

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'S SUR-REPLY

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I. INTRODUCTION

The Petition failed to address every element of claims 1, 7, 8, and 9. Therefore, Petitioners have not met their 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” and their challenge must fail.

For some unaddressed limitations, Petitioners’ Reply points to unrelated sections of their Petition as allegedly discussing the limitations at issue. But those sections do not invalidate the critical limitations – nor should it be the Board’s or Patent Owner’s burden to sift through the Petition to identify stray arguments in unrelated sections. For other unaddressed limitations, Petitioners’ Reply allege that the unaddressed limitations do not substantively change the scope of the claims. But this argument is directly contrary to the Federal Circuit’s instructions that words of a claim should not be surplusage.

The Reply has not shown that the Petition addresses every element of claims 1, 7, 8, and 9. Multifold therefore respectfully requests that Challenged Claims 1-9 be found patentable.

II. 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**

The Patent Owner Response showed that the Petition failed to address an entire limitation of claim 1: “displaying, by the processor, the selected first and second desktops or applications on the first and second displays.” POR, 12-15. The Petition similarly failed to address the analogous limitation of 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” because it referred to unrelated claim elements 1[A] and 1[B] instead of the relevant limitation. POR, 16-17.

Petitioners’ Reply does not contest that the Petition failed to include any section discussing the “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” limitation. Nor do Petitioners contest that the words “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” do not appear anywhere in the Petition at all. Instead, Petitioners’ Reply argues that the Petition addressed “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” where it discussed “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.” *See generally* Reply, 5-12 (relying on sections of the Petition discussing the “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” limitation for the “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” limitation).

First, Petitioners should not be permitted to bury an argument directed to one limitation in a section ostensibly discussing a different limitation. It is Petitioners’ burden to explain where each element is found in the art – not Patent Owner’s burden to sift through the Petition to determine that. *Google v. EveryMD*, IPR2014-00347, Paper 9, Decision Denying Institution at 25 (PTAB May 22, 2014). Here, even more egregiously, Petitioners did not even mention the relevant limitation at all – much less tie their evidence to that limitation – denying Patent Owner notice of what evidence they intended to rely on. Petitioners should not be permitted to identify evidence for the first time on Reply to support an argument that was not made by the Petition.

Second, Petitioners’ newly identified evidence does not anticipate or render obvious claim 1. Claim 1 recites a specific order of steps that must be performed in

the order written. *Mformation Tech. v. Research in Motion Ltd.*, 764 F.3d 1392, 1398-99 (Fed. Cir. 2014) (holding that “a claim ‘requires an ordering of steps when the claim language, as a matter of logic or grammar, requires that the steps be performed in the order written’.”). Here, claim 1 requires the first and second steps (“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;”) as well as the third and fourth steps (“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;”) to be performed before the fifth step (“displaying, by the processor, the selected first and second desktops or applications on the first and second displays;”). It is logically impossible to display selected first and second desktops before steps that select the first desktop and select the second desktop. Because of this order, the fifth step of “displaying” must occur after both (two) “selecting” steps.

None of Petitioners’ art meets the order required by claim 1. For Yook, Petitioners identify Fig. 4b where the Home key splits a screen that displayed App.A into a left portion displaying App.A and a right portion displaying App.C. Reply, 5.

But in this example, there are not two inputs and two selections to display App.A and App.C on the first and second displays as claimed. Instead of two inputs and two selections, the user provides a single command (the Home key) that displays the two applications. Even if Yook discloses how a user “can display multiple applications at once” (Reply, 6), this does not suggest the two claimed pairs of “receiving” and “selecting” steps followed by the “displaying” step.

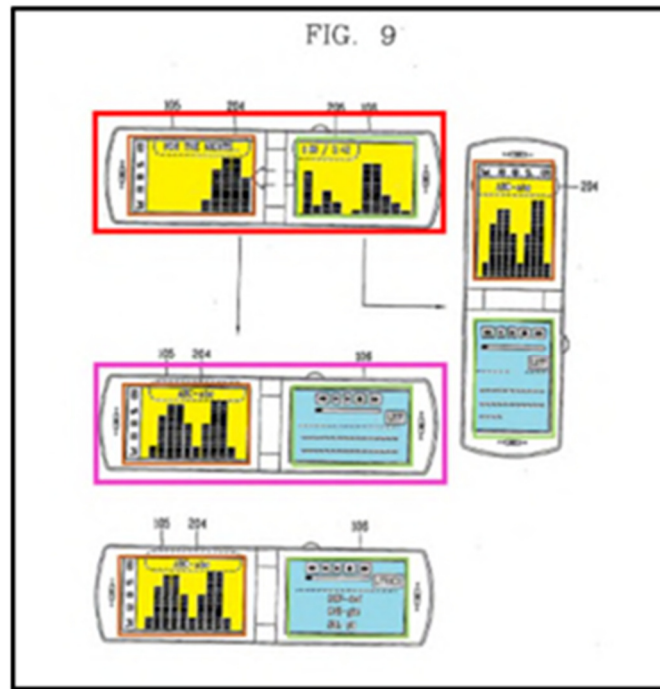
The Reply then looks to Fig. 10 of Yook:



The Reply alleges that “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.” Reply, 6. But this again fails to meet the required order of steps. Claim 1 requires two pairs of “receiving” and “selecting” steps, one for the first desktop/application and one for the second desktop/application. By Petitioners’ own admission, in this example the user has

only made one input to reveal a first application and the device itself responds by revealing a second application without the second “receiving” step or the second “selecting” step. Thus, Yook does not disclose steps of “receiving a first input,” “selecting a first desktop or application,” “receiving a second input,” “selecting a second desktop or application,” and “displaying the selected first and second desktops or applications” in the order of claim 1.

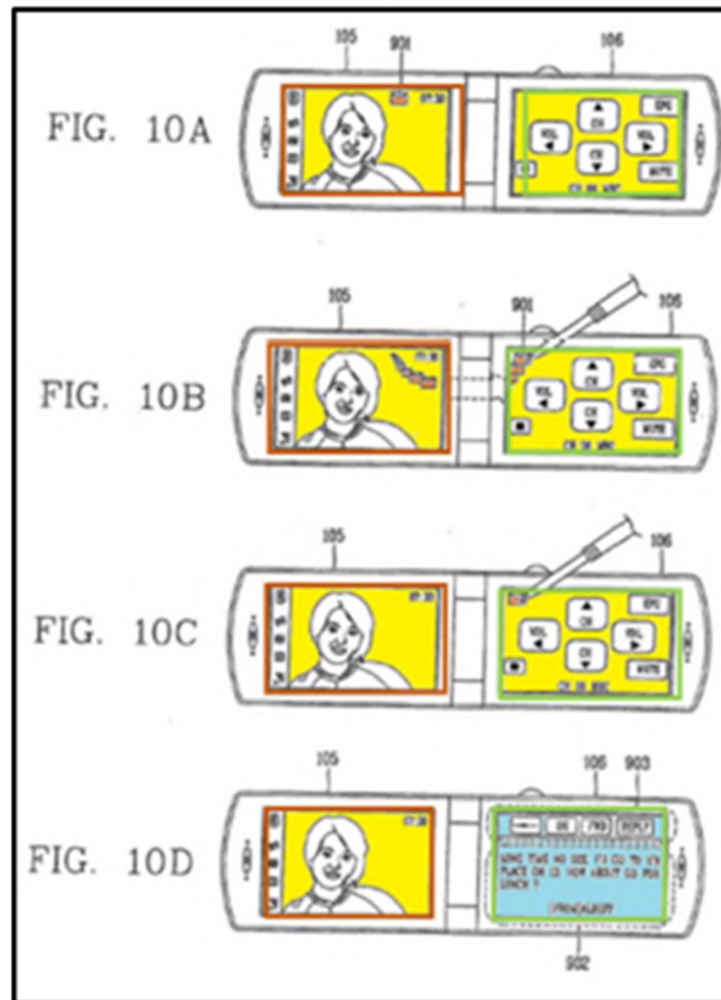
For Lee, Petitioners allege that “Lee describes how a user can perform multitasking and display two application windows using the two separate displays” as shown in Fig. 9. Reply, 7-8. Petitioners’ theory, however, is that Lee’s device selects one application which is displayed on both displays (Pet., 46) and then the user may open a second application on the second display (Pet., 48), as shown in Fig. 9:



Reply, 7. But this again does not meet the order of steps of claim 1. In this example from Lee, the user selects a first application for display on both displays, that application is displayed on both displays, and then the user selects a second application for display and that application is displayed on one of the two displays. By contrast, the order of steps of claim 1 requires an instruction and selecting a first desktop/application to display on a first display, an instruction and selecting a second desktop/application to display on a second display, and then displaying both the selected first and second desktops/applications. Lee does not have two distinct pairs of “receiving” and “selecting” steps of two desktops/applications for display on a first and a second display, respectively. Rather, Lee displays one

application on both displays first and the user selects a second application to be displayed on one of the displays.

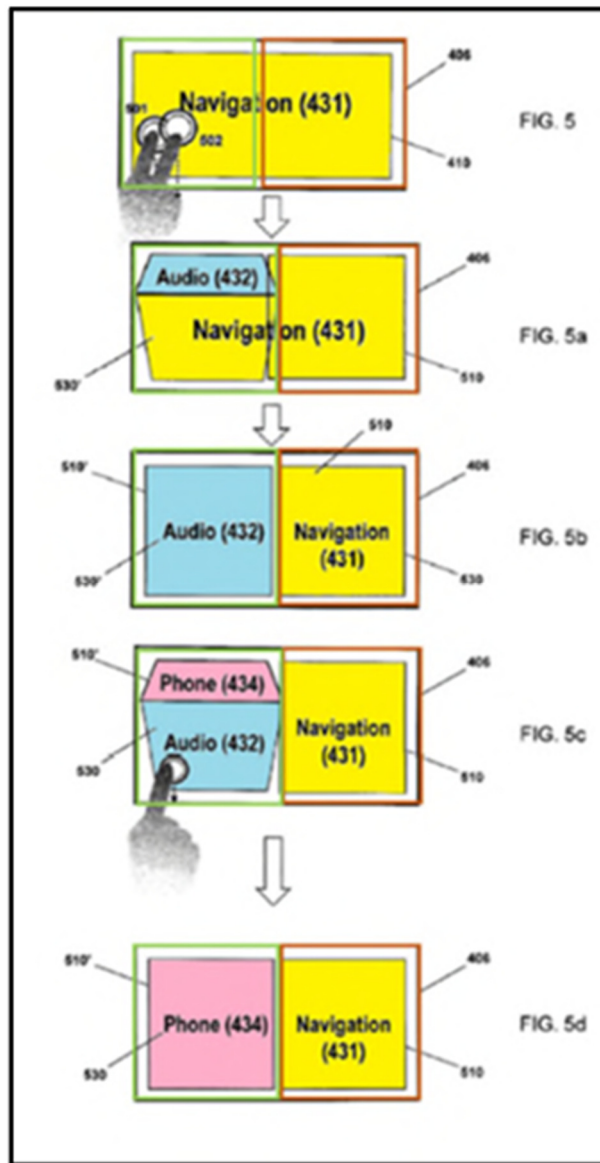
The Reply then identifies another example based on Fig. 10 of Lee:



Reply, 8. According to Petitioners, “Lee showed how ‘a user can tap a message icon (orange) and reveal a second application on the second display (green outline).’” *Id.* But this example suffers from the same deficiency as the first example. The user has not satisfied the order of steps of claim 1 because a single

application is open on both displays and then the user provides an instruction for a second application to open on a second display. Like the previous example, selecting a second application for display while a first application is already displayed on both displays does not satisfy the order of steps requiring two distinct pairs of “receiving” and “selecting” steps of two desktops/applications for display on a first display and a second display respectively followed by the step of “displaying” the selected first and second desktops/applications on the first display and the second display. Lee has not performed the first “receiving” step and the first “selecting” step because a single application is already open on both displays – only the second “receiving” step and the second “selecting” step are present. Thus, Lee also does not disclose steps of “receiving a first input,” “selecting a first desktop or application,” “receiving a second input,” “selecting a second desktop or application,” and “displaying the selected first and second desktops or applications” in the order claimed.

For Aguilar, the Reply relies on “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.” Reply, 9-10.

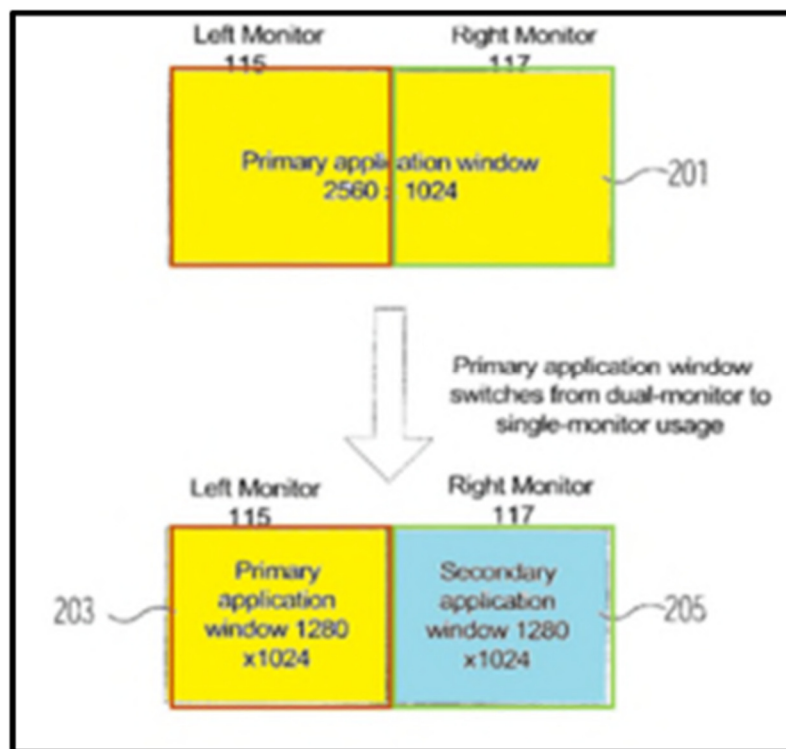


This example again misses the required order of steps. Here, a single navigation application is open on both alleged displays. The user then selects an application for display on the left display and that application is displayed on the left. There is no teaching or suggestion of the claimed order of steps of a pair of “receiving” and “selecting” steps that selects first and second applications/desktops for display on

first and second displays respectively and then “displaying” both the selected first and second applications/desktops on the first and second displays.

Finally, for Purcell, the Reply alleges that “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.”

Reply, 11. But the example provided by Purcell also does not satisfy the claimed order of steps:



Reply, 11-12. In Purcell, the primary application is displayed on both monitors, and then the user selects a secondary application to display on the right monitor.

Once again, Purcell lacks a teaching of two pairs of “receiving” and “selecting” steps, including receiving an input and selecting a first desktop/application for a first display, receiving an input and selecting a second desktop/application for a second display, and then displaying both selected first and second desktops/applications on the first display and the second display respectively.

Rather, Purcell at most teaches only a single input for displaying a second application on a second monitor, without a separate input for displaying the first application on the first monitor as claimed (because the first application is already displayed on both monitors). Thus, Purcell does not disclose steps of “receiving a first input,” “selecting a first desktop or application,” “receiving a second input,” “selecting a second desktop or application,” and “displaying the selected first and second desktops or applications” in the order claimed.

Patent Owner’s arguments above demonstrate why Petitioners should not be permitted to bury an argument directed to one limitation in a section ostensibly discussing a different limitation. Until Petitioners identified what they relied on to teach “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” in their Reply, it was impossible to appreciate that Petitioners’ evidence directed to this limitation conflicted with the evidence directed to the “receiving” and “selecting” limitations and that their

theory in its entirety did not meet the order of steps required by claim 1. Once Petitioners identified display of a second application on a second display as evidence for the “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” limitation, it is readily apparent that the evidence they cite for the two pairs of “receiving” and “selecting” steps together with the displaying step are not performed by the art in the same order as recited by the claims.

Moreover, Petitioners plainly did not make an argument directed to the “displaying, by the processor, the selected first and second desktops or applications on the first and second displays” limitation in their Petition. The Board should not permit Petitioners to identify new evidence for the first time on Reply to support an argument that was not made in the Petition. Petitioners thus have not met their burden to identify “where each element of the claim is found in the prior art patents or printed publications relied upon” as required by 35 U.S.C. §312(a)(3) and 37 C.F.R. §42.104(b)(4). Multifold respectfully requests that the Board find claims 1 and 7 not unpatentable.

- B. Claim 9: The Petition does not identify with particularity evidence 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” is anticipated or obvious**

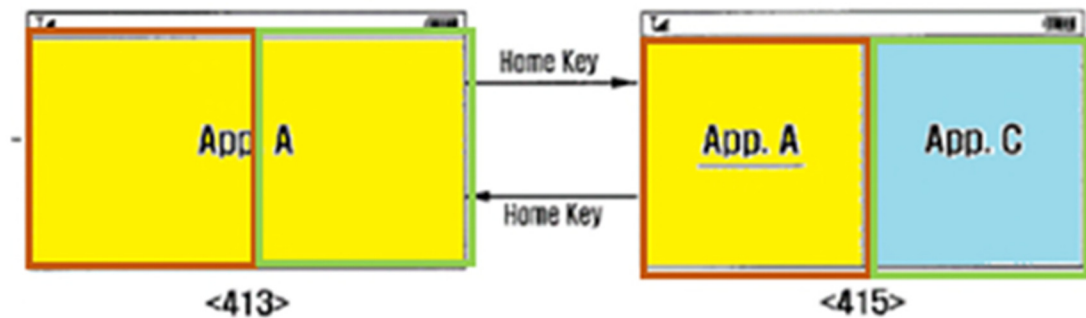
Like for claims 1 and 7, the Patent Owner Response showed that the Petition failed to address an entire limitation of claim 9: “the selected one being displayed only one of the first and second displays according to the instructions configured to respond to the third predetermined input.” POR, 23-26. Petitioners erroneously assumed that claim 9 is identical in scope to claim 6 and merely referred to arguments made against claim 6 for claim 9. *Id.* (citing Pet., 39-40). But the clause “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” in claim 9 is an additional limitation that narrows the scope of claim 9 beyond that of claim 6. POR, 25-26.

Petitioners’ Reply attempts to salvage their claim 9 argument by alleging that “claim 6...is substantively the same as claim 9.” Reply, 20. But the two claims are not substantively the same. As the Patent Owner Response explained at 25-26, 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.” POR, 25-26. Ignoring the clear requirement of claim 9 that the display resulting from the fourth input to minimize is according to instructions configured to respond to the third input to maximize violates the fundamental canon of claim construction that presumes every word has purpose. *Pause 22 Technology LLC v. TiVo Inc.*, 419 F.3d 1326, 1334 (Fed. Cir. 2005); *Apple Inc. v. Motorola, Inc.*, 757 F.3d 1286, 1305 (Fed. Cir. 2014).

Petitioners fail to proffer any evidence—in either the Petition or the Reply—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. *Id.* Petitioners’ evidence as presented on pages 36-37 of the Petition is that Yook describes two separate actions as shown in annotated Fig. 4b:

FIG . 4b



Pet., 36. Petitioners allege that pressing the Home Key when Yook is in the state shown in <413> results in the state shown in <415>. Similarly, Petitioners allege that pressing the Home Key when Yook is in the state shown in <415> results in the state shown in <413>. But Petitioners present no evidence that pressing the Home Key from state <413> to <415> is according to instructions of pressing the Home Key from state <415> to state <413> as required by claim 9. Nor could they, because 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 because Yook describes two separate and distinct actions. POR, 25-26. Petitioners' allegation that the art displays in a minimized condition cannot satisfy claim 9's requirement that the display must be a result of the same instructions that result in a maximized condition. *Id.*

To the extent the Reply also argues at 20 that "Patent Owner does not argue that Petitioners' evidence in support of Claim 7[D] is insufficient," this argument is

illogical. Claim 9 depends from claim 7 and is narrower in scope. Thus, evidence that supports claim 7 does not necessarily support claim 9. Even if Petitioners' art contains a teaching of 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"), such evidence says nothing about whether the display resulting from the fourth input to minimize is according to instructions configured to respond to the third input to maximize as required by claim 9.

Finally, Patent Owner cites *Apple Inc. v. MPH Techs. Oy*, No. 2021-1355, 2021-1356, 2022 WL 4103286 (Fed. Cir. Sep. 8, 2022) and *SAS Inst., Inc. v. Iancu*, 138 S. Ct. 1348, 1355 (2018) for the proposition that, "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. Petitioners failed to address a limitation of claim 9, and the Board must confirm claim 9.

C. Claim 8: The Petition does not identify with particularity evidence that “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” is anticipated or obvious

As with claims 1, 7, and 9 above, the Patent Owner Response showed that the Petition failed to address an entire limitation of claim 8: “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.” POR, 26-27. Petitioners erroneously assumed that claim 8 is identical in scope to claim 4 and merely referred to arguments made against claim 4 for claim 8. *Id.* (citing Pet., 39). 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.” The Petition did not address all of claim 8’s limitations and claim 8 may not be invalidated by arguments not in the Petition.

To the extent Petitioners argue that claim 8 contains the “same” limitations as claim 4 (Reply, 22), “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” in claim 8 is substantively different from any limitation in claim 4 for the same reasons as explained for claim 9 above. And the Petition failed to address it. Even if the Petition addressed the third predetermined input of claim 7, the Petition does not address how the art suggests “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” as required by claim 8. Petitioners presented no evidence tying “signifying that a desktop or application appearing on that display can be maximized by a user gesture” to “the instructions configured to receive a third predetermined input” as required by claim 8. Thus, under *Apple*, 2022 WL 4103286, and *SAS Inst.*, 138 S. Ct. 1348, “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. Petitioners failed to address a limitation of claim 8, and the Board must thus confirm claim 8.

D. Claim 5: Yook does not suggest “the visual indicator has a wave shape”

The Parties do not appear to dispute that Yook does not disclose or suggest a wave shape. Neither Petitioners’ expert Dr. Rodriguez nor Patent Owner’s expert Dr. Surati testified that Yook teaches a wave shape.

The Patent Owner Response explained that the claimed wave shape is a specific functional embodiment described by the ’756 Patent and not merely a design choice. POR, 18-22. The ’756 Patent teaches that the wave shape imparts additional functionality not provided by a generic visual indicator. *Id.* Figure 10 and col. 31 ln. 16-60 of the ’756 Patent discloses 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. 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.”). Thus, 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.

The Reply’s assertion at 17 that “Patent Owner makes no argument that the recited ‘wave shape’ is of patentable significance instead of a matter of routine design choice” is therefore incorrect. The ’756 Patent itself teaches that the wave shape provides functionality of patentable significance (*i.e.*, unlike other visual

indicators, it expands with the application to indicate maximization). The Reply is also incorrect that “Patent Owner cites no evidence that the particular shape has any significance or that is anything more than aesthetics.” Reply, 17. Both the ’756 Patent specification and Dr. Surati’s testimony support the conclusion that the claimed wave shape has functional significance.

The Patent Owner Response then demonstrated that none of the icons cited by the Petition provides functionality remotely like the claimed wave shape. POR, 23 (*citing* Ex.2002, ¶¶62-77). The Reply never meets ***Petitioners’*** burden to show that the icons have the functionality of the wave shaped indicator described by the ’756 Patent to be an obvious design choice. The evidence shows that the claimed wave shape is not a design choice from the icons cited in the Petition and claim 5 should be confirmed.

III. CONCLUSION

For the foregoing reasons, the Petitioners have failed to show by a preponderance of the evidence that claims 1-9 are unpatentable.

Respectfully submitted,

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Date: January 9, 2026

CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITS

This Patent Owner's Sur-Reply ("Sur-Reply") consists of 4,328 words, excluding table of contents, table of authorities, certificate of service, this certificate, or table of exhibits. The Sur-Reply complies with the type-volume limitation of 5,600 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).

Respectfully submitted,

/Minghui Yang/

Date: January 9, 2026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

PATENT OWNER'S SUR-REPLY

The names and address of the parties being served are as follows:

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