

**Motorola Mobility LLC and Google LLC,
v.
Multifold International Incorporated PTE. LTD.**

Patent Owner Demonstratives
IPR2025-00040 (Patent 9,134,756)
February 24, 2026

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37 C.F.R. §42.104(b)(4)

[T]he Petition must set forth:

(b) Identification of challenge. Provide a statement of the precise relief requested for each claim challenged. The statement must identify the following:

(4) How the construed claim is unpatentable under the statutory grounds identified in paragraph (b)(2) of this section. **The petition must specify where each element of the claim is found in the prior art patents or printed publications relied upon;**

Paper 15, 6, 16 and Paper 22, 1

35 U.S.C. §312(a)(3)

A petition filed under section 311 may be considered only if — (3) the petition identifies, in writing and **with particularity**, each claim challenged, the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim

Paper 15, 1-2, 6, 15-16

'756 Patent, Claim 1

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.

The Petition

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, vi

'756 Patent, Claim 1

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.

'756 Patent, Claim 1

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.

35 U.S.C. §312(a)(3)

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.**

Paper 22, 2

35 U.S.C. §312(a)(3)

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.

'756 Patent, Claim 9

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

Ex.1001, Claim 9

The Petition

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

See Claim 6.

Paper 1, 39-40, 56, 70-71, 83

'756 Patent, Claim 6

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

Ex.1001, Claim 6

'756 Patent, Claim 9

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

Ex.1001, Claim 9

'756 Patent, Claim 9

[B]ecause 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.

Paper 15, 25

'756 Patent, Claim 9

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.”

Paper 15, 25

'756 Patent, Claim 9

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.

Paper 15, 25

'756 Patent, Claim 8

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

Ex.1001, Claim 8

The Petition

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

See claim 4; Ex. 1003 ¶¶96-98.

Paper 1, 39

'756 Patent, Claim 4

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

Ex.1001, Claim 4

'756 Patent, Claim 8

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

Ex.1001, Claim 8

'756 Patent, Claim 8

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.

Paper 22, 19

'756 Patent, 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.

Paper 22, 19

35 U.S.C. §312(a)(3)

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.

'756 Patent, Claim 5

5. The method of claim 4, wherein the visual indicator has a wave shape.

Ex.1001, Claim 5

'756 Patent, Claim 5

The '756 Patent teaches that the wave shape recited in claim 5 is a specific functional embodiment of the visual indicator:

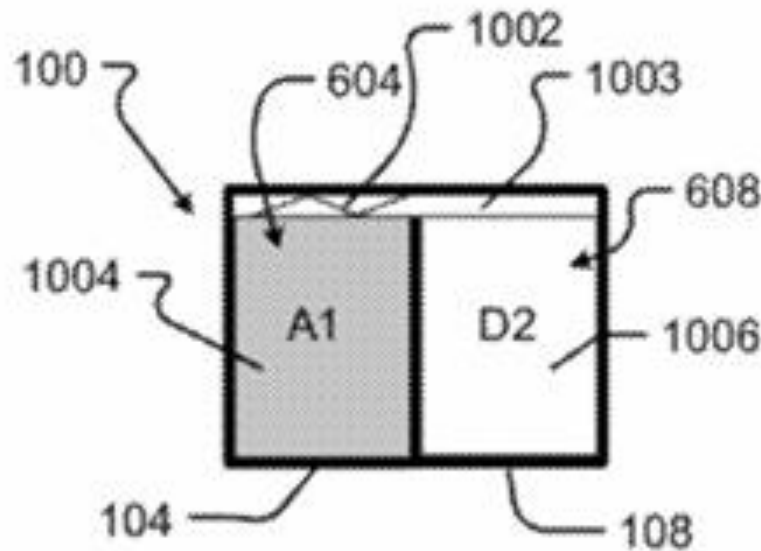


FIG. 10A

Paper 15, 18-22

'756 Patent, Claim 5

The '756 Patent teaches that the wave shape recited in claim 5 is a specific functional embodiment of the visual indicator:

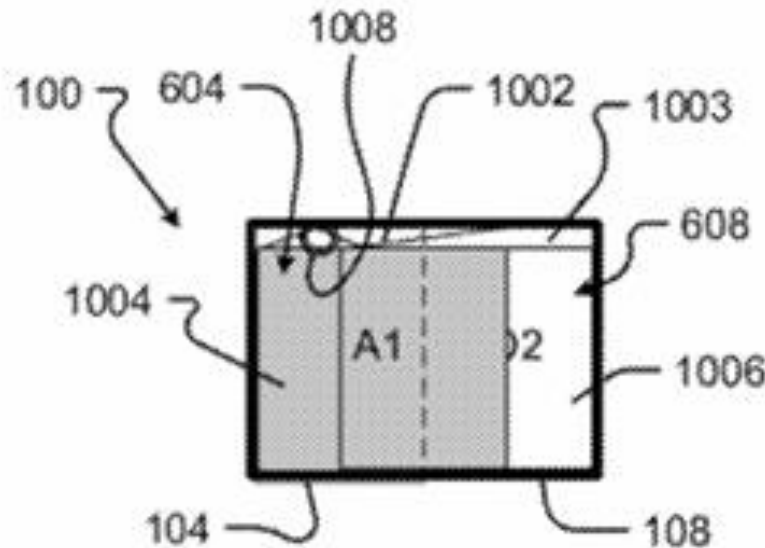


FIG. 10B

Paper 15, 18-22

'756 Patent, Claim 5

The '756 Patent teaches that the wave shape recited in claim 5 is a specific functional embodiment of the visual indicator:

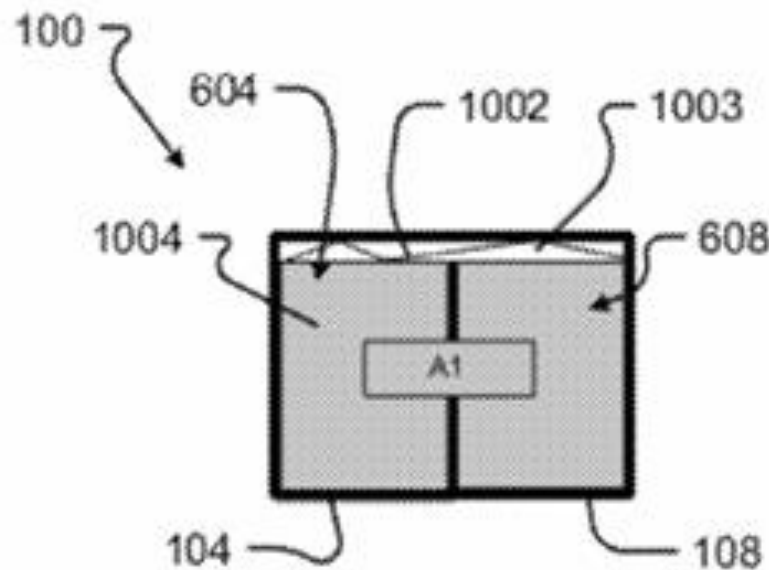


FIG. 10C

Paper 15, 18-22

'756 Patent, Claim 5

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.”).

Paper 15, 22

'756 Patent, Claim 5

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.

Paper 22, 22