UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA MOBILITY LLC AND GOOGLE LLC,

Petitioners,

v.

MULTIFOLD INTERNATIONAL INC. PTE. LTD.,

Patent Owner.

Case IPR2025-00040

U.S. Patent No. 9,134,756

PATENT OWNER RESPONSE

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EXHIBIT LIST	
2001	Patent Family of EP1775925A2 retrieved from Espacenet
2002	Declaration of Rajeev Surati, Ph.D.
2003	CV of Rajeev Surati, Ph.D.
2004	Transcript of Deposition of Dr. Jeffrey Rodriguez in IPR2025-00040

I. INTRODUCTION

Patent Owner Multifold International Inc. Pte. Ltd. ("Multifold" or "Patent Owner") respectfully requests that the Board confirm the patentability of Challenged Claims 1-9 of U.S. Patent 9,134,756 ("the '756 Patent).

The '756 Patent is directed to, *inter alia*, methods of displaying a plurality of desktops and/or applications on a multi-display device. In some claims, the method selects a first desktop or application to display on a first display, selects a second desktop or application to display on a second display, and then selects one of the two desktops or applications to be maximized, resulting in the selected desktop or application being displayed in a maximized condition on both the first and second displays. The '756 Patent's dependent claims include further recitals such as that "the visual indicator has a wave shape" as in claim 5, the "visual indicator signif[ies] 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" as in claim 8, and "the selected [desktop or application] being displayed [on] only one of the first and second displays according to the instructions configured to respond to the third predetermined input" as in claim 9.

The Petition's challenge to independent claims 1 and 7 omits any discussion of an entire claim limitation and therefore does not satisfy Petitioners' burden under 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4) to identify "where **each**

element of the claim is found in the prior art patents or printed publications relied upon." Petitioners also have not met their burden to show that elements of claims 5, 8, and 9 are found in the references relied upon. Multifold therefore respectfully requests that Challenged Claims 1-9 be found patentable.

II. BACKGROUND

A. The '756 Patent

The '756 Patent is directed to a "user device and methods for revealing a combination of desktops on single and multiple [displays]." Ex.1001, abstract. Figure 1 shows an exemplary multi-display device that is a dual-screen device. The device includes a primary screen 104 comprising a display 110 and a secondary screen 108 comprising a display 114:

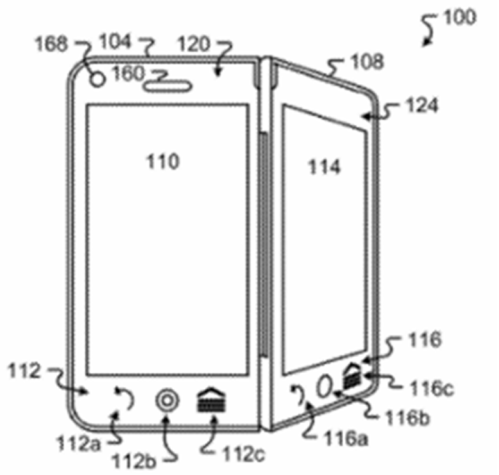


FIG. 1A

"A determined number of desktops and/or running applications can be selectively displayed on dual[] displays conditioned upon inputs received and the state of the device." Ex.1001, abstract. For example, a first desktop or application may be displayed on a first display, and a second desktop or application may be displayed on a second display, as shown in Fig. 10A:

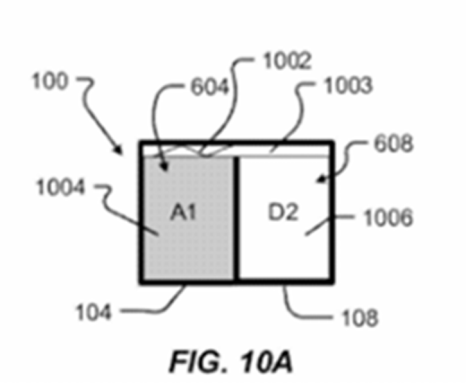


FIG. 10A

Ex.1001, 31:16-23. The user provides gestures and, based on the context of the gesture, the device may select a desktop or application to display on the first display (Ex.1001, 17:48-67), select a desktop or application to display on the second display (id.), maximize a desktop or application on both displays (Ex.1001, 31:43-53), or minimize an application displayed on both displays onto only the first or second display (Ex.1001, 31:60-67). Thus, the dual-display device presents "a user with an intuitive ability to manage multiple applications/desktops running simultaneously." Ex.1001, abstract.

Figure 10 also shows an example embodiment of the functionality of visual indicator 1002 in a particular dual screen device with first and second screens:

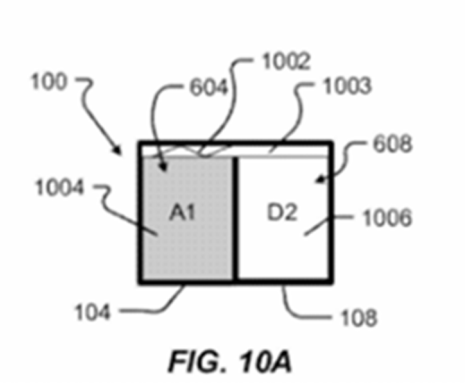


FIG. 10A

For example, in this embodiment, visual indicator 1002 may be a wave shape. Ex.1001, 31:16-60. In Figure 10A, visual indicator 1002 is shown above application A1. In Fig. 10B, visual indicator 1002 expands with A1:

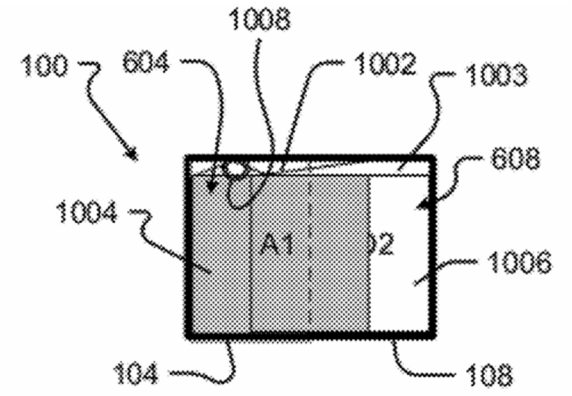


FIG. 10B

In Fig. 10C, A1 "fully occupies both the primary and secondary screens" and the visual indicator "also expands across both the primary and secondary screens":

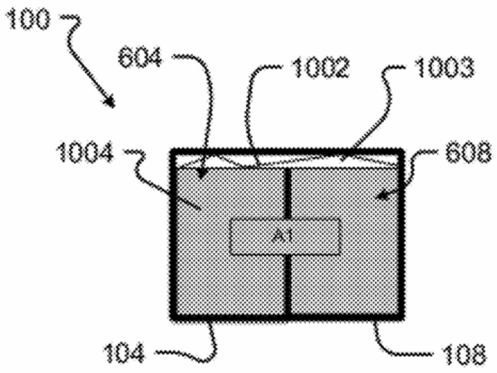


FIG. 10C

Ex.1001, Fig. 10, 31:54-59. "The visual indicator 1002 therefore also expands across both the primary and secondary screens, indicating that the user can now minimize this application by again executing another gesture." Ex.1001, 31:54-59.

B. Petitioners' Cited References

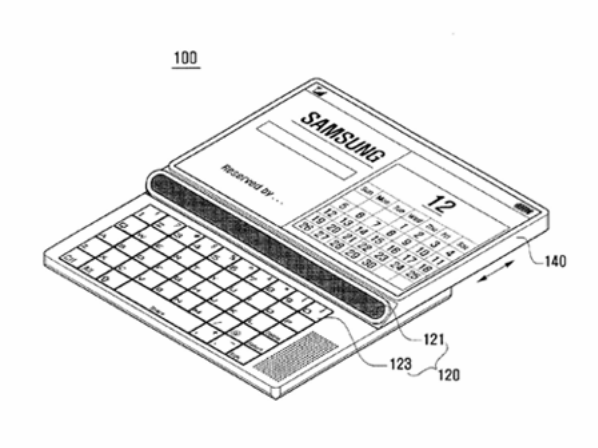
The Petition asserts eight grounds of invalidity relying on four references: Ground 1 challenging claims 1-4 and 6-9 as anticipated by Yook; Ground 2 challenging claims 1-9 as obvious over Yook; Ground 3 challenging claims 1-3, 6, 7 and 9 as anticipated by Lee; Ground 4 challenging claims 1-3, 6, 7, and 9 as obvious over Lee; Ground 5 challenging claims 1-3, 6, 7 and 9 as anticipated by Aguilar[1]; Ground 6 challenging claims 1-4, 6, 7, and 9 as obvious over Aguilar;

[1] Although the Petition's Table of Contents and headings list claim 8 in Grounds 5 and 6 (*see* Paper 1 (Pet.), iii-iv), the text of the Petition does not challenge claim 8

Ground 7 challenging claims 1-3, 6, 7, and 9 as anticipated by Purcell; and Ground 8 challenging claims 1-9 as obvious over Purcell and Yook.

1. Yook (Ex.1004)

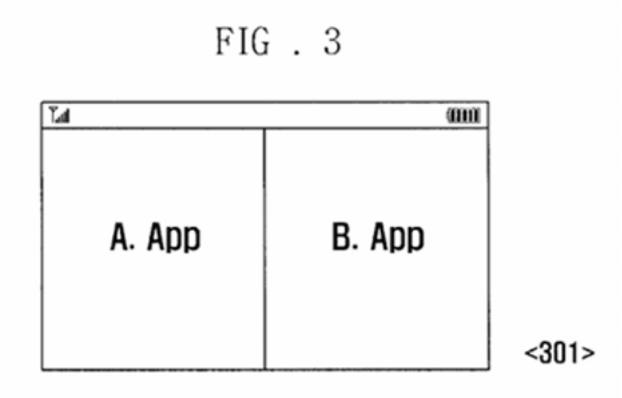
Yook is directed to a single-screen mobile terminal as shown in Fig. 1:



Ex.1005, Fig. 1. Yook further discloses that its single screen 140 may be divided into multiple "screen areas" as shown in, for example, Fig. 3:

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in either Ground 5 or Ground 6. *See* Paper 1 (Pet.), 6, 70, 71. Petitioners' expert Dr. Rodriguez also confirmed in deposition that claim 8 is not challenged in Grounds 5 or 6, nor did he provide any opinions as to the validity of claim 8 under either Ground 5 or Ground 6. Ex.2004, 75:2-20. In any event, listing claim 8 in a header without substantively addressing the claim language does not satisfy Petitioners' burden under 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4) to identify "where **each** element of the claim is found in the prior art patents or printed publications relied upon."



Ex.1005, Fig. 3.

Yook's Fig. 4. shows functions that may be performed by the divided areas. For example, Fig. 4A shows the division of touch screen 140 into two areas A and B. Ex.1005, [0044]. Fig. 4B shows that function A may be displayed on the entirety of touch screen 140, that function C may be displayed on the entirety of touch screen 140, or that touch screen 140 may be divided into two areas, with function A displayed in one area and function C displayed in the other area. Ex.1005, [0046].

2. Lee (Ex.1005)

Lee is directed to a mobile communication terminal having a first display unit and a second display unit. Figure 4 shows such a mobile terminal:

FIG. 4

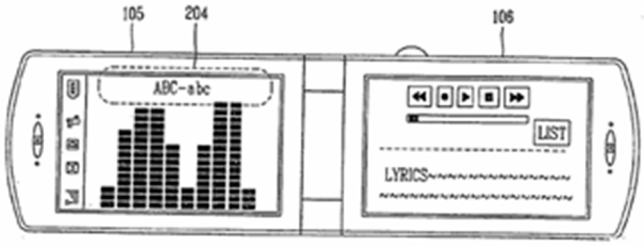


Fig. 10A shows that separate functionality of a single application can be displayed on each screen. Ex.1005, [0051]. For example, multimedia content is displayed on the first display screen 105 and the playback controls for the multimedia content is displayed on the second display screen 106:

FIG. 10A

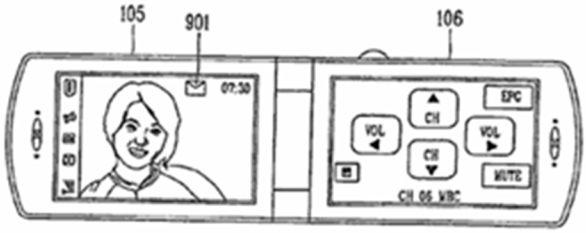
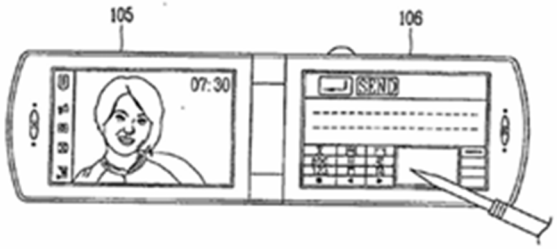


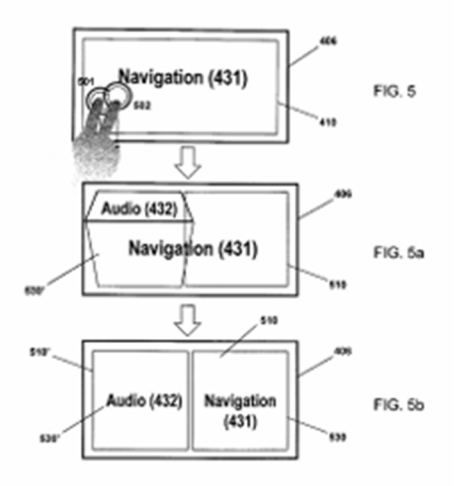
Fig. 11A shows that the user may multitask and send messages on the second display screen while continuing to view the multimedia content on the first display screen:

FIG. 11A



3. Aguilar (Ex.1006)

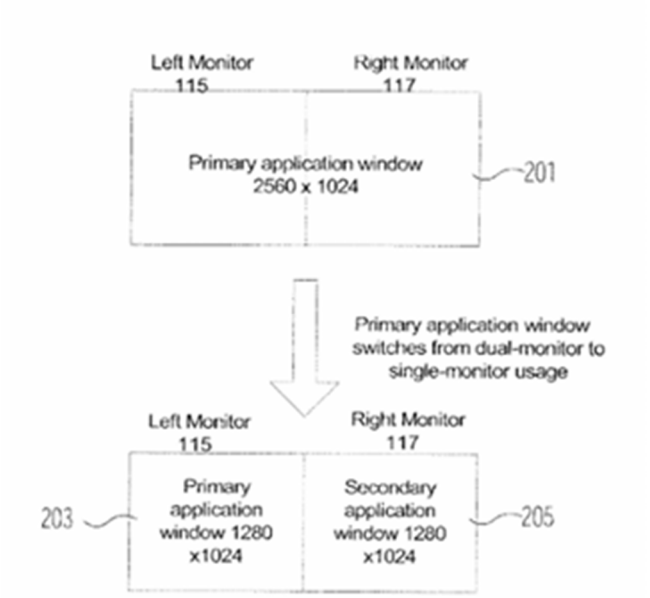
Aguilar is directed to a "user interface with multiple applications which can be operated concurrently and/or independently." Ex.1006, abstract. Fig. 5 of Aguilar shows an embodiment "in which the user is allowed to split the display screen to two display segments":



Ex.1006, 4:19-22. The user may be "allowed to select different applications in one of the display segments," and "the applications in different display segments can be swapped." Ex.1006, 4:23-28.

4. Purcell (Ex.1007)

Purcell is directed to a "screen sharing function [that] enables a main executable application, which typically uses more than one monitor, to switch to single-monitor usage as necessary." Ex.1007, abstract. Purcell Figure 2 shows a diagram of a dual-monitor system:



Ex.1007, Fig. 2.

The "primary application typically runs with a single full-size image window spanning both monitors 115 and 117" of a dual monitor system. Ex.1007, [0016]. "In order to permit another application to execute concurrently and display an image window adjacent to an image window of the primary application," the system "dynamically changes the primary application image window size to match

that of the left monitor 115." *Id*. This enables secondary monitor 117 to display a secondary application and permits a user to interact with both applications without causing either window to obscure the other. *Id*.

III. CLAIM CONSTRUCTION

Patent Owner interprets all claim terms in accordance with their plain and ordinary meaning consistent with the specification and file history of the '756 Patent. *Phillips v. AWH Corp.*, 415 F.3d 1303, 1313-1318 (Fed. Cir. 2005); 83 Fed. Reg. 51,340, 51,342 (Oct. 11, 2018). Patent Owner concurs with the Institution Decision "that construction of claim terms is not necessary to" resolve the disputes between the parties. Paper 10 (Inst. Dec.), 11 (*citing Wellman, Inc. v. Eastman Chem. Co.*, 642 F.3d 1355, 1361 (Fed. Cir. 2011)).

IV. LEVEL OF ORDINARY SKILL

Patent Owner agrees with Petitioner that the priority date of the '756 patent is October 1, 2010. Paper 1 (Pet.), 5.

For the purposes of this response, Patent Owner applies Petitioner's definition that 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." *Id*., 20-21 (citations omitted).

Patent Owner's expert Dr. Surati meets the required level of ordinary skill as of October 2010. Ex.2002, ¶44.

V. CLAIMS 1-9 ARE PATENTABLE

A. Claims 1 and 7: The Petition does not identify with particularity evidence that "displaying, by the processor, the selected first and second desktops or applications on the first and second displays" is anticipated or obvious (All Grounds)

Independent claim 1 of the '756 Patent reads in full as follows:

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

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;

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;

displaying, by the processor, the selected first and second desktops or applications on the first and second displays;

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.

Ex.1001, 35:23-45.

Petitioners reproduce claim 1 in their List of Challenged Claims as follows:

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.**

Paper 1 (Pet.), vi.

As shown by Patent Owner's color-coded annotations, the Petition maps claim 1's preamble to element 1[P] in red, the first two steps of the claimed method to element 1[A] in green, the third and fourth steps of the claimed method to element 1[B] in blue, and the sixth and seventh steps of the claimed method to element 1[C] in violet. Petitioners' mapping, however, omits the fifth step of claim 1: "displaying, by the processor, the selected first and second desktops or applications on the first and second displays." *Compare* Ex.1001, 35:36-37 *to* Paper 1 (Pet.), vi.

Critically, this is not simply an error in the Petition's List of Challenged Claims. The ***entire petition*** fails to address how any reference anticipates or renders the fifth step of claim 1 obvious. Paper 1 (Pet.), 21-32 (failing to address how Yook anticipates the fifth step of claim 1 under Ground 1), 40-42 (failing to address how Yook renders the fifth step of claim 1 obvious under Ground 2), 44-52 (failing to address how Lee anticipates the fifth step of claim 1 under Ground 3), 56-58 (failing to address how Lee renders the fifth step of claim 1 obvious under Ground 4), 58-66 (failing to address how Aguilar anticipates the fifth step of claim 1 under Ground 5), 71-72 (failing to address how Aguilar renders the fifth step of claim 1 obvious under Ground 6), 73-79 (failing to address how Purcell anticipates the fifth step of claim 1 under Ground 7), 83-86 (failing to address how Purcell in

view of Yook renders the fifth step of claim 1 obvious under Ground 8). Indeed, the phrase "displaying, by the processor, the selected first and second desktops or applications on the first and second displays" ***appears nowhere in the Petition***. Not only did Petitioners omit the fifth step of claim 1 from their List of Challenged Claims, but they also based their respective arguments for each ground on the erroneous List of Challenged Claims omitting the fifth step of claim 1. Petitioners thus failed to address the fifth step of claim 1 entirely.

The Board may only consider arguments made ***in the Petition*** and may not institute a different IPR of its own design. *Apple Inc. v. MPH Techs. Oy*, No. 2021-1355, 2021-1356, 2022 WL 4103286 at *15 (Fed. Cir. Sep. 8, 2022). "As the Supreme Court has held, 'in an inter partes review the petitioner is master of its complaint and normally entitled to judgment on… the claims it raises, not just those the decisionmaker might wish to address.' This holding is consistent with the statutory framework that requires a petition to identify 'the grounds on which the challenge to each claim is based.'" *Id*. (*citing SAS Inst., Inc. v. Iancu*, 138 S. Ct. 1348, 1355 (2018) *and* 35 U.S.C. §312(a)(3)). Thus, the Federal Circuit instructs that under circumstances as here, "where a petitioner did not address all of a claim's limitations in its petition," the petitioner fails to meet its burden under 35

U.S.C. §312(a)(3) and the claim may not be invalidated on arguments not in the Petition. *Id*. at *16-17.

The Federal Circuit's logic in *Apple* fully applies here. The Petition failed to address the fifth step of claim 1. Thus, Petitioners indisputably have not met the requirements of 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4) to identify "where **each** element of the claim is found in the prior art patents or printed publications relied upon." Under these circumstances, where Petitioners omit an element of claim 1 from their Petition, Petitioners have not met their burden to address every claim element and claim 1 cannot be invalidated. *Id*. at *14 ("[Patent Owner] argues that the Board correctly found that [Petitioner] failed to carry its burden to address all of the relevant limitations… We agree."). Moreover, because *inter partes* review is limited to arguments made in the Petition, it is too late for Petitioners to present arguments against the fifth step of claim 1 post-institution. *SAS Inst.*, 138 S. Ct. at 1355. Because Petitioners never raised any arguments against the fifth step of claim 1 in the Petition, any arguments against the fifth step of claim 1 in Petitioners' Reply must be disregarded. *Apple*, 2022 WL 4103286 at *14-16.

Finally, the same reasoning also applies to claim 7. The third element of claim 7 is analogous to the fifth step of claim 1 and reads: "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." Ex.1001, 36:5-10. For this element of claim 7, the Petition merely refers to elements 1[A] and 1[B] of claim 1. *See, e.g.*, Paper 1 (Pet.), 39. But as established above, elements 1[A] and 1[B] do not address the fifth step of claim 1 requiring "displaying, by the processor, the selected first and second desktops or applications on the first and second displays." Thus, Petitioners also have not met their burden with respect to claim 7.

For these reasons, the Petition fails to address every element of challenged claims 1 and 7 as required by 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4). As Petitioners have not met their burden, the Board should confirm these claims.

B. Claim 5: Yook does not suggest "the visual indicator has a wave shape" (Grounds 2 and 8)

Claim 5 depends on claim 1 by way of claim 4 and further recites "the visual indicator has a wave shape." Petitioners challenge claim 5 on only two grounds: Ground 2 as obvious in view of Yook and Ground 8 as obvious in view of Purcell and Yook. Further, Petitioners' Ground 8 challenge relies on Yook's teachings alone and do not cite any additional teaching in Purcell. Paper 1 (Pet.), 87 ("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.").

The Petition does not argue that Yook discloses a wave shaped visual indicator as recited by claim 5. Paper 1 (Pet.), 43-44. Nor does Yook disclose the recited wave shaped visual indicator. Ex.2002, ¶¶61-65. Instead, Petitioners argue that "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." Pet., 88. Petitioners' argument, however, is contradicted by the '756 Patent.

The '756 Patent teaches that the wave shape recited in claim 5 is a specific functional embodiment of the visual indicator. Ex.2002, ¶¶60-77. The '756 Patent describes the functionality of the wave shaped visual indicator in Figure 10 and col. 31 ln. 16-60:

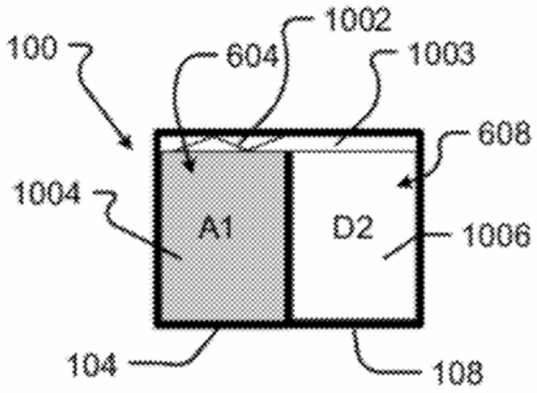


FIG. 10A

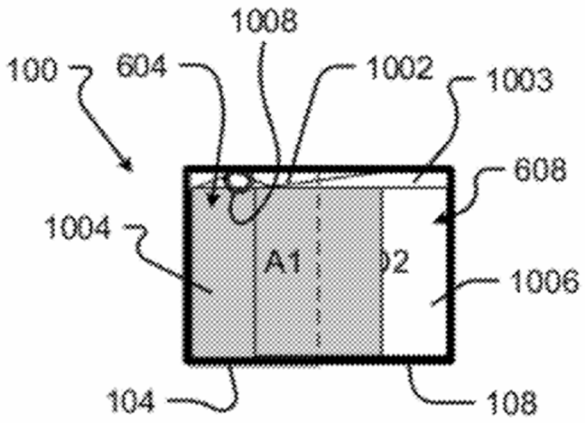


FIG. 10B

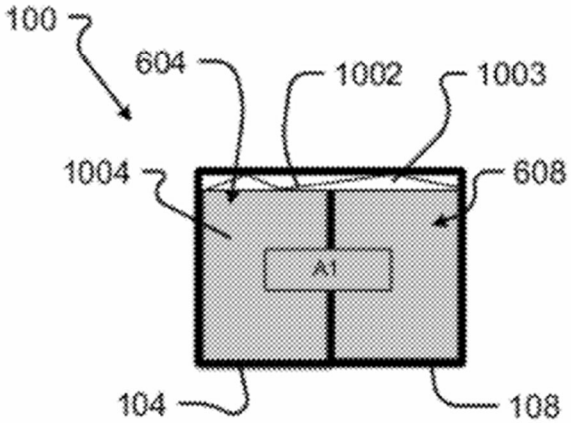


FIG. 10C

Ex.1001, Fig. 10.

The ’756 Patent provides that a function of the visual indicator generically (i.e., irrespective of shape) is to indicate that the application may be maximized when it is in a minimized state and may be minimized when it is in a maximized state. Ex.1001, 31:19-23 (“FIG. 10A also illustrates a visual indicator 1002 indicating to the user that the application or a desktop running on the screen in which the visual indicator is displayed allows the user to minimize or maximize that application/desktop.”). For the wave shaped visual indicator specifically recited in claim 5 however, the ’756 Patent teaches that the wave shaped indicator indicates whether the application may be minimized or maximized ***by expanding with the application*** – as shown in Fig. 10. Ex.1001, 31:23-27 (“Accordingly, in FIG. 10A, the indicator 1002 signifies that a user can maximize the application A1 in its current minimized state. The indicator 1002 is shown as having a wave shape that extends across the upper portion of the screen 104”), 31:54-59 (“The visual indicator 1002 therefore also expands across both the primary and secondary screens, indicating that the user can now minimize this application by again executing another gesture.”); *see also* Ex.2002, ¶¶66-74.

This is fully illustrated by Fig. 10. In Figure 10A, the wave shape is above application A1 to the left:

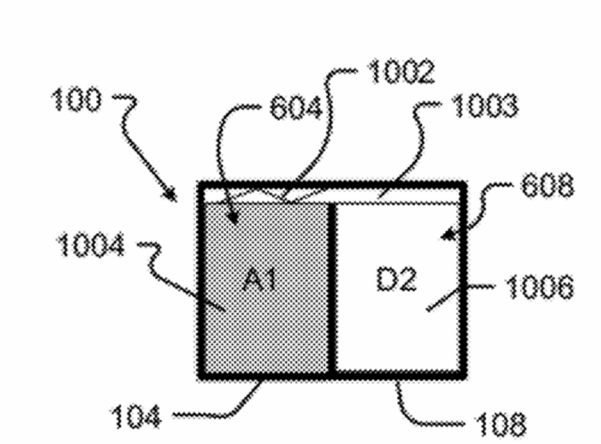


FIG. 10A

In Fig. 10B, the wave shape expands as A1 expands:

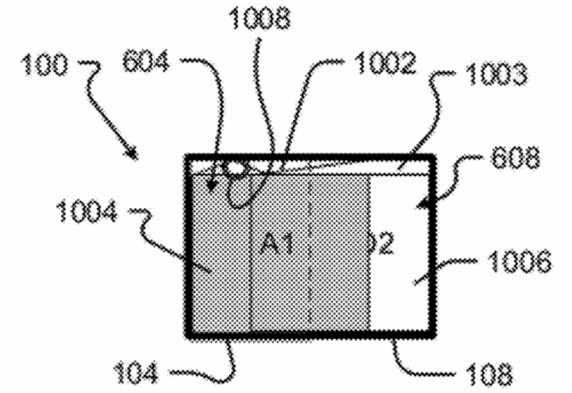


FIG. 10B

And finally in Fig. 10C, as A1 occupies both the first and second screens, the wave shaped visual indicator also expands across both screens:

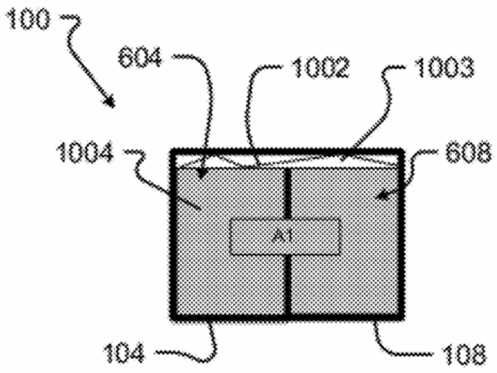


FIG. 10C

The ’756 Patent further describes the purpose of this functionality is that the wave shaped indicator expands with the application to indicate that the application may be maximized or minimized with another gesture: “The visual indicator 1002 therefore also expands across both the primary and secondary screens, indicating that the user can now minimize this application by again executing another gesture.” Ex.1001, 31:54-59. A person of ordinary skill would know that the wave shape is suitable for expanding with the application because it can stretch as shown in Fig. 10. Ex.2002, ¶74 (“From these disclosures, a person of ordinary skill would know that the wave shape is suitable for expanding with the application because it expands as shown in Fig. 10. The person of ordinary skill would thus understand that a wave shaped visual indicator is a specific functional embodiment of a visual indicator that can expand with the application.”).

Based on these disclosures, a person of ordinary skill would understand that a wave shaped visual indicator is a specific functional embodiment of a visual indicator that can expand with the application. Ex.2002, ¶¶66-74. By contrast, the Petition has not shown that any of "icons" identified on page 43 shares the functionality of the wave shaped indicator recited by Claim 5. Ex.2002, ¶¶62-65, 75. Indeed, a person of ordinary skill would understand that the icons on page 43 of the Petition have specific text and visual indicia that become hard to read if expanded in the manner described in Figure 10 of the '756 Patent. *Id*., ¶75. Thus, the person of ordinary skill would have no reason to use any of the icons identified on page 43 in the manner of the wave shaped visual indicator described by the '756 Patent – nor are they an obvious design choice. Ex.2002, ¶¶76-77.

For these reasons, Petitioners have not shown that Yook renders claim 5 obvious.

C. Claim 9: Petitioners' references do not suggest "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" (All Grounds)

Claim 9 depends from independent claim 7 and further recites "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." Ex.1001, 36:27-34. Petitioners have not met their burden with respect to claim 9 for two reasons.

First, the Petition does not address every element of claim 9 as required by 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4) to identify "where **each** element of the claim is found in the prior art patents or printed publications relied upon." For claim 9, the Petition merely refers to arguments made for claim 6. *See, e.g.*, Paper 1 (Pet.), 39-40 ("*See* Claim 6."). But claim 9 contains an additional element not found in claim 6. Unlike claim 6, which recites "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," claim 9 further requires that "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***." The Petition does not address how the references suggest displaying "according to the instructions configured to respond to the third predetermined input." Thus, as explained in Section V.A above, the Petition did not address all of claim 9's limitations and claim 9 may not be invalidated by arguments not in the Petition. *Apple*, 2022 WL 4103286 at *16-17.

Second, because claim 9 depends from claim 7, by antecedent basis "the instructions configured to respond to the third predetermined input" recited by claim 9 are the "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" recited by claim 7. Thus, according to claim 9, minimizing a selected desktop or application ("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") must result in the selected one "being displayed" according to the same instructions that cause the display of a desktop or application "in a maximized condition."

Petitioners present no evidence with respect to claim 6 that minimizing a selected desktop or application results in the selected one being displayed according to the same instructions that cause the display of a desktop or application in a maximized condition. Indeed, the Petition alleges with respect to claim 6 that the application is displayed in a ***minimized*** condition, and does not describe the same instructions as also causing maximizing. *See, e.g.*, Paper 1 (Pet.), 36 (identifying a minimized window in Yook: "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."), 53 (discussing minimizing an application in Lee), 68 (discussing minimization in Aguilar), 80 (arguing that Purcell discloses minimizing an application: "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."). Plainly, display in a minimized condition does not satisfy a requirement that the display must be a result of the same instructions that result in a maximized condition.

For these reasons, the Petition fails to address every element of claim 9 as required by 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4), nor would claim 9 be obvious in view of Petitioner' references. The Board should thus confirm claim 9.

D. Claim 8: Petitioners' references do not suggest "a visual indicator… 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." (Grounds 1, 2, and 8)

Claim 8 depends from independent claim 7 and further recites "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." Ex.1001, 36:22-27. The Petition does not address every

element of claim 8 as required by 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4) and is thus deficient for the same reasons as for claim 9 above.

Like for claim 9, the Petition does not make independent arguments against claim 8 but merely refers to arguments made for claim 4. *See, e.g.*, Paper 1 (Pet.), 39 ("*See* Claim 4."). But claim 8 contains an additional element not found in claim 4. Unlike claim 4, which recites "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," claim 8 further requires that "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 respond to the third predetermined input***." The Petition does not address how the references suggest the visual indicator signifies displaying "according to the instructions configured to respond to the third predetermined input." Thus, as explained in Section V.C above, the Petition did not address all of claim 8's limitations and claim 8 may not be invalidated by arguments not in the Petition. *Apple*, 2022 WL 4103286 at *16-17. The Board should thus confirm claim 8.

VI. CONCLUSION

Multifold respectfully requests that the Board confirm the patentability of Challenged Claims 1-9.

Date: August 25, 2025

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITS

This Patent Owner Response ("POR") consists of 5,243 words, excluding table of contents, table of authorities, certificate of service, this certificate, or table of exhibits. The POR complies with the type-volume limitation of 14,000 words as mandated in 37 C.F.R. § 42.24. In preparing this certificate, counsel has relied on the word count of the word-processing system used to prepare the paper (Microsoft Word).

Dated: August 25, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, pursuant to 37 CFR § 42.6(e), a true and correct copy of the foregoing **PATENT OWNER RESPONSE** have been served electronically via email on counsel of record for Petitioners:

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