

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA MOBILITY LLC AND GOOGLE, LLC,
Petitioners,

v.

MULTIFOLD INTERNATIONAL INCORPORATED PTE. LTD.,
Patent Owner

Case IPR2025-00040
Patent No. 9,134,756

**PETITIONERS' REPLY TO
PATENT OWNER'S RESPONSE**

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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
1012	2025.11.05 Deposition Transcript of Rajeev Surati, Day 2

I. INTRODUCTION

Petitioners reply to the Patent Owner Response (Paper No. 15, “POR”) concerning challenged claims 1–9 (the “Challenged Claims”) of U.S. Patent No. 9,134,756 (“the ’756 patent”). Patent Owner directs its arguments only to claims 1, 5, 7, 8, and 9 and offers no argument to the rest of the Challenged Claims. The Patent Owner Response abandons Patent Owner’s unmeritorious arguments from its Preliminary Response (Paper No. 7, “POPR”) and instead introduces a new slate of arguments, each of which also fail. These new arguments ask the Board to ignore the plain text and arguments of the Petition (Paper 1, “Pet.”) and should be rejected.

First, for Claims 1 and 7, Patent Owner offers no substantive arguments regarding validity, and its expert Dr. Rajeev Surati expressly states, in bold red font, that he offered no opinion on the patentability of the challenged independent claim. Ex. 2002 (“Surati Decl.”) ¶ 46; *see also* Ex. 1012 (Deposition of Dr. Rajeev Surati), at 162:16–164:3. Patent Owner merely claims that the Petition fails to address a limitation “displaying, by the processor, the selected first and second desktops or applications on the first and second displays,” because its text did not appear in the copied and pasted claim language in the list of Challenged Claims and section headings for claim 1. In other words, Patent Owner’s entire argument is premised on an obvious typographical error. Patent Owner neglects to address the *actual substance* of the Petition, which clearly addresses this limitation with respect to each

reference. This display of information is core to the teaching of each prior art reference, and Patent Owner cannot seriously dispute that the Petition has shown that the prior art. references supporting each ground disclose this limitation.

Patent Owner's argument does not even apply to claim 7, where *there is no typographical error* in the list of Challenged Claims or section headings, so the entire premise of the argument does not exist. Here as well, Patent Owner does not even discuss the substance of the prior art or the Petition's arguments and does nothing to undermine the Petition's showing of unpatentability of claim 7 on all grounds.

Second, for dependent Claim 5, Patent Owner argues the Yook reference does not suggest "the visual indicator has a wave shape" for grounds 2 and 8. Patent Owner does not meaningfully engage with the Petitioners' argument that the shape of the visual indicator is a mere design choice. Even Patent Owner's expert Dr. Surati acknowledges that the "wave shape" has no particular meaning and one can choose to use any visual element, consistent with the specification of the '756 patent.

Finally, Patent Owner claims Petitioners failed to address limitations from Claims 8 and 9 and the Board should not consider Petitioner's arguments, citing *Apple Inc. v. MPH Technologies Oy*, No. 2021-1355, 2022 WL 4103286 (Fed. Cir. Sept. 8, 2022). Patent Owner misunderstands and misapplies *Apple*. There, the Petitioner neglected to address an intervening claim from which challenged claims

depended, thus leaving a substantive hole in the ground. This is not applicable to the arguments raised in the Petition. There is no reason for the Board to not consider Petitioners' arguments about the patentability of Claims 8 and 9, which Patent Owner does not otherwise challenge.

For the reasons presented in the Petition and the additional reasons discussed below, the Challenged Claims are unpatentable.

II. EACH OF THE CHALLENGED CLAIMS ARE UNPATENTABLE

The POR does not challenge Petitioners' arguments that Claims 2–4 and 6 are unpatentable. Patent Owner's argument directed to the remaining Challenged Claims are uniformly without merit.

A. Independent Claims 1 and 7: Each Ground identifies “displaying, by the processor, the selected first and second desktops or applications on the first and second displays”

Patent Owner claims Petitioners failed to address a limitation in Independent Claim 1 in each of its grounds: “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” on the sole basis that some text was omitted from the headings in the Petition. POR at 14–17. But the Petition and declaration address how a processor displays applications on each

display, showing it in multiple annotated figures and accompanying description. There is no “missing” limitation.¹

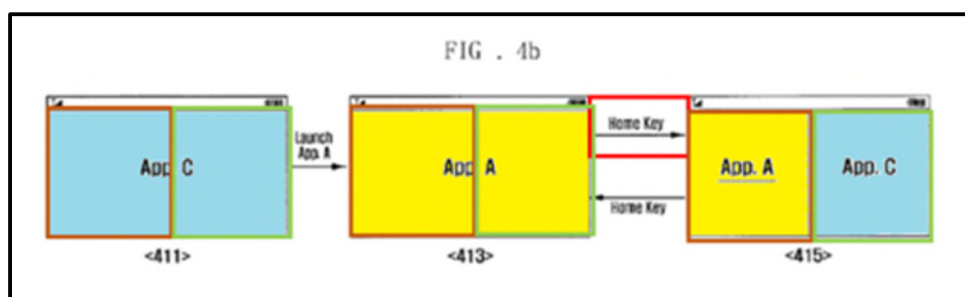
For claim 7, without any substantive response to the Petition, Patent Owner resorts to alleging that Petitioners failed to address an “analogous” limitation in claim 7: “instructions configured to respond to the first and second predetermined inputs with outputs that cause the first desktop or application to be displayed on the first display and cause the second desktop or application to be displayed on the second display.” *Id.*, 16-17. Yet, even though Patent Owner tried to lump the argument in with claim 1, there is no missing language from the headings or claim listings for claim 7. Patent Owner simply has no response for claim 7.

¹ The Board was not confused by this omission and properly included the “missing” language as part of limitation 1[B] and considered it in its institution decision. *See* Paper 10 (“Institution Decision”), at 20. It is also telling that Patent Owner chose not to argue that “[t]he *entire petition* fails to address how any reference anticipates or renders [the “missing” limitation] obvious,” POR at 14 (emphasis in original), in its preliminary response. *See generally* POPR.

1. Claim 1

Grounds 1-2 (Yook)

Grounds 1 (anticipation) and 2 (obviousness) are based on the Yook reference. Pet. at 21-44.² For example, the Petition explains in detail how Yook discloses and suggests the processor displaying selected desktops and/or applications on the first and second displays. First, the Petition references and annotates Figure 4b, which the Petition identifies as showing Yook “simultaneously output[ting] two functional view areas App.C and App.A.”



Pet. at 28. In describing Figure 4b, the Petition makes clear that “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)” and “[i]n response to receiving the input from touching the ‘Home’ key, the processor reveals a second application, App.C

² The examples cited herein refer to the arguments presented for Ground 1 (anticipation), but these arguments equally apply to Ground 2 (obviousness). See Pet. at 40.

on the second display (green box).” Pet. at 25, 28. Yook provides several examples of how a user of the Yook device can display multiple applications at once, including use of a divided display to show two open applications can be displayed across both displays. *Id.* at 13-14.

The Petition next discusses and annotates Figure 10 of Yook, which the Petition describes as showing “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**” (emphasis added).

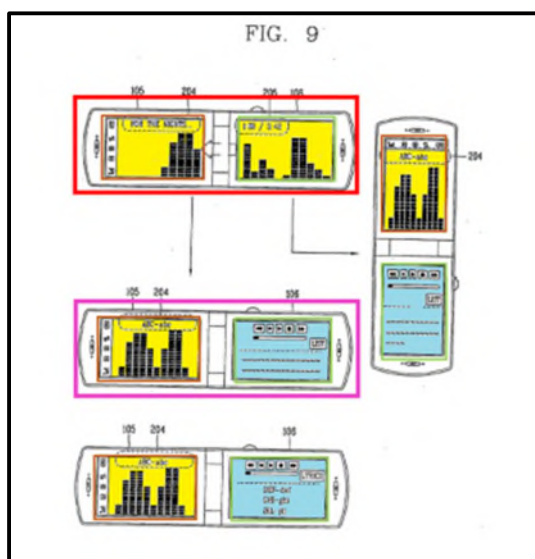


Pet. at 28-29. The Petition similarly discusses a processor displaying desktops and/or applications on the first and second display in relation to Figures 5a and 4d. Pet. at 29-30; *see also id.* at 26 (“Yook further discloses that a processor manages the multiple displays”), 27 (“The split-screen or screen area management program is executed in a series of instructions or commands by the Control Unit processor.”).

The Petition explicitly discusses Yook disclosing Patent Owner’s alleged “missing” limitation.

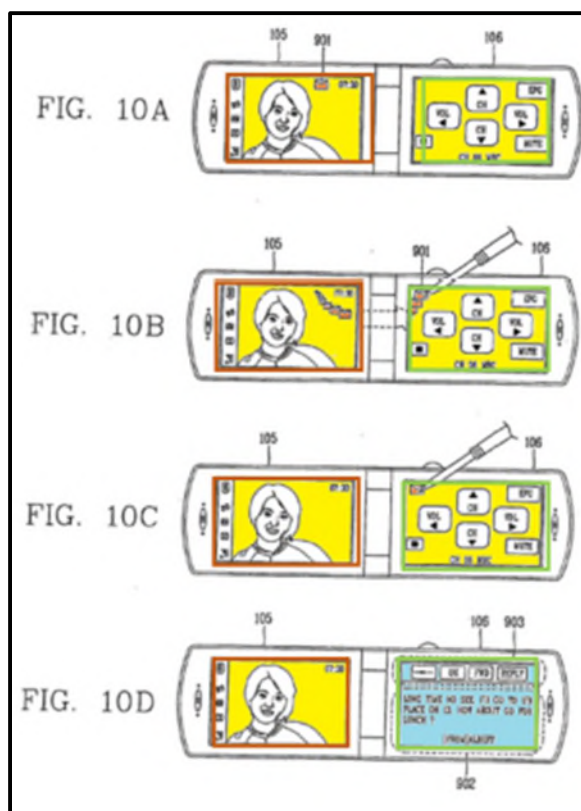
Grounds 3-4 (Lee)

Grounds 3 (anticipation) and 4 (obviousness) are based on the Lee reference. Pet. at 44-58.³ The Petition describes how Lee discloses displaying one application and then instructing a second application to open on a second display. *Id.* at 15-16. For example, the Petition explains that Lee “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*,” Pet. at 47 (emphasis added), as shown in Figure 9.



³ The examples cited herein refer to the arguments presented for Ground 3 (anticipation), but these arguments equally apply to Ground 4 (obviousness). See Pet. at 57.

Id. at 48. Lee also “provides an example of displaying one application, and then instructing a second application to open on a second display,” referencing Figure 10 Pet. at 15. In further discussing Figure 10 of Lee, the Petition notes that Lee showed how “a user can tap a message icon (orange) and reveal a *second application* on the *second display* (green outline).” *Id.* at 49 (emphasis added).

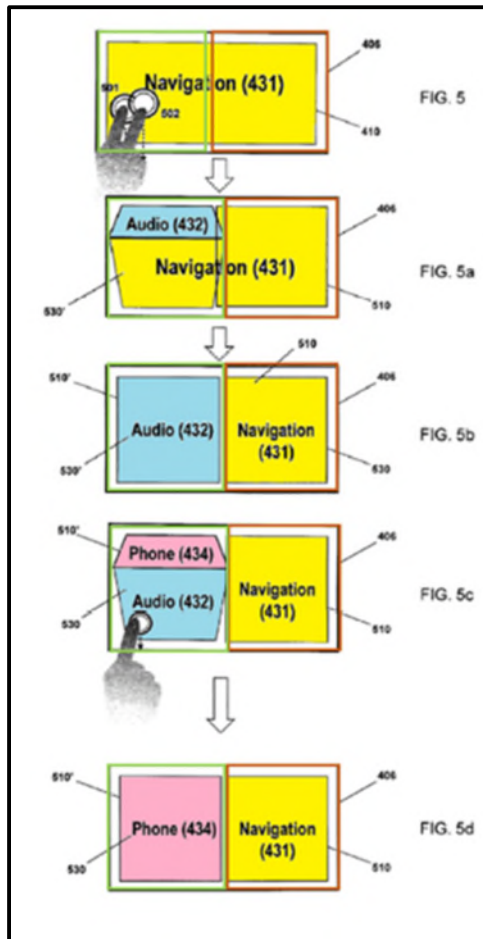


Id. at 50. Patent Owner appears not to argue that the Lee device lacks a processor, which the Petition clearly discusses. *Id.* at 45. The Petition explicitly discusses Lee disclosing Patent Owner’s alleged “missing” limitation.

Grounds 5–6 (Aguilar)

Grounds 5 (anticipation) and 6 (obviousness) are based on the Aguilar reference. Pet. at 58-73.⁴ The Petition explains in detail how Aguilar is directed to a multi-display device that permits displaying an application across multiple logical displays or on a first display, enabling display of second application on a second display. *Id.* at 17-18. Aguilar specifically discloses the user scrolling through a spindle of applications on one screen while the Navigation 431 application panel is displayed on the other, as shown in Figure 5.

⁴ The examples cited herein refer to the arguments presented for Ground 5 (anticipation), but these arguments equally apply to Ground 6 (obviousness). *See* Pet. at 71.

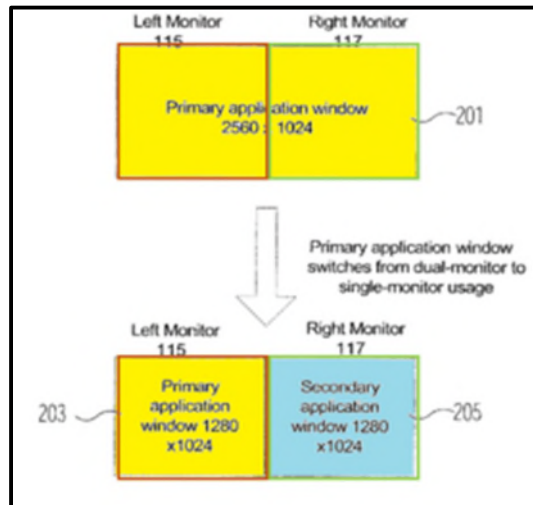


Id. at 62-63. Patent Owner appears not to argue that the Aguilar device lacks a processor, which the Petition clearly discusses. *Id.* at 61-63 (describing Figure 9 as illustrating the processor components “that are part of the process for storing and executing the instructions and commands to perform the screen splitting functions for the user interface.”). Thus, the Petition explicitly discusses Aguilar disclosing Patent Owner’s alleged “missing” limitation.

Grounds 7–8 (Purcell)

Grounds 7 (anticipation) and 8 (obviousness) are based on the Purcell reference. Pet. at 73–88.⁵ Purcell is directed to a system with multiple display monitors that are used to display multiple applications at the same time to a user. *Id.* at 19-20. For example, the Petition explains in detail how Purcell discloses displaying selected desktops and/or applications on the first or second display. Specifically, the Petition describes the way Purcell teaches allowing a second application “to execute concurrently and display an image window adjacent to an image window of the primary application” as illustrated in Figure 2:

⁵ The examples cited herein refer to the arguments presented for Ground 7 (anticipation), but these arguments equally apply to Ground 8 (obviousness). *See* Pet. at 83. Though Ground 8 is that the Challenged Claims are obvious over Purcell in view of Yook, combination with Yook is only relevant to dependent claims not at issue in this section. *See id.* at 84–88.



Id. at 77–78. Patent Owner appears not to argue that the Aguilar device lacks a processor, which the Petition clearly discusses. *Id.* at 75-78 (“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 ...’”). Thus, the Petition explicitly discusses Purcell disclosing Patent Owner’s alleged “missing” limitation.

Finally, Patent Owner suggests the Federal Circuit’s opinion in *Apple Inc. v. MPH Technologies Oy*, No. 2021-1355, 2022 WL 4103286 (Fed. Cir. Sept. 8, 2022) controls. *Apple* is inapplicable here to Patent Owner’s argument. In *Apple*, the Court affirmed the Board’s decision to decline to consider Apple’s unpatentability arguments for dependent claims 6–8 of U.S. Patent No. 7,937,581, each of which

depended from claim 5. *Apple*, 2022 WL 4103286 at *2, 6. Apple’s petition stated 3 grounds the patent was unpatentable:

- Ground 1 challenged claims 1–2, 4, 6–7, and 9 of the ’581 patent based on the Ishiyama and Murikawa references. *Id.* at *3.
- Ground 2 challenged claims 3 and 5 of the ’581 patent based on the Ishiyama, Murikawa, and Ahonen references. *Id.*
- Ground 3 challenged claim 8 of the ’581 patent based on the Ishiyama, Murikawa, and Forsl w references. *Id.*

The Board found that Grounds 1 and 3 did not address the intervening limitations of claim 5, from which claims 6–8 depend, because Grounds 1 and 3 do not include the Ahonen reference, which was essential to its finding that Claim 5 was invalid. *Id.* at 3, 7. In other words, the petitioner there failed to meet its burden because the stated grounds to challenge dependent claims 6–8 did not identify the references necessary to invalidate claim 5, on which those dependent claims depend.

The result in *Apple* has no applicability to Patent Owner’s arguments. Unlike in *Apple*, the Petition identifies claim 1 in each Ground and identifies the prior art references that render those grounds unpatentable as anticipated or obvious. Petition at 5-6. As discussed above, each limitation of each Challenged Claim is discussed in detail in the Petition, and indeed, neither Patent Owner nor its expert witness even

attempt to argue that any of the references fails to disclose any claim limitation. *See supra* Section II.A. Moreover, since claim 1 is an *independent* claim and does not depend on any other claim, Petitioners could not have failed to identify any references necessary to invalidate the claims that depend on claim 1 because there are none.

2. Claim 7

In a single paragraph, Patent Owner contends that “the same reasoning also applies to Claim 7” to argue that Petitioner somehow failed to meet its burden for that Claim. POR at 16-17. Specifically, Patent Owner argues that limitation 7[C] is analogous to the typographical error in the language from Claim 1. *Id.* (compare “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” with “displaying, by the processor, the selected first and second desktops or applications on the first and second displays”).

Unlike the headings on sections for Claim 1, however, the Petition did *not* omit any language from Claim 7 in its headings or in its listing of Challenged Claims. The “analogous” instructions language appears everywhere that the Petition discusses Claim 7. Petition at vii, 39, 55–56, 70, 82–83. As such, even assuming that

Patent Owner’s argument as to Claim 1 had any merit—and it does not—Patent Owner cannot assert that the Petition fails to address every element of Claim 7: the Petition (a) recites the claim language and (b) points to evidence that the prior art meets that claim language.

In any event, as discussed in Section II.A.1, the Petition provides detailed examples how the cited references disclose displaying first and second desktops and/or applications on a first and second display by instructions received by the processor, for each ground asserted. *See* Pet. at 24–30, 39, 46–50, 55–56, 58–63, 70, 75–78, 82–83. Just as these satisfy Petitioners’ burden as to the omitted language in claim 1[B], they also satisfy Petitioners’ burden as to claim 7[C]. For each ground in the Petition, And Patent Owner makes no argument whatsoever that the cited evidence fails to teach or suggest Claim 7. POR at 16-17.

Thus, Patent Owner’s arguments on Claims 1 and 7 fail because each of the Grounds in the Petition, and the references cited therein, explicitly address each limitation of the Challenged Claims.

B. Dependent Claim 5: Yook

The only substantive argument Patent Owner makes is that Petitioners fail to meet their burden for dependent Claim 5 in Grounds 2 and 8—both of which rely on the teachings of Yook—claiming Yook does not disclose a visual indicator with a

“wave shape.” POR at 17-23. Patent Owner makes two primary arguments: (1) that Yook does not disclose a “wave shape” visual indicator, and the specified “wave shape” of the claimed visual indicator is not merely a design choice, and (2) the identified icons from Yook cannot be the claimed “visual indicator” because they do not indicate an application can be minimized or maximized. Neither of these are correct.

First, that the form of visual element used for the visual indicator is a choice is not meaningfully in dispute. Patent Owner’s own expert Dr. Surati acknowledges that visual indicators like icons are not so rigid as to require specific functionality. *See* Surati Depo. 1012 at 185:9–187:8 (Dr. Surati testified that “you could use anything to do anything, I guess, just like a -- any image to do anything . . . There are a lot of considerations in UI that you have to make.”). Just as the inventors of the ’756 patent *chose* to claim a “wave shape” in Claim 5, they could just as easily choose to use some other form of visual indicator, like the icons taught by Yook.

That the “wave shape” is but a design choice is underscored by Dr. Surati’s testimony that he did not identify any particular association between the “wave shape” and the functionality of minimizing and maximizing an application or desktop across displays. Surati Depo. at 189:13–18, 195:6–20, 196:10–200:6. In fact, Dr. Surati testified that the example visual indicator in Figures 10a-c of the ’756

patent, having a wave shape, only indicated that a user can do *something*, but not necessarily what that something is (e.g., minimizing or maximizing). *Id.* at 200:1–6. Only through repeated use and exposure does Dr. Surati think a user would recognize any relationship between a wave shape and the functionality of maximizing or minimizing an application. *Id.* at 197:13–199:22. In other words, the particular form of visual indicator was not tied to the functionality of indicating the ability to minimize or maximize an application, but rather it was a design choice.

Patent Owner makes no argument that the recited “wave shape” is of patentable significance instead of a matter of routine design choice. *See* Pet. at 43–44. Patent Owner cites no evidence that the particular shape has any significance or that is anything more than aesthetics. *See, e.g., Ex Parte Brian C. Montgomery, Justin Shane Patton, and Preston L. Anderson*, Appeal 2017-001914, 2017 WL 4457732, at *3 (PTAB Sept. 27, 2017) (sustaining the rejection of claims as obvious and observing “changes in design such as size, shape and making something integral are merely obvious design choices and such changes have no patentable significance unless a new and unexpected result is produced.”).

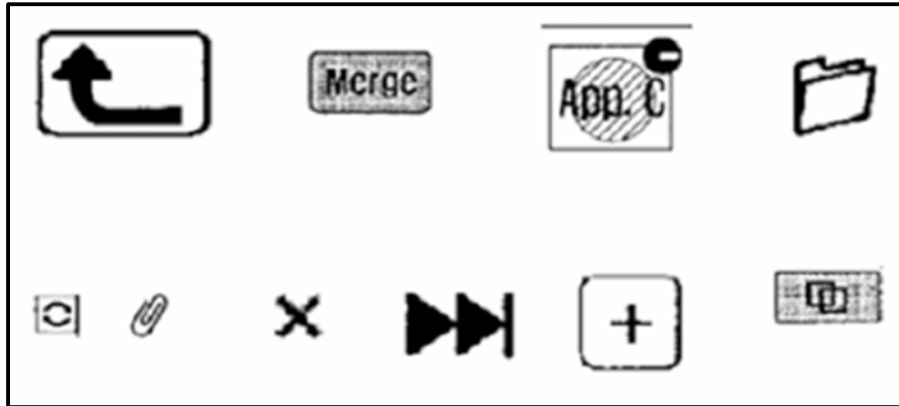
Second, Patent Owner argues that the icons from Yook cannot support Petitioners’ argument on Claim 5 because they do not indicate that an application can be minimized or maximized. Patent Owner argues that expanding the icons, like

the “wave shape” visual indicator is in Figures 10a-c of the ’756 patent, renders them unreadable. POR at 23 (citing Ex. 2002 ¶ 75). But this argument rings hollow for several reasons.

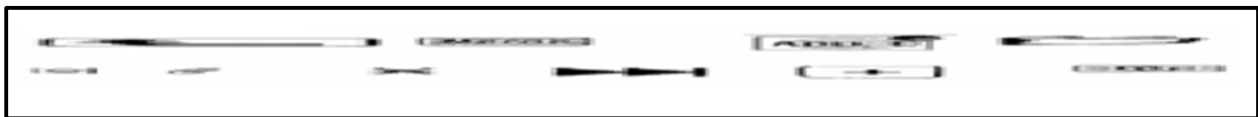
Patent Owner identifies no requirement in the claim language of the ’756 patent requiring the claimed visual indicator to “expand” or stretch between the minimized and maximized states. Patent Owner’s expert Dr. Surati acknowledges there is no claim language requiring such expansion. Surati Depo. 214:14–215:14 (“So I would just simply say, like, literally reading the claim language, it doesn’t literally say that.”). Nor is there any language requiring the visual indicator to have any different appearance when the application is minimized and maximized. *Id.* at 216:12–217:10. Thus Dr. Surati and Patent Owner are improperly importing elements from Figures 10a-c, mere embodiments, into the language of Claim 5. That is improper. *See Phillips v. AWH Corp.*, 415 F.3d 1303, 1323 (Fed. Cir. 2005) (noting it is improper to import limitation from the specification into the claims).

Even if an expansion of the visual indicator *were* required, the supposed illegibility resulting from expanding the Yook icons was the result of Dr. Surati’s actions. The original and Dr. Surati’s “expanded” Yook icons look like the following:

Original Yook Icons



Dr. Surati's "Expanded" Yook Icons



Dr. Surati admits that the reason the “expanded” Yook icons in his report are hard to read is because he manipulated both the width and the height of the icons to conform to the height of the annunciator window element in Figures 10a-c. *See* Surati Depo. at 211:17–22, 210:19–211:3. By making the icons shorter, he made them less readable. *Id.* at 208:17–19. He did all this even though there is no requirement the visual indicator be contained within any annunciator window. *Id.* at 211:5–15; *see also* Ex. 1001 ('756 patent) at 31:30-35. Thus, even if there were a requirement to have an “expanded” visual indicator, Patent Owner’s arguments based on Dr. Surati’s opinion should not be credited.

Grounds 2 and 8, and the Yook reference cited therein, sufficiently support Petitioners arguments that Claim 5 is invalid.

C. Dependent Claim 9: Each Ground identifies “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”

Patent Owner attempts to argue that the Petition failed to address a specific element of claim 9 when the Petition referred back to claim 6, which is substantively the same as claim 9. Patent Owner is wrong for multiple reasons.

First, the language Patent Owner relies on as allegedly being different between claims 6 and 9 is “according to the instructions configured to respond to the third predetermined input.” But this is not a substantive difference between the claims and is a result of claim 9 depending from claim 7, which is a computer readable medium claim and claim 6 depending from claim 1, which is a method claim. Both dependent claims 6 and 9 recite the same substance, but claim 9 includes “instructions configured to” perform the method in claim 6. Therefore, this is a distinction without a difference. And regardless, the Petition for claim 6 properly relied upon, for example, that Yook “direct[s] the processor to respond by initiating full-screen mode.” Petition at 36. The same is true for all other references and Grounds, including specific reference to a CPU, VRAM, and “executing the instructions and commands to perform the screen splitting....” in Aguilar. *Id.*, at 68-69. Patent Owner’s argument lacks merit. Moreover, the Petition explicitly discloses “instructions configured to respond to the third predetermined input” in Claim 9

because that is also required by Claim 7 from which it depends. *See* '756 Patent at 36:10-17, 28-33. And Patent Owner does not argue that Petitioners' evidence in support of Claim 7[D] is insufficient. *See generally* POR.

Second, to the extent it is even relevant, Patent Owner attempts to rely on *Apple* to argue that the Petitioners have failed to meet their burden on Claim 9. Patent Owner misreads *Apple*. As discussed in Section II.A.1, the Board in *Apple* declined to consider arguments related to dependent claims where the stated grounds for invalidating those dependent claims did not include a reference necessary to invalidating the claim from which those dependent claims depend. *Apple*, 2022 WL 4103286, at *2, 3, 6, 7. That is not the situation we have here where the Petition addresses substantively similar independent and dependent claims and refers back to those for claim 9. Moreover, Claim 9 of the '756 patent depends from Claim 7. For each Ground in the Petition challenging the patentability of Claim 9, Petitioners also challenge the patentability of Claim 7 *relying on the same references*. *See* Pet. at 5-6, 37-40 (Grounds 1 and 2 challenge Claims 7 and 9 based on Yook), 54-56 (Grounds 3 and 4 challenge Claims 7 and 9 based on Lee), 68-71 (Grounds 5 and 6 challenge Claims 7 and 9 based on Aguilar), and 81-83 (Grounds 7 and 8 challenge Claims 7 and 9 based on Purcell). Additionally, Claim 7 includes instructions configured to maximize the desktop or application in response to the third

predetermined input based on *instructions*. And because both claims are based on the same grounds and references, *Apple* does not apply.

Thus, each Ground in the Petition, and the references cited therein, sufficiently support Petitioners arguments that Claim 9 is invalid.

D. Dependent Claim 8: Grounds 1, 2, and 8 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.”

Finally, Patent Owner challenges the Petition’s support for the unpatentability of Claim 8 in a way that mirrors its argument about Claim 9 regarding “instructions.” *See* Section II.C. Those arguments fail for the same reasons because the Petition address how a processor executing “instructions” performs the limitation.

Patent Owner claims that by citing Claim 4 to also support the unpatentability of Claim 8, Petitioners have failed to include arguments supporting Claim 8’s requirement that a visual indicator indicate an application or desktop can be maximized on a “display [that] can be maximized by a user gesture according to the instructions configured to respond to the third predetermined input,” citing *Apple*. POR at 27. Claim 8 of the ’756 patent depends from Claim 7, which recites a third predetermined input that Patent Owner does not challenge. And claim 4, which includes the same limitations as claim 8 aside from reciting “instruction” is included in the Petition as fully disclosing what is required by claim 8 and not challenged by

Patent Owner. *Apple* is not applicable here because there is no change in asserted references from an independent to a dependent claim and the Petition properly relied on a substantively similar claim for its disclosure. *See* Pet. at 5-6, 37-40 (Grounds 1 and 2 challenge Claims 7 and 8 based on Yook) and 81-83 (Ground 8 challenge Claims 7 and 9 based on Purcell).

Grounds 1, 2, and 8 in the Petition, and the references cited therein, sufficiently support Petitioners arguments that Claim 8 is invalid.

III. CONCLUSION

As set forth in the Petition and above, the Challenged Claims are either anticipated or rendered obvious by the Yook, Lee, Aguilar, and Purcell references. Accordingly, the Board should find them unpatentable.

Dated: November 20, 2025

By: */Christopher J. Higgins/*

Christopher J. Higgins (Reg. No. 66,422)

Counsel for Petitioner Motorola Mobility LLC

CERTIFICATE OF WORD COUNT

The undersigned certifies that the foregoing PETITIONER’S REPLY TO PATENT OWNER’S RESPONSE complies with the type-volume limitation in 37 C.F.R. § 42.24(c)(1). According to the utilized word-processing system’s word count, the Reply—excluding the caption, table of contents, table of exhibits, mandatory notices, certificate of word count, and certificate of service—contains 4,343 words.

Dated: November 20, 2025

By: */Christopher J. Higgins/*

Christopher J. Higgins (Reg. No. 66,422)

Counsel for Petitioner Motorola Mobility LLC

CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on November 20, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

James T. Carmichael Stephen Schreiner Minghui Yang Stephen McBride Christopher R. Abidin	jim@carmichaelip.com schreiner@carmichaelip.com mitch@carmichaelip.com stevemcbride@carmichaelip.com chris@carmichaelip.com MultifoldIPRs@carmichaelip.com
--	--

/Karen Johnson/

Karen Johnson