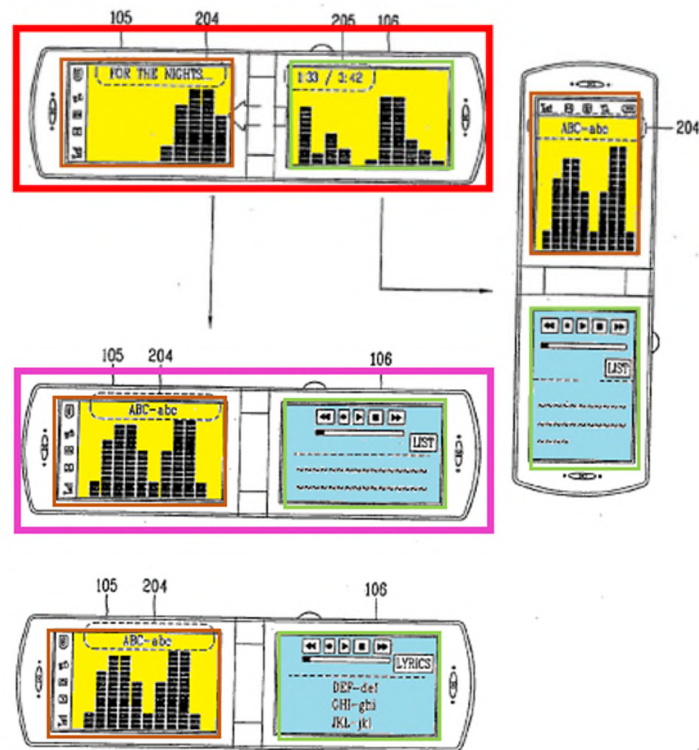
Lee discloses this limitation. Ex. 1004, Fig. 4, Fig. 6, Fig. 9, ¶[0048]; Ex. 1003, ¶119-20. In the previous element, with respect to Figs. 6-8, Lee described how a single application window can be displayed on both displays. Ex. 1005, ¶[0048]; Ex. 1003, ¶120. Lee further recognized that a user may wish to “multitask” among several applications, and Lee describes how a user can perform multitasking and display two application windows using the two separate displays. Ex. 1005, ¶¶[0049]-[0053]; Ex. 1003, ¶119. Lee begins this discussion with Fig. 9, which shows the device displaying a window of the first application on both the first and second display in the red outline:

FIG. 9



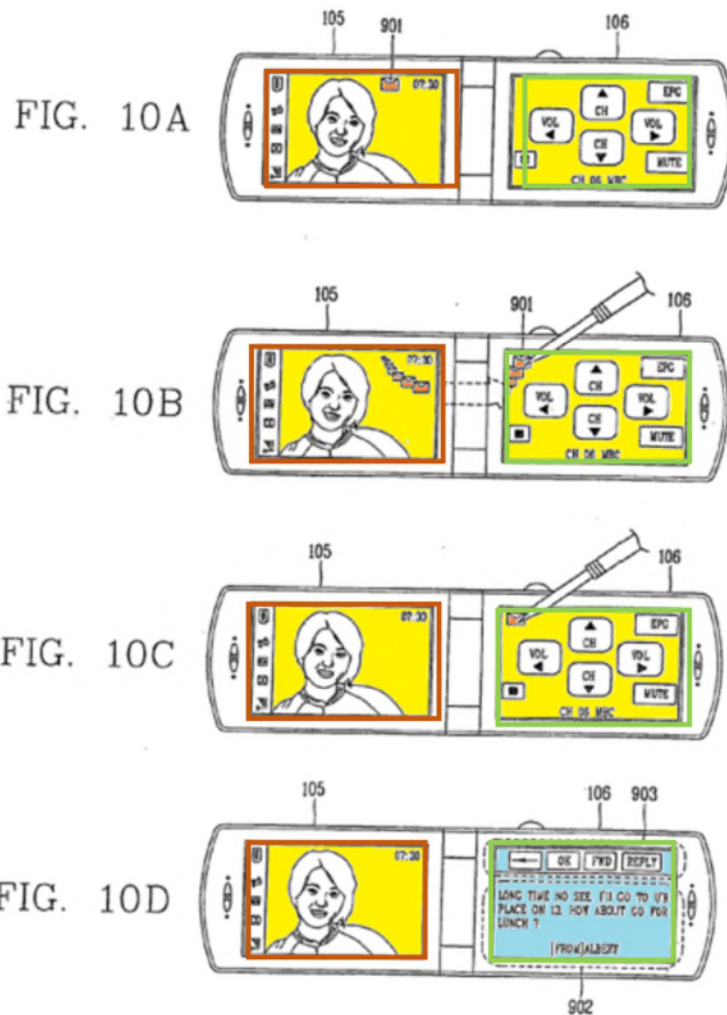
Id. If an input is received by the device (e.g., screen rotation, touch screen button, or dedicated button), then the display of the second display changes to the pink box below. Ex. 1003, ¶120-121.

FIG. 9



Id. As shown above, the second display (green outline, element 106) reveals a second application. Ex. 1005, ¶[0049]; Ex. 1003, ¶120-21.

Lee also discloses in Fig. 10 how a user input (e.g., a tap on a message icon) represents an instruction to reveal a second application on a second display. Ex. 1003, ¶122; Ex. 1005, Fig. 10, ¶¶[0052]-[0053]. As shown below, a user can tap a message icon (orange) and reveal a second application on the second display (green outline). *Id.*



1[C] receiving, by the processor, a third input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays; and displaying, by the processor, the selected one of the first or second desktops or applications in a maximized condition.

Lee discloses that a third input maximizes an application that results in the application being displayed on both the first display and the second display. Ex. 1003, ¶123. For example, in Figs. 6-8, Lee describes how “the mobile terminal displaying that a main image of the first display screen expands to the second

display screen...” Ex. 1005, ¶[0048]; Ex. 1003, ¶124. Lee explains how this is done when there are two applications displayed across the two displays (Fig. 4 below) as described above with respect to claim elements 1[A] and [B]. Ex. 1003, ¶124. When this transition occurs, one of the two applications is maximized because it is increased in size and displayed on both displays (Fig. 6). Ex. 1003, ¶124; *see also id.* at ¶125 (referring to Fig. 11 disclosing yet another example of Lee’s device maximizing an application (e.g., a multimedia application) based on an instruction received to present it on both the first and the second display).

FIG. 4

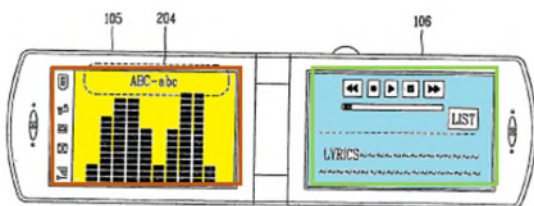
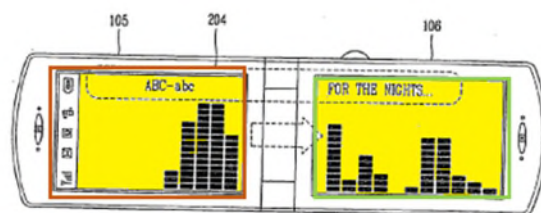
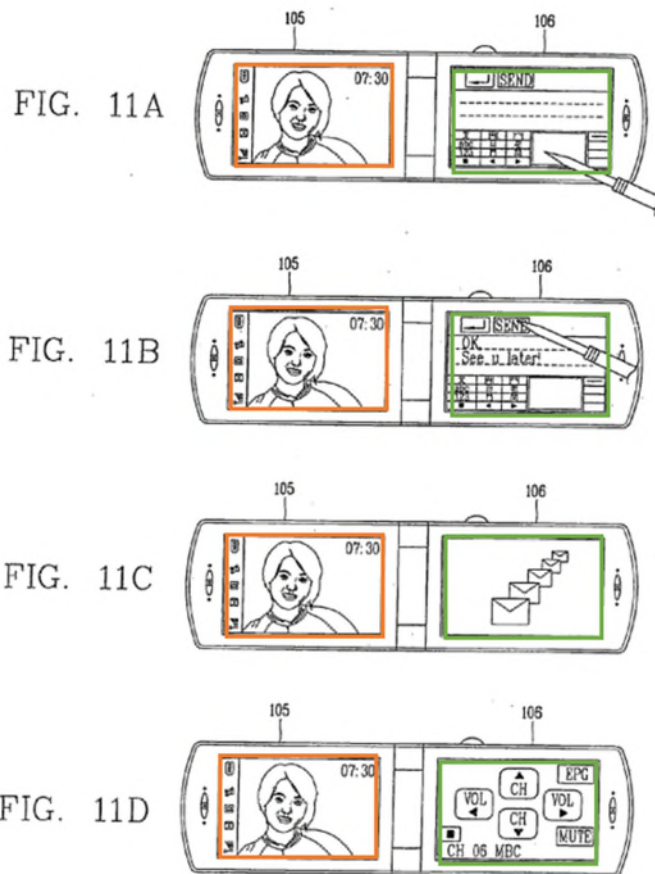


FIG. 6





2. **Claim 2 - The method of claim 1, wherein at least one of the first, second, and third inputs is achieved by at least a user input gesture.**

Lee discloses that at least one of the first, second, or third inputs is a user input gesture. Ex. 1003, ¶126. For example, Lee describes how its two displays can comprise a “touch sensitive screen” that is used to perform “input unit function.” Ex. 1005, ¶[0034]; Ex. 1003, ¶127. In particular, Lee describes how “[w]hen the input unit 104 is implemented as a touch sensitive input unit (i.e., part of the touch sensitive screen), the controller 110 can receive signals inputted by the touch sensitive input unit 104 and expand the screen information displayed on the first

display screen 105 to the second display screen 106....or return to the default...if the both display screens have been displaying the same.” Ex. 1005, ¶[0037]; Ex. 1003, ¶127.

3. Claim 3 - The method of claim 1, wherein the third input is a user gesture comprising at least one of a tap or long hold gesture.

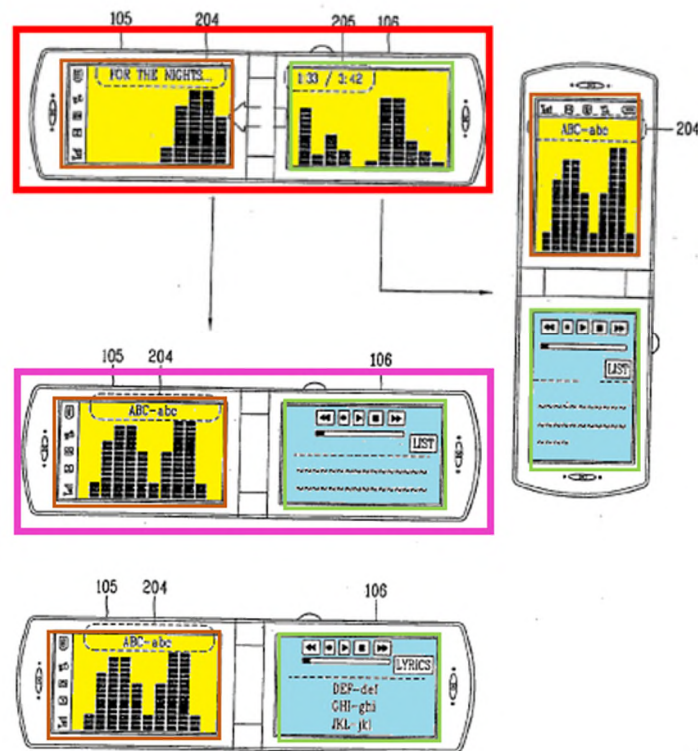
Lee discloses that the third input is a user gesture that can be a tap or a long hold gesture. Ex. 1003, ¶128. As discussed above with respect to claim 2, Lee discloses a “touch sensitive screen” that receives input via user “taps” on the touchscreen. Ex. 1003, ¶129. Lee further shows examples of such taps in Figs. 3A, 3B, 8, and 10. *Id.*

4. Claim 6 - The method of claim 1, wherein a fourth input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays.

Lee discloses that a fourth input can minimize one of the first or second applications to be displayed only on one of the first or second display. Ex. 1003, ¶130. Lee discloses that the first window is automatically minimized to fit the first display and then displayed on the first display after receiving an input, such as a screen rotation. As shown below with reference to the red and pink boxes in annotated Fig. 9, the first window of the first application (red box example) is automatically minimized to fit the smaller first display (105) in the pink box

example. Ex. 1003, ¶131. Lee describes how the original window is minimized and may only display a “portion of the original image” from the two-display format. Ex. 1005, ¶[0048]; Ex. 1003, ¶131.

FIG. 9



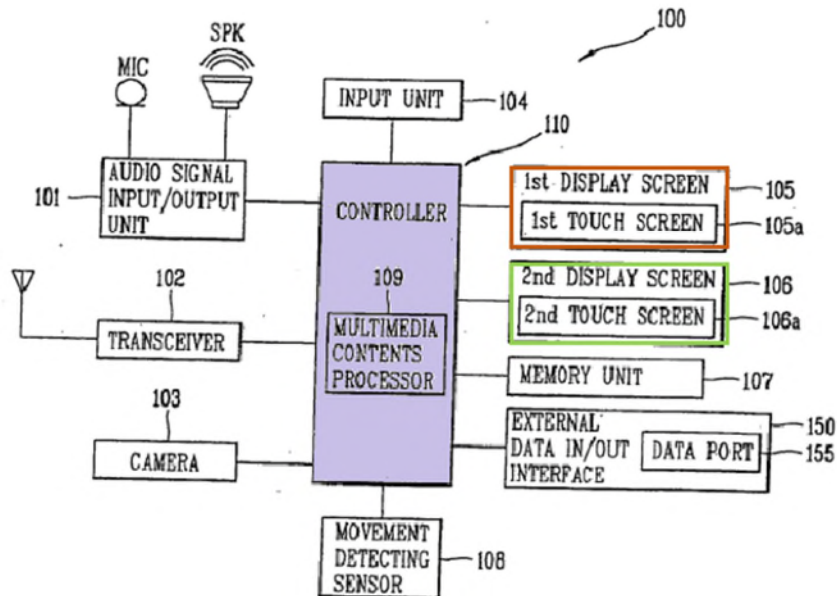
5. Claim 7

7[P] A non-transitory computer-readable medium having stored thereon instructions that cause a computing system to execute a method, the instructions comprising:

If the preamble is limiting, Lee discloses instructions that are stored and executed to perform the method recited in the remaining elements of the claim. Lee describes in more detail how its device includes a Controller with a Multimedia

Contents Processor (purple) that controls a 1st display screen (orange outline) and a
2nd display screen (green outline). Ex. 1005, ¶[0027], Fig. 1; Ex. 1003, ¶133.

FIG. 1



7[A] instructions configured to receive a first predetermined input that represents an instruction to determine and reveal a first desktop or application on a first display of the multi-display device;

See Claim 1[A].

7[B] instructions configured to receive a second predetermined input that represents an instruction to determine and reveal a second desktop or application on a second display of the multi-display device;

See Claim 1[B].

7[C] instructions configured to respond to the first and second predetermined inputs with outputs that cause the first desktop or

application to be displayed on the first display and cause the second desktop or application to be displayed on the second display:

See Claim 1[A] and 1[B].

7[D] instructions configured to receive a third predetermined input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays according to the instructions configured to respond to the third predetermined input; and instructions configured to respond to the third predetermined input that causes displaying of the selected one of the first or second desktops or applications in a maximized condition.

See Claim 1[C].

- 6. Claim 9 - The computer-readable medium of claim 7 wherein a fourth predetermined input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays according to the instructions configured to respond to the third predetermined input.**

See Claim 6.

D. Ground 4: Claims 1-3, 6, 7, and 9 are Obvious Over Lee

Claims 1-3, 6, 7, and 9 are anticipated by Lee. Because Lee anticipates the Challenged Claims, Lee also renders those claims obvious. “[A] disclosure that anticipates under § 102 also renders the claim invalid under § 103, for ‘anticipation is the epitome of obviousness.’” *Realtime Data*, 912 F.3d at 1373.

To the extent Patent Owner argues that Lee does not anticipate, then the claims would have been, at a minimum, rendered obvious in light of Lee when considered in view of the knowledge of a POSITA for at least the reasons set forth above. Ex. 1003, ¶139. As described above, Lee is from the same field of endeavor and directed to the same purported problem as the Challenged Claims, so it is analogous art.

First, any differences in terminology between Lee and the '756 patent are, at most, no more than obvious variants and not patentable distinctions. For example, a “first display screen” (Lee) is not meaningfully different from a “display” as the '756 Patent defines the term. Ex. 1005, ¶[0035] (“The above-described first display screen 105 and second screen 106 can be implemented in a same hardware configuration (i.e., one big display screen being partitioned to have separate display region) or be implemented as the separate independent units respectively.”); Ex. 1001, 5:1-9 (“The term “display” refers to a portion of one or more screens used to display the output of a computer to a user. “); Ex. 1003, ¶140. The same is true for other terminology differences between Lee and the '756 patent. Ex. 1003, ¶140.

Second, to the extent Patent Owner argues that the various “examples” of how a user may interact with Lee’s disclosed system constitute separate embodiments, Petitioners disagree. As described above, Lee discloses a system and associated components and then provides various examples of the many

functionalities a user can implement. These are not separate embodiments. Ex. 1003, ¶141. However, if the Board accepts Patent Owner’s potential view, then a POSITA would have been motivated to try each and every one of Lee’s disclosed “examples” on the disclosed system in Lee. *Id.* “Combining two embodiments disclosed adjacent to each other in a prior art patent does not require a leap of inventiveness.” *Boston Scientific Scimed*, 554 F.3d at 991 (Fed. Cir. 2009).

E. Ground 5: Claims 1-3 and 6-9 Are Anticipated by Aguilar

1. Claim 1

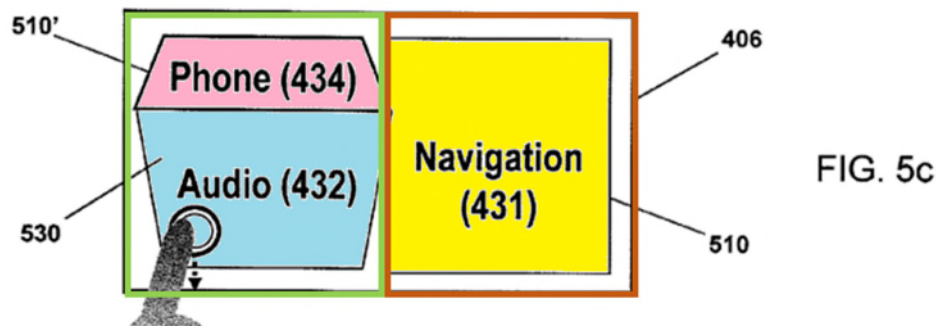
1[P] A method of displaying a plurality of desktops and/or applications, each having at least one window, on a multi-display device, comprising:

If the preamble is limiting, Aguilar discloses this limitation. Aguilar discloses systems and methods for performing the steps below. Ex. 1003, ¶144. Aguilar describes a device that includes software and hardware that permit a user to perform many different functions related to the display of multiple applications. *Id.*

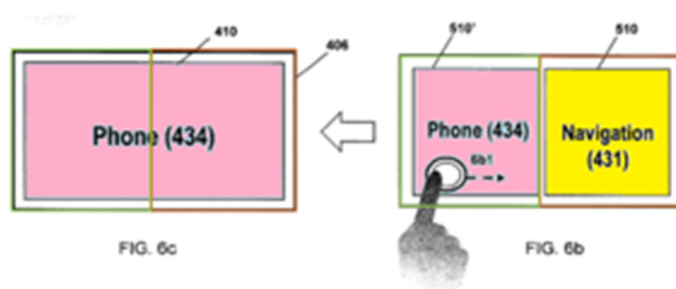
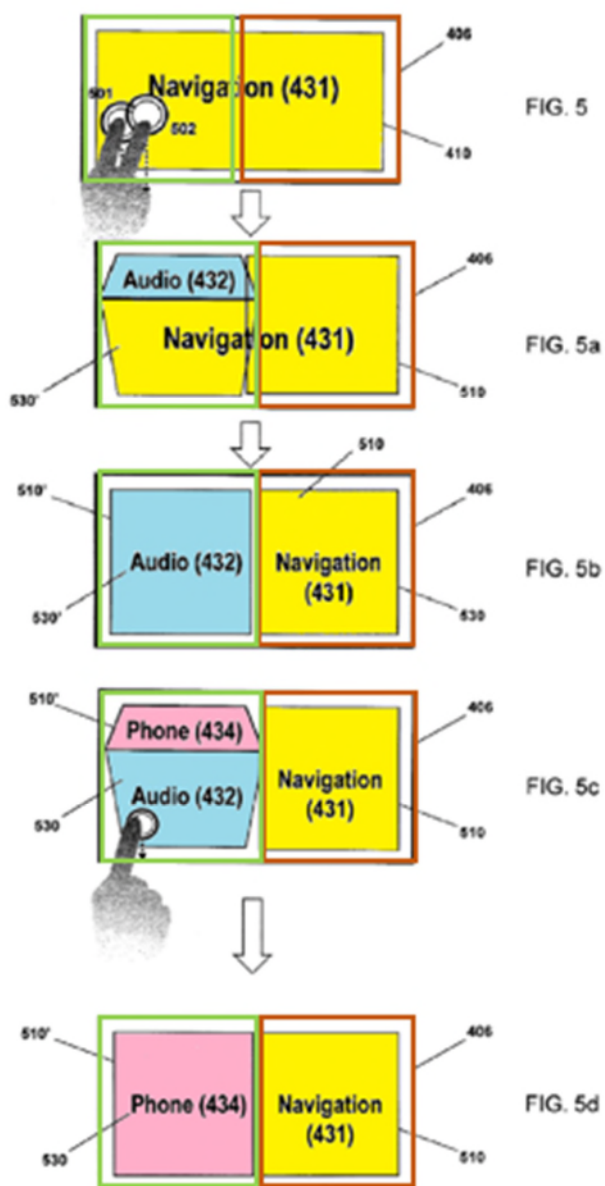
1[A] receiving, by a processor, a first input that represents an instruction to reveal one of a desktop or application on a first display of the multi-display device; selecting, by the processor, a first desktop or application to display on the first display:

Aguilar discloses this limitation. Ex. 1003, ¶145. Aguilar describes how the user is presented with a spindle stack of potential applications to choose from. Ex. 1006, Fig. 4; 5:20-37; 5:54-6:3; Ex. 1003, ¶146. In Fig. 5, Aguilar demonstrates

how a user may choose the Navigation application to reveal on both the first display (orange box) and the second display (green box). Ex. 1006, Fig. 5; Ex. 1003, ¶146. The user could also choose the Phone or Audio application to display on both screens as well. Ex. 1006, 6:23-47; Ex. 1003, ¶145.



Aguilar discloses a device with a first display (orange box) and a second display (green box). Ex. 1006, Fig. 5; Ex. 1003, ¶145-46. As shown below in Fig. 5, Aguilar provides that a “user can also split the user interface to at least two display segments which may contain different applications.” Ex. 1006, 5:13-16, Fig. 5a-b; Ex. 1003, ¶146. Aguilar discloses screen splitting between a Navigation application and an Audio application in one example and splitting between a Navigation application and a Phone application in another. Ex. 1003, ¶147. Thus, if required to be only displayed on a single display, Aguilar meets the claim as well. Ex. 1003, ¶147.



Aguilar further discloses that “if the user wishes to have a ‘dual view’ on the screen 410, the user may be allowed to split the screen 410 into at least two display segments (530, 530’) by using the ‘two finger dragging down’ gesture...” Ex. 1006, 6:48-52; Ex. 1003, ¶148. As shown below in Fig. 9 of Aguilar, there is a display controller, CPU, VRAM, and video generating unit (purple) that are part of the process for storing and executing the instructions and commands to perform the screen splitting functions for the user interface. Ex. 1006, 9:13-25; Ex. 1003, ¶148.

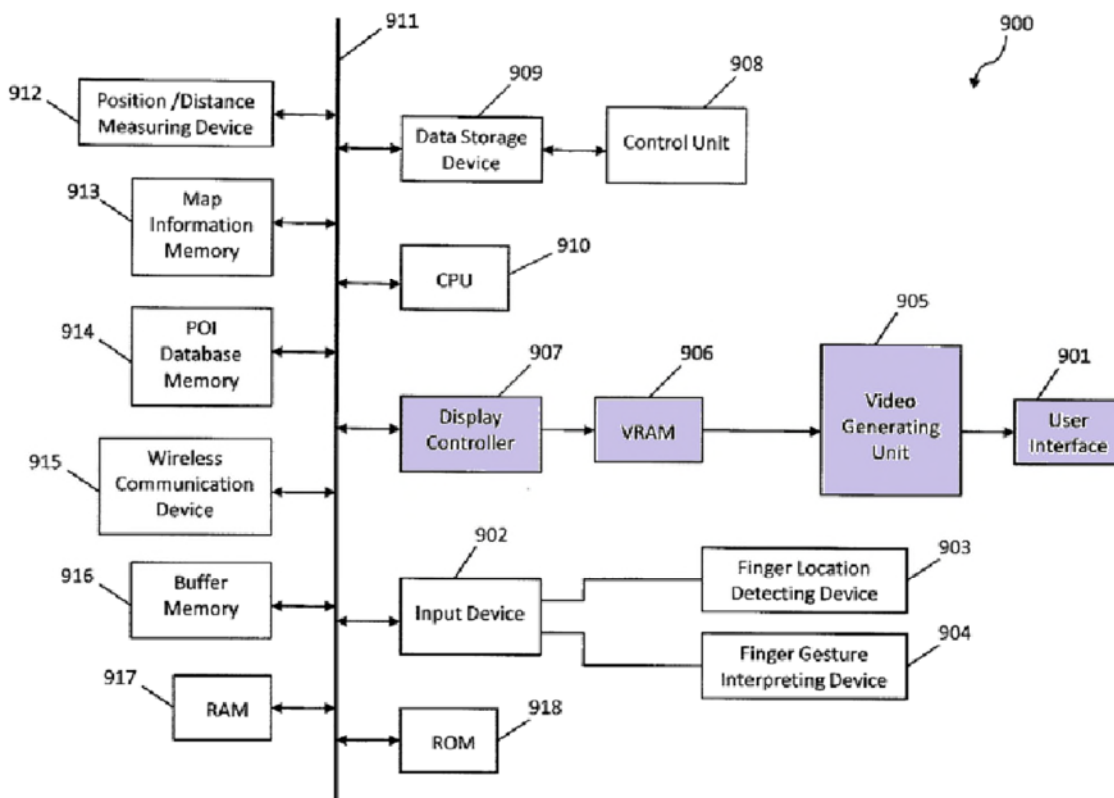
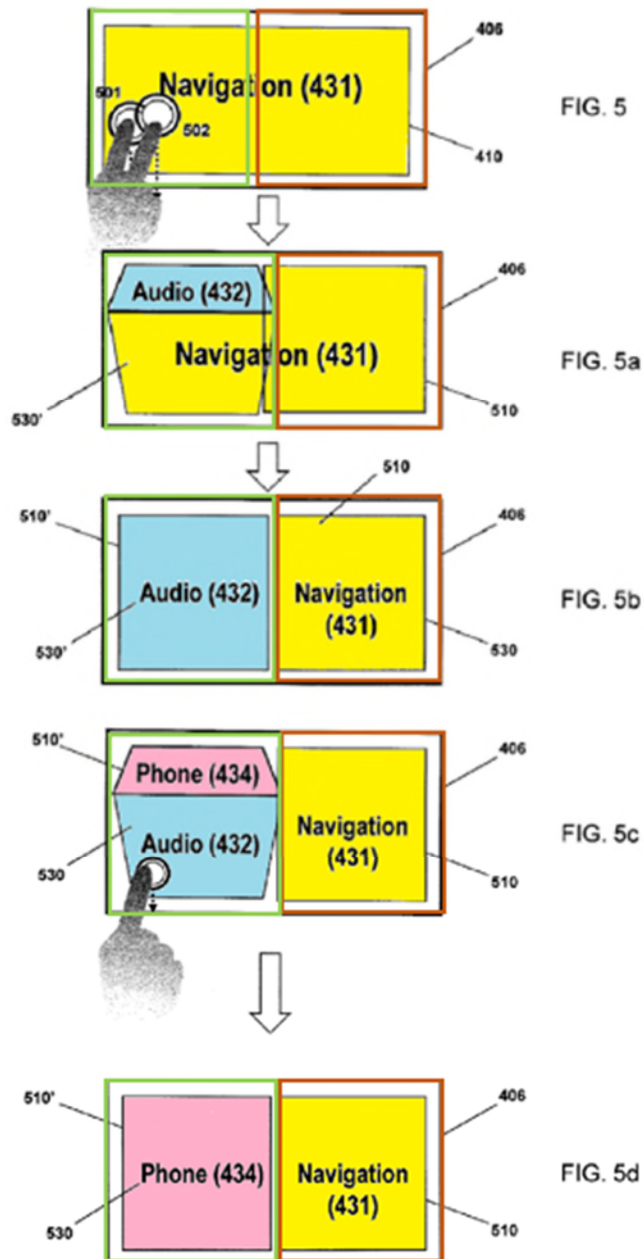


FIG. 9

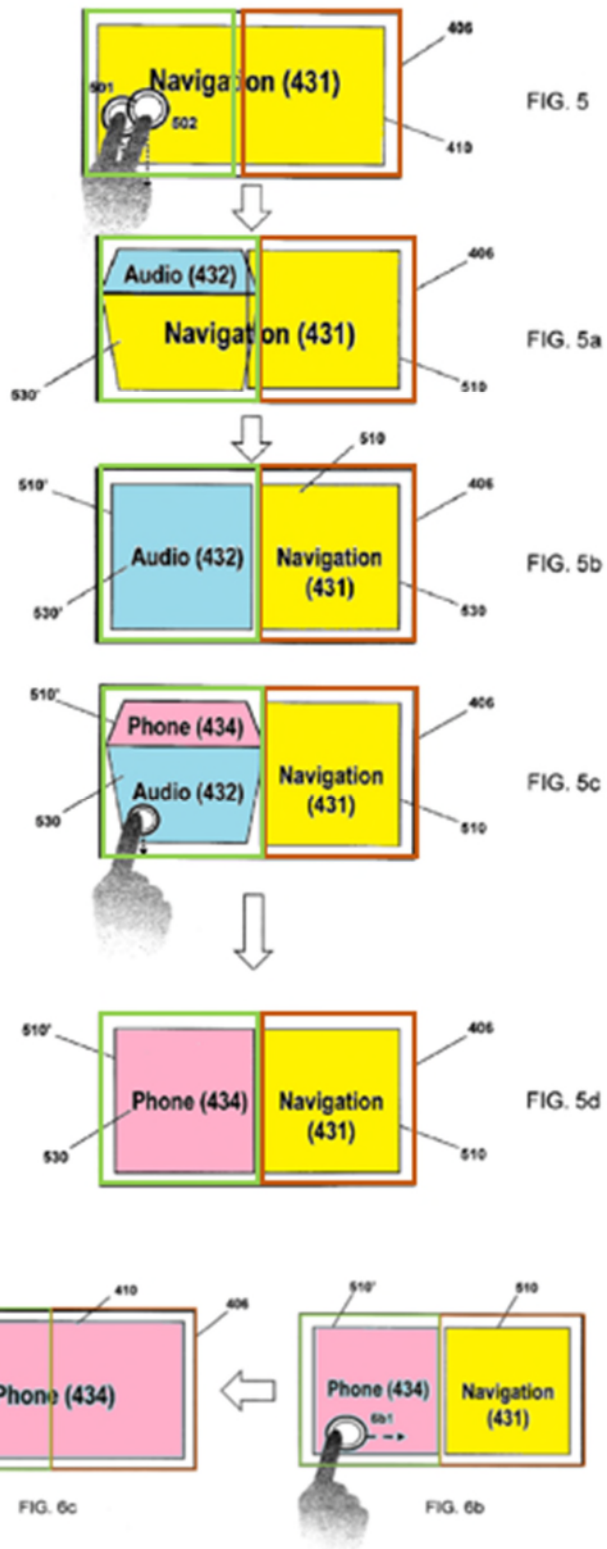
1[B] receiving, by the processor, a second input that represents an instruction to reveal one of a desktop or application on a second display of the multi-display device; selecting, by the processor, a second desktop or application to display on the second display;

Aguilar discloses this limitation. Ex. 1003, ¶149. Aguilar describes a process whereby a user can select from a smaller spindle of applications to display on the second display (green box). Ex. 1006, 7:1-7 (“the smaller spindle 530’ includes a plurality of application panels and if the user wants to view other application panels on the smaller spindle 530’ while using the Navigation 431, the user can simply use one finger to spin the smaller spindle 530’ at the lower corner of the left side of the screen 510’ until a desirable application is found, as shown in FIGS. 5c and 5d.”); Ex. 1003, ¶150. In the example shown, the Audio application is selected, but if the user keeps scrolling, as shown in Fig. 5c, the Phone application may be selected and revealed on the second display (green box). Ex. 1003, ¶150.



1[C] receiving, by the processor, a third input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays; and displaying, by the processor, the selected one of the first or second desktops or applications in a maximized condition.

Aguilar discloses a third input received by the processor that causes one of the first or second applications to be displayed on both the first and second displays in a maximized condition. Ex. 1003, ¶151. Aguilar shows this process with respect to Figs. 5 and 6. As shown below, either of the applications may be maximized to be displayed on both the first and second displays. Ex. 1003, ¶152. When this transition occurs, one of the two applications is maximized because it at least doubles in size to be displayed on both displays. Ex. 1003, ¶152.



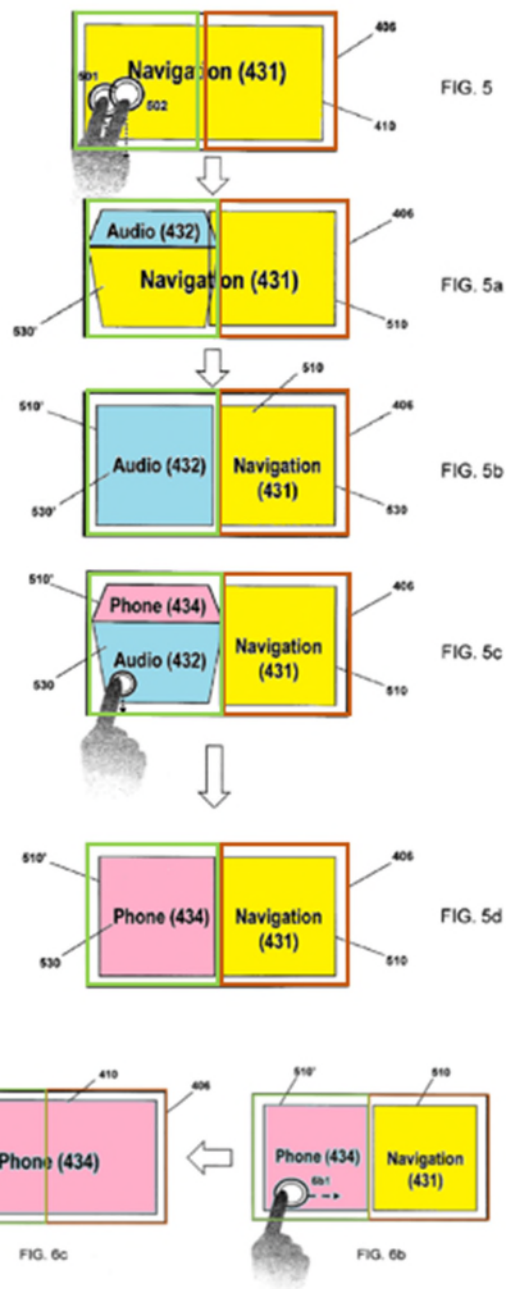
Aguilar describes how either the first or second application may be maximized on both displays via the finger gesture input shown in Fig. 6b:

As can be seen in FIG. 6b, two applications, Phone 434 and Navigation 431, are located on the display segments 510' and 510, respectively. If the user wishes to close the Navigation 431 application, the user can simply slide the Phone 434 application on the display segment 510' to the Navigation 431 on the display segment 510, and *the two display segments 510' and 510 will be merged to the screen 410 with the Phone 434 application thereon*, as shown in FIG. 6c. On the other hand, *if the user wants to keep the Navigation application 431 and get rid of the Phone application 434, the user can slide the Navigation application 431 to the left side where the Phone application 434 is located*.

Ex. 1006, 7:42-54. Either example meets claim 1. Ex. 1003, ¶153.

2. Claim 2 - The method of claim 1, wherein at least one of the first, second, and third inputs is achieved by at least a user input gesture.

Aguilar discloses that at least one of the first, second, or third inputs is a user input gesture. Ex. 1003, ¶154. Aguilar expressly describes its devices as including “touch sensors” and “gesture interpreting device” to “interpret the user’s finger gesture on the display unit 406.” Ex. 1006, 5:20-37; Ex. 1003, ¶155. These gesture inputs are shown below by the user’s fingers implementing the inputs from claim 1. Ex. 1003, ¶155; Ex. 1006, Figs. 5-6c.



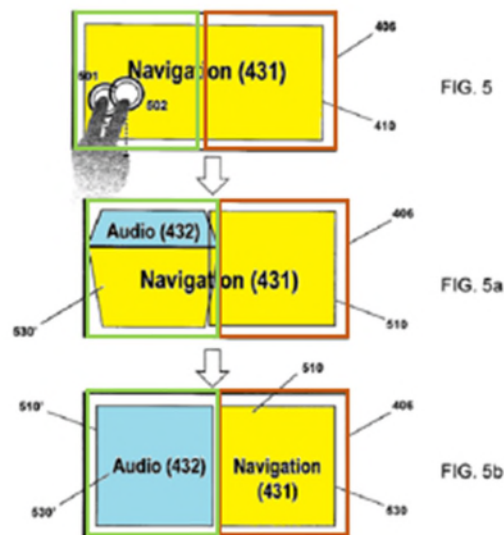
3. **Claim 3 - The method of claim 1, wherein the third input is a user gesture comprising at least one of a tap or long hold gesture.**

Aguilar discloses this claim. Ex. 1003, ¶156. As discussed above with respect to claim 2, Aguilar discloses that a user's fingers may tap the screen, as an

input gesture, to choose the application to display on the device and may also long hold on the screen to drag one of the applications from the split-screen display to the maximized display as shown in Figs. 6b and 6c. Ex. 1003, ¶157.

4. **Claim 6 - The method of claim 1, wherein a fourth input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays.**

Aguilar discloses this claim. Ex. 1003, ¶158. Aguilar discloses that the first application (yellow) is automatically resized to fit on only the first display (orange box). Ex. 1006, Fig. 5, 6:48-7:63; Ex. 1003, ¶159.



5. **Claim 7**

7[P] A non-transitory computer-readable medium having stored thereon instructions that cause a computing system to execute a method, the instructions comprising:

If the preamble is limiting, Aguilar discloses instructions that are stored and executed to perform the method recited in the remaining elements of the claim. Ex. 1003, ¶160. As shown below in Fig. 9 of Aguilar, there is a CPU, display controller, VRAM, and video generating unit (purple) that are part of the process for storing and executing the instructions and commands to perform the screen splitting functions for the user interface. Ex. 1006, 9:13-25; Ex. 1003, ¶161.

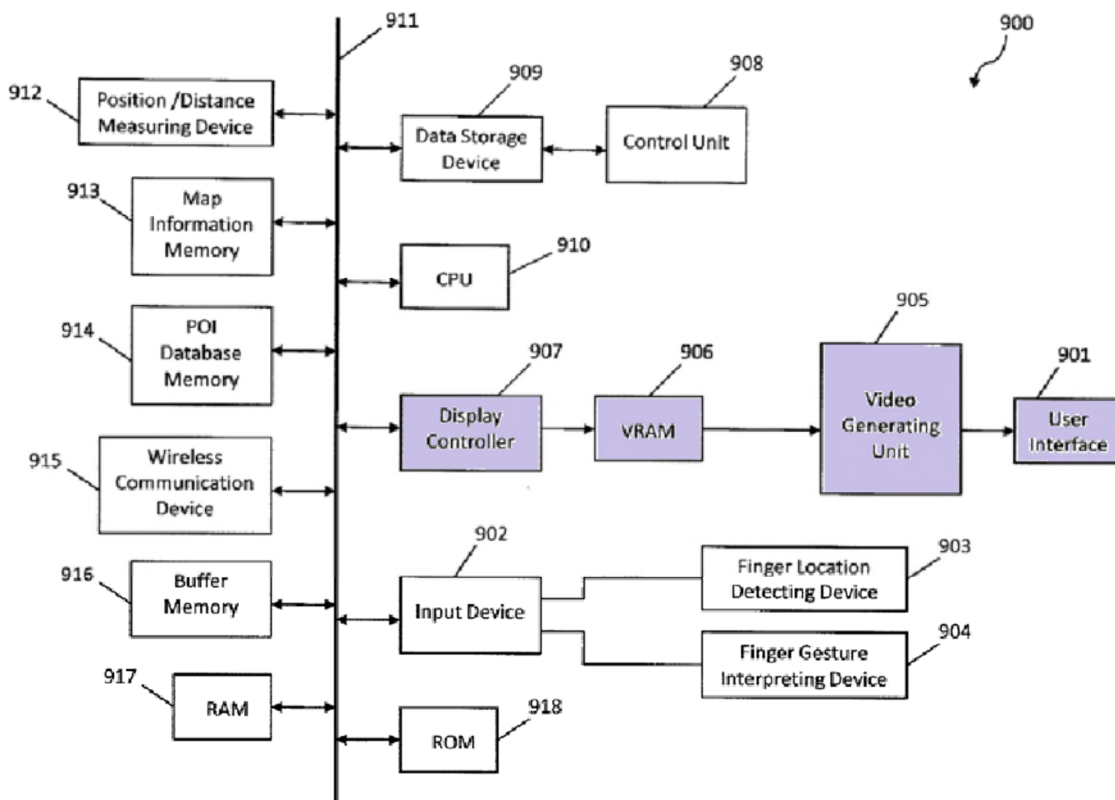


FIG. 9

7[A] instructions configured to receive a first predetermined input that represents an instruction to determine and reveal a first desktop or application on a first display of the multi-display device;;

See Claim 1[A].

7[B] instructions configured to receive a second predetermined input that represents an instruction to determine and reveal a second desktop or application on a second display of the multi-display device;

See Claim 1[B].

7[C] instructions configured to respond to the first and second predetermined inputs with outputs that cause the first desktop or application to be displayed on the first display and cause the second desktop or application to be displayed on the second display:

See Claim 1[A] and 1[B].

7[D] instructions configured to receive a third predetermined input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays according to the instructions configured to respond to the third predetermined input; and instructions configured to respond to the third predetermined input that causes displaying of the selected one of the first or second desktops or applications in a maximized condition.

See Claim 1[C].

- 6. Claim 9 - The computer-readable medium of claim 7 wherein a fourth predetermined input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed**

only one of the first and second displays according to the instructions configured to respond to the third predetermined input.

See Claim 6.

F. Ground 6: Claims 1-4, 6, 7, 8 and 9 are Obvious Over Aguilar

Claims 1-4, 6, 7, and 9 are anticipated by Aguilar. Because Aguilar anticipates the Challenged Claims, Aguilar also renders those claims obvious. “[A] disclosure that anticipates under § 102 also renders the claim invalid under § 103, for ‘anticipation is the epitome of obviousness.’” *Realtime Data*, 912 F.3d at 1373.

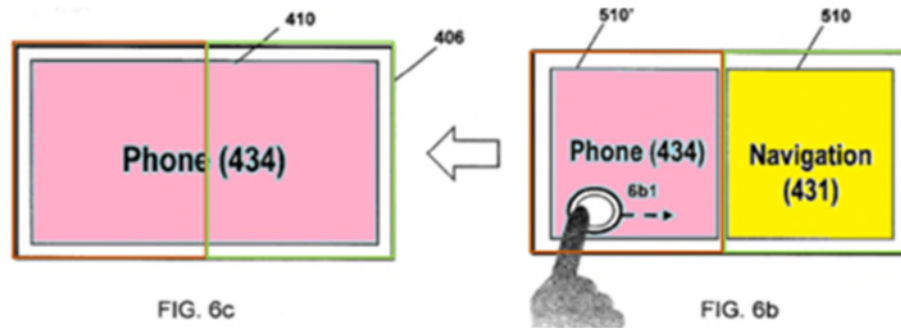
To the extent Patent Owner argues that Aguilar does not anticipate, then the claims would have been, at a minimum, obvious in light of Aguilar when considered in view of the knowledge of a POSITA for at least the reasons set forth above. Ex. 1003, ¶167. As described above, Aguilar is from the same field of endeavor and directed to the same purported problem as the Challenged Claims, so it is analogous art.

First, any differences in terminology between Aguilar and the ’756 patent are, at most, no more than obvious variants and not patentable distinctions. For example, “display segments” (Aguilar) is not meaningfully different from a “display” as the ’756 Patent defines the term. Ex. 1006, 2:28-41 (“The display apparatus may include a display screen to display at least one application thereon” and the ability to “split the display screen to at least two display segments...”); Ex. 1001, 5:1-9 (“The term

“display” refers to a portion of one or more screens used to display the output of a computer to a user. “); Ex. 1003, ¶168. The same is true for other terminology differences between Aguilar and the ’756 patent. Ex. 1003, ¶168.

Second, to the extent Patent Owner argues that the various “examples” of how a user may interact with Aguilar’s disclosed system constitute separate embodiments, Petitioners disagree. As described above, Aguilar discloses a system and associated components and then provides various examples of the many functionalities a user can implement. Ex. 1003, ¶169. These are not separate embodiments. However, if the Board accepts Patent Owner’s potential view, then a POSITA would have been motivated to try each and every one of Aguilar’s disclosed “examples” on the disclosed system in Aguilar – just as Aguilar discloses. “Combining two embodiments disclosed adjacent to each other in a prior art patent does not require a leap of inventiveness.” *Id.*; *Boston Scientific Scimed*, 554 F.3d at 991 (Fed. Cir. 2009).

Claims 4 and 8 relate to visual indications on the display that an application can be maximized. Aguilar discloses in various ways that an application can be maximized, including through visual cues when a user applies a tap to the touch screen as shown in Fig. 6b. There, the circle appearing on the display upon a gesture signifies that the application can be maximized. Ex. 1003, ¶¶170-71.



Ex. 1006, Fig. 6b. To the extent Patent Owner argues that the visual cue must be present on the display before the user gesture, such a visual cue would have been obvious in view of Aguilar. Ex. 1003, ¶172. Minimizing and maximizing applications on a display was common and routine in computing devices for decades prior to the 2011 alleged date of invention for the '756 patent. Ex. 1003, ¶173. Indeed, as shown above, the references cited herein including Yook included visual indicators (e.g., icons) on the screen for maximizing a window and the Windows operating system of Purcell included well-known visual indicators for minimizing and maximizing applications and their associated windows. Ex. 1003, ¶173. Therefore, claims 4 and 8 would have been obvious to a POSITA at the time of the alleged invention.

G. Ground 7: Claims 1-3, 6, 7, and 9 Are Anticipated by Purcell

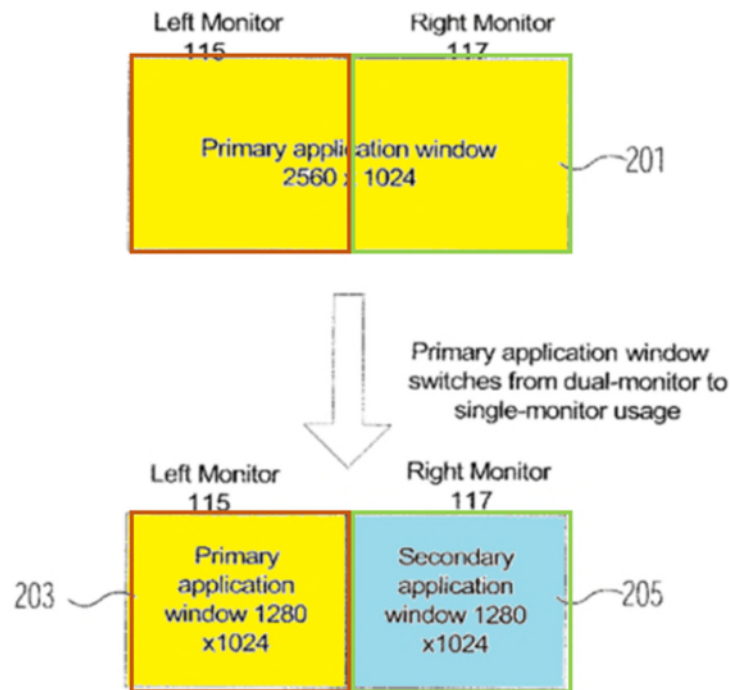
1. Claim 1

1[P] A method of displaying a plurality of desktops and/or applications, each having at least one window, on a multi-display device, comprising:

If the preamble is limiting, Purcell discloses this limitation. Ex. 1003, ¶176. Purcell discloses systems and methods for performing the steps below. Ex. 1003, ¶177. Similar to Yook and Lee, Purcell describes a device that includes software and hardware that permit a user to perform many different functions related to the display of multiple applications. *Id.*

Purcell discloses a device with a first display (orange box) and a second display (green box). Ex. 1007, Fig. 2; Ex. 1003, ¶178. Purcell is directed to a system with multiple display monitors that is used to display multiple applications at the same time to a user. Ex. 1007, Abstract; Ex. 1003, ¶178. Fig. 2 of Purcell is illustrative of its system:

FIGURE 2

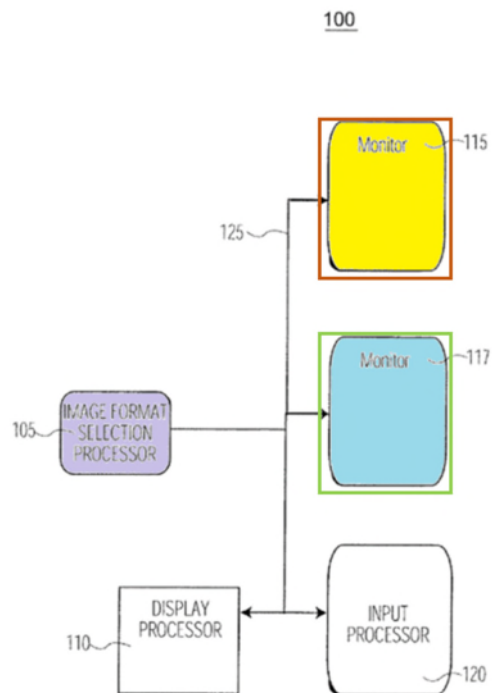


Ex. 1006, Fig. 2; Ex. 1003, ¶178.

1[A] receiving, by a processor, a first input that represents an instruction to reveal one of a desktop or application on a first display of the multi-display device; selecting, by the processor, a first desktop or application to display on the first display:

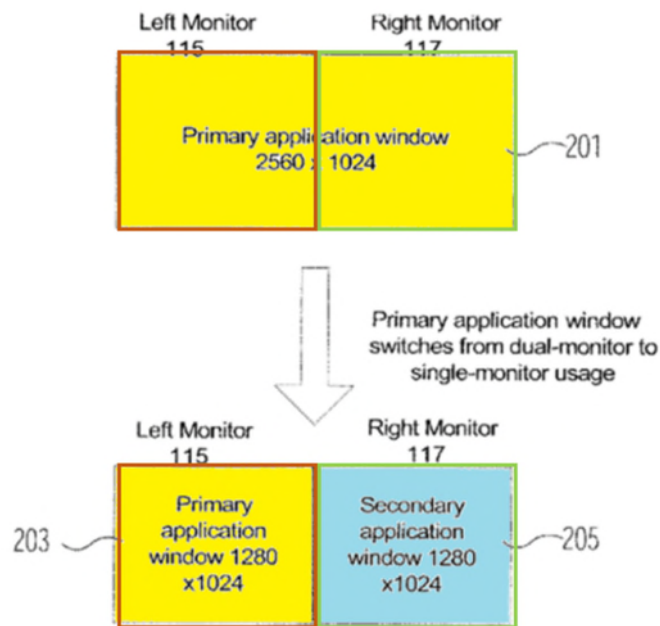
Purcell discloses receiving an input to a processor to cause a first application to be revealed on the first display. Ex. 1003, ¶179. Purcell discloses that an image format selection processor and a display processor execute computer readable instructions stored in the system in order to perform the method steps. Ex. 1007, ¶¶[0013]-[0015]; Ex. 1003, ¶180.

FIGURE 1



Purcell explains that a primary application window 201 (yellow) can run with a single window and span both monitors/displays. Ex. 1007, ¶[0016]; Ex. 1003, ¶181.

FIGURE 2

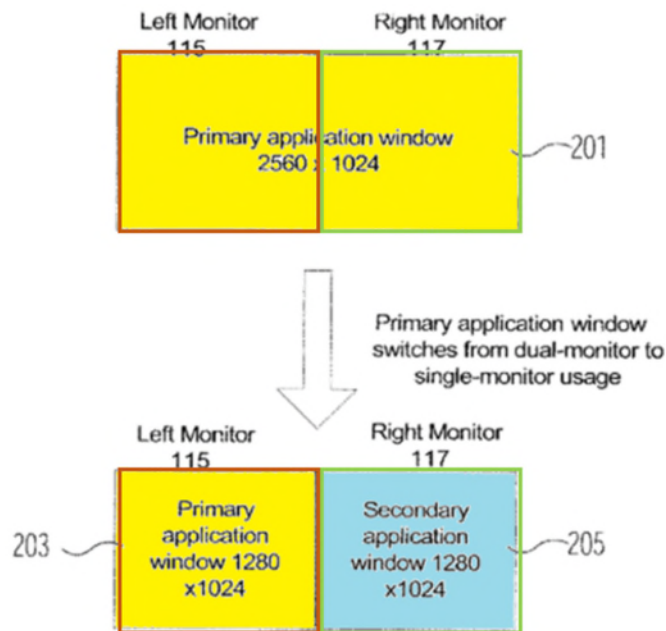


Ex. 1007, Fig. 2; Ex. 1003, ¶181. As also shown in Fig. 2, the first application (yellow) can be displayed only on the first display (orange box). Either scenario meets the claim. Ex. 1003, ¶181.

1[B] receiving, by the processor, a second input that represents an instruction to reveal one of a desktop or application on a second display of the multi-display device; selecting, by the processor, a second desktop or application to display on the second display;

Purcell discloses receiving a second input to reveal a second application, and in response to that input, displaying a second application on the second display. Ex. 1003, ¶182. Purcell describes a second input is received for instructions “to permit another application to execute concurrently and display an image window adjacent

to an image window of the primary application...” Ex. 1007, ¶[0016]; Ex. 1003, ¶183. Based on the input and instructions, the system then “initiates execution of a secondary application that displays an associated image window on the right monitor (monitor 117).” *Id.* Thus, the second application is revealed on the second display. *Id.*



Ex. 1007, Fig. 2; Ex. 1003, ¶183.

1[C] receiving, by the processor, a third input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays; and displaying, by the processor, the selected one of the first or second desktops or applications in a maximized condition.

Purcell discloses a third input received by the processor that causes one of the first or second applications to be displayed on both the first and second displays in a maximized condition. Ex. 1003, ¶184. Purcell explains that “[i]n response to a

user command to terminate execution of the second application or a function of the second application, the image format selection ***processor automatically initiates increase in size of the first image window to encompass display screens of the first monitor and the different second monitor.***” Ex. 1007, ¶[0020], claim 12; Ex. 1003, ¶185. When this transition occurs, one of the two applications is maximized because it at least doubles in size to be displayed on both displays. Ex. 1003, ¶185.

2. Claim 2 - The method of claim 1, wherein at least one of the first, second, and third inputs is achieved by at least a user input gesture.

Purcell discloses that at least one of the first, second, or third inputs is a user input gesture. Purcell’s system operates based upon a user interacting with its “user interface” that receives “user commands.” Ex. 1007, ¶¶[0015], [0020]; Ex. 1003, ¶186. These types of commands include those known in the art and capable of Windows-based devices, including “ALT+TAB command,” “Windows Taskbar,” or “clicking on an un-obscured portion of the secondary application image window.” Ex. 1007, ¶[0003]; Ex. 1003, ¶187. For example, the “user enters the command using a keyboard, mouse, a touch screen, a microphone or a voice recognition application...” Ex. 1007, ¶[0013]; Ex. 1003, ¶187. Any of these may be considered a “user input gesture,” but at minimum, input received when a user taps/touches the touch screen meets claim 2. Ex. 1003, ¶187.

3. Claim 3 - The method of claim 1, wherein the third input is

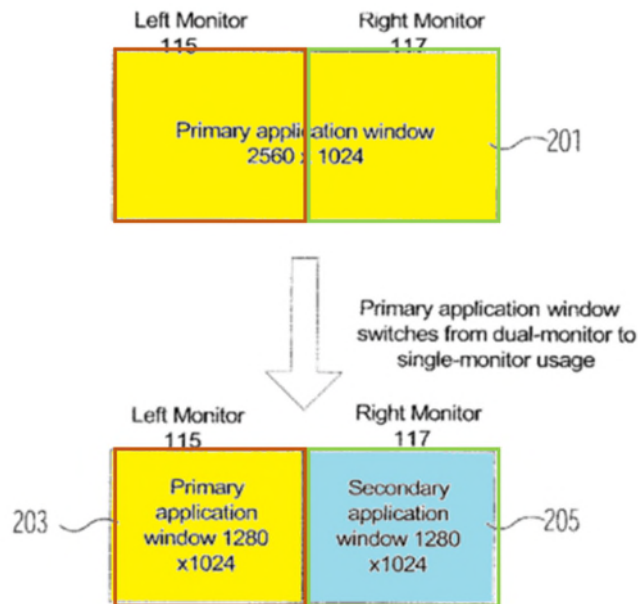
a user gesture comprising at least one of a tap or long hold gesture.

Purcell discloses that the third input is a user gesture that can be a tap or a long hold gesture. Ex. 1003, ¶188. As described above, Purcell discloses the reception of input via a touch screen, which would require a “tap” on the touch screen by a user. Ex. 1003, ¶189.

- 4. Claim 6 - The method of claim 1, wherein a fourth input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays.**

Purcell discloses that a fourth input can minimize one of the first or second applications to be displayed only on one of the first or second display. Ex. 1003, ¶190. Purcell’s system, based on user input, “initiates execution of a secondary application that displays an associated image window on the right monitor (monitor 117).” Exhibit 1007, ¶[0016]; Ex. 1003, ¶191. As part of the dynamic resizing described in Purcell, the primary application window changes size and is reduced to a portion of the amount of pixels it displays. *Id.*, ¶¶[0016], [0019]; Ex. 1003, ¶191. Purcell notes that “to permit another application to execute concurrently and display an image window adjacent to an image window of the primary application, system 100 dynamically changes the primary application image window size to match that of a left monitor (monitor 115).” *Id.*

FIGURE 2



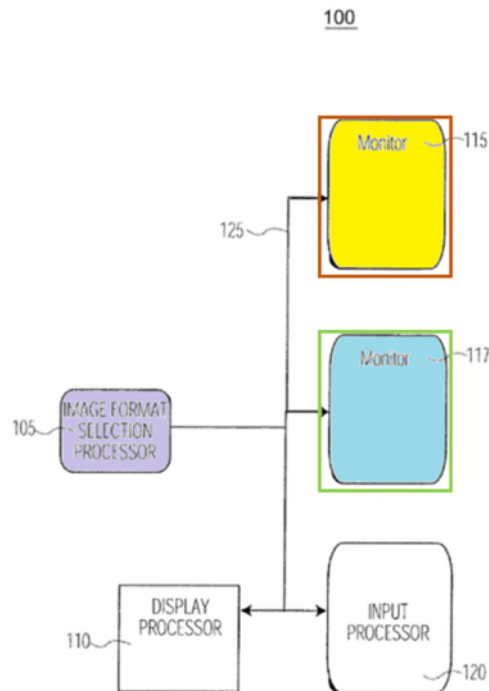
Ex. 1007, Fig. 2.

5. Claim 7

7[P] A non-transitory computer-readable medium having stored thereon instructions that cause a computing system to execute a method, the instructions comprising:

If the preamble is limiting, Purcell discloses instructions that are stored and executed to perform the method recited in the remaining elements of the claim. Purcell discloses that an image format selection processor and a display processor execute computer readable instructions stored in the system in order to perform the method steps. Ex. 1007, ¶¶[0013]-[0015]; Ex. 1003, ¶192.

FIGURE 1



7[A] instructions configured to receive a first predetermined input that represents an instruction to determine and reveal a first desktop or application on a first display of the multi-display device;

See Claim 1[A].

7[B] instructions configured to receive a second predetermined input that represents an instruction to determine and reveal a second desktop or application on a second display of the multi-display device;

See Claim 1[B].

7[C] instructions configured to respond to the first and second predetermined inputs with outputs that cause the first desktop or application to be displayed on the first display and cause the second desktop or application to be displayed on the second display:

See Claim 1[A] and 1[B].

7[D] instructions configured to receive a third predetermined input that represents an instruction to maximize a selected one of the first or second desktops or applications resulting in the selected one being displayed on both of the first and second displays according to the instructions configured to respond to the third predetermined input; and instructions configured to respond to the third predetermined input that causes displaying of the selected one of the first or second desktops or applications in a maximized condition.

See Claim 1[C].

- 6. Claim 9 - The computer-readable medium of claim 7 wherein a fourth predetermined input is an instruction to minimize a selected one of the first or second desktops or applications, resulting in the selected one being displayed only one of the first and second displays according to the instructions configured to respond to the third predetermined input.**

See Claim 6.

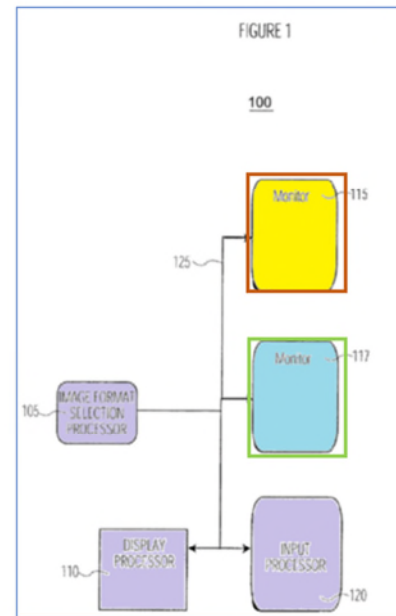
H. Ground 8: Claims 1-9 Are Obvious Over Purcell in View of Yook

Claims 1-3, 6, 7, and 9 are anticipated by Purcell. Because Purcell anticipates the Challenged Claims, Purcell also renders those claims obvious. “[A] disclosure that anticipates under § 102 also renders the claim invalid under § 103, for ‘anticipation is the epitome of obviousness.’” *Realtime Data*, 912 F.3d at 1373. In addition, the combination of Purcell and Yook renders all Challenged Claims obvious. Ex. 1003, ¶198.

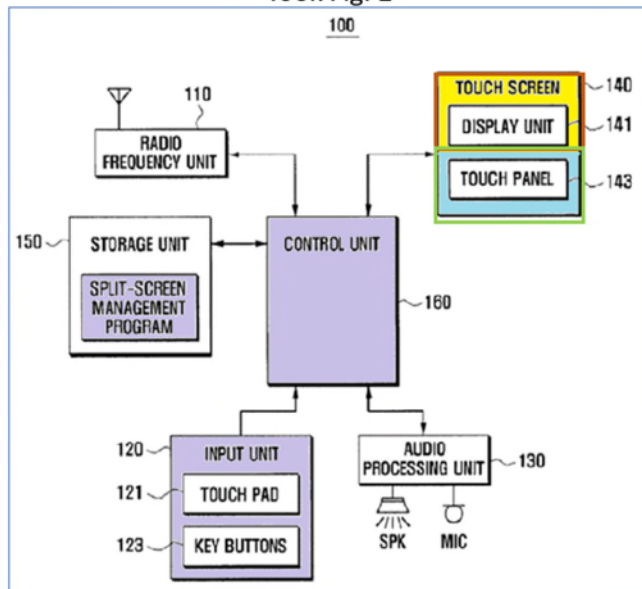
A POSITA would have been motivated to combine the teachings of Purcell's dual monitor display system with the teachings of Yook's dual-display system to achieve additional user display options that were commonplace in the industry at the time. Ex. 1003, ¶199. Both Purcell and Yook are directed to the same general problem of reducing burdensome aspects of users interacting with multiple applications at the same time. *Id.*, ¶200. Purcell, for example, notes that it was a "burdensome non-user friendly process" to "interact with the secondary application" when a primary application is also running. *Id.*, ¶201, Ex. 1007, ¶[0003]. Yook notes how there was a need to enable users to more effectively operate larger screens that could handle multiple applications at the same time. Ex. 1003, ¶202; Ex. 1004, ¶[0005]. Based on these presented problems, both Purcell and Yook developed systems and methods that permitted the simultaneous display of windows from two applications at the same time across multiple displays. Ex. 1004, ¶[0006]; Ex. 1007, ¶[0004]; Ex. 1003, ¶202.

Yook and Purcell also developed similar systems and methods to accomplish the solutions to the same problem, including, as shown below the use of an input processor, split screen management program, and a control unit/display unit. Ex. 1003, ¶202.

Purcell Fig. 1

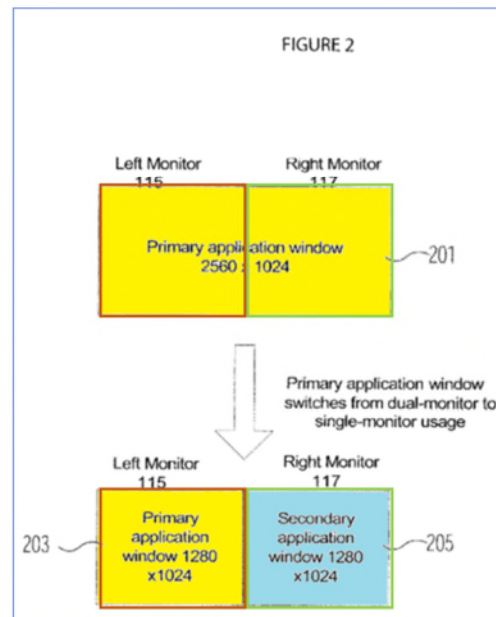


Yook Fig. 2



The manner in which Yook and Purcell implemented their split-screen methods on these systems was also similar as shown below. Ex. 1003, ¶203.

Purcell Fig. 2



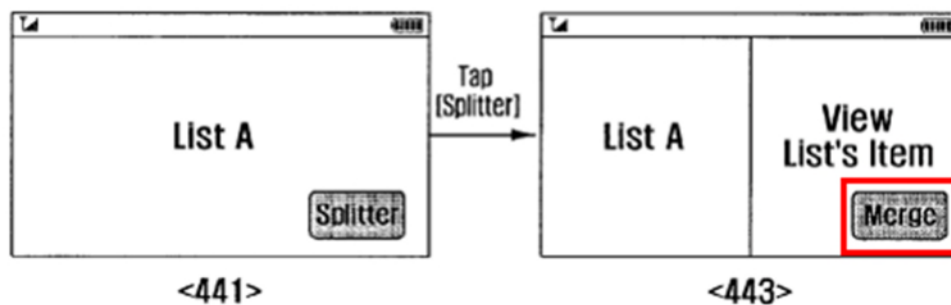
Yook Fig. 4b



Both Purcell and Yook allow a first application window to be displayed on both display portions and then permit a second application window to be displayed on a second display while the first application window occupies the first display. Ex. 1003, ¶204. Subsequently, and as explained above in Sections VIII.A and VIII.F, both references can reverse the split screen and revert back to the first application window displaying both displays. Based on these teachings a POSITA would have looked to combine Purcell with Yook at least because they are similar hardware and software systems that are directed to solving the same alleged problem in the prior art. Ex. 1003, ¶205. Moreover, a POSITA would have understood that the teachings of Purcell with respect to split-screen display would have been readily applicable to Yook because the resizing of application windows to fit smaller displays was well-known in the art. Ex. 1003, ¶205.

With respect to dependent claims 4, 5, and 8, the combination of Purcell and Yook renders the claims obvious. *Id.*, ¶206. These claims all relate to the presence of a “visual indicator” on one of the displays to indicate that one of the displays can be maximized. *Id.*, ¶207. As described above, these claims are rendered invalid by Yook. Both Yook and Purcell describe how a “touch screen” user interface is implemented. *Id.* Indeed, both references anticipate claims 2 and 3 that relate to user gesture inputs. Purcell, however, does not expressly recite the presence of a visual indicator on its displays. Purcell does, however, note that its system may be

implementing the Windows operating system, which would include a Taskbar with various icons and menu options as well as icons at the top of windows that would indicate to a user that a window can be maximized, minimized, or closed. Ex. 1003, ¶208-09; Ex. 1007, ¶[0003], [0011]; Ex. 1008; Ex. 1009. Yook specifically provides examples of visual indicators on its displays that indicate to a user that a display can be maximized to be displayed across both the first display and the second display. For example, Yook displays a “merge” button that a user can tap with an input gesture and that will return the split-screen display back into one application displayed on both the first and second displays. Ex. 1004, ¶[0055]; Ex. 1003, ¶210.



A POSITA would find this teaching of Yook to be readily applicable and easily implemented in the system of Purcell, to the extent that functionality is not already present in Purcell’s operating system. Ex. 1003, ¶211. Purcell expressly recognizes that a user can close the second display, thus, providing a visual indicator that the first display can retake the entire first and second displays is common sense and something a POSITA would find obvious to implement. Ex. 1003, ¶211. Therefore,

claims 4 and 8 would have been obvious to a POSITA at the time of the alleged invention.

As noted in Section VIII.B, claim 5 is rendered obvious by Yook because the shape of the visual indicator is merely a design choice and has no bearing on the functionality of the element. Claim 5 is rendered obvious for the same reasons here with Purcell combined with Yook. *Id.*, ¶212.

I. Secondary Considerations of Non-Obviousness

Petitioners are unaware of any applicable secondary considerations of non-obviousness. None were identified or asserted during prosecution. *See generally* Ex. 1003. Regardless, even if such considerations existed, none would overcome the strong *prima facie* showing of obviousness.

IX. Conclusion

As explained above, Petitioners are likely to prevail in showing that at least one of the Challenged Claims is unpatentable and requests that IPR be instituted and that the Challenged Claims be canceled.

Respectfully submitted,

Dated: October 18, 2024

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Designated Lead Counsel for Petitioners

Petition for *Inter Partes* Review of
U.S. Patent No. 9,134,756

CERTIFICATE OF WORD COUNT

The undersigned certifies that the foregoing PETITION FOR *INTER PARTES* REVIEW complies with the type volume limitation in 37 C.F.R. § 42.24(a)(1)(i). According to the utilized word-processing system's word count, the petition—excluding the caption, table of contents, table of exhibits, mandatory notices, certificate of word count, and certificate of service—contains 12,701 words.

Respectfully submitted,

Dated: October 18, 2024

By: /Christopher J. Higgins
Christopher J. Higgins (Reg. No. 66,422)
Counsel for Petitioner Motorola

Petition for *Inter Partes* Review of
U.S. Patent No. 9,134,756

CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing PETITION FOR IPR and associated documents and exhibits were caused to be served on October 18, 2024 via courier upon the following counsel of record for Patent Owner:

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A courtesy copy was also sent via overnight mail to the Patent Owner's Power of Attorney of record at the following address as listed on Patent Center:

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