

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

Patent Owner Demonstratives
IPR2025-00058 (Patent 9,158,494)
February 25, 2026

Rob Pickens
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Seo Reference is NOT Prior Art

E. Asserted Grounds of Unpatentability

Petitioner, supported by the declaration of Sandeep Chatterjee, Ph.D. (Ex. 1002), asserts the following grounds of unpatentability (Pet. 4)²:

Claims Challenged	35 U.S.C. §	References/Basis
1, 2, 4, 6, 10, 12	§ 102	Seo ³
1, 2, 4, 6, 10, 12, 13	§ 103	Seo
14, 18–20	§ 103	Seo, Yook ⁴
9	§ 103	Seo, Choi ⁵

IPR2025-00058 DI (Paper 11) at 9

³ Seo et al., U.S. Pat. Appl. Pub. 2012/0306782 A1, published December 6, 2012 (Ex. 1005, “Seo”).

⁴ Yook et al., U.S. Pat. Appl. Pub. 2010/0248788 A1, published September 30, 2010 (Ex. 1007, “Yook”).

⁵ Choi, U.S. Pat. 8,649,824 B2, issued February 11, 2014 (Ex. 1010, “Choi”).

IPR2025-00058 DI (Paper 11) at 9

Seo Reference is NOT Prior Art

VII. THE IMERJ DUAL DISPLAY PHONE ANTEDATES SEO..... 11

A. The Invention Was Conceived Before February 10, 2011..... 12

B. The Invention Was Actually Reduced To Practice Before February 10, 2011..... 24

1. EV-1 Prototypes Reduced The Invention To Practice Before February 10, 2011 27

2. The Imerj Smartpad Prototype Was Reduced To Practice Before February 10, 2011 32

3. EV-2 Prototypes Reduced The Invention To Practice Before February 10, 2011 34

IPR2025-00058 POR, i

C. Alternately, The Invention Was Actually Reduced To Practice No Later Than February 22, 2011 35

1. Diligence Was Continuous From Before February 10, 2011 Through February 22, 2011 36

VIII. THE EV-1 AND EV-2 IMERJ PROTOTYPES EVIDENCE THE CONCEPTION AND REDUCTION TO PRACTICE OF ALL LIMITATIONS OF CHALLENGED CLAIMS 38

IPR2025-00058 POR, ii

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A. The Imerj Dual Display Smartphone

The Imerj dual display smartphone was an innovative smartphone developed by Flextronics from 2009 through 2011. A picture of the smartphone is shown below:



IPR2025-00058 POR, 4

IPR2025-00058 POR, 4

The Imerj dual display smartphone could support a variety of different orientations across its two screens, including, for example, a “Portrait Dual” mode where two pages from the same application are displayed on different screens:



Seo Reference is NOT Prior Art

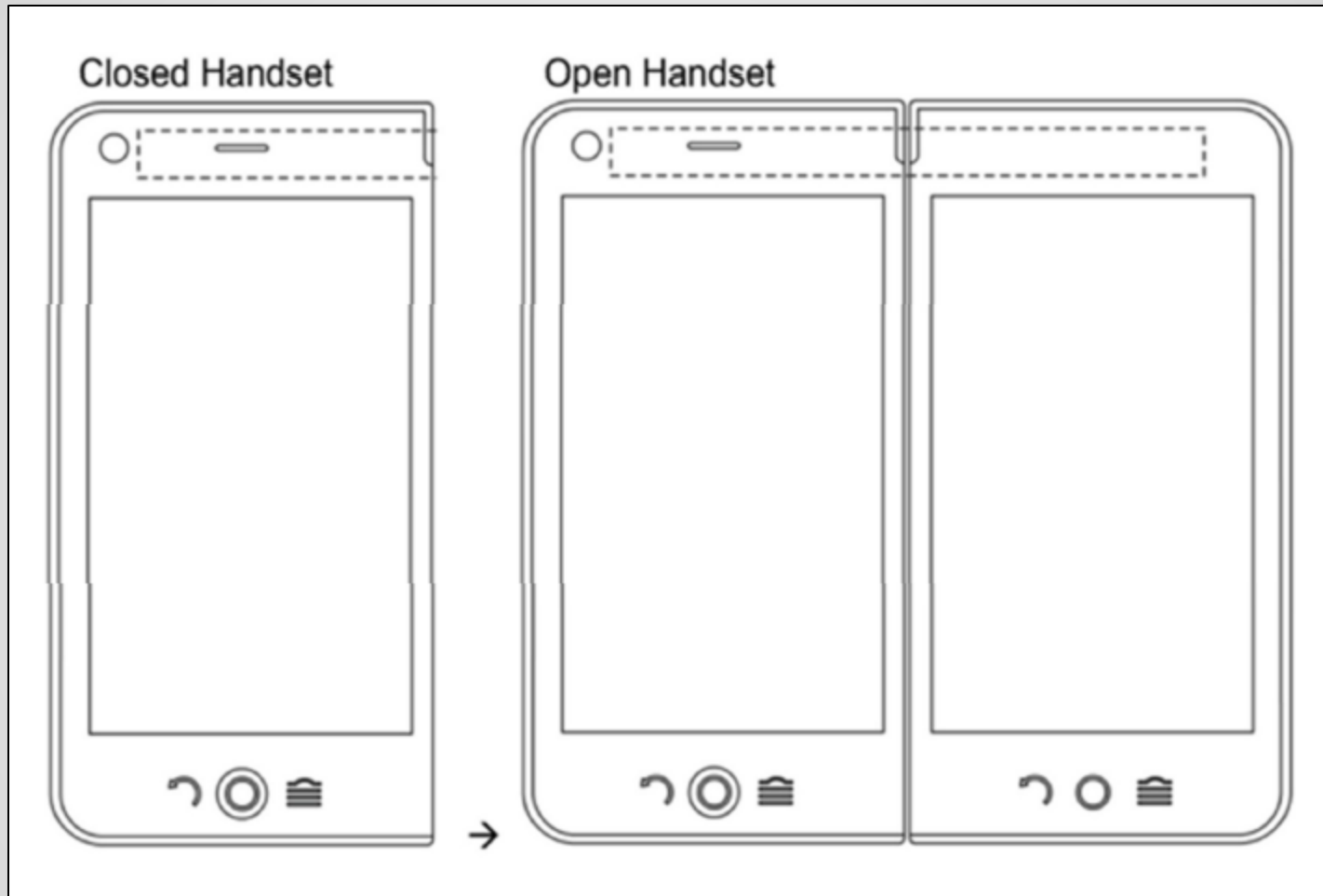


IPR2025-00058 POR, 5

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EX2006 [UX Overview], 15;
IPR2025-00058 POR, 13

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Portrait Dual Screen



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The following off-screen gestures are supported by the WPC:

Tap	<i>Currently not utilized</i>
Long-press	<i>Currently not utilized</i>
Drag	1. Moves applications from one screen to another 2. Maximizes and minimizes dual-screen capable applications
Long-drag	Considered a sequence of continuous drag operations.
Flick	1. Moves applications from one screen to another 2. Minimizes dual-screen applications
Pin & drag	Holds the pinned application in place while moving the other applications in the application stack. The pinned application always remains in view.
Pinch	Displays the Application Manager
Spread	Reveals the Desktop

EX2012 [Windowing Management], 4, 8;
IPR2025-00058 POR, 13

Seo Reference is NOT Prior Art

2.1 Introduction to maximization and minimization rules

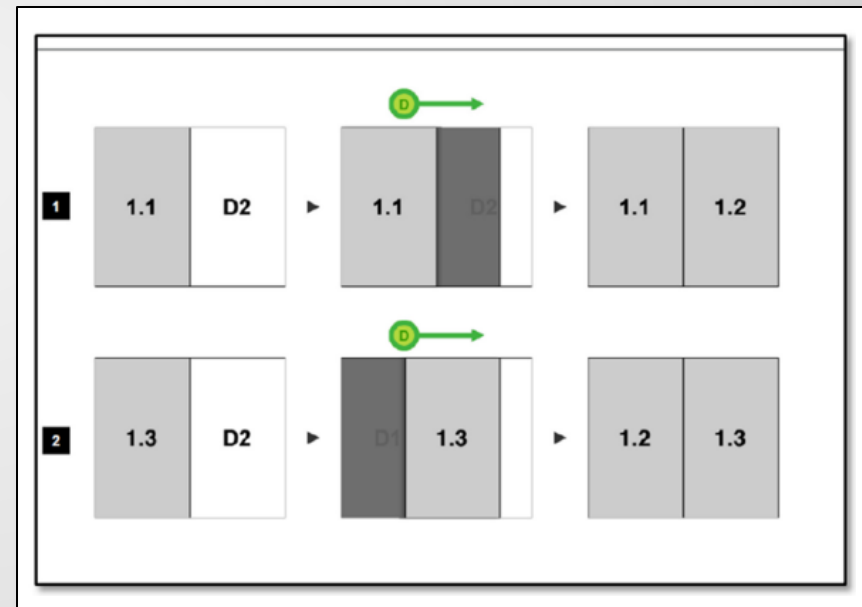
From the point of view of the WPC system, applications are either maximized to span across two screens, or minimized to one screen; the application (and its internal structure) determines the details on that action, ie which of views move during maximization, and which remains visible during minimization.

During a maximization action, due to technical restrictions it may not be possible to show the uncovered view. In these cases, an empty view is shown, instead.

Examples of maximization scenarios:

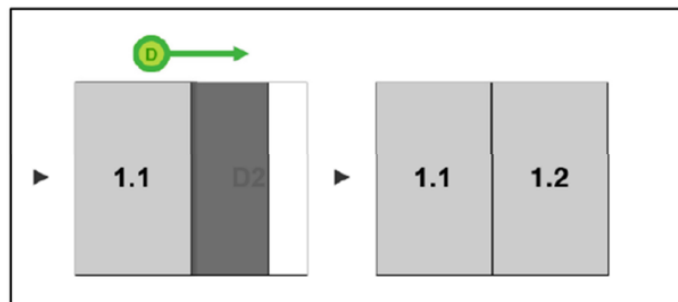
1. A root view on the left screen is maximized, sliding its child view on the right screen.
2. A leaf view on the left screen is moved to the right screen, and its parent is uncovered on the left screen

EX2012 [Windowing Management], 10 (images excerpted);
IPR2025-00058 POR, 17



EX2012 [Windowing Management], 10 (images excerpted);
IPR2025-00058 POR, 18

Seo Reference is NOT Prior Art



In this example, “1.2” is a child of “1.1.” EX2012 [Windowing Management], 6; EX2001 [Sirpal Decl.], ¶18.

EX2012 provides additional examples of standard rules for maximizing and minimizing dual-screen applications across two displays in response to gesture inputs. EX2012 [Windowing Management], 9-19; EX2001 [Sirpal Decl.], ¶19. For example, standard minimization rules are provided that illustrate how a dual-screen capable application that is being displayed on two displays can be minimized:

Examples of minimization scenarios:

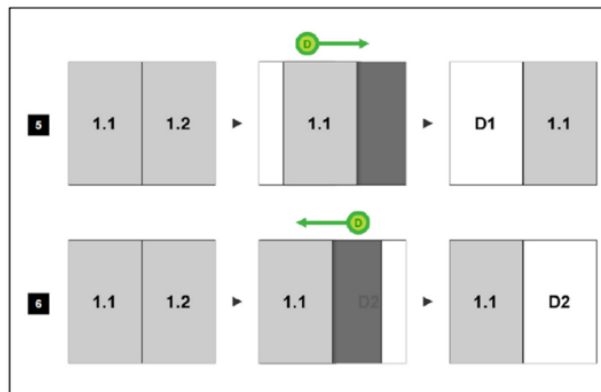
5. A parent view on the left screen is moved on top of its child view on the right screen.
6. A child view on the right screen is moved underneath a parent view on the left screen.

The motion for minimizing a window is:

MOT.1.4 Minimize

IPR2025-00058 POR, 19

Seo Reference is NOT Prior Art



EX2012 [Windowing Management], 12 (images excerpted); EX2001 [Sirpal Decl.], ¶19.

In the two examples illustrated above (examples “5” and “6”), a dual-screen capable application, displaying parent view (or page) “1.1” on the left side and child view (or page) “1.2” on the right side, is minimized, based on gesture input, to show only parent page “1.1” on either the right side (as shown in example “5”) or the left side (as shown in example “6”), based on the direction of the drag gesture input (shown in green). *Id.* Under these example rules, dual-screen capable applications minimize such that the parent view (*e.g.*, “1.1”) remains displayed while the child view (*e.g.*, “1.2”) is no longer displayed. EX2001 [Sirpal Decl.], ¶19.

IPR2025-00058 POR, 20

Seo Reference is NOT Prior Art

Additionally, in the Imerj project, some dual-screen applications had additional maximization/minimization rules. EX2001 [Sirpal Decl.], ¶21. The internet browser (or “Browser”) was one such application. *Id.* EX2013 [Browser – Interaction Design] demonstrates this functionality was conceived no later than November 18, 2020. EX2001 [Sirpal Decl.], ¶21.

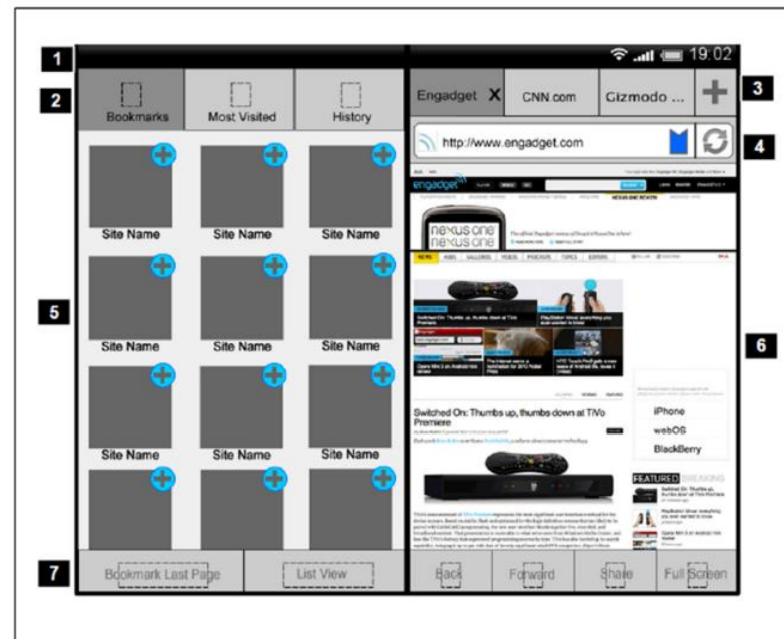
Similarly, the photo gallery application had additional example rules. Non-inventor Ron Cassar, who led the development of system architecture and development for the smartphone firmware, testified that, different than the email and browser applications, when the photo gallery was opened and maximized to two displays, a minimization gesture would result in the parent page minimizing and the child remaining. EX2002 [Cassar Decl.], ¶77.

IPR2025-00058 POR, 21

Seo Reference is NOT Prior Art

Patent Owner presents additional evidence corroborating inventor Sanjiv Sirpal's testimony that conception occurred prior to February 10, 2010. EX2013 [Browser-Interaction Design] is a UX design specification created by co-inventor Mo Selim, revised by Sanjiv Sirpal, and dated October 6, 2010. EX2013 [Browser-Interaction Design], 1-2; EX2001 [Sirpal Decl.], ¶22. This specification defines the operation of the Browser, including its support for "Portrait Dual" (or "Portrait Dual Screen," or "Dual Portrait," or "PD") mode, which is a mode where the Browser displays two views (or pages) on two displays as shown below:

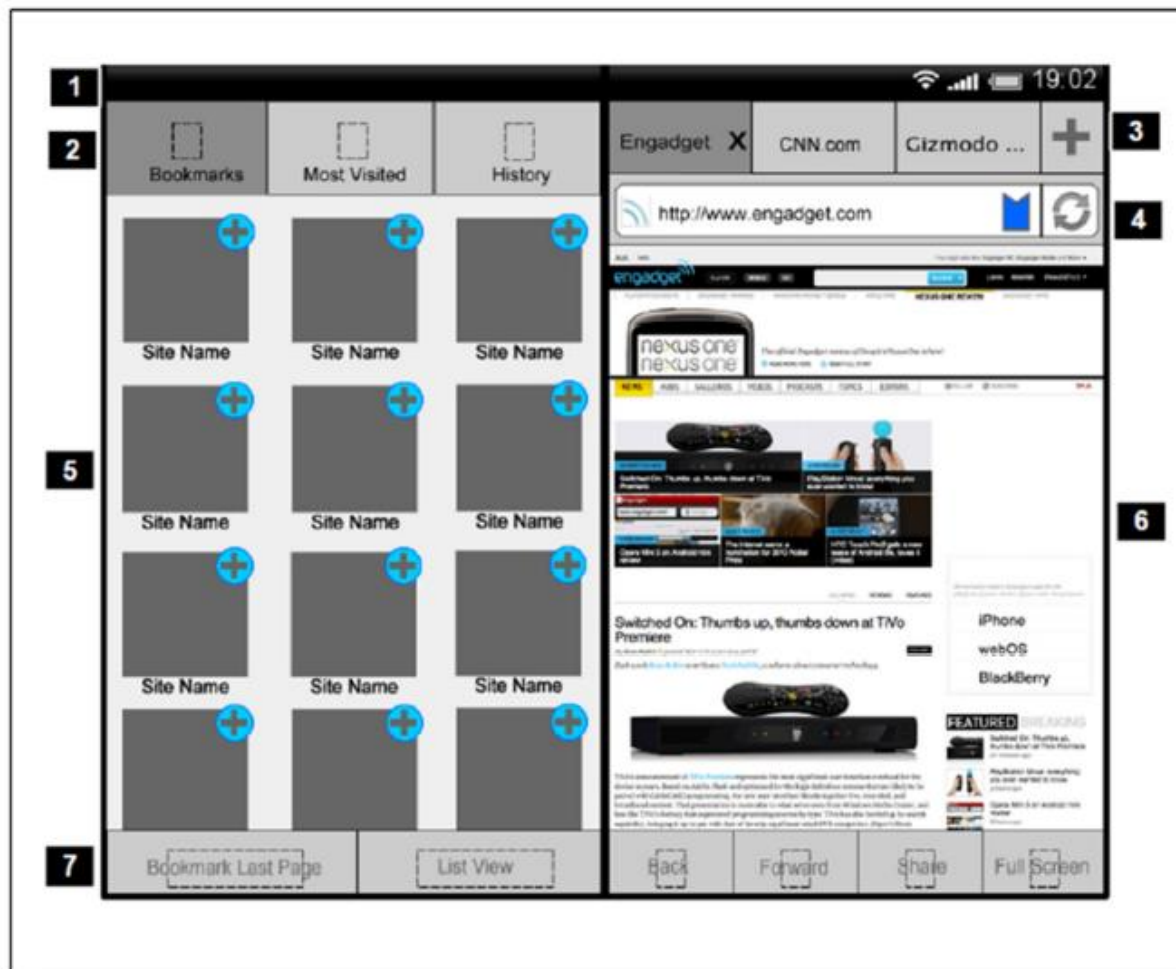
IPR2025-00058 POR, 21



EX2013 [Browser-Interaction Design], 34; EX2001 [Sirpal Decl.], ¶22.

This specification explains that "The Default view in Portrait Dual displays the Control Page on the Left (with Bookmark tab selected) and the Web Browser view on the right. This is the view that is always seen when the application is maximized in Portrait Mode." EX2013 [Browser-Interaction Design], 34; EX2001 [Sirpal Decl.], ¶22.

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EX2013 [Browser-Interaction Design], 34; EX2001 [Sirpal Decl.], ¶22.

Seo Reference is NOT Prior Art

In addition, the Browser specification specifies that the “Web Browser” view remains visible on minimization gestures, unless there is a modal on the “Control Page” on the left:

3.11 Minimizing Portrait Dual

When using the browser is minimized from Dual Screen to Single Screen the following criteria is used to assess which screen remains in view

Priority 1 - Screen with a Modal (Inline or Full Screen)

Priority 2 - The Web Browser

Example 1)



Example 2)



Example 3)



Example 4)



Example 5)



EX2013 [Browser-Interaction Design], 44; EX2001 [Sirpal Decl.], ¶23.

Seo Reference is NOT Prior Art

The first functioning smartphone prototypes were referred to as EV-1 prototypes. EX2001 [Sirpal Decl.], ¶30; EX2002 [Cassar Decl.], ¶23; EX2003 [Becze Decl.], ¶16. These prototypes were delivered to the Imerj team during October and November 2010. EX2001 [Sirpal Decl.], ¶30; EX2002 [Cassar Decl.], ¶23; EX2003 [Becze Decl.], ¶¶16-19. Approximately 50 EV-1 prototypes were manufactured, with 20-26 of those used for software testing. EX2003 [Becze Decl.], ¶16. A photo of an EV-1 prototype is shown below:



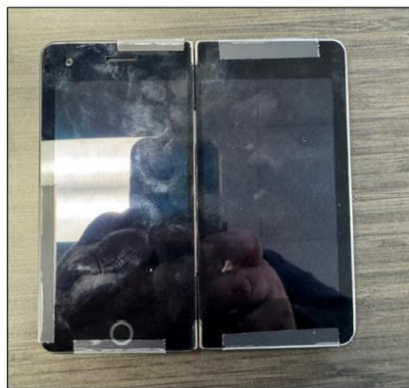
EX2017; EX2003 [Becze Decl.], ¶18.

Seo Reference is NOT Prior Art

The second set of prototypes were referred to as EV-2 prototypes. EX2001 [Sirpal Decl.], ¶32; EX2002 [Cassar Decl.], ¶24; EX2003 [Becze Decl.], ¶21. These prototypes were delivered to the Imerj team in **January 2011**. EX2002

IPR2025-00058 POR, 25

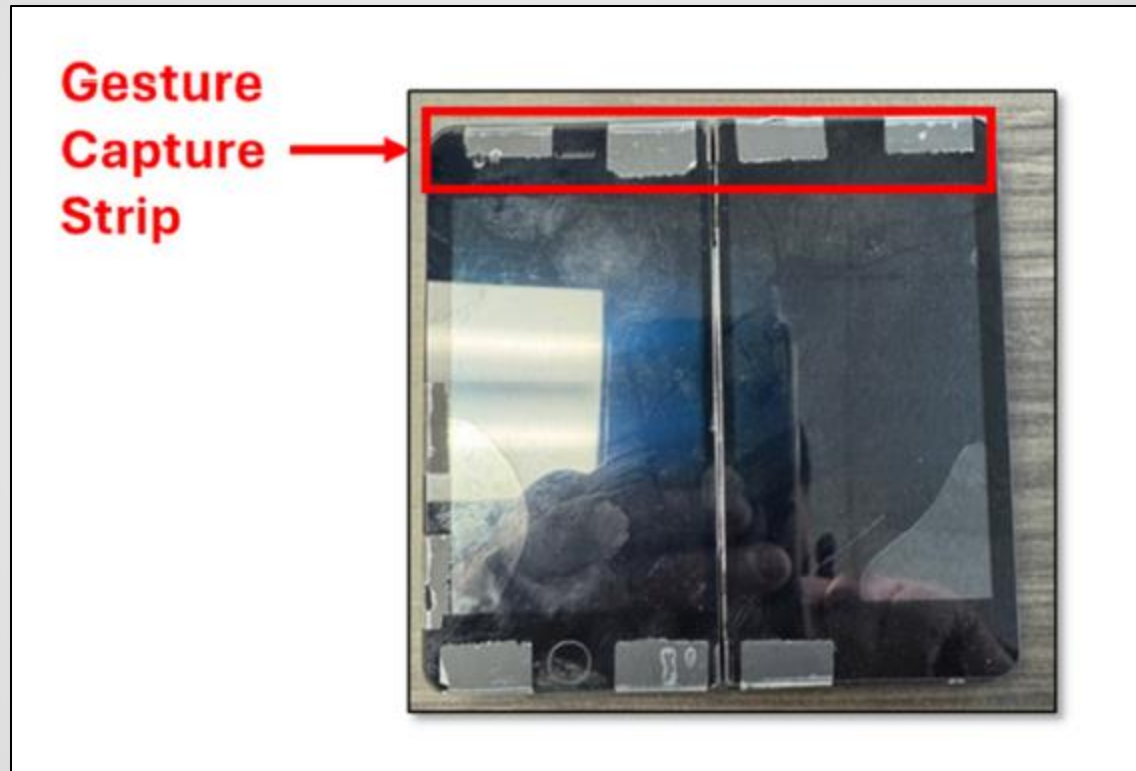
[Cassar Decl.], ¶24; EX2003 [Becze Decl.], ¶21; EX2036 [Conquest Software Review]; EX2038 [Conquest Project Update]. By the end of January 2011, at least 200 EV-2 prototypes had been distributed to Imerj engineers. EX2038 [Conquest Project Update]; EX2002 [Cassar Decl.], ¶43. A photo of an EV-2 prototype is shown below:



EX2018; EX2003 [Becze Decl.], ¶22. Both the EV-1 and EV-2 prototypes were reduced to practice before February 10, 2011. EX2001 [Sirpal Decl.], ¶¶25-38; EX2002 [Cassar Decl.], ¶¶19-49, 60-62; EX2003 [Becze Decl.], ¶¶16-25; EXS2032-2039 [emails and presentations detailing testing and development on EV-1 and EV-2 prototypes]; EXS2040, 2042-2063 [pre-February 2011 JIRA

IPR2025-00058 POR, 26

Seo Reference is NOT Prior Art



IPR2025-00058 POR, 27

Seo Reference is NOT Prior Art

ID		% Complete	Task Name	Duration	Start	Finish
	0					
.						
49		100%	Gestures	05.9 days?	Wed 8/25/10	Wed 1/19/11
50		100%	Add Gesture area to the Froyo emulator	5 days	Mon 10/4/10	Fri 10/8/10
51		100%	Refactor Application Model Manager from WPM	15 days	Wed 8/25/10	Thu 11/18/10
52		100%	Refactor Gesture Controller from WPM	2 days	Wed 8/25/10	Fri 9/3/10
53		100%	Gesture Controller	05.9 days?	Wed 8/25/10	Wed 1/19/11
54		100%	Single Display Application Transition Controller	3 days	Fri 9/3/10	Fri 11/26/10
55		100%	Minimize Dual Display Application Transition Controller	3 days	Fri 9/3/10	Fri 11/26/10
56		100%	Maximize Dual Display Application Transition Controller	4 days	Mon 9/6/10	Fri 11/26/10
57		100%	Delayed application configuration change after off-screen gesture complete	3 days	Thu 8/26/10	Wed 11/17/10
58		100%	Spread Gesture	5 days	Tue 12/7/10	Wed 1/19/11
59		100%	Expose UI for configuration parameters.	3 days	Wed 10/13/10	Fri 10/15/10
60		100%	Desktop Reveal	6 days	Sun 9/19/10	Fri 11/26/10
61		100%	Support for different orientations - single display application	3 days	Fri 11/26/10	Wed 12/1/10
62		100%	Support for different orientations - minimize	3 days	Wed 12/1/10	Mon 12/6/10
63		100%	Support for different orientations -maximize	3 days	Mon 12/6/10	Thu 12/9/10
64		100%	Support for different orientations - bonk	3 days	Thu 12/9/10	Tue 12/14/10
65		100%	Support for different orientations - reveal	3 days	Tue 12/14/10	Fri 12/17/10
66		100%	Integration with Parent / Child infrastructure	1 day?	Mon 11/22/10	Mon 11/22/10
67		100%	Integration with Wave animation	5 days	Mon 12/6/10	Fri 12/10/10
68		100%	Add wave animation to emulator	1 day?	Wed 8/25/10	Wed 8/25/10
69		100%	Pinch & Swap	7 days	Fri 11/26/10	Mon 1/17/11
70		100%	Bonk	5 days	Wed 8/25/10	Mon 1/17/11

EX2033 [SSA Project Plan] (excerpted and annotated); EX2022 [Cassar

Decl.], ¶36; EX2023 [Sirpal Decl.], 35.

Seo Reference is NOT Prior Art

% Complete	Task Name	Duration	Start	Finish
.				
100%	Gestures	05.9 days?	Wed 8/25/10	Wed 1/19/11
100%	Add Gesture area to the Froyo emulator	5 days	Mon 10/4/10	Fri 10/8/10
100%	Refactor Application Model Manager from WPM	15 days	Wed 8/25/10	Thu 11/18/10
100%	Refactor Gesture Controller from WPM	2 days	Wed 8/25/10	Fri 9/3/10
100%	Gesture Controller	05.9 days?	Wed 8/25/10	Wed 1/19/11
100%	Single Display Application Transition Controller	3 days	Fri 9/3/10	Fri 11/26/10
100%	Minimize Dual Display Application Transition Controller	3 days	Fri 9/3/10	Fri 11/26/10
100%	Maximize Dual Display Application Transition Controller	4 days	Mon 9/6/10	Fri 11/26/10
100%	Delayed application configuration change after off-screen gesture complete	3 days	Thu 8/26/10	Wed 11/17/10
100%	Spread Gesture	5 days	Tue 12/7/10	Wed 1/19/11
100%	Expose UI for configuration parameters.	3 days	Wed 10/13/10	Fri 10/15/10
100%	Desktop Reveal	6 days	Sun 9/19/10	Fri 11/26/10
100%	Support for different orientations - single display application	3 days	Fri 11/26/10	Wed 12/1/10
100%	Support for different orientations - minimize	3 days	Wed 12/1/10	Mon 12/6/10
100%	Support for different orientations - maximize	3 days	Mon 12/6/10	Thu 12/9/10
100%	Support for different orientations - bonk	3 days	Thu 12/9/10	Tue 12/14/10
100%	Support for different orientations - reveal	3 days	Tue 12/14/10	Fri 12/17/10
100%	Integration with Parent / Child infrastructure	1 day?	Mon 11/22/10	Mon 11/22/10
100%	Integration with Wave animation	5 days	Mon 12/6/10	Fri 12/10/10
100%	Add wave animation to enuciator	1 day?	Wed 8/25/10	Wed 8/25/10
100%	Pinch & Swap	7 days	Fri 11/26/10	Mon 1/17/11
100%	Bonk	5 days	Wed 8/25/10	Mon 1/17/11

EX2033 [Project Plan], 1 (excerpted and annotated). These confirm that the relevant gesture functionality was implemented in EV-1 units (and, correspondingly, EV-2) prior to February 10, 2011. EX2002 [Cassar Decl.], ¶¶37-

Seo Reference is NOT Prior Art

WPC – Top Ten

Top 10 Issues

Issue Type	Key	Summary	Assignee	Reporter	Priority	Status
SSA-1102 Bug	SSA-1102	Button LEDs do not indicate that the desktop has focus	Ron Cassar	Paul Reeves	Major	Open
SSA-1592 Bug	SSA-1592	When in LD, block WPC events on the bottom screen when keyboard is displayed	Ron Cassar	Martin Gimpl	Unknown	Open
SSA-1569 Bug	SSA-1569	WPC gestures on capacitive strip still work in lock screen for dual screen applications	Ron Cassar	David Tay	Unknown	Open
SSA-1521 Bug	SSA-1521	WPC: applications on right screen are in view when half open the device after reveal Desktop in PS	Ron Cassar	Luke Sun	Unknown	Open
SSA-1402 Bug	SSA-1402	WPC Maximization and Scrolling graphics performance is very choppy on K35	Ron Cassar	David Tay	Unknown	Open

Generated at Tue Feb 22 15:37:26 PST 2011 by Sanjiv Sirpal using JIRA 4.2#587

EX2008 [Feb22_TigerTeamsToronto], 4.

U.S. Patent No. 9,158,494 – Claim 1

What is claimed is:

1. A method for controlling a display of a device, comprising:

presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page; 35

presenting a second page of the first application on a second display of the device, wherein the second page is a primary page, wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page; 40

receiving a first input from a user, wherein the first input includes an input to minimize the first application to one of the first and second displays of the device, wherein the second page of the first application is displayed by one of the first display of the device and the second display of 45 the device, and wherein the first page of the first application is not displayed.

Ex. 1001 at 51:32-47 (Claim 1)

Seo is not prior art: Diligence Was Continuous From Before February 10, 2011 Through February 22, 2011

A. Claim 1

1. [1.pre] “A method for controlling a display of a device, comprising:”

To the extent the preamble is limiting, the EV-1 and EV-2 prototypes performed this limitation. For example, as described above and with respect to the limitations below, the EV-1 and EV-2 prototypes were dual screen devices that ran dual display applications—where two different application pages from the same application could be displayed on the different screens of the device.

The prototypes were operable such that the user could control whether one or both pages of the application were displayed on the screens of the device by inputting gestures to minimize or maximize the application. *See, e.g.*, EX2006 [UX Overview], 15, 30, 31, 34-36, 45-49, 53, 79, 118, 119, 129; EX2012 [Window Management – Interaction Design], 8-23; EX2013 [Browser – Interaction Design], 33, 34, 44; EX2022 (video showing minimization of child page); EX2023 (video showing maximization of child page); EX2001 [Sirpal Decl.], ¶¶53-54; EX2002 [Cassar Decl.], ¶¶28, 29, 64, 65 (describing how the Imerj smartphones could

maximize and minimize child pages repeatedly); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

EX2017 (EV-1 Prototype)



Ex. 2017;
IPR2025-00058 POR, 40

EX2018 (EV-2 Prototype)



Ex. 2018;
IPR2025-00058 POR, 40

IPR2025-00058 POR, 39

IPR2025-00058 POR, 40

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

A. Claim 1

1. [1.pre] “A method for controlling a display of a device, comprising:”

To the extent the preamble is limiting, the EV-1 and EV-2 prototypes performed this limitation. For example, as described above and with respect to the limitations below, the EV-1 and EV-2 prototypes were dual screen devices that ran dual display applications—where two different application pages from the same application could be displayed on the different screens of the device.

The prototypes were operable such that the user could control whether one or both pages of the application were displayed on the screens of the device by inputting gestures to minimize or maximize the application. *See, e.g.*, EX2006 [UX Overview], 15, 30, 31, 34-36, 45-49, 53, 79, 118, 119, 129; EX2012 [Window Management – Interaction Design], 8-23; EX2013 [Browser – Interaction Design], 33, 34, 44; EX2022 (video showing minimization of child page); EX2023 (video showing maximization of child page); EX2001 [Sirpal Decl.], ¶¶53-54; EX2002 [Cassar Decl.], ¶¶28, 29, 64, 65 (describing how the Imerj smartphones could

maximize and minimize child pages repeatedly); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

EX2017 (EV-1 Prototype)



Ex. 2017;
IPR2025-00058 POR, 40

EX2018 (EV-2 Prototype)



Ex. 2018;
IPR2025-00058 POR, 40

IPR2025-00058 POR, 39

IPR2025-00058 POR, 40

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

A. Claim 1

1. [I.pre] “A method for controlling a display of a device, comprising:”

To the extent the preamble is limiting, the EV-1 and EV-2 prototypes performed this limitation. For example, as described above and with respect to the limitations below, the EV-1 and EV-2 prototypes were dual screen devices that ran dual display applications—where two different application pages from the same application could be displayed on the different screens of the device.

The prototypes were operable such that the user could control whether one or both pages of the application were displayed on the screens of the device by inputting gestures to minimize or maximize the application. *See, e.g.*, EX2006 [UX Overview], 15, 30, 31, 34-36, 45-49, 53, 79, 118, 119, 129; EX2012 [Window Management – Interaction Design], 8-23; EX2013 [Browser – Interaction Design], 33, 34, 44; EX2022 (video showing minimization of child page); EX2023 (video showing maximization of child page); EX2001 [Sirpal Decl.], ¶¶53-54; EX2002 [Cassar Decl.], ¶¶28, 29, 64, 65 (describing how the Imerj smartphones could

maximize and minimize child pages repeatedly); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

IPR2025-00058 POR, 39

IPR2025-00058 POR, 40

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

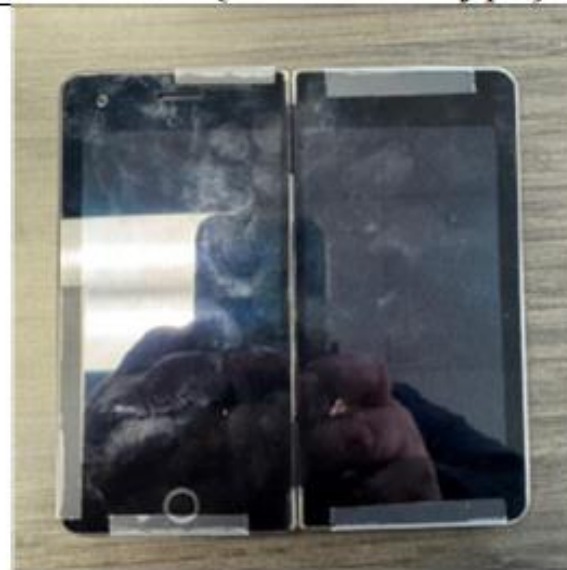
IPR2025-00058 POR, 39

Each of the EV-1 and EV-2 prototypes had two displays.

EX2017 (EV-1 Prototype)



EX2018 (EV-2 Prototype)



IPR2025-00058 POR, 40

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

IPR2025-00058 POR, 39

See, e.g., EX2006, 79 (annotations added showing the claimed first page):

Portrait Dual Screen



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Flextronics Confidential 79

Multifold Exhibit 2089
Google v. Multifold
IPR2025-00058, Page 79 of 131

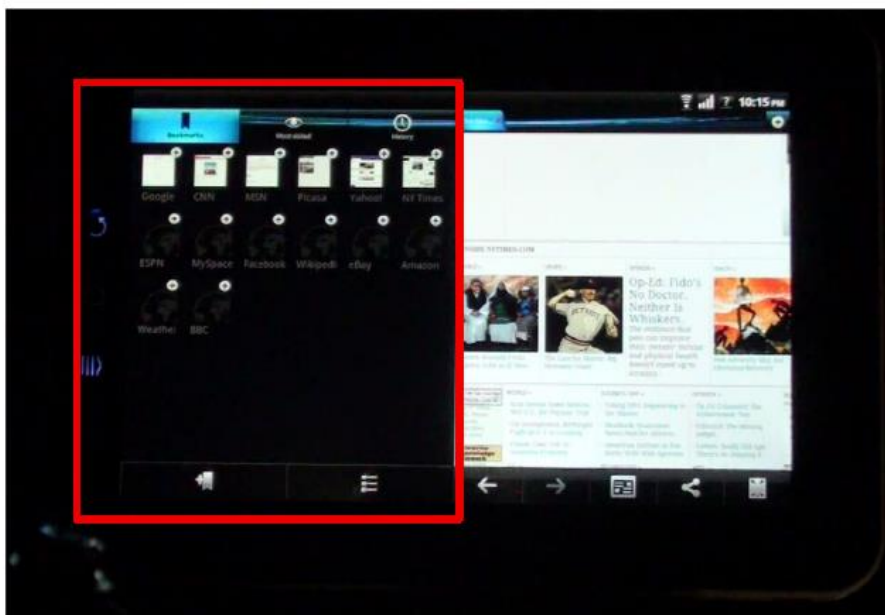
IPR2025-00058 POR, 41

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

IPR2025-00058 POR, 39

See also, e.g., EX2023, 0:01(annotations added showing the claimed first page):



IPR2025-00058 POR, 42

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

IPR2025-00058 POR, 39

In the Browser application example, the Bookmark / Control page is the auxiliary page and the Browser Content page is the primary page because the Browser Content page is the default view (EX2013, 9), and when the Browser application is minimized from Dual Screen to Single Screen, “priority” is given to the Browser Content view page when assessing which screen remains in view (*id.*, 44). This aligns with Petitioner’s description of why, in Seo, messaging screen 820 is the auxiliary page to main messaging screen 800. *See* Petition, 21-24.

IPR2025-00058 POR, 42

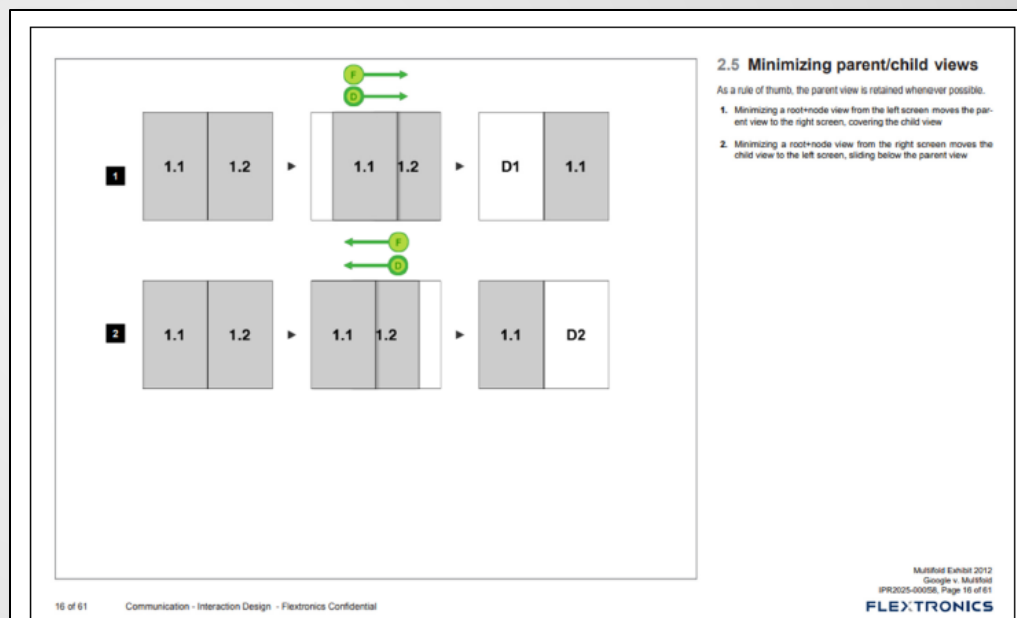
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

IPR2025-00058 POR, 39

Accordingly, the EV-1 and EV-2 prototypes were capable of presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page. For example, as shown below, the prototypes were capable of displaying page 1.1 of an application in one display, and page 1.2 of the same application in another display of the device, where “1.1 is the parent of 1.2.” See EX2012, 16 (shown below), 6. As such, “page 1.2” is the claimed “first page” of limitation 1[a].

IPR2025-00058 POR, 43



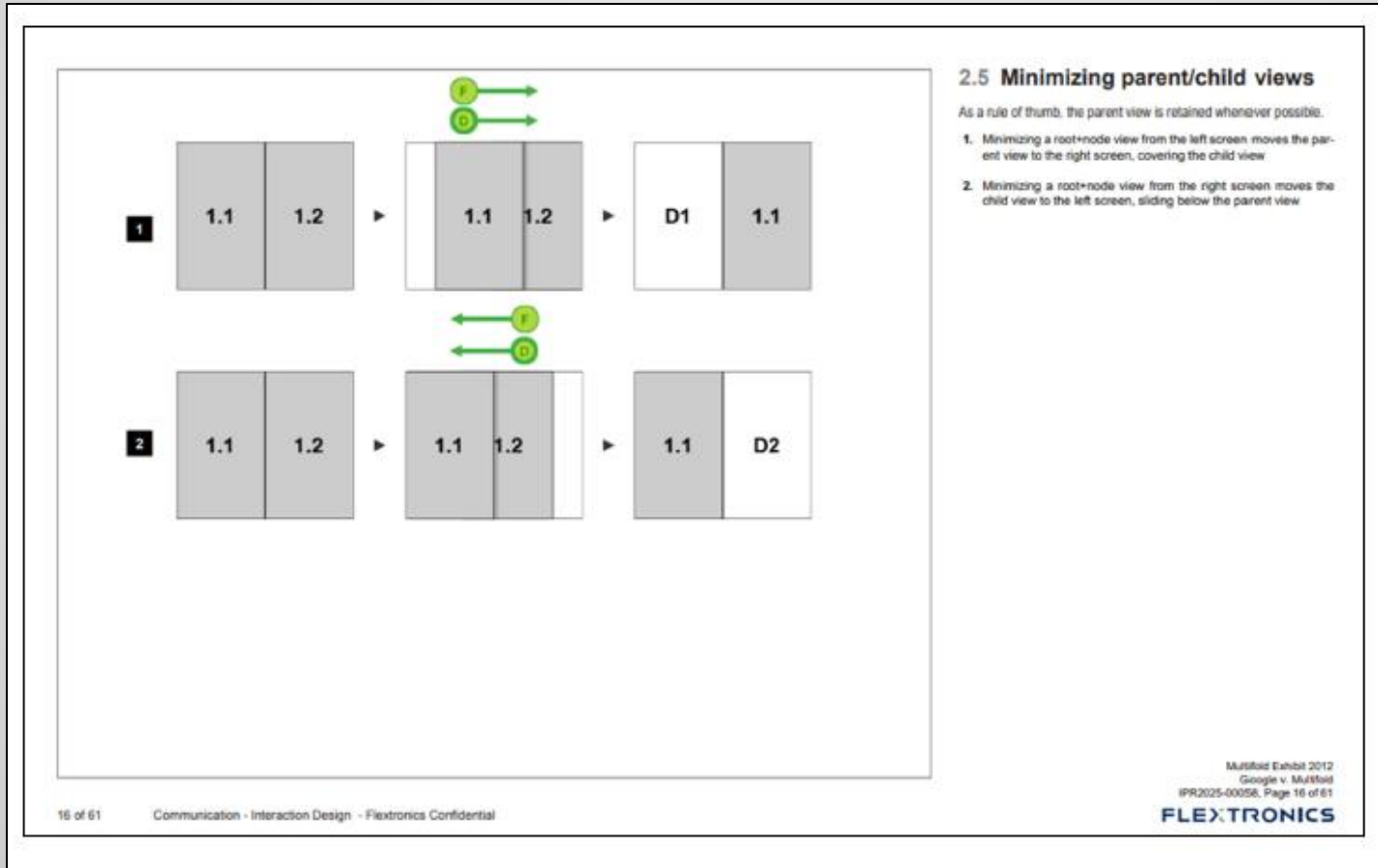
IPR2025-00058 POR, 44

See also, e.g., EX2001 [Sirpal Decl.], ¶¶53; EX2002 [Cassar Decl.], ¶¶28, 29, 64, 65 (describing how the Imerj smartphones could maximize and minimize child pages repeatedly); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

IPR2025-00058 POR, 39



Ex. 2012, 16
IPR2025-00058 POR, 44

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.b] “presenting a second page of the first application on a second display of the device, wherein the second page is a primary page,”

IPR2025-00058 POR, 44

See, e.g., EX2006, 79 (annotations showing the claimed second page):

IPR2025-00058 POR, 45

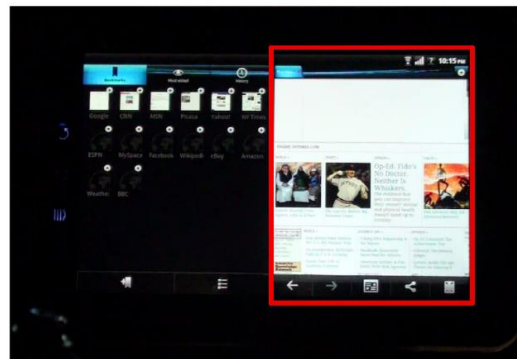
Portrait Dual Screen



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FIG. 79
Multiple Exhibit 2089
Google et al. v. Multifold
IPR2025-00058, Page 79 of 121

See also, e.g., EX2023, 0:01(annotations added showing the claimed second page):



IPR2025-00058 POR, 46

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.b] “presenting a second page of the first application on a second display of the device, wherein the second page is a primary page,”

IPR2025-00058 POR, 44

Portrait Dual Screen



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Flextronics Confidential 79

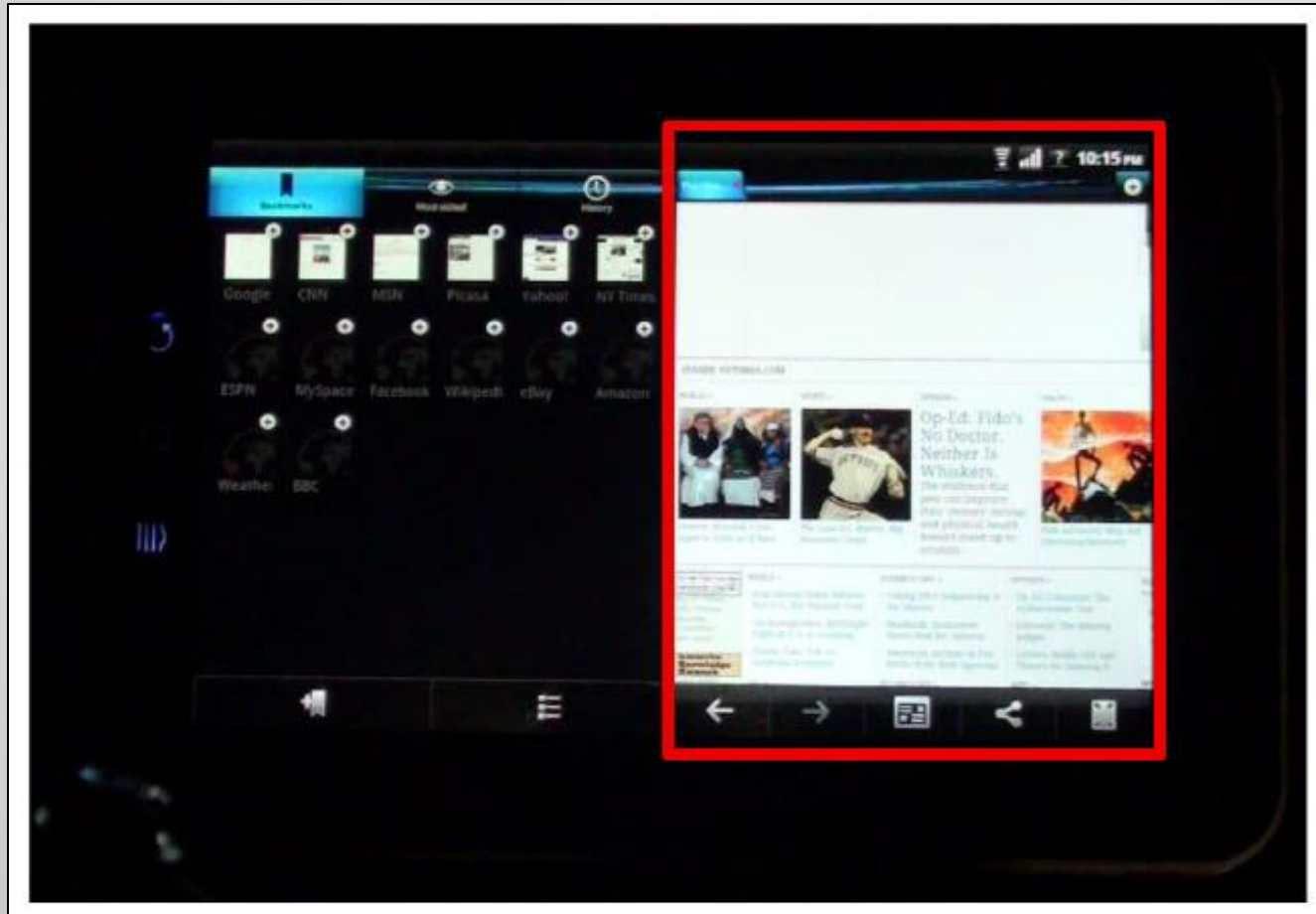
Multifold Exhibit 2006
Google v. Multifold
IPR2025-00058, Page 79 of 131

Ex. 2006, 79
(annotation showing
the claimed second
page);
IPR2025-00058 POR, 46

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.b] “presenting a second page of the first application on a second display of the device, wherein the second page is a primary page,”

IPR2025-00058 POR, 44



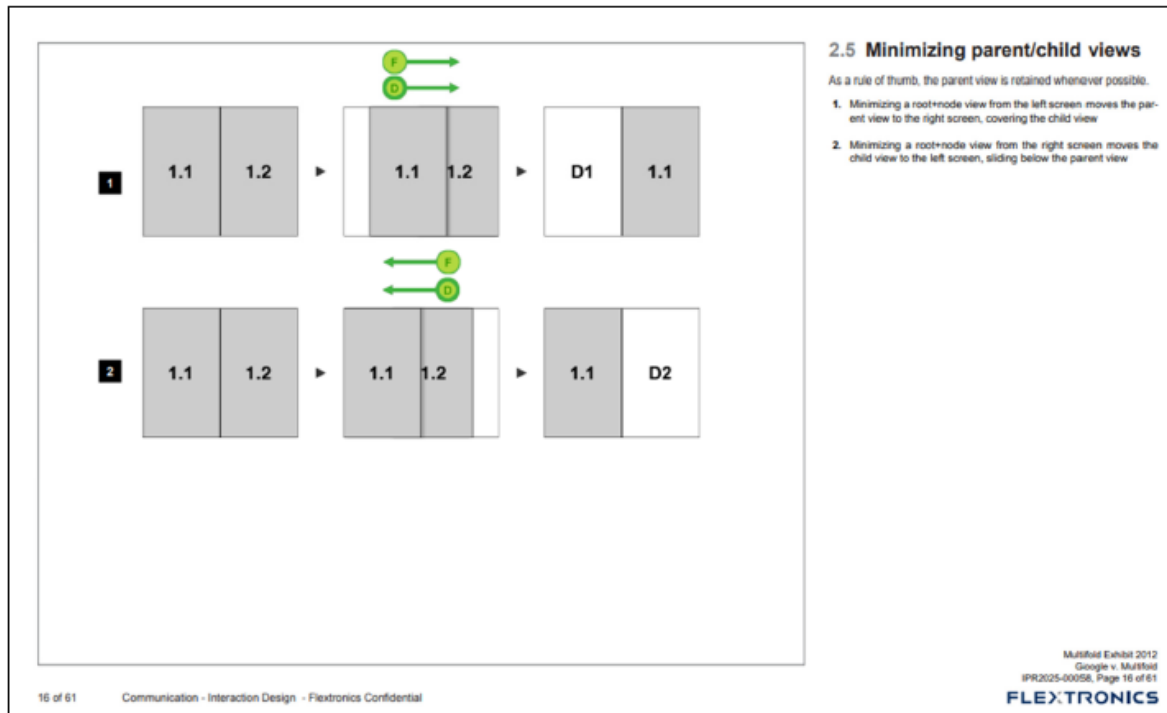
Ex. 2023, 0:01
(annotations added
showing the claimed
second page);
IPR2025-00058 POR, 46

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.b] “presenting a second page of the first application on a second display of the device, wherein the second page is a primary page,”

IPR2025-00058 POR, 44

See EX2012, 16 (shown below), 6. As such, “page 1.1” is the claimed “second page” of limitation 1[b].



IPR2025-00058 POR, 48

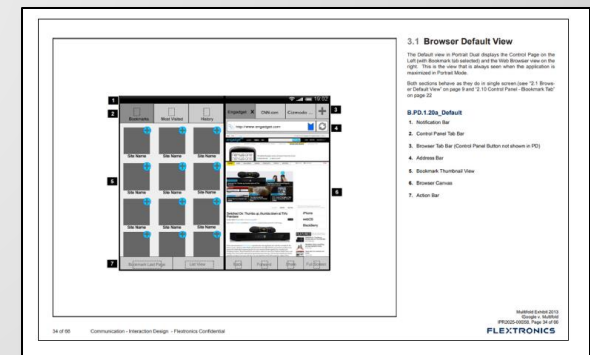
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.c] “wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page;”

IPR2025-00058 POR, 48

For example, for the Browser application, the Bookmark / Control page (“first page”) and the Browser Content page (“second page”), present different content and are distinct pages, and the Bookmark / Control page is a child of the Browser Content page. *See, e.g.*, EX2013, 9 (describing the Browser Content page as the “default view of the browser in Portrait Single mode”), 22 (describing the Bookmark / Control page as a separate potential page of the Browser application in Portrait Single mode), 31 (depicted below, and describing how when displayed together in Portrait Dual mode, “[b]oth [pages] behave as they do in single screen.”).

IPR2025-00058 POR, 49

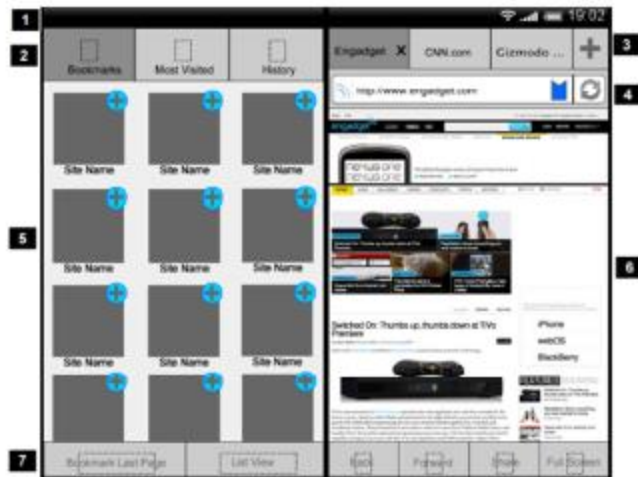


Ex. 2013, 34;
IPR2025-00058 POR, 49

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.c] “wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page;”

IPR2025-00058 POR, 48



3.1 Browser Default View

The Default view in Portrait Dual displays the Control Page on the Left (with Bookmark tab selected) and the Web Browser view on the right. This is the view that is always seen when the application is maximized in Portrait Mode.

Both sections behave as they do in single screen (see “2.1 Browser Default View” on page 9 and “2.10 Control Panel - Bookmark Tab” on page 22).

B.PD.1.20a_Default

1. Notification Bar
2. Control Panel Tab Bar
3. Browser Tab Bar (Control Panel Button not shown in PD)
4. Address Bar
5. Bookmark Thumbnail View
6. Browser Canvas
7. Action Bar

Multifold Exhibit 2013
©Google v. Multifold
IPR2025-00058, Page 34 of 66
FLEXTRONICS

Ex. 2013, 34;
IPR2025-00058 POR, 49

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.c] “wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page;”

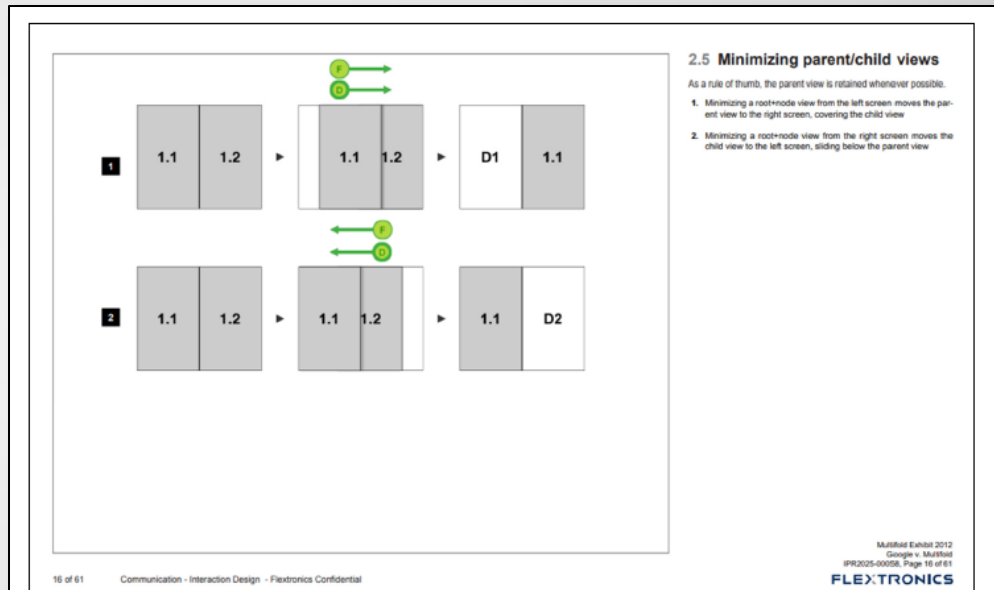
IPR2025-00058 POR, 48

Further, as described above, the EV-1 and EV-2 prototypes implemented the functionality set forth in the design specifications regarding gesture functionality.

See, e.g., supra §VIII.A.3 (citing to EX2001 [Sirpal Decl.], ¶¶24, 55; EX2002 [Cassar Decl.], ¶10; EX2003 [Becze Decl.], ¶6). And thus, the design specifications disclose how the prototypes operated to display and minimize applications with parent and child pages (e.g., browser, email, messaging).

Accordingly, the EV-1 and EV-2 prototypes were capable of presenting applications wherein the first (auxiliary) and second (primary) pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page. For example, as shown below, the prototypes were capable of displaying page 1.1 of an application in one display, and page 1.2 of the same application in another display, where “1.1 is the parent of 1.2.” *See* EX2012, 16 (shown below), 6 (explaining applications with “parent /child structure”).

IPR2025-00058 POR, 50



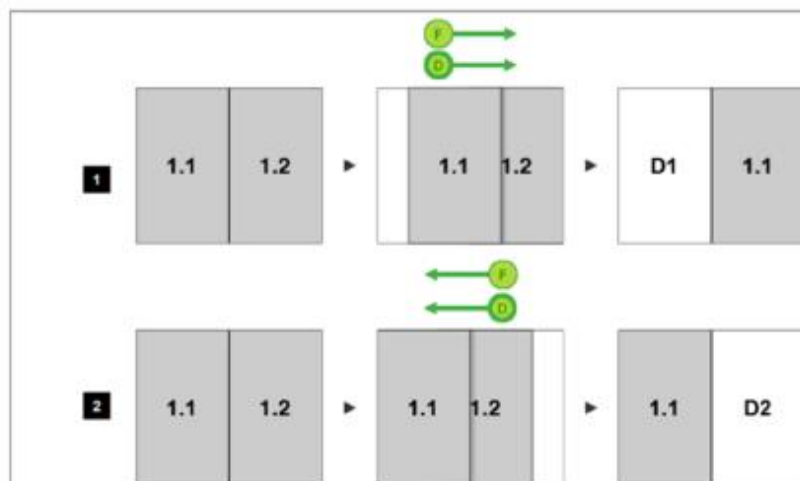
See also, e.g., EX2001 [Sirpal Decl.], ¶53; EX2002 [Cassar Decl.], ¶¶28, 29, 64, 65 (describing how the Imerj smartphones could maximize and minimize child pages repeatedly); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

IPR2025-00058 POR, 51

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.c] “wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page;”

IPR2025-00058 POR, 48



2.5 Minimizing parent/child views

As a rule of thumb, the parent view is retained whenever possible.

1. Minimizing a root+node view from the left screen moves the parent view to the right screen, covering the child view
2. Minimizing a root+node view from the right screen moves the child view to the left screen, sliding below the parent view

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.d] “receiving a first input from a user, wherein the first input includes an input to minimize the first application to one of the first and second displays of the device, wherein the second page of the first application is displayed by one of the first display of the device and the second display of the device, and wherein the first page of the first application is not displayed.”

IPR2025-00058 POR, 51

second displays of the device. *See, e.g.*, EX2012, 8 (describing the drag gesture as “[m]aximiz[ing] and minimiz[ing] dual-screen capable applications” and the flick gesture as “[m]inimiz[ing] dual-screen capable applications”).

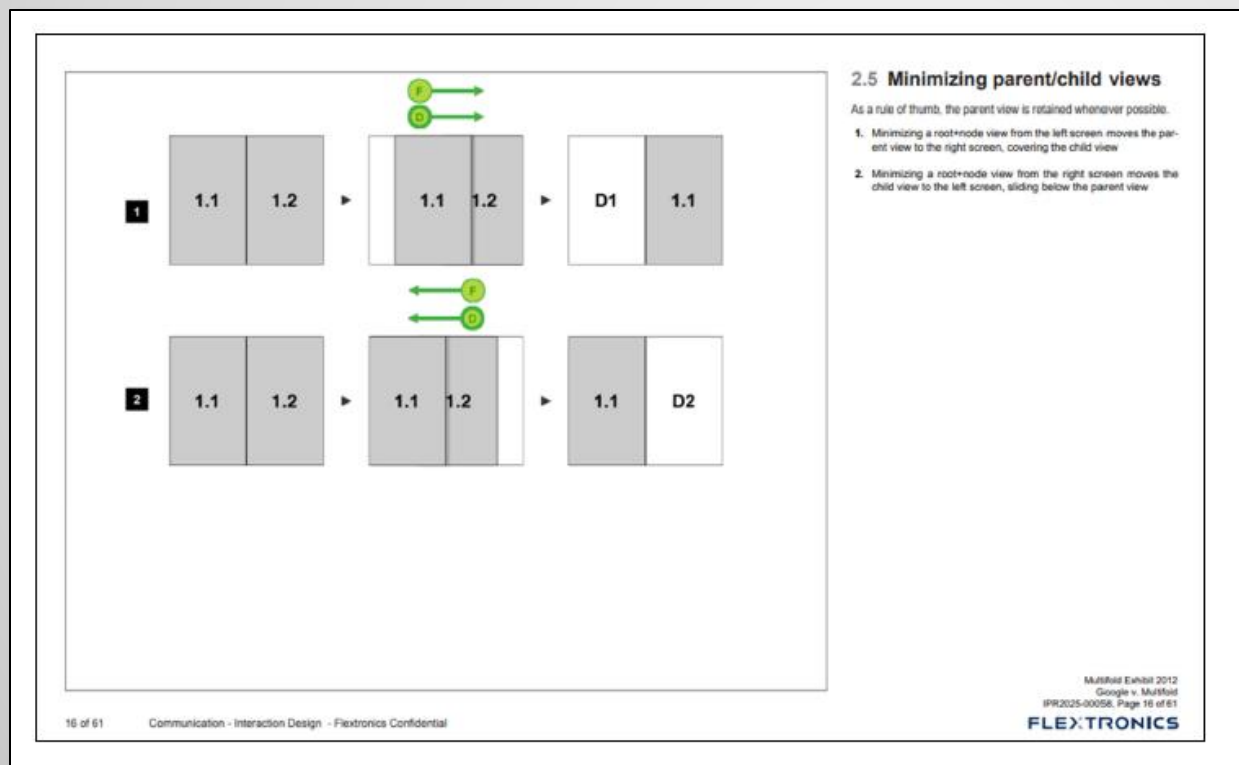
Further, upon receipt of the minimization input, the EV-1 and EV-2 prototypes would display the “second” (primary/parent) page of the application on one of the device’s displays, and not display the “first” (auxiliary/child) page of the application. For example, upon receipt of a minimization input, parent page 1.1 of the application (the “second page”) is displayed, and child page 1.2 (the “first page”) is not displayed. *See, e.g.*, EX2012, 16.

IPR2025-00058 POR, 52

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.d] “receiving a first input from a user, wherein the first input includes an input to minimize the first application to one of the first and second displays of the device, wherein the second page of the first application is displayed by one of the first display of the device and the second display of the device, and wherein the first page of the first application is not displayed.”

IPR2025-00058 POR, 51



Ex. 2012, 16;
IPR2025-00058 POR, 51

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.d] “receiving a first input from a user, wherein the first input includes an input to minimize the first application to one of the first and second displays of the device, wherein the second page of the first application is displayed by one of the first display of the device and the second display of the device, and wherein the first page of the first application is not displayed.”

IPR2025-00058 POR, 51

For example, for the Browser application, upon receipt of a minimization input, the EV-1 and EV-2 prototypes would display the Browser Content page (the

IPR2025-00058 POR, 52

“second page”), and not the Bookmarks / Control page (the “first page”). *See, e.g.*, EX2013, 44 (example 1 depicted below):

3.11 Minimizing Portrait Dual

When using the browser is minimized from Dual Screen to Single Screen the following criteria is used to asses which screen remains in view

Priority 1 - Screen with a Modal (Inline or Full Screen)

Priority 2 - The Web Browser

Example 1)



IPR2025-00058 POR, 53

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

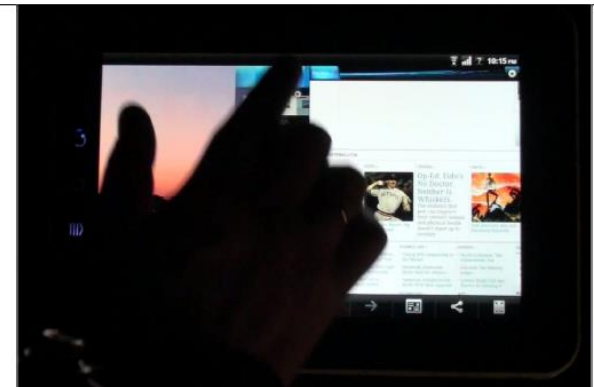
[1.d] “receiving a first input from a user, wherein the first input includes an input to minimize the first application to one of the first and second displays of the device, wherein the second page of the first application is displayed by one of the first display of the device and the second display of the device, and wherein the first page of the first application is not displayed.”

IPR2025-00058 POR, 51

See also, e.g., EX2023, 0:05 (showing user input to minimize the displayed Browser application to one of the two displays) *and* 0:07 (showing the result of the minimization input, with the Browser Content page (“second page”) still displayed on the device, but the Bookmarks / Control page (“first page”) no longer displayed).

IPR2025-00058 POR, 53

EX2023, 0:05



EX2023, 0:07



IPR2025-00058 POR, 54

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS



Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

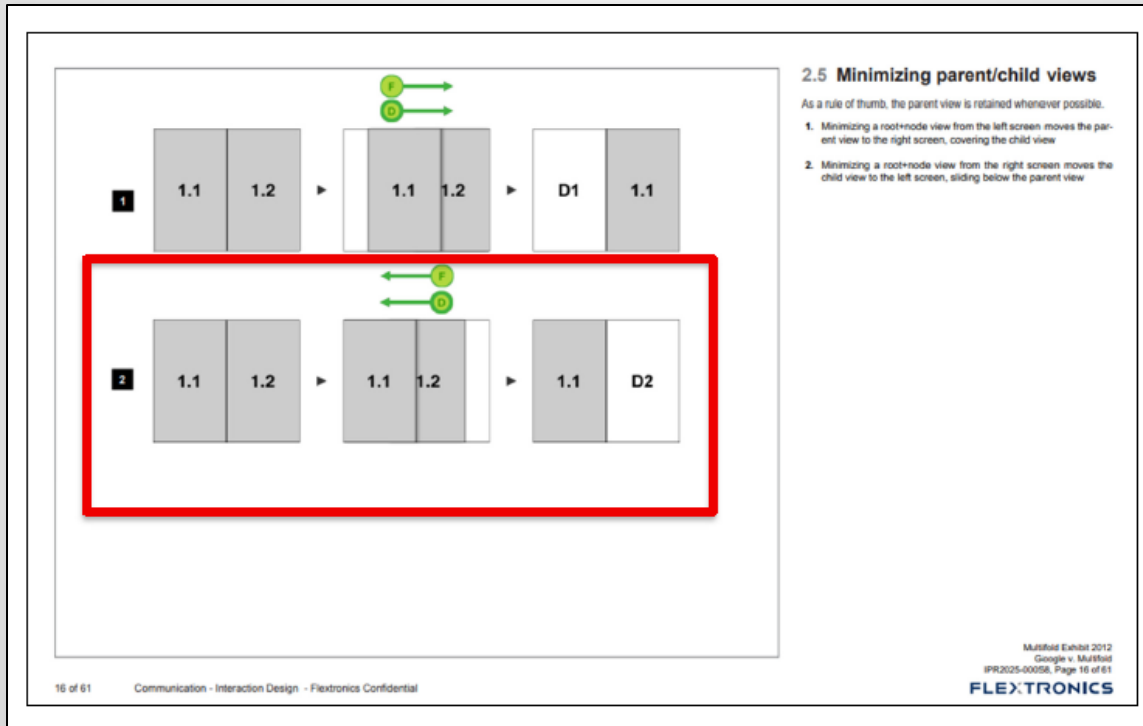
B. Claim 4

1. [4] “The method of claim 1, wherein after receiving the first input a first page of a second application is presented by the first display.”

IPR2025-00058 POR, 55

See, e.g., EX2012, 16 (example 2 below showing that page 1.1 ends up where it was initially displayed – on the second display).

IPR2025-00058 POR, 55



Ex. 2012, 16 (example 2 annotated showing that page 1.1 ends up where it was initially displayed – on the second display);
IPR2025-00058 POR, 56

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

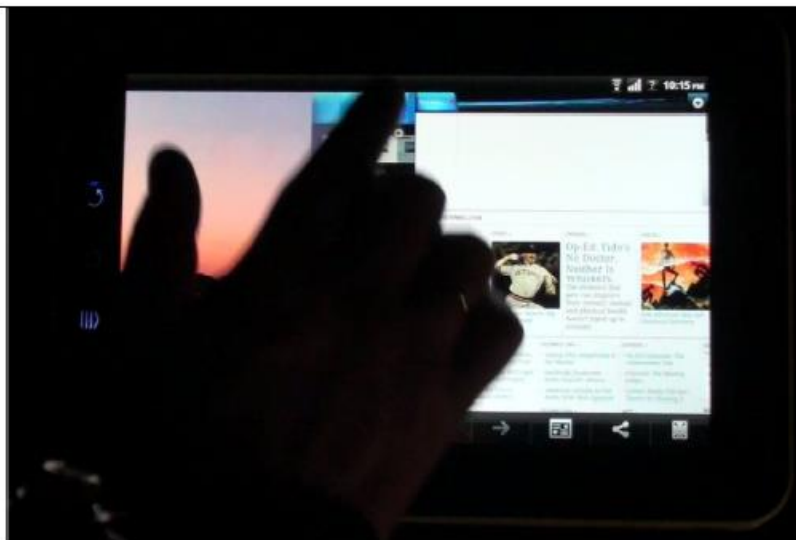
B. Claim 4

1. [4] “The method of claim 1, wherein after receiving the first input a first page of a second application is presented by the first display.”

IPR2025-00058 POR, 55

See also, e.g., EX2023 (showing that, for the Browser application, the second page—the Browser Content page—remains on the second display after minimization).

EX2023, 0:05



IPR2025-00058 POR, 56

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

B. Claim 4

1. [4] “The method of claim 1, wherein after receiving the first input a first page of a second application is presented by the first display.”

IPR2025-00058 POR, 55

EX2023, 0:07



IPR2025-00058 POR, 57

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

B. Claim 4

1. [4] “The method of claim 1, wherein after receiving the first input a first page of a second application is presented by the first display.”

IPR2025-00058 POR, 55

After the minimization input resulted in the second page of the first application being displayed on the second display of the device, the EV-1 and EV-2 prototypes allowed for a first page of a second application to be presented by the first display (e.g., if there was another application open in the stack). *See* EX2001 [Sirpal Decl.], ¶56. As explained by Mr. Cassar, “[t]he EV-1 and EV-2 prototypes were devices *where a second application could be displayed on the screen where the child application had just been minimized from*. For example, when an email (or browser) window is minimized, the EV-1 and EV-2 screens would then either display the desktop *or a second application*, if a second application were previously open and placed on the display.” EX2002 [Cassar Decl.], ¶¶29, 68. *See also, e.g.*, EX2003 [Becze Decl.], ¶¶12, 20, 25.

IPR2025-00058 POR, 57

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

C. Claim 6

1. [6.a] “The method of claim 1, wherein the device is oriented such that the first and second displays are presented in a dual portrait format,”

IPR2025-00058 POR, 58

Portrait Dual Screen



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Flextronics Confidential 79

Multifold Exhibit 2006
Google v. Multifold
IPR2025-00058, Page 79 of 131

Ex. 2006, 79 (showing
Browser in Portrait Dual
Screen);
IPR2025-00058 POR, 58-9

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

C. Claim 6

1. [6.a] “The method of claim 1, wherein the device is oriented such that the first and second displays are presented in a dual portrait format,”

IPR2025-00058 POR, 58

3.11 Minimizing Portrait Dual

When using the browser is minimized from Dual Screen to Single Screen the following criteria is used to asses which screen remains in view

Priority 1 - Screen with a Modal (Inline or Full Screen)

Priority 2 - The Web Browser

Example 1)



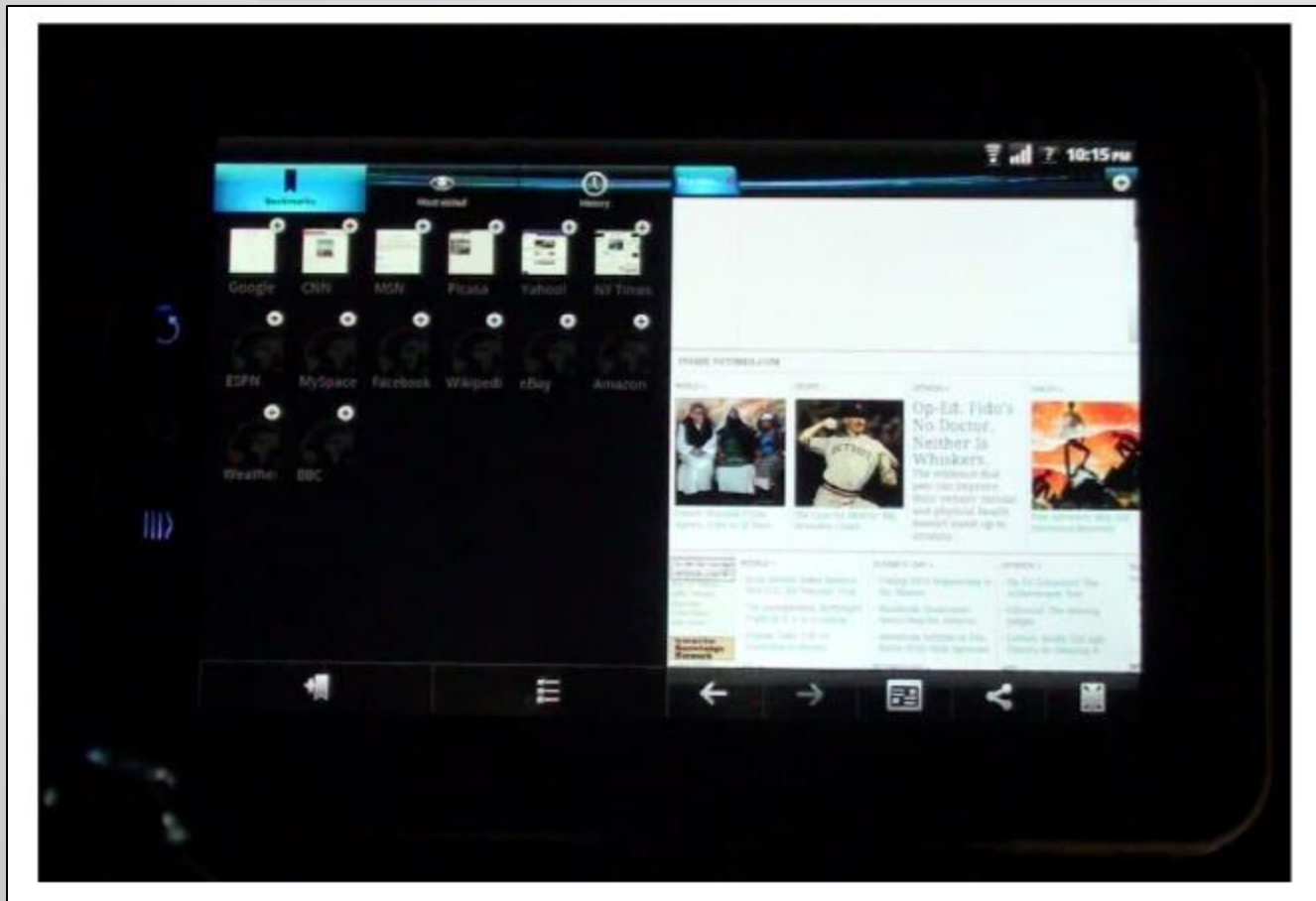
Ex. 2013, 44 (depicting
“Minimizing Portrait Dual”);
IPR2025-00058 POR, 59

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

C. Claim 6

1. [6.a] “The method of claim 1, wherein the device is oriented such that the first and second displays are presented in a dual portrait format,”

IPR2025-00058 POR, 58



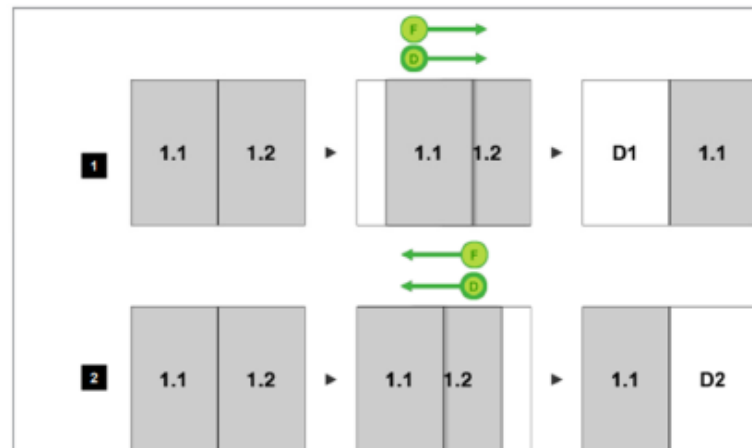
Ex. 2023 (video showing minimization of Browser application in dual portrait mode);
IPR2025-00058 POR, 60

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

C. Claim 6

1. [6.a] “The method of claim 1, wherein the device is oriented such that the first and second displays are presented in a dual portrait format,”

IPR2025-00058 POR, 58



2.5 Minimizing parent/child views

As a rule of thumb, the parent view is retained whenever possible.

1. Minimizing a root+node view from the left screen moves the parent view to the right screen, covering the child view
2. Minimizing a root+node view from the right screen moves the child view to the left screen, sliding below the parent view

Ex. 2012, 16 (showing minimization examples in portrait dual mode, which would apply to various dual display applications (e.g., email, messenger, browser, etc.)); IPR2025-00058 POR, 60-1

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

C. Claim 6

1. [6.a] “The method of claim 1, wherein the device is oriented such that the first and second displays are presented in a dual portrait format,”

IPR2025-00058 POR, 58

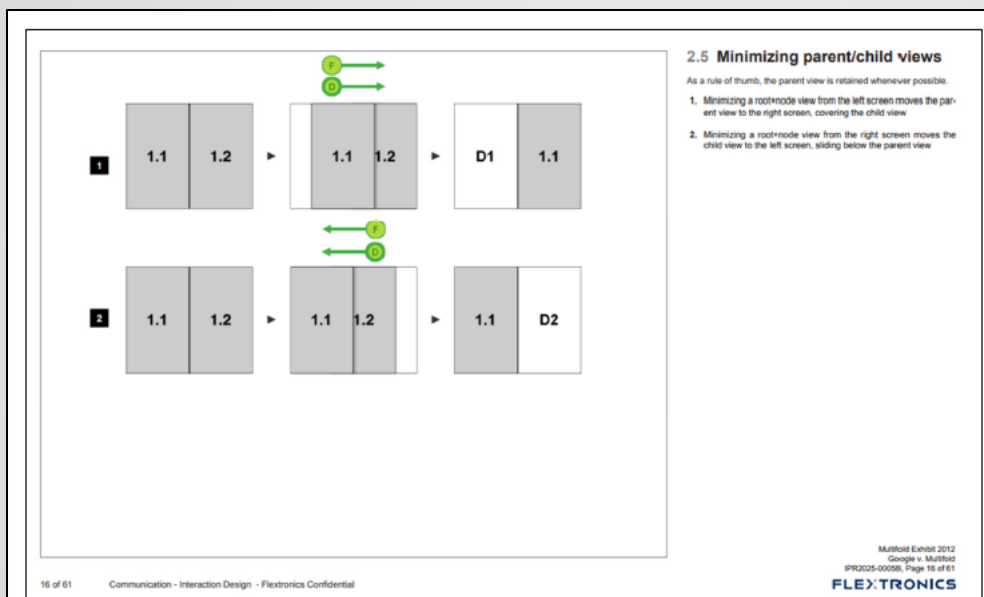
See also, e.g., EX2002 [Cassar Decl.], ¶¶29, 69 (“The EV-1 and EV-2 could be in dual portrait mode and receive a first input that is a gesture from the side of a left display moving toward the right display. This is essentially the long drag gesture described above to minimize a page.”); EX2003 [Becze Decl.], ¶¶20 (dual portrait functional on EV-1), 25 (dual portrait functional on EV-2).

IPR2025-00058 POR, 61

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[6.b] “and wherein the first input includes a gesture that is input from a side of the device corresponding the first display towards a side of the device corresponding to the second display.”

IPR2025-00058 POR, 61



Thus, because the minimization gesture could be performed in either direction, in the EV-1 and EV-2 prototypes, the “first input includes a gesture that is input from a side of the device corresponding the first display towards a side of the device corresponding to the second display.”

IPR2025-00058 POR, 62

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[6.b] “and wherein the first input includes a gesture that is input from a side of the device corresponding the first display towards a side of the device corresponding to the second display.”

IPR2025-00058 POR, 61

EX2023 (e.g.,
0:05)



EX2023 (e.g.,
0:07)



IPR2025-00058 POR, 63

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[6.b] “and wherein the first input includes a gesture that is input from a side of the device corresponding the first display towards a side of the device corresponding to the second display.”

IPR2025-00058 POR, 61

See also, e.g., EX2002 [Cassar Decl.], ¶¶29, 69 (“The EV-1 and EV-2 could be in dual portrait mode and receive a first input that is a gesture from the side of a left display moving toward the right display. This is essentially the long drag gesture described above to minimize a page.”); EX2003 [Becze Decl.], ¶¶20 (dual portrait functional on EV-1), 25 (dual portrait functional on EV-2).

IPR2025-00058 POR, 64

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

D. Claim 9

1. [9] “The method of claim 1, wherein the first application is a web browser, and wherein the primary page is a content page that includes web content.”

IPR2025-00058 POR, 64

Portrait Dual Screen



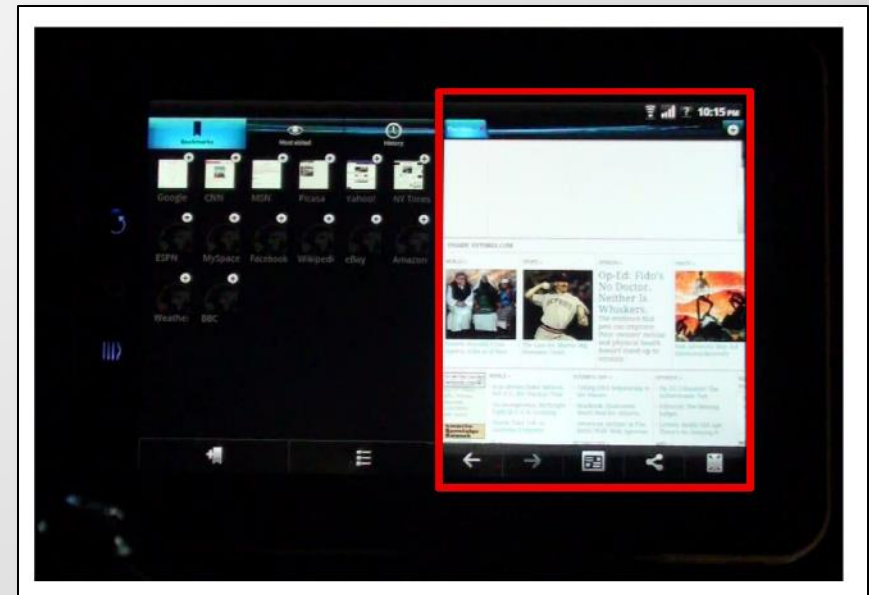
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Flextronics Confidential 79

Multifold Exhibit 2009
Google v. Multifold
IPR2025-00058, Page 79 of 131

Ex. 2006, 79 (annotations added showing the claimed primary page)
IPR2025-00058 POR, 64-5

Ex. 2323, 0:01 (annotations added showing the claimed primary page)
IPR2025-00058 POR, 65



Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

D. Claim 9

1. [9] “The method of claim 1, wherein the first application is a web browser, and wherein the primary page is a content page that includes web content.”

IPR2025-00058 POR, 64

The Browser Content page is the primary page because the Browser Content page is the default view (EX2013, 9), and when the Browser application is minimized from Dual Screen to Single Screen, “priority” is given to the Browser Content view page when assessing which screen remains in view (*id.*, 44).

See also, e.g., EX2002 [Cassar Decl.], ¶¶17, 28, 33, 35, 64, 65-66 (browser content is part of primary page), 66 (dual portrait mode minimization and maximization available for web browser), 75; EX2003 [Becze Decl.], ¶¶12.

IPR2025-00058 POR, 66

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

E. Claim 10

1. [10] “The method of claim 1, further comprising: after receiving the first input, receiving a second input from the user, wherein the second input includes an input to maximize the first application to both of the first and second displays of the device, wherein the first page of the first application is presented on the first display of the device and the second page is displayed on the second display of the device.”

IPR2025-00058 POR, 66

As described above, the EV-1 and EV-2 prototypes performed the method of claim 1. *See supra*, §VIII.A. Moreover, the prototypes could (after performing a minimization), receive a second input to maximize the first application to both displays of the device, resulting in the “first” (auxiliary / child) page of the application being displayed on the first display of the device (where it was

IPR2025-00058 POR, 66

displayed in limitation 1[a]) and the “second” (primary / parent) page of the application being displayed on the second display of the device (where it was displayed in limitation 1[b]).

For example, the EV-1 and EV-2 prototypes could receive a second input from a user to maximize the application to be displayed on both of the first and second displays of the device. *See, e.g.*, EX2012, 8 (describing the drag gesture as “[m]aximiz[ing] ... dual-screen capable applications”).

IPR2025-00058 POR, 67

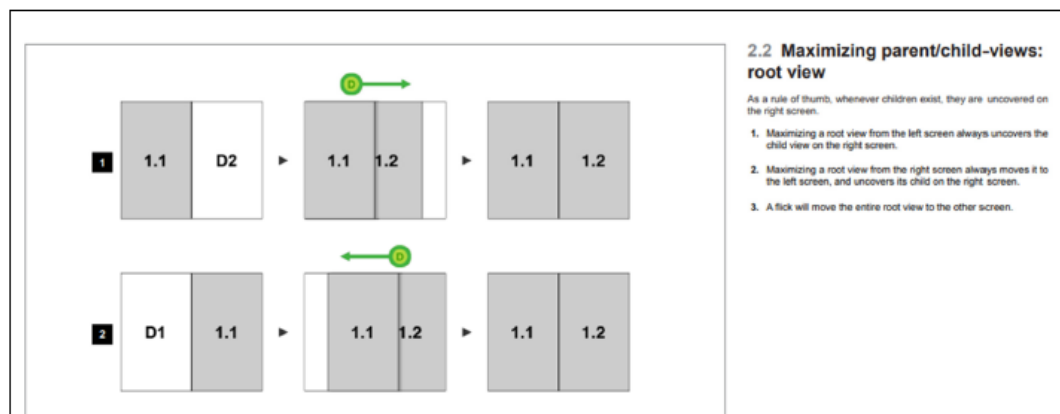
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

E. Claim 10

1. [10] “The method of claim 1, further comprising: after receiving the first input, receiving a second input from the user, wherein the second input includes an input to maximize the first application to both of the first and second displays of the device, wherein the first page of the first application is presented on the first display of the device and the second page is displayed on the second display of the device.”

IPR2025-00058 POR, 66

Examples of a maximization command resulting in the display of the application on both of the first and second displays of the device are shown below. Here, in both examples 1 and 2, page 1.1 is the parent page, and page 1.2 is the child page. *See* EX2012, 13 (showing maximization examples).



IPR2025-00058 POR, 67

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

E. Claim 10

1. [10] “The method of claim 1, further comprising: after receiving the first input, receiving a second input from the user, wherein the second input includes an input to maximize the first application to both of the first and second displays of the device, wherein the first page of the first application is presented on the first display of the device and the second page is displayed on the second display of the device.”

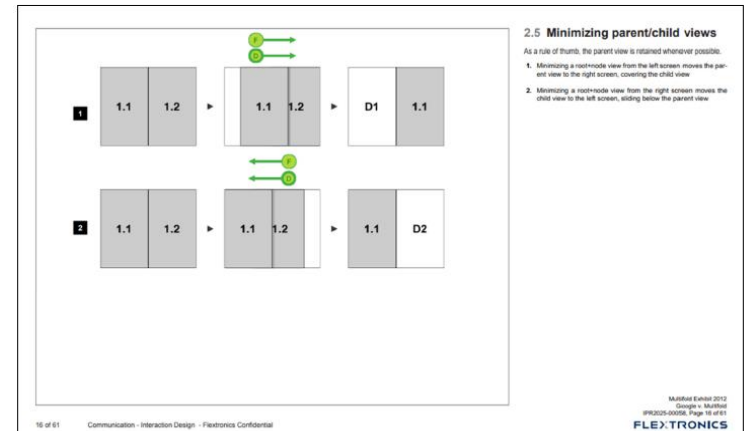
The EV-1 and EV-2 prototypes allowed such maximization commands to be received for dual display applications (e.g., browser, email, messenger) *after having received* a minimization command that resulted in one of the pages of the

application no longer being displayed. *See also, e.g.,* EX2002 [Cassar Decl.], ¶¶29, 70 (“The EV-1 and EV-2 prototypes could receive a second input that maximizes an application across both display screens. ... Maximizing and minimizing the dual portrait mode could be repeated indefinitely on EV-1 and EV-2 prototypes.”).

For example, as explained by Mr. Sirpal (EX2001 ¶58) and as shown above for limitation 1[d], the prototypes allowed for receipt of a minimization input that would result in parent page 1.1 of an application (the claimed “second page”) being displayed, and child page 1.2 (the “first page”) no longer being displayed. *See, e.g.,* EX2012, 16 (showing minimization examples).

IPR2025-00058 POR, 66

IPR2025-00058 POR, 68



Here, the end point of minimization example 1 is the beginning point of maximization example 2 (depicted above), and the end point of minimization

example 2 is the beginning point of maximization example 1 (depicted above).

Accordingly, by allowing for maximization example 2 to be performed after minimization example 1 (and/or allowing for maximization example 1 to be performed after minimization example 2), the prototypes practiced this limitation because the end result would be the first page of the first application (page 1.2) being presented on the first display of the device (where it initially started) and the second page of the first application (page 1.1) being displayed on the second display of the device (where it initially started).

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

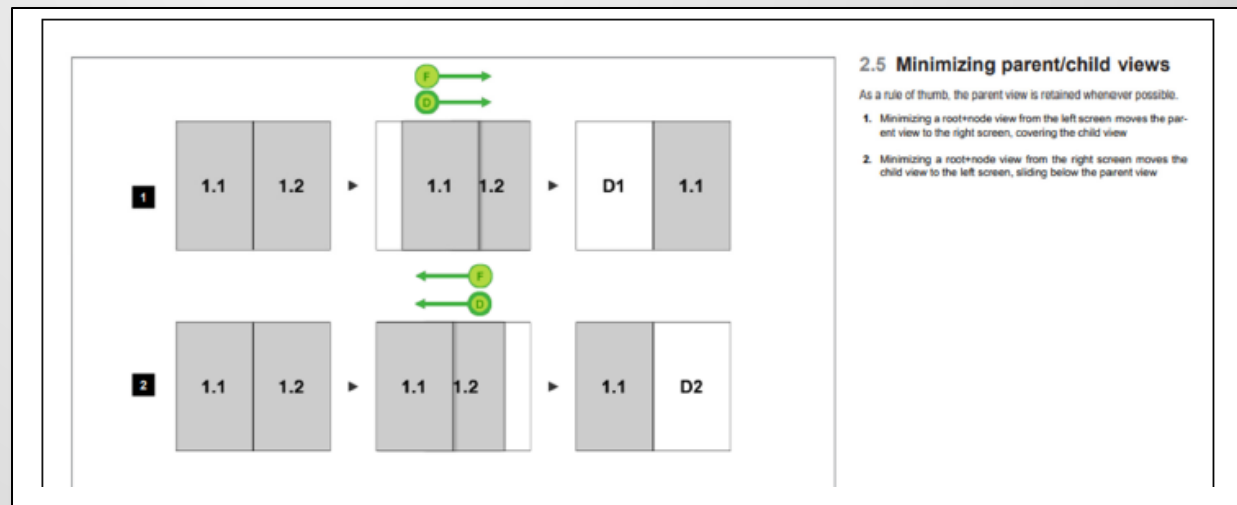
E. Claim 10

1. [10] “The method of claim 1, further comprising: after receiving the first input, receiving a second input from the user, wherein the second input includes an input to maximize the first application to both of the first and second displays of the device, wherein the first page of the first application is presented on the first display of the device and the second page is displayed on the second display of the device.”

IPR2025-00058 POR, 66

EX2012, 13 (showing maximization examples);
IPR2025-00058 POR, 67

EX2012, 16 (showing minimization examples);
IPR2025-00058 POR, 68



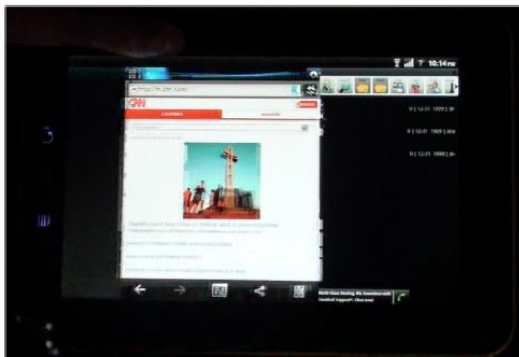
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

E. Claim 10

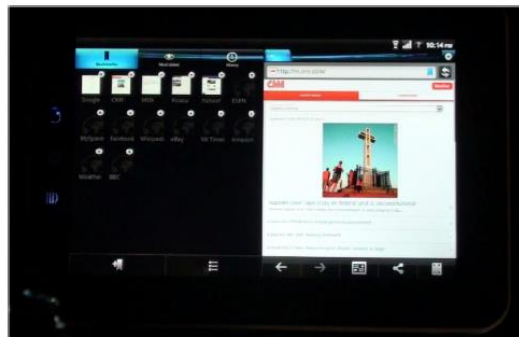
1. [10] “The method of claim 1, further comprising: after receiving the first input, receiving a second input from the user, wherein the second input includes an input to maximize the first application to both of the first and second displays of the device, wherein the first page of the first application is presented on the first display of the device and the second page is displayed on the second display of the device.”

IPR2025-00058 POR, 66

EX2022, 0:05
(showing user
input)



EX2022, 0:08
(showing end
result of
maximization)



IPR2025-00058 POR, 70

As another example, for the Browser Application, the prototypes allowed for a maximization command that would result in the “first page” (the Bookmarks / Control page) being displayed on the left display of the device, and the “second page” (the Browser Content page) being displayed on the right display. *See* EX2022 (depicted below).

IPR2025-00058 POR, 69

IPR2025-00058 POR, 70

Accordingly, for the Browser application of the EV-1 and EV-2, a maximization input as shown in EX2022 that took place after a minimization input as shown in EX2023, would result in the “first page” (the Bookmarks / Control page) being displayed on the left display of the device (e.g., the first display as

shown in limitation 1[a]) and the “second page” (the Browser Content page) being displayed on the right display of the device (e.g., the second display as shown in limitation 1[b]).

See also, e.g., EX2003 [Becze Decl.] ¶12, 20, 25, 29, 31.

IPR2025-00058 POR, 71

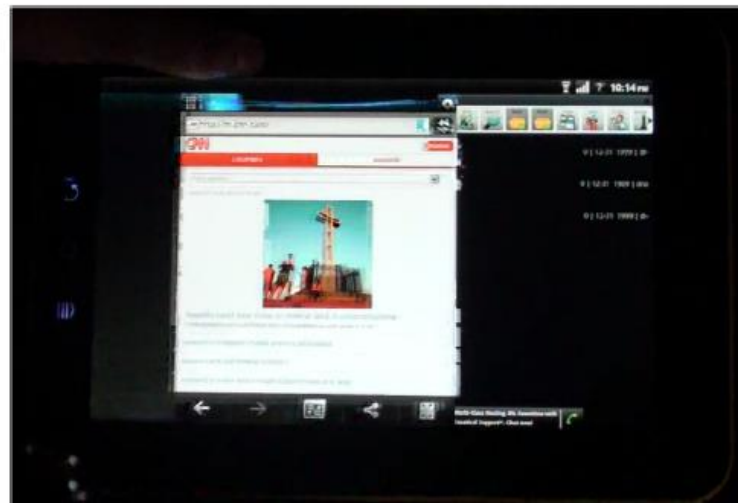
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

E. Claim 10

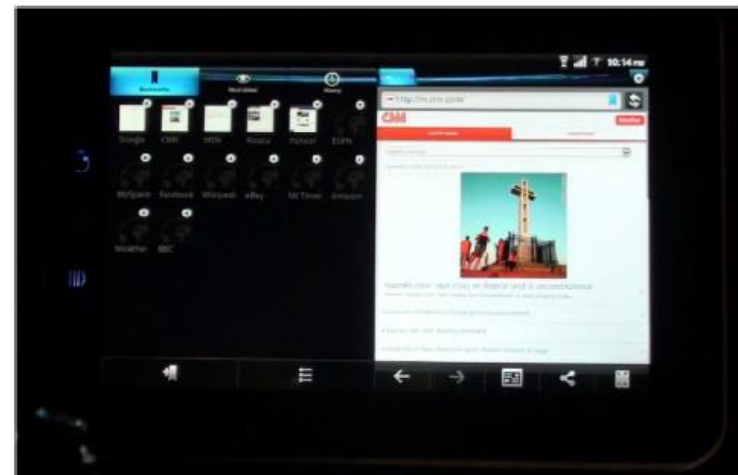
1. [10] “The method of claim 1, further comprising: after receiving the first input, receiving a second input from the user, wherein the second input includes an input to maximize the first application to both of the first and second displays of the device, wherein the first page of the first application is presented on the first display of the device and the second page is displayed on the second display of the device.”

IPR2025-00058 POR, 66

EX2022, 0:05
(showing user input)

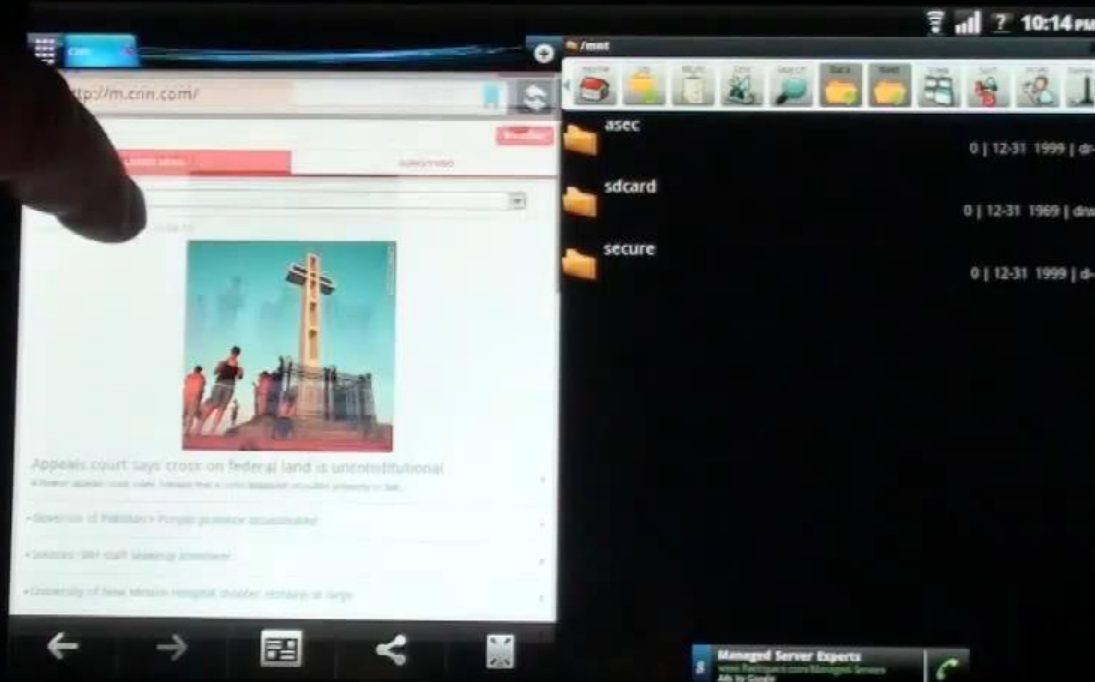


EX2022, 0:08
(showing end result of maximization)



IPR2025-00058 POR, 70

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS



Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

F. Claim 12

1. [12.a] “The method of claim 10, further comprising: after receiving the first and second inputs, receiving a third input from the user dismissing the first page of the application, wherein one of a first page of a second application or a desktop is presented by the first display of the device;”

IPR2025-00058 POR, 71

As described above, the EV-1 and EV-2 prototypes performed the method of claim 10. *See supra*, §VIII.E. After having received the maximization command of claim 10 (“the second input”), the EV-1 and EV-2 prototypes allowed for receipt of a third input (e.g., a minimization command) from the user dismissing the first page (auxiliary / child page) of the application, and resulting in a first page of a second application or a desktop being displayed on the first display of the device (e.g., where auxiliary / child page was originally displayed). *See e.g.*, EX2002 [Cassar Decl.], ¶¶29, 70, 71 (“Maximizing and minimizing the [child page] of the dual portrait mode could be *repeated indefinitely* on EV-1 and EV-2 prototypes.”).

IPR2025-00058 POR, 71

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

F. Claim 12

1. [12.a] “The method of claim 10, further comprising: after receiving the first and second inputs, receiving a third input from the user dismissing the first page of the application, wherein one of a first page of a second application or a desktop is presented by the first display of the device;”

IPR2025-00058 POR, 71

For example, returning to the minimization and maximization examples of EX2012 (discussed in claim 10 above), the EV-1 and EV-2 prototypes allowed for the following sequence:

- Receiving first minimizing input (from limitation 1[d]) as the input from minimization example 2 (from page 16 of EX2012);
- Receiving the second maximizing input (from limitation 10) as the input from maximization example 1 (from page 13 of EX2012);
- Receiving the “third input” (from limitation 12[a]) as the input from minimization example 2 (from page 16 of EX2012).

As shown in EX2012, the result of the third input would be that the “first page of the application” (e.g., child page 1.2) would be dismissed, and a desktop (e.g., D2) would be displayed on the first display of the device (e.g., which originally was displaying child page 1.2).

See also, e.g., EX2003 [Becze Decl.] ¶12, 20, 25, 29, 31.

IPR2025-00058 POR, 72

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[12.b] “after receiving the third input, receiving a fourth input from the user to maximize the first application to the first and second displays of the device, wherein the second display of the device presents the second page of the first application, and wherein the first display of the device presents the first page of the first application.”

IPR2025-00058 POR, 72

IPR2025-00058 POR, 73

After having received the “third input” of limitation 12[a], the EV-1 and EV-2 prototypes allowed for receipt of a fourth input (e.g., a maximization command) from the user maximizing the application to both displays of the device, and resulting in the second page (primary page) of the first application being displayed on the second display of the device (e.g., where the second page was originally displayed), and the first page (auxiliary / child page) of the first application being displayed on the first display of the device (e.g., where the first page was originally displayed). *See e.g.*, EX2002 [Cassar Decl.], ¶¶29, 70, 71 (“Maximizing and minimizing the [child page] of the dual portrait mode could be *repeated indefinitely* on EV-1 and EV-2 prototypes.”).

For example, returning to the minimization and maximization examples of EX2012 (discussed in claim 12[a] above), the EV-1 and EV-2 prototypes allowed for the sequence of 12[a] to continue as follows (after the third input):

- Receiving the “fourth” input (from limitation 12[b]) as the input from maximization example 1 (from page 13 of EX2012).

IPR2025-00058 POR, 73

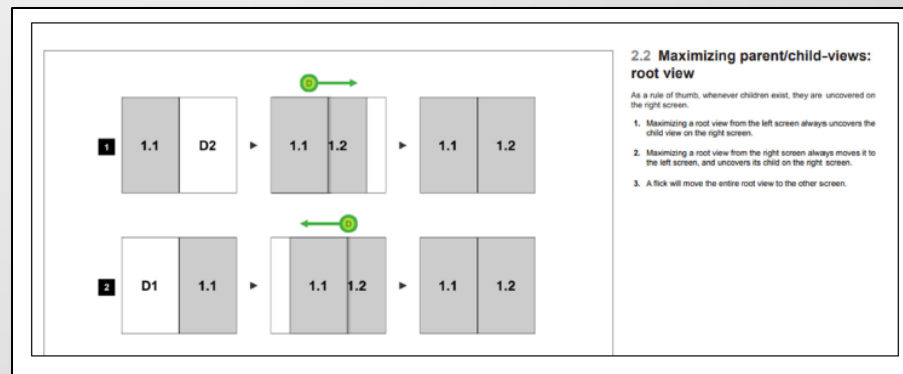
As shown in EX2012, the result of the fourth input would be that the “second page of the first application” (e.g., parent page 1.1) would be displayed on the second display of the device (e.g., which originally was displaying parent page 1.1), and the “first page of the first application” (e.g., child page 1.2) would be

displayed on the first display of the device (e.g., which originally was displaying child page 1.2).

See also, e.g., EX2003 [Becze Decl.] ¶¶12, 20, 25, 29, 31.

IPR2025-00058 POR, 74

EX2012, 13



Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

G. Claim 13

1. [13] “The method of claim 1, wherein the first display of the device is the left hand display while the device is in a dual-portrait mode, and wherein the second display of the device is the right hand display while the device is in the dual-portrait mode.”

IPR2025-00058 POR, 74

As described above, the EV-1 and EV-2 prototypes performed the method of claim 1. *See supra*, §VIII.A. Moreover, the prototypes could operate in dual screen portrait mode with the “first display” being left display of the device, and the “second display” being the right display of the device. *See, e.g.*, EX2001 [Sirpal Decl.], ¶61.

For example, for the Browser application, as seen above in limitation 1[a], the “first display” displaying the “first page” of the application was the left display. *See supra*, §VIII.A.2. *See also, e.g.*, EX2006, 79 (annotations added showing the claimed first page on the first display):

IPR2025-00058 POR, 74

IPR2025-00058 POR, 75

And, as seen above in limitation 1[b], the “second display” displaying the “second page” of the application was the right hand display. *See supra*, §VIII.A.3. *See, e.g.*, EX2006, 79 (annotations added showing the claimed second page on the second page):

Portrait Dual Screen



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Flextronics Confidential 79
Multifold Exhibit 2089
Google et al. v. Multifold
IPR2025-00058, Page 79 of 151

Portrait Dual Screen



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Flextronics Confidential 79
Multifold Exhibit 2089
Google et al. v. Multifold
IPR2025-00058, Page 79 of 151

See also, e.g., EX2002 [Cassar Decl.], ¶¶29, 69, 75; EX2003 [Becze Decl.]

¶¶8, 12, 20, 25, 29, 31.

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

G. Claim 13

1. [13] “The method of claim 1, wherein the first display of the device is the left hand display while the device is in a dual-portrait mode, and wherein the second display of the device is the right hand display while the device is in the dual-portrait mode.”

IPR2025-00058 POR, 74

Portrait Dual Screen



EX2006, 79 (annotation added showing the claimed first page on the first display);
IPR2025-00058 POR, 75

Portrait Dual Screen



EX2006, 79 (annotation added showing the claimed second page on the second page);
IPR2025-00058 POR, 76

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

H. Claim 18

1. [18.pre] “A non-transitory computer readable medium having stored thereon computer-executable instructions, the computer-executable instructions causing a processor to execute a method for selectively presenting an application across a display of a device, the computer-executable instructions comprising:”

IPR2025-00058 POR, 76

To the extent the preamble is limiting, the EV-1 and EV-2 prototypes embodied this limitation. *See, e.g.*, EX2001 [Sirpal Decl.], ¶67.

For example, the EV-1 and EV-2 prototypes both had processors and memories with computer-executable instructions stored thereon. Among other things, those instructions governed the touch and gesture inputs of the devices, and

IPR2025-00058 POR, 76

implemented the Windows Position Control functionality. Accordingly, the instructions caused the processor to impact the display of applications (including dual display applications) on the displays of the device. *See, e.g.*, EX2002 [Cassar Decl.], ¶74 (“The EV-1 and EV-2 prototypes both had processors and memories); *see also id.*, ¶¶27-29; EX2003 [Becze Decl.], ¶17.

See also, e.g., EX2002 [Cassar Decl.], ¶¶28, 76-77 (discussing modal view and photo gallery application minimize the parent page); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

See also supra, §VIII.A.1.

IPR2025-00058 POR, 77

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.a] “instructions to display a first page of a first application on a first display portion of the device;”

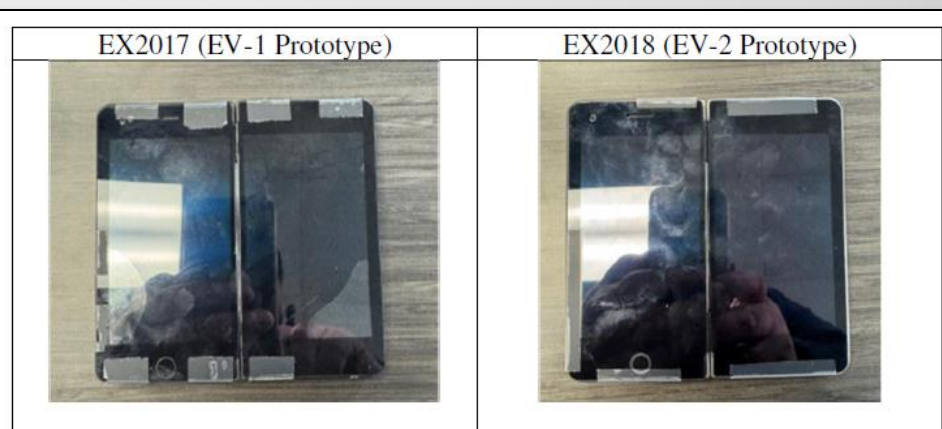
IPR2025-00058 POR, 77

The EV-1 and EV-2 prototypes embodied this limitation. *See, e.g.*, EX2001 [Sirpal Decl.], ¶67.

The prototypes had instructions (*see, e.g.*, limitation 18[pre]) to display a first page of a first application on a first display portion of the device.

For example, each of the EV-1 and EV-2 prototypes had two displays, and each display is a “display portion of the device.”

IPR2025-00058 POR, 77



Further, the EV-1 and EV-2 prototypes both permitted displaying two pages from a single application on the two different displays of the prototypes. *See, e.g., supra*, §VIII.A.2-3 (discussing limitations 1[a] and 1[b]).

IPR2025-00058 POR, 78

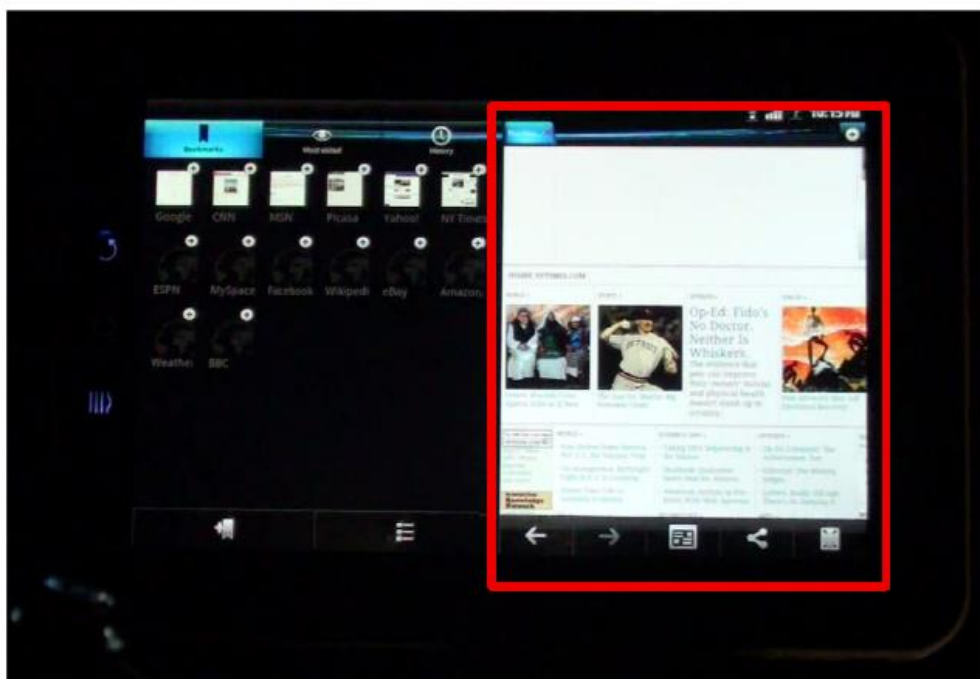
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.a] “instructions to display a first page of a first application on a first display portion of the device;”

IPR2025-00058 POR, 77

As an example, for the Browser application, the claimed “first page,” is the Browser Content page highlighted below, and the first display portion is the display on the right side of the device. (As explained below regarding limitation 18[b], for the Browser application the Bookmark / Control page is the second page).

IPR2025-00058 POR, 78



PATENT OWNER DEMONSTRATIVE
EXHIBITS - NOT EVIDENCE

IPR2025-00058

Portrait Dual Screen



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Flextronics Confidential 79

Multifold Exhibit 2089
Google v. Multifold
IPR2025-00058, Page 79 of 131

EX2006, 79 (annotations added showing the
claimed first page);
IPR2025-00058 POR, 79

EX2023, 0:01(annotations added showing the
claimed first page);
IPR2025-00058 POR, 79

Multifold Exhibit 2089, Google et al. v. Multifold, Slide 74 of 115

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.a] “instructions to display a first page of a first application on a first display portion of the device;”

IPR2025-00058 POR, 77

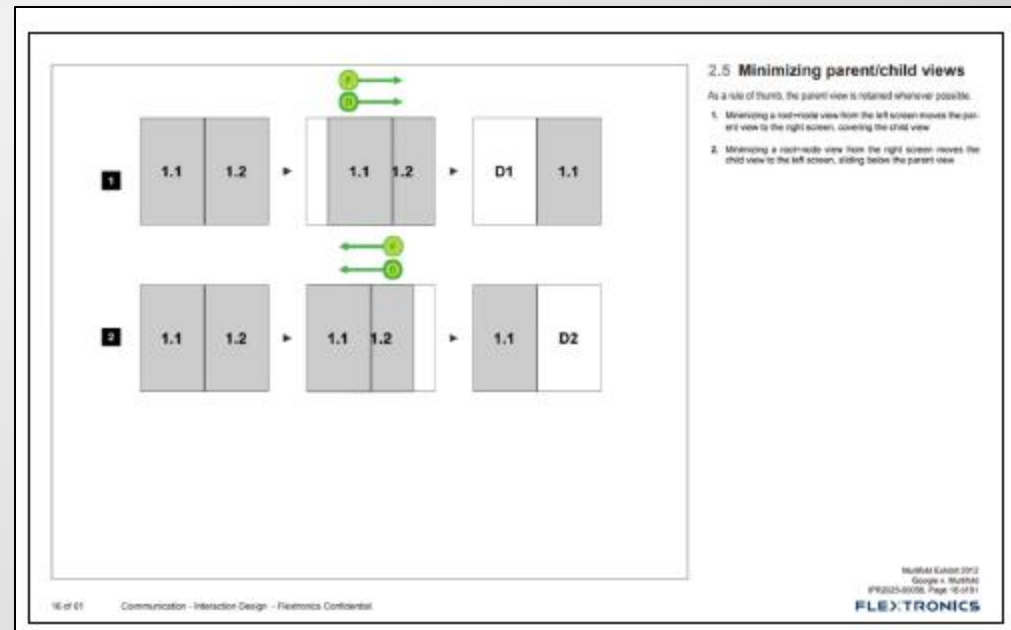
Also, in addition to the Browser application, as described above for limitations 1[a] and 1[b], the EV-1 and EV-2 prototypes implemented the gesture functionality set forth in the design specifications (e.g., the functionality set forth in EX2012). *See, e.g., supra*, §VIII.A.2-3 (discussing limitations 1[a] and 1[b]). And thus, the design specifications disclose how the prototypes operated when displaying and minimizing applications.

Accordingly, the EV-1 and EV-2 prototypes were capable of presenting a first page of a first application on a first display of the device.

- In a first example, as shown below, the prototypes were capable of displaying page 1.1 of an application in one display, and page 1.2 of the same application in another display, where “1.1 is the parent of 1.2.” *See* EX2012, 16 (shown below), 6. As such, “page 1.1” is an example of the claimed “first page” of limitation 18[a], and the left display is the “first display portion.”

IPR2025-0058 POR, 80

IPR2025-0058 POR, 81



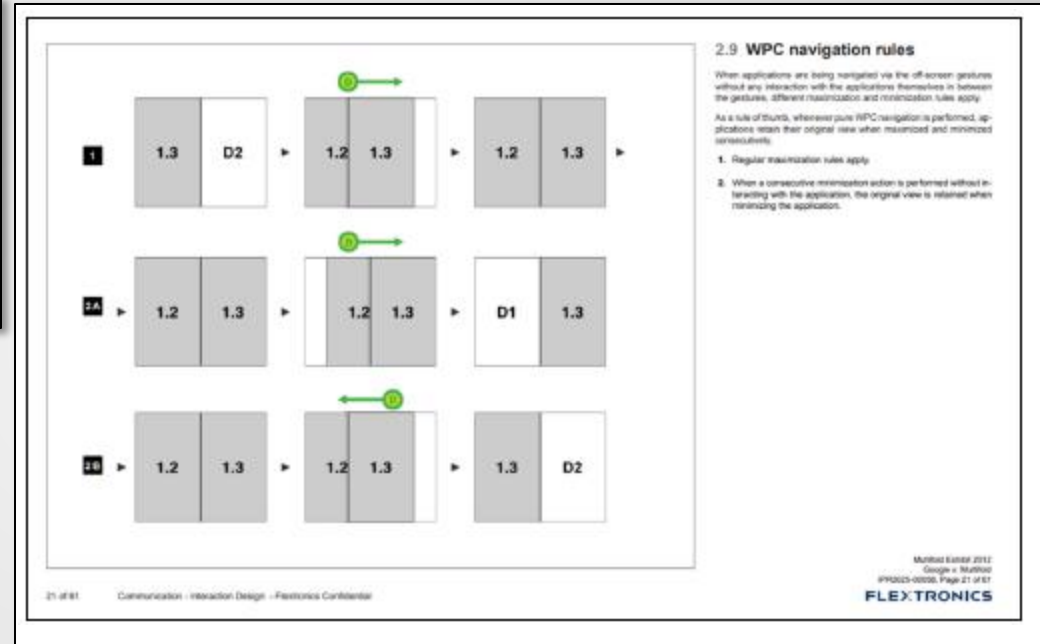
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.a] “instructions to display a first page of a first application on a first display portion of the device;”

IPR2025-00058 POR, 77

- In a second example, as shown below, the prototypes were capable of displaying page 1.2 of an application in one display, and page 1.3 of the same application in another display of the device, where “1.2 [is] the parent of 1.3.” See EX2012, 21 (shown below), 6. As such, in this example, “page 1.2” is an example of the claimed “first page” of limitation 18[a], and the left display is the “first display portion.”

IPR2025-0058 POR, 81



IPR2025-0058 POR, 81

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.a] “instructions to display a first page of a first application on a first display portion of the device;”

IPR2025-00058 POR, 77

See also, e.g., EX2002 [Cassar Decl.], ¶¶28, 76-77 (discussing modal view and photo gallery application minimize the parent page); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

IPR2025-0058 POR, 82

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.b] “instructions to display a second page of the first application on a second display portion of the device, wherein the first and second pages present different content and are distinct pages, and wherein the second page is a child of the first page; and”

IPR2025-00058 POR, 82

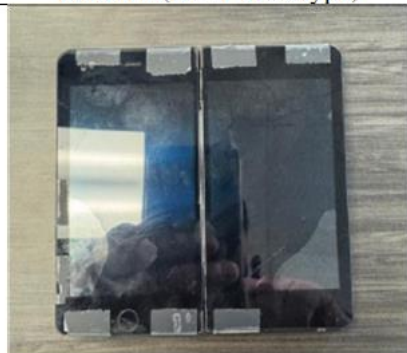
The EV-1 and EV-2 prototypes embodied this limitation. *See, e.g.*, EX2001 [Sirpal Decl.], ¶67.

IPR2025-00058 POR, 82

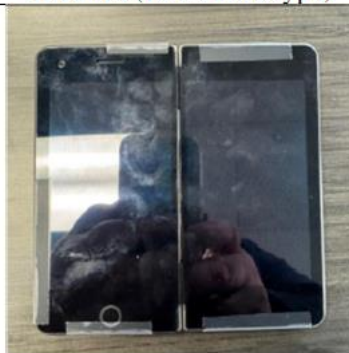
The prototypes had instructions (*see, e.g.*, limitation 18[pre]) to display a second page of the first application on a second display portion of the device.

For example, each of the EV-1 and EV-2 prototypes had two displays, and each display is a “display portion of the device.”

EX2017 (EV-1 Prototype)



EX2018 (EV-2 Prototype)



Further, the EV-1 and EV-2 prototypes both permitted displaying two pages from a single application on the two different displays of the prototypes. *See, e.g., supra*, §VIII.A.2-3 (discussing limitations 1[a] and 1[b]).

IPR2025-00058 POR, 83

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.b] “instructions to display a second page of the first application on a second display portion of the device, wherein the first and second pages present different content and are distinct pages, and wherein the second page is a child of the first page; and”

IPR2025-00058 POR, 82

EX2006, 79 (annotation added showing the claimed second page);
IPR2025-00058 POR, 83

As an example, for the Browser application, the claimed “second page,” is the Bookmark/Control page highlighted below, and the second display portion is the display on the left side of the device.

IPR2025-00058 POR, 83

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Flextronics Confidential 79

Multifold Exhibit 2006
Google v. Multifold
IPR2025-00058, Page 79 of 131

EX2023, 0:01(annotation added showing the claimed second page);
IPR2025-00058 POR, 84

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.b] “instructions to display a second page of the first application on a second display portion of the device, wherein the first and second pages present different content and are distinct pages, and wherein the second page is a child of the first page; and”

IPR2025-00058 POR, 82

Also, in addition to the Browser application, as described above for limitations 1[a] and 1[b], the EV-1 and EV-2 prototypes implemented the gesture functionality in the design specification documents (e.g., the functionality set forth in EX2012). *See, e.g., supra*, §VIII.A.2-3 (discussing limitations 1[a] and 1[b]). And thus, the design specifications disclose how the prototypes operated to display and minimize applications.

Accordingly, the prototypes were capable of presenting a second page of the first application on a second display portion of the device.

IPR2025-00058 POR, 84

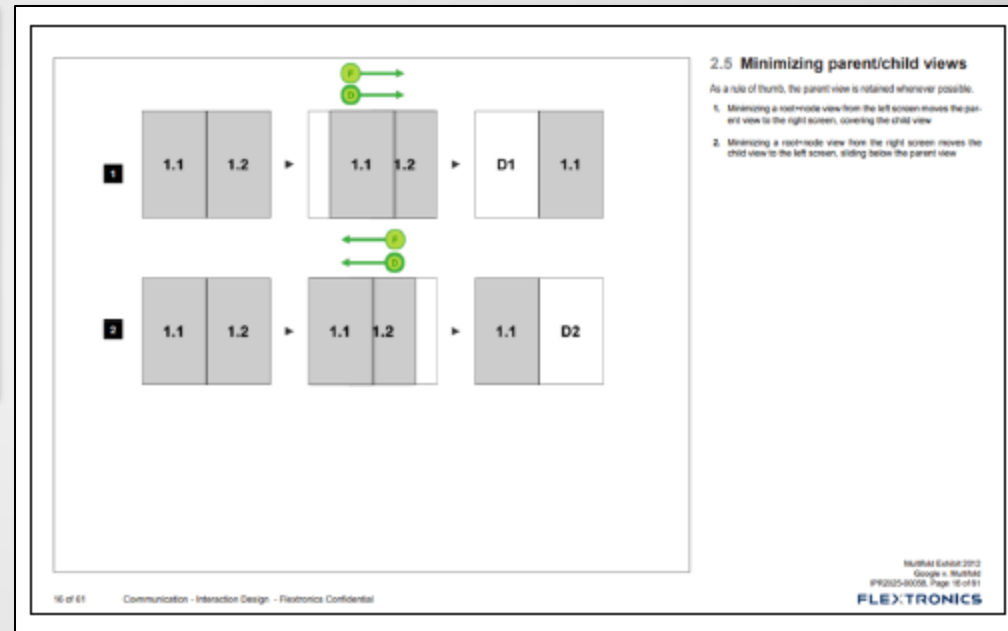
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.b] “instructions to display a second page of the first application on a second display portion of the device, wherein the first and second pages present different content and are distinct pages, and wherein the second page is a child of the first page; and”

IPR2025-00058 POR, 82

- In a first example, as shown below, the prototypes were capable of displaying page 1.1 of an application in one display, and page 1.2 of the same application in another display of the device, where “1.1 is the parent of 1.2.” See EX2012, 16 (shown below), 6. As such, “page 1.2” is an example of the claimed “second page” of limitation 18[b], and the right display is the “second display portion.”

IPR2025-00058 POR, 85



IPR2025-00058 POR, 85

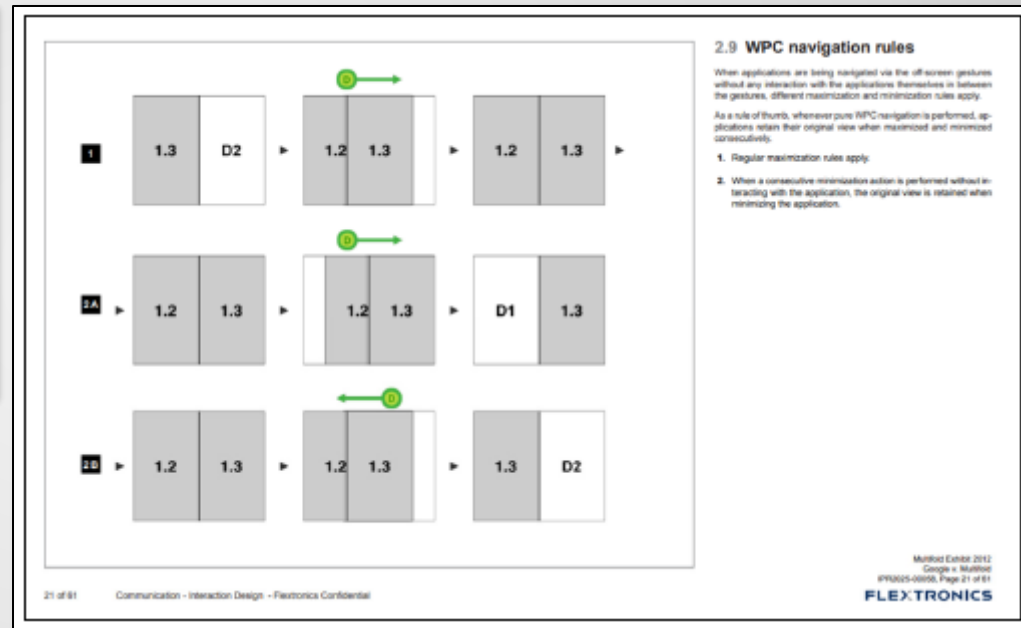
Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.b] “instructions to display a second page of the first application on a second display portion of the device, wherein the first and second pages present different content and are distinct pages, and wherein the second page is a child of the first page; and”

IPR2025-00058 POR, 82

- In a second example, as shown below, the prototypes were capable of displaying page 1.2 of an application in one display, and page 1.3 of the same application in another display of the device, where “1.2 [is] the parent of 1.3.” See EX2012, 21 (shown below), 6. As such, in this example, “page 1.3” is an example of the claimed “second page” of limitation 18[b], and the right display is the “first display portion.”

IPR2025-00058 POR, 85



IPR2025-00058 POR, 86

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.b] “instructions to display a second page of the first application on a second display portion of the device, wherein the first and second pages present different content and are distinct pages, and wherein the second page is a child of the first page; and”

IPR2025-00058 POR, 82

In each of the three examples (for the Browser application, page 16 of EX2012, and page 21 of EX2012), the identified “first” and “second” pages present different content and are distinct pages, and “the second page is a child of the first page.” *See supra*, §VIII.A.4 (discussing limitation 1[c]); *see also* EX2012, 6 (“1.1 is the parent of 1.2, which is the parent of 1.3”).

See also, e.g., EX2002 [Cassar Decl.], ¶¶28, 76-77 (discussing modal view and photo gallery application minimize the parent page); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

IPR2025-00058 POR, 86

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.c] “in response to a first input received from a user to minimize the first application to one of the first and second display portions of the device, display the second page of the first application on one of the first and second display portions of the device and discontinue the display of the first page of the application.”

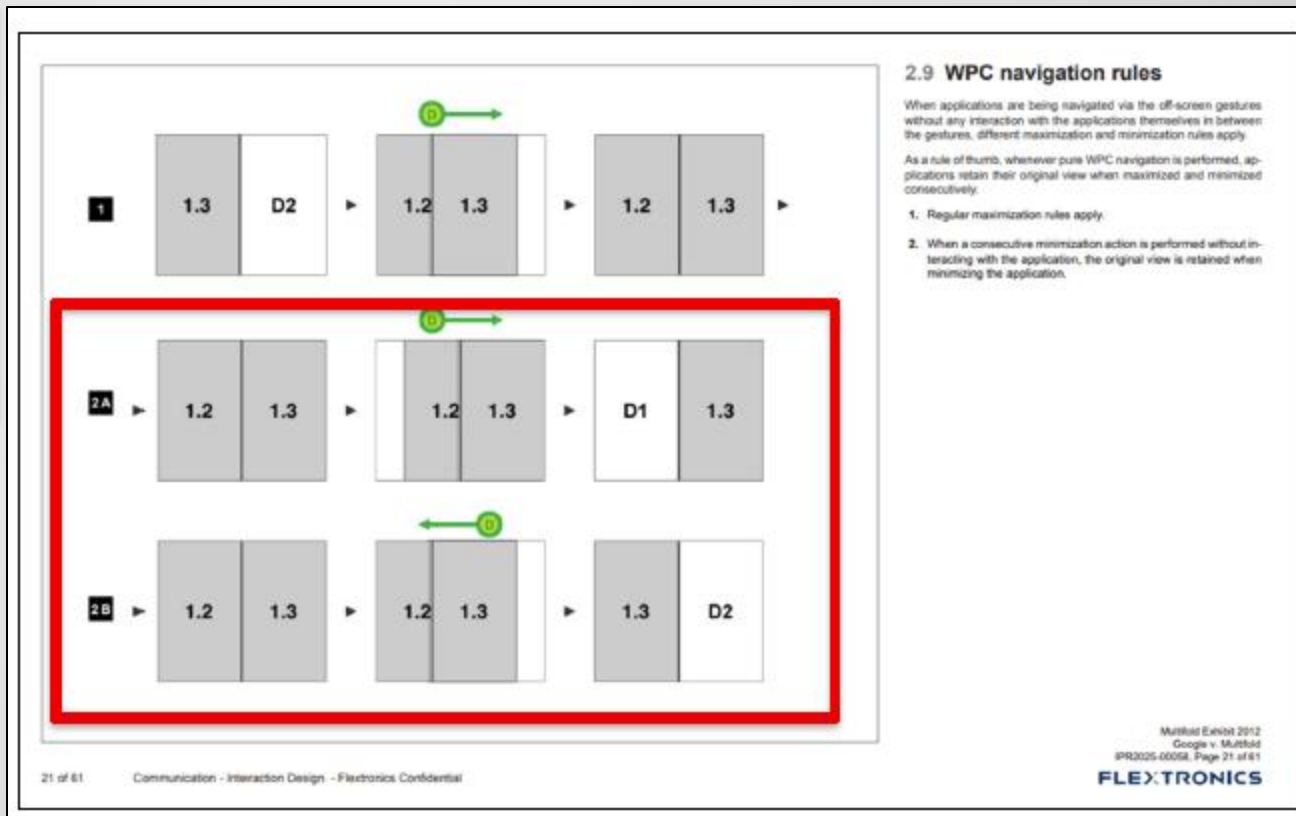
IPR2025-00058 POR, 86

EX2012, 21 (annotation added to examples 2a and 2b);
IPR2025-00058 POR, 88

For example, the EV-1 and EV-2 prototypes could receive a first input from a user to minimize the displayed dual screen application to one of the first and second display portions of the device. *See, e.g.*, EX2012, 8 (describing the drag gesture as “[m]aximiz[ing] and minimiz[ing] dual-screen capable applications” and the flick gesture as “[m]inimiz[ing] dual-screen capable applications”).

Further, upon receipt of the minimization input, the prototypes would display the “second” (child) page of the application on one of the device’s displays, and not display the “first” (e.g., parent) page of the application. For example, regarding the example on page 21 of EX2012, child page 1.3 of the application (the “second page”) is displayed, and page 1.2 (the “first page”) is not displayed. *See, e.g.*, EX2012, 21 (at examples 2a and 2b).

IPR2025-00058 POR, 87



Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

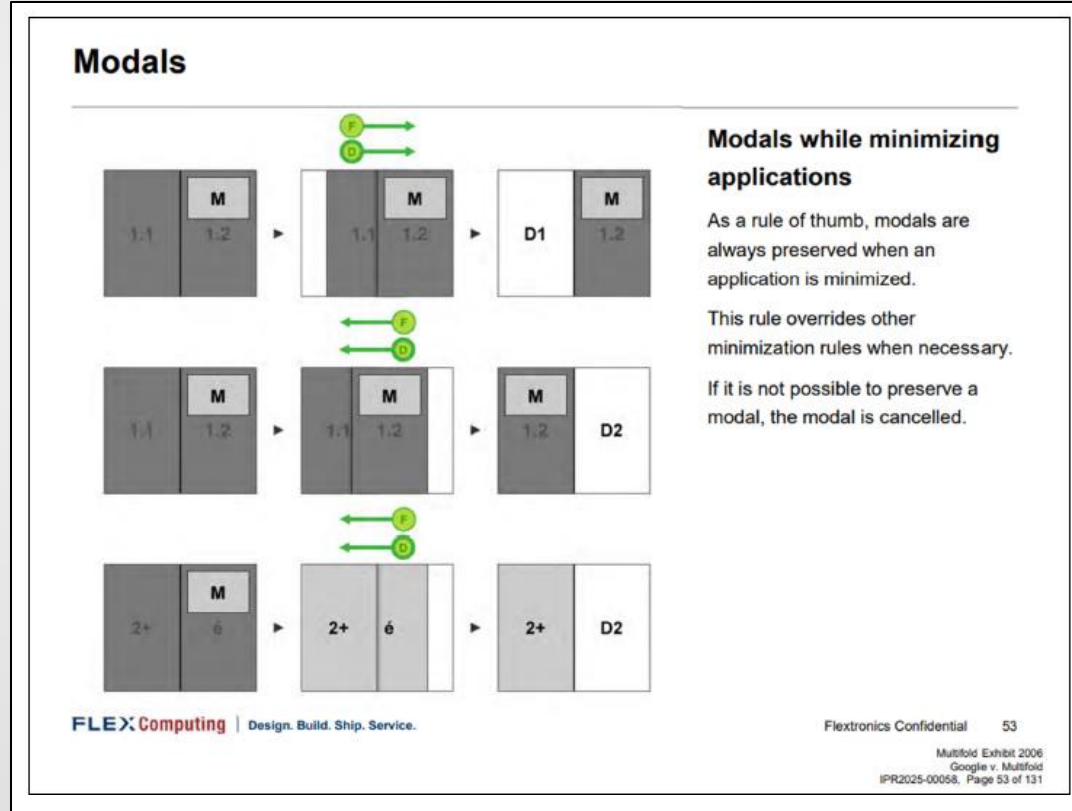
[18.c] “in response to a first input received from a user to minimize the first application to one of the first and second display portions of the device, display the second page of the first application on one of the first and second display portions of the device and discontinue the display of the first page of the application.”

IPR2025-00058 POR, 86

EX2006, 53;
IPR2025-00058 POR, 89

For further example, regarding the Browser application and the example from page 16 of EX2012 discussed in limitations 18[a] and 18[b] above, upon receipt of a minimization input, the EV-1 and EV-2 prototypes would display the “second page” (child page), and not the “first page” if a modal was present. *See, e.g.,* EX2013, 44 (“When using the browser is minimized from Dual Screen to Single Screen the following criteria is used to assess which screen remains in view: **Priority 1 – Screen with a Modal**”). *See also* EX2012, 20 (“As a rule of thumb, the view containing the modal will always be visible after a minimization action whenever possible.”); EX2006, 53 (depicted below):

IPR2025-00058 POR, 88



Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.c] “in response to a first input received from a user to minimize the first application to one of the first and second display portions of the device, display the second page of the first application on one of the first and second display portions of the device and discontinue the display of the first page of the application.”

IPR2025-00058 POR, 86

See also, e.g., EX2002 [Cassar Decl.], ¶¶28, 76-77 (discussing modal view and photo gallery application minimizing the parent page); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

IPR2025-00058 POR, 89

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

I. Claim 19

1. [19] “The computer readable medium of claim 18, wherein the device includes multiple displays, wherein the first display portion of the device includes a first display of the multiple displays, wherein the second display portion of the device includes a second display of the multiple displays, and wherein in response to one of the first input and a second input received from the user the second page of the first application is displayed on the first display of the device.”

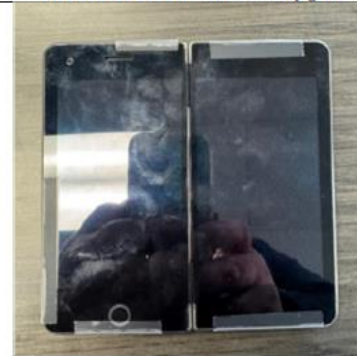
IPR2025-00058 POR, 90

The prototypes also satisfied the requirements of claim 19, because as recited above for limitations 18[a] and 18[b], each of the EV-1 and EV-2 prototypes had two displays, and each of the first and second “display portions of the device” includes a display of the device (e.g., the left display or right display).

EX2017 (EV-1 Prototype)



EX2018 (EV-2 Prototype)



IPR2025-00058 POR, 90

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

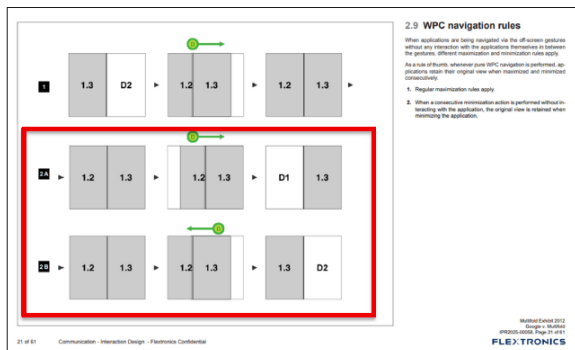
I. Claim 19

1. [19] “The computer readable medium of claim 18, wherein the device includes multiple displays, wherein the first display portion of the device includes a first display of the multiple displays, wherein the second display portion of the device includes a second display of the multiple displays, and wherein in response to one of the first input and a second input received from the user the second page of the first application is displayed on the first display of the device.”

IPR2025-00058 POR, 90

Further, the EV-1 and EV-2 also embodied the requirement that, in response to one of the first input and a second input received from the user, the second page of the first application is displayed on the first display of the device.

For example, regarding the example on page 21 of EX2012, upon receiving the minimization inputs (described at examples 2a and 2b), child page 1.3 of the application (the “second page”) is displayed on the left display of the device (“the first display of the device”). *See, e.g.*, EX2012, 21 (at examples 2a and 2b).



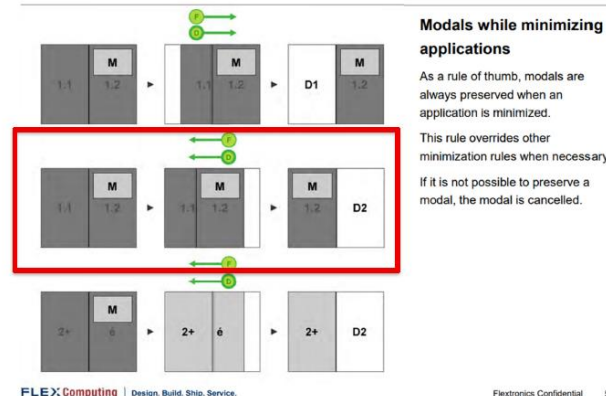
IPR2025-00058 POR, 91

Furthermore, regarding the Browser application and the example from page 16 of EX2012 discussed in limitations 18[c] above, upon receipt of a minimization input from the direction of second page to the first page, the EV-1 and EV-2 prototypes would display the “second page” (child page) on the first display of the

IPR2025-00058 POR, 91

device. *See, e.g.*, EX2012, 20 (“As a rule of thumb, the view containing the modal will always be visible after a minimization action whenever possible.”); EX2006, 53 (annotated below):

Modals



IPR2025-00058

Multifold Exhibit 2089, Google et al. v. Multifold, Slide 88 of 115

IPR2025-00058 POR, 92

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

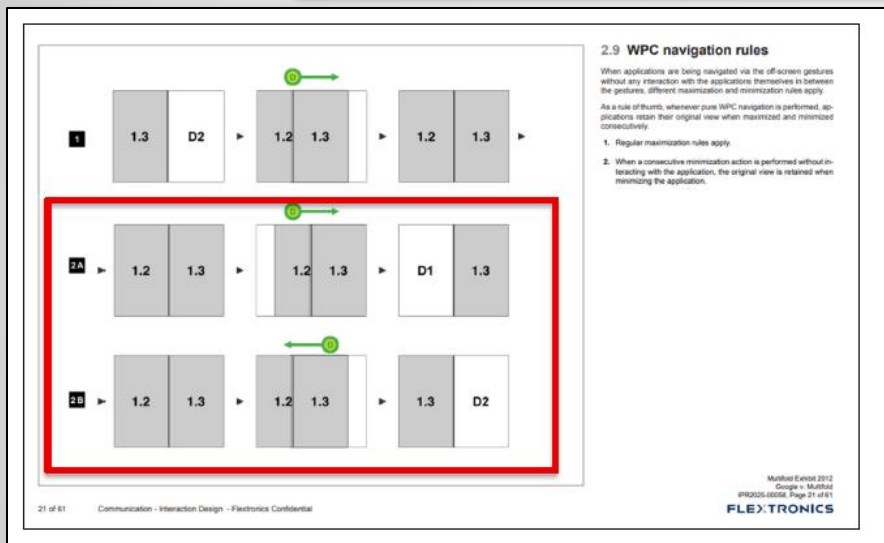
I. Claim 19

1. [19] “The computer readable medium of claim 18, wherein the device includes multiple displays, wherein the first display portion of the device includes a first display of the multiple displays, wherein the second display portion of the device includes a second display of the multiple displays, and wherein in response to one of the first input and a second input received from the user the second page of the first application is displayed on the first display of the device.”

IPR2025-00058 POR, 90

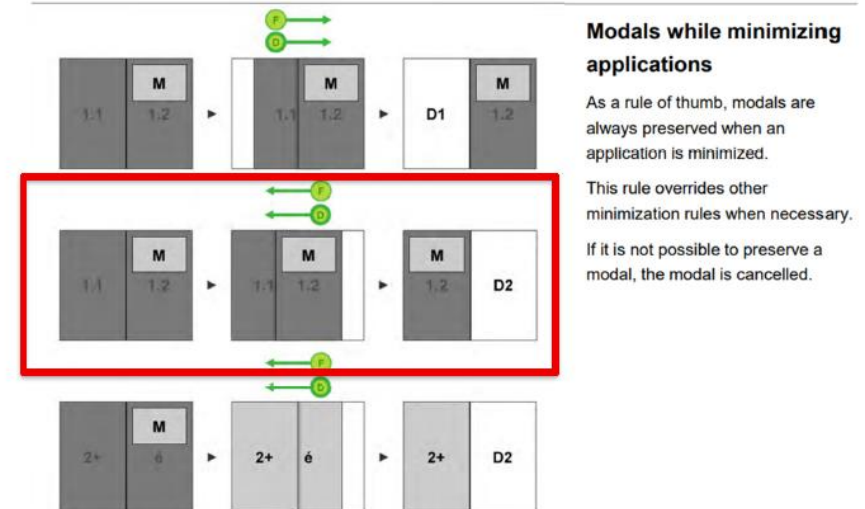
EX2006, 53 (annotated);

IPR2025-00058 POR, 92 (“As a rule of thumb, the view containing the modal will always be visible after a minimization action whenever possible.” (quoting EX2012, 20))



EX2012, 21 (examples 2a and 2b annotated);
IPR2025-00058 POR, 91 (“upon receiving the minimization inputs (described at examples 2a and 2b), child page 1.3 of the application (the “second page”) is displayed on the left display of the device (“the first display of the device”)”)

Modals



Flextronics Confidential 53

Multifold Exhibit 2006
Google v. Multifold
IPR2025-00058, Page 53 of 131

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

I. Claim 19

1. [19] “The computer readable medium of claim 18, wherein the device includes multiple displays, wherein the first display portion of the device includes a first display of the multiple displays, wherein the second display portion of the device includes a second display of the multiple displays, and wherein in response to one of the first input and a second input received from the user the second page of the first application is displayed on the first display of the device.”

IPR2025-00058 POR, 90

See also, e.g., EX2002 [Cassar Decl.], ¶¶28, 72, 76 (“The EV-1 and EV-2 prototypes had the ability for user input to minimize a parent application page while the child application remained maximized. One example I recall is modal views in the child page.”), 77; EX2003 [Becze Decl.] ¶¶12, 18, 20, 25, 29, 31.

IPR2025-00058 POR, 92

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

J. Claim 20

1. [20] “The computer readable medium of claim 19, wherein in response to an input received from the user to maximize the first application the first page of the first application is displayed on the first display of the device and the second page of the application is displayed on the second display of the device.”

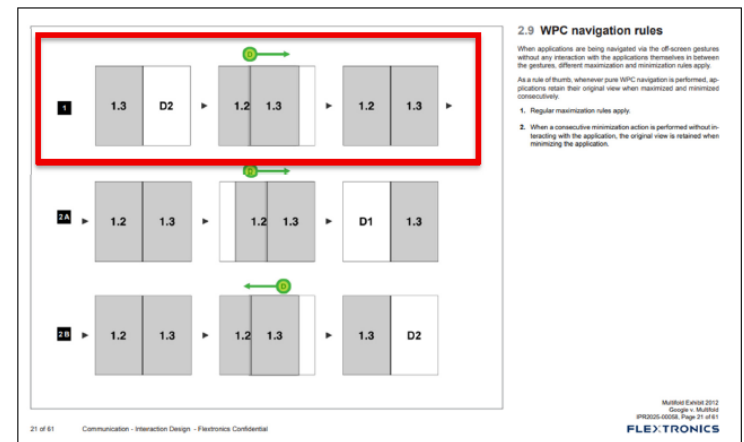
IPR2025-00058 POR, 93

IPR2025-00058 POR, 94

The prototypes also satisfied the requirements of claim 20, because as recited above for Claim 10, the EV-1 and EV-2 prototypes could receive a maximization input after receiving a minimization input. *See supra*, §VIII.E. As described further below, in response to the maximization input, the first page of the first application is displayed on the first display, and the second page (child page) of the first application is displayed on the second display.

For example, regarding the example on page 21 of EX2012, after receiving the minimization inputs of claims 18-19 (described at examples 2a and 2b), the EV-1 and EV-2 prototypes could receive a maximization input (e.g., as shown in example 1 of EX2012 at page 21, highlighted below).

IPR2025-00058 POR, 93



As a result, page 1.2 of the application (the “first page”) is displayed on the left display of the device (“the first display of the device”), and child page 1.3 of the application (the “second page”) is displayed on the right display of the device (“the second display of the device”).

See also, e.g., EX2002 [Cassar Decl.], ¶77 (gallery application maximizes both pages to both displays as recited in claim 20 from a minimized state); [Becze Decl.], ¶¶20, 25 (gesture functionality for “maximizing apps in dual portrait mode was functional on EV-1 and EV-2 prototypes).

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

J. Claim 20

1. [20] “The computer readable medium of claim 19, wherein in response to an input received from the user to maximize the first application the first page of the first application is displayed on the first display of the device and the second page of the application is displayed on the second display of the device.”

IPR2025-00058 POR, 93



2.9 WPC navigation rules

When applications are being navigated via the off-screen gestures without any interaction with the applications themselves in between the gestures, different maximization and minimization rules apply.

As a rule of thumb, whenever pure WPC navigation is performed, applications retain their original view when maximized and minimized consecutively.

1. Regular maximization rules apply.

2. When a consecutive minimization action is performed without interacting with the application, the original view is retained when minimizing the application.

EX2012, 21 (annotated);
IPR2025-00058 POR, 94

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

IPR2025-00058 POR, 39

Becze Declaration, Exhibit 2003

6. The gesture functionality implemented in the Imerj smartphone was defined by Sanjiv Sirpal, who led the user experience team for the Imerj project. The user experience team was responsible for defining how the displays should behave and what functions would be performed by particular gestures. Sanjiv was responsible for coming up with the concept of minimizing and maximizing apps in dual portrait mode. Sanjiv provided the specifications for the gesture functionality and helped ensure that the smartphone met the specified gesture functionality. My team and I developed hardware prototypes based on the designs provided by Sanjiv. I was not involved in the software development for the Imerj project. From the beginning, I was confident we could develop a device that would work for its intended purpose based on the specifications provided by

IPR2025-00058 POR, 43

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.a] “presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;”

IPR2025-00058 POR, 39

Cassar Declaration, Exhibit 2002

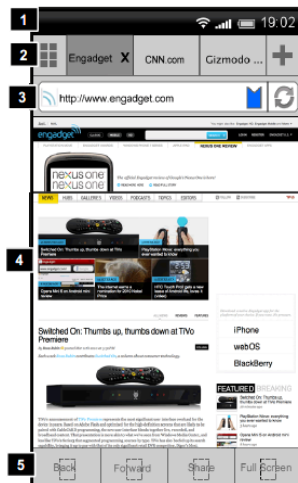
10. I directed implementation of the gesture functionality in the Imerj software based on specifications provided by Sanjiv. It was one of the first things I worked on at Imerj, and some of the gesture capability was available in the earliest prototypes. Sanjiv and his team provided specifications and helped ensure that the software met the specified functionality. From the beginning, I was confident we could develop a device that would work for its intended purpose based on the specifications provided by Sanjiv Sirpal.

IPR2025-00058 POR, 43

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.b] “presenting a second page of the first application on a second display of the device, wherein the second page is a primary page,”

IPR2025-00058 POR, 44



2.1 Browser Default View

This is the default view of the browser in Portrait Single mode.

B.PS.1.0a_Default

1. Notification Bar
2. Tab Bar
3. Address Bar
4. Browser Canvas
5. Action Bar

Changes from Android Baseline Default View

The browser default view differs from the Android Baseline in the following areas

Tab Bar

Action bar

There is some variation within the address bar (explained in section “2.2.1 Address Bar” on page 10)

Ex. 2013, 9 (Explains why Browser Content page is the primary);
IPR2025-00058 POR, 47

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.b] “presenting a second page of the first application on a second display of the device, wherein the second page is a primary page,”

IPR2025-00058 POR, 44

3.11 Minimizing Portrait Dual

When using the browser is minimized from Dual Screen to Single Screen the following criteria is used to asses which screen remains in view

Priority 1 - Screen with a Modal (Inline or Full Screen)

Priority 2 - The Web Browser

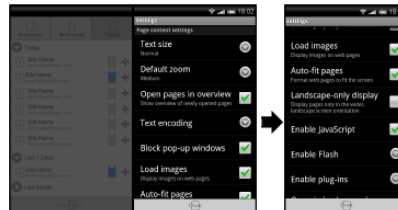
Example 1)



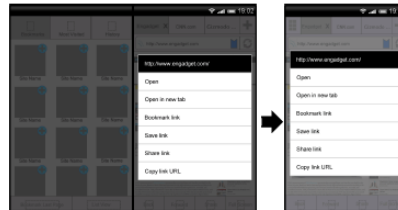
Example 2)



Example 3)



Example 4)



Example 5)

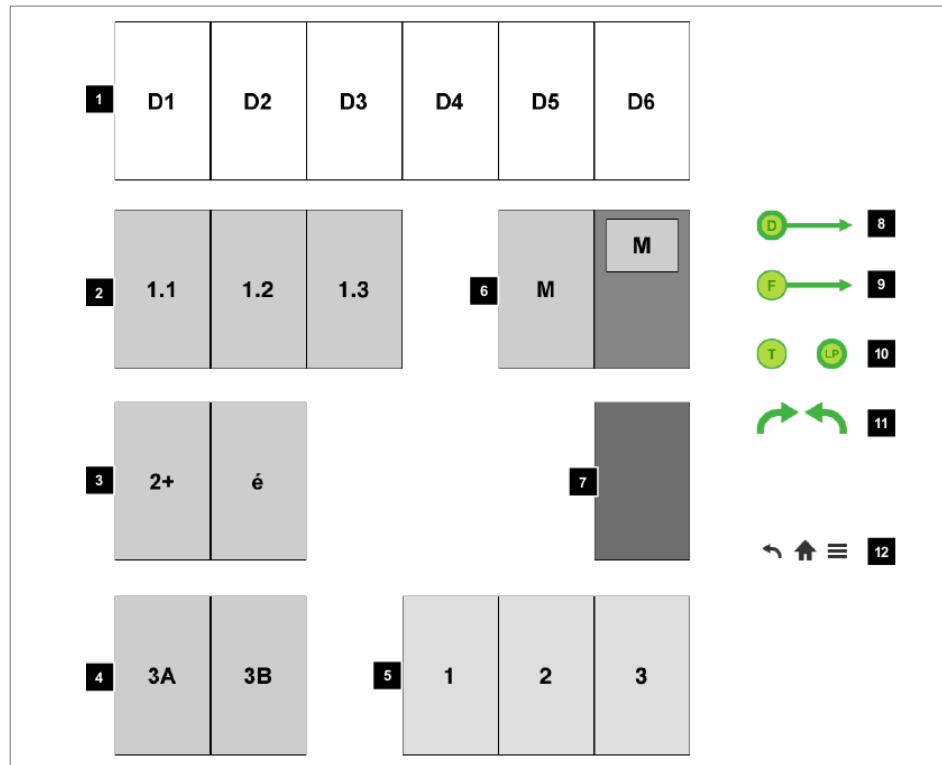


Ex. 2013, 44 (Shows conscious design choice making Browser Content the primary page);
IPR2025-00058 POR, 47

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[1.c] “wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page;”

IPR2025-00058 POR, 48



Legend

- Desktops
 - Always layered underneath the applications.
 - The desktops cannot be reordered.
- Application with a parent/child structure
 - 1.1 is the root of the application (view with no parent), 1.3 the leaf (view with no children).
 - 1.1 is the parent of 1.2, which is the parent of 1.3.
- Application with an exposé structure
 - 2+ is the main view of the application, é is the exposé view.
- Application with a parallel structure
- Single-screen applications
- Modal views
 - Modals can take over either the entire, or part of a view.
 - Modals dim out the view underneath them, as well as any other view within the application structure that is visible in PD orientations.
- Empty view (well)
 - Used during WPC transitions when the actual view cannot be rendered
- Off-screen drag gesture
- Off-screen flick gesture
- On-screen tap and long-press gestures
- Rotation of the device clockwise and counterclockwise
- Hardware buttons

6 of 61

Communication - Interaction Design - Flextronics Confidential

Multifold Exhibit 2012
Google v. Multifold
IPR2025-00058, Page 6 of 61
FLEXTRONICS

Ex. 2012, 6;
IPR2025-00058 POR, 50

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

F. Claim 12

1. [12.a] “The method of claim 10, further comprising: after receiving the first and second inputs, receiving a third input from the user dismissing the first page of the application, wherein one of a first page of a second application or a desktop is presented by the first display of the device;”

IPR2025-00058 POR, 71

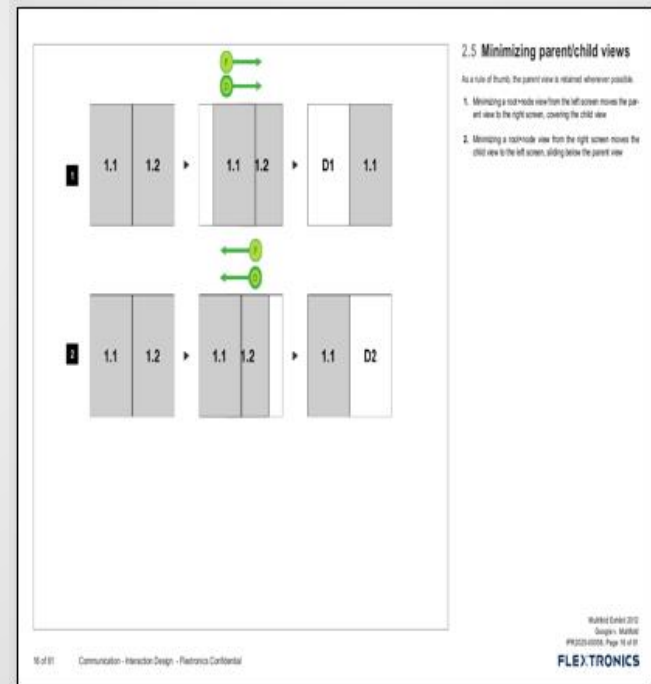
For example, returning to the minimization and maximization examples of EX2012 (discussed in claim 10 above), the EV-1 and EV-2 prototypes allowed for the following sequence:

- Receiving first minimizing input (from limitation 1[d]) as the input from minimization example 2 (from page 16 of EX2012);
- Receiving the second maximizing input (from limitation 10) as the input from maximization example 1 (from page 13 of EX2012);
- Receiving the “third input” (from limitation 12[a]) as the input from minimization example 2 (from page 16 of EX2012).

As shown in EX2012, the result of the third input would be that the “first page of the application” (e.g., child page 1.2) would be dismissed, and a desktop (e.g., D2) would be displayed on the first display of the device (e.g., which originally was displaying child page 1.2).

See also, e.g., EX2003 [Becze Decl.] ¶12, 20, 25, 29, 31.

EX2012, 16



IPR2025-00058 POR, 72

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

[18.c] “in response to a first input received from a user to minimize the first application to one of the first and second display portions of the device, display the second page of the first application on one of the first and second display portions of the device and discontinue the display of the first page of the application.”

IPR2025-00058 POR, 86

See also, e.g., EX2002 [Cassar Decl.], ¶¶28, 76-77 (discussing modal view and photo gallery application minimizing the parent page); EX2003 [Becze Decl.] ¶¶12, 20, 22, 25, 29, 31.

IPR2025-00058 POR, 89

76. The EV-1 and EV-2 prototypes had the ability for user input to minimize a parent application page while the child application remained maximized. One example I recall is modal views in the child page. These are, for example, when a prompt is triggered on a child page (such as entering a password or entering an email address) that require user input before proceeding. Examples are discussed at Exhibit 2006 [UX Overview], 51-55. In these cases, any minimization action will result in the parent page minimizing. *Id.*, 53. This modal functionality was part of the “Minimize Dual Display Application Transition Controller” task at row 55 of my Project Plan. Exhibit 2033 [Project

EX2002, 76

Seo is not prior art: IMERJ PROTOTYPES EVIDENCE CONCEPTION AND REDUCTION TO PRACTICE OF ALL CLAIM LIMITATIONS

I. Claim 19

1. [19] “The computer readable medium of claim 18, wherein the device includes multiple displays, wherein the first display portion of the device includes a first display of the multiple displays, wherein the second display portion of the device includes a second display of the multiple displays, and wherein in response to one of the first input and a second input received from the user the second page of the first application is displayed on the first display of the device.”

IPR2025-00058 POR, 90

68. I understand Claim 19 to include the device to have multiple displays and, in response to the first input or another user input, essentially switching the second page of an application (i.e., the child) from a second display to a first display. EV-1 and EV-2 prototypes had this functionality. EV-1 and EV-2 prototypes each had multiple displays and this functionality (switching the second page of an application (i.e., the child) from a second display to a first display) was accomplished in EV-1 and EV-2 prototypes by swiping on the gesture capture region from the second display toward the first display. EV-1 and EV-2 both implemented WPC specification Exhibit 2012 [Window Management – Interaction Design] which provides, at page 21, examples “2A” and “2B” that provide the functionality of claim 18 discussed

above. Exhibit 2012, 21. At the end of example “2B” the second page “1.3” is displayed on the first display in response to the first input, which meets “in response to one of the first input and the second input” recited in claim 19 where it is in response to the first input. *Id.* At the end of example “2A” on page 21 the second page “1.3” is displayed on the second display, which matches the initial state of example “3” on page 15. *Id.*, 15, 21. The second input of claim 19 is met by the “F” input of example “3” on page 15 because, in response to that “F” input the second page “1.3” is displayed on the second display, as recited in claim 19. *Id.*, 15.

EX2001, Sirpal ¶168

TIMELINE

IPR2025-00058: U.S. Patent No. 9,158,494

Timeline of Conception, Reduction to Practice & Critical Dates

● Conception ● Reduction to Practice ● Critical Date (Seo) ● Alternate RTP

Sept. 10, 2010

Windowing Management Specification

EX2012 defines WPC operations with maximize/minimize gestures and parent-child relationships for dual-screen applications.

POR 16–20; EX2012

Nov. 18, 2010

UX Foundation Overview by Sirpal

PowerPoint showing dual-screen handset with gesture strip, maximize/minimize functionality. Conception corroborated no later than this date.

POR 13–15; EX2006, 15, 30, 31, 79; EX2001 ¶¶11–13

Jan. 4, 2011

Smartpad Demonstration Video

Video demonstrates minimization/maximization on Smartpad in dual portrait mode using EV-1 prototype processor.

POR 32–33; EX2022, EX2023; EX2001 ¶¶79–81

Jan. 25, 2011

EV-2 "Relatively Functional Smartphones"

Rod Schrock email confirms EV-2 units are functional smartphones, marking transition from development to polish testing phase.

POR 34–35; EX2037; EX2001 ¶¶38, 82–83

Feb. 22, 2011

Alternate RTP with Diligence

Alternative RTP date with continuous diligence from before Feb. 10. Tiger Team testing demonstrates polish phase maturity.

POR 35–38; EX2007, EX2008; EX2001 ¶¶39–48

▲ SEO REFERENCE CRITICAL DATE ▲

Oct. 6, 2010

Browser Interaction Design

EX2013 details browser dual portrait mode with control page and web browser view, minimization behavior rules.

POR 21–23; EX2013, 1–2, 34, 44

Dec. 1, 2010

ParentChild Framework Added

Paul Reeves email confirms ParentChild functionality integrated into software framework, evidencing implementation progress.

POR 30; EX2034

Jan. 14, 2011

SSA Project Plan—WPC 100% Complete

Project plan shows WPC gestures complete (rows 49–70). Minimize/maximize/parent-child features completed Nov. 2010.

POR 28–30; EX2032, EX2033

Feb. 10, 2011

Seo Reference Effective Filing Date

Earliest possible effective filing date for Seo prior art reference. Multifold demonstrates conception and RTP before this date.

POR 2, 12; Inst. Dec. 13–14

LEGAL STANDARD

The sufficiency of corroboration is determined according to a “rule of reason.” *Price v. Symsek*, 988 F.2d 1187, 1195 (Fed. Cir. 1993).

IPR2025-00058 POR, 9

Under the rule of reason, “all pertinent evidence is examined in order to determine whether the inventor’s story is credible.” *Fleming v. Escort Inc.*, 774 F.3d 1371, 1377 (Fed. Cir. 2014) (quoting *Sandt Tech., Ltd. v. Resco Metal & Plastics Corp.*, 264 F.3d 1344, 1350 (Fed. Cir. 2001)).

IPR2025-00058 POR, 9-10

LEGAL STANDARD

Conception

“Conception exists when a definite and permanent idea of an operative invention, including every feature of the subject matter sought to be patented, is known.” *Sewall v. Walters*, 21 F.3d 411, 415 (Fed. Cir. 1994).

IPR2025-00058 POR, 9

When a party relies on an earlier conception, it must “connect[] the conception with [the inventor's] reduction to practice by reasonable diligence on his part, so that they are substantially one continuous act.” *Mahurkar v. C.R. Bard, Inc.*, 79 F.3d 1572, 1577 (Fed. Cir. 1996).

IPR2025-00058 POR, 10

Reduction

To establish an actual reduction to practice, a party must establish that: (1) an embodiment or process existed that satisfies every element of the claim at issue; and (2) the invention would work for its intended purpose. *E.I. du Pont De Nemours & Co. v. Unifrax I LLC*, 921 F.3d 1060, 1075 (Fed. Cir. 2019).

IPR2025-00058 POR, 10

Petitioners Failed to Properly Seek Additional Discovery

The rules also provide for “[a]dditional discovery” under 37 C.F.R. § 42.51(b)(2). Additional discovery requires either that the “parties [] agree to additional discovery between themselves,” or, failing agreement, “a party may move for additional discovery.” *Id.*

IPR2025-00058 Sur-Reply, 3

There is “no mandate that the Board draw a negative inference whenever a party fails to present some types of documentary evidence an opposing party insists must exist.” *Dionex Softron GmbH v. Agilent Techs., Inc.*, 56 F.4th 1353, 1362 (Fed. Cir. 2023)

IPR2025-00058 Sur-Reply, 3-4

Attorney-Client Privilege

“The attorney-client privilege is the oldest of the privileges for confidential communications known to the common law... Its purpose is to encourage full and frank communication between attorneys and their clients and thereby promote broader public interests in the observance of law and administration of justice.”
Upjohn Co. v. U.S., 449 U.S. 383, 389 (1981).

IPR2025-00058 Sur-Reply, 4

Cassar Deposition: Prototype Dates

Q: You mentioned how you were installing software daily. Is that because you were constantly updating the software? [EX1020, 195:9-12]

Mr. Cassar: Yes. [EX1020, 195:13]

Q: And until when did that process occur? [EX1020, 195:14-15]

Mr. Cassar: Well, we were – we kept going probably for another year on doing things and extending things and keeping – every time Google came up with a release, we had to keep going. That wasn't ever gonna stop. [EX1020, 195:18-22; 196:1]

Q: So that was until 2012? [EX1020, 196:2]

Mr. Cassar: I would say until probably 2012, at least until the end of 2011, yes. Until we stopped the project. [EX1020, 196:3-5]

Cassar Deposition: Liability Waiver

Q: Did anyone at Flextronics require you to participate in this proceeding as a condition of that waiver? [EX1020, 264:2-4]

Mr. Cassar: No, they did not. [EX1020, 264:11-11]

Q: Did anyone at Flextronics ask you to participate in this proceeding? [EX1020, 264:12-13]

Mr. Cassar: No, they did not. [EX1020, 264:15-17]

Q: Did anyone at Flextronics ever at any juncture imply that you would face liability if you did not participate in this proceeding? [EX1020, 264:19-22]

Mr. Cassar: No, they did not.
[EX1020, 265:1-3]

Ed Becze General Information

Ed Becze, Ph.D.

- **Current Role:** CEO and Managing Partner of Pegmatis Inc. [EX1021, 10:10–14]
- **Responsibilities:** He and Mr. Cassar "manage all 18 or 20 [people working at Pegmatis] directly." [EX1021, 11:8–12].
- **Imerj Role:** Director of Product Design at Flextronics (later Director of Mechanical Platform Engineering at Imerj Design) [EX2003, ¶¶1, 4-5].

Ron Cassar General Information

Ron Cassar

- **Current Role:** COO and CFO of Pegmatis Inc. [EX1020, 11:11–15]
Responsibilities: Runs the software side of Pegmatis [EX1020, 11:11–15].
- **Current Business Context:** "It's a very busy time for [his] company," and "[w]e've got a lot of initiatives going on right now [at Pegmatis]." [EX1020, 27:15–19, 69:2–9, 70:6–13]
- **Imerj Role:** Senior Manager (later Director) of Software Development at Flextronics [EX2002, ¶¶4-5]

Sanjiv Sirpal General Information

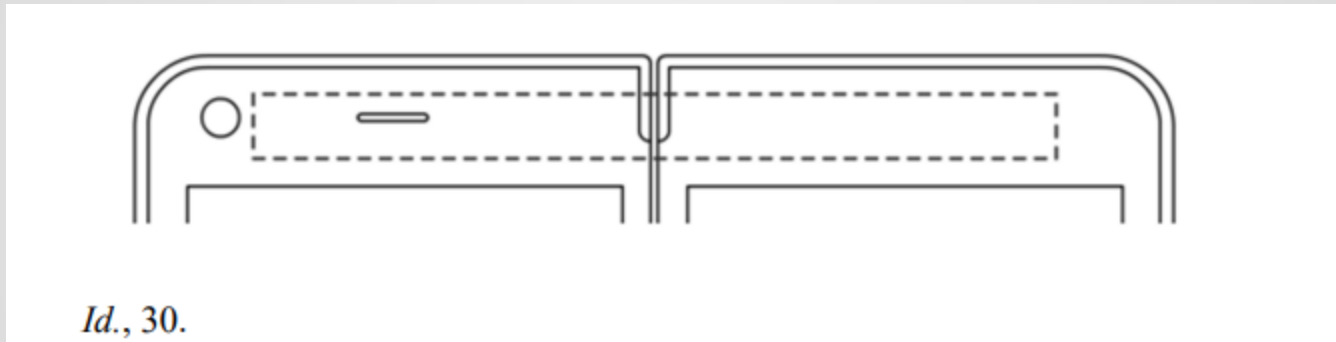
Sanjiv Sirpal

- **Named Inventor:** First named inventor on U.S. Patent No. 9,158,494 [EX2001, ¶1]
- **Employment:** Head of Design at Parspec, a Silicon Valley startup where he earned approximately \$250,000 a year prior to deposition [EX1019, 64:15–65:7].
- **Imerj Role:** Started as Senior User Interface Designer in June 2008; later served as Director of User Experience at Flextronics Flex Computing Segment on the Imerj project [EX2001, ¶¶6-7]

Claim 2

[e]ach display had a gesture capture region along the top of the display and a touch display encompassing most of the display below the gesture capture region. [EX2001, ¶ 62]

IPR2025-00058 Sur-Reply, 9-10



IPR2025-00058 Sur-Reply, 10

“[g]estures could be tracked from the off-screen gesture region through the screen itself – through the display region itself” (EX1019, 101:15-102:11; see also EX1020, 138:14-139:14),

IPR2025-00058 Sur-Reply, 11

Declaration Preparation

Cassar Testimony

With regard to my declaration, there was no discussion. I have never had a conversation with anybody with regards to the content of my declaration outside of my legal counsel. EX1020, 50:18-51:1

IPR2025-00058 Sur-Reply, 15

Becze Testimony

“several meetings” occurred “where [counsel] took down information,” that his draft declaration was then “edited [] for accuracy,” and that his declaration was finalized after a “follow-up meeting [with counsel]” to confirm it “was accurate.” EX1021, 33:3-10, 33:18-34:3, 35:1-13.

IPR2025-00058 Sur-Reply, 12

Sirpal Testimony

Q: Did you speak to Mr. Cassar about any of the subject matter in your declaration?

Mr. Sirpal: No. [EX1019 42:5-8]

Q: Did you speak to Mr. Becze about the substance of anything in your declaration?

Mr. Sirpal: No, I did not. [EX1019 43:2-5]

Petition Fails to Adequately Address Claims 14 and 18

IX. CLAIMS 14 AND 18-20 ARE NOT OBVIOUS

- A. Claims 14 and 18: The Petition does not identify with particularity evidence that “in response to a first input ... to minimize the first application ... , discontinue the display of the first page of the application” is obvious

IPR2025-00058 POR, 95

Ex. 1001 at 51:32-47 (Claim 1)

What is claimed is:

1. A method for controlling a display of a device, comprising:
presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page; 35
presenting a second page of the first application on a second display of the device, wherein the second page is a primary page, wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page; 40
receiving a first input from a user, wherein the first input includes an input to minimize the first application to one of the first and second displays of the device, wherein the second page of the first application is displayed by one of the first display of the device and the second display of the device, and wherein the first page of the first application is not displayed. 45

14. A device, comprising:
a first display, including:
a touch display, wherein the touch display is located within a first area of the first display;
50 a gesture capture region, wherein the gesture capture region is located within a second area of the first display;
a second display, including:
a second touch display, wherein the second touch display is located within a first area of the second display;
55 a second gesture capture region, wherein the second gesture capture region is located within a second area of the second display memory;
a processor in communication with the first display, second display, and memory;
application programming stored in the memory and executed by the processor, wherein the application programming is operable to:
60 present a first page of a first application in a first portion of the first display;
65 present a second page of the first application in a second portion of the second display, wherein the first and

second pages present different content and are distinct pages, and wherein the second page is a child of the first page;
receive input entered by a user in the gesture capture region; 5
in response to a first input entered by the user to minimize the first application to one of the first and second portions of the display, present the second page of the first application in one of the first and second portions of the display and discontinue the presentation of the first page of the application. 10

Ex. 1001 at
52:46-67
(Claim 14)

Ex. 1001 at
53:1-11
(Claim 14)

Petition Fails to Adequately Address Claims 14 and 18

IX. CLAIMS 14 AND 18-20 ARE NOT OBVIOUS

- A. Claims 14 and 18: The Petition does not identify with particularity evidence that “in response to a first input ... to minimize the first application ... , discontinue the display of the first page of the application” is obvious

IPR2025-00058 POR, 95

Ex. 1001 at 51:32-47 (Claim 1)

What is claimed is:

1. A method for controlling a display of a device, comprising:
presenting a first page of a first application on a first display of the device, wherein the first page is an auxiliary page;
presenting a second page of the first application on a second display of the device, wherein the second page is a primary page, wherein the first and second pages present different content and are distinct pages, and wherein the auxiliary page is a child of the primary page;
receiving a first input from a user, wherein the first input includes an input to minimize the first application to one of the first and second displays of the device, wherein the second page of the first application is displayed by one of the first display of the device and the second display of the device, and wherein the first page of the first application is not displayed.

18. A non-transitory computer readable medium having stored thereon computer-executable instructions, the com-

puter-executable instructions causing a processor to execute a method for selectively presenting an application across a display of a device, the computer-executable instructions comprising:

5 instructions to display a first page of a first application on a first display portion of the device;
instructions to display a second page of the first application on a second display portion of the device, wherein the first and second pages present different content and are distinct pages, and wherein the second page is a child of the first page;
10 in response to a first input received from a user to minimize the first application to one of the first and second display portions of the device, display the second page of the first application on one of the first and second display portions of the device and discontinue the display of the first page of the application

Ex. 1001 at
53:32-33
(Claim 18)

Ex. 1001 at
54:1-17
(Claim 18)

Petition Fails to Adequately Address Claims 14 and 18

IX. CLAIMS 14 AND 18-20 ARE NOT OBVIOUS

- A. Claims 14 and 18:** The Petition does not identify with particularity evidence that “in response to a first input ... to minimize the first application ... , discontinue the display of the first page of the application” is obvious

IPR2025-00058 POR, 95

14[m], 18[c]. In other words, for claims 14 and 18, in response to the

IPR2025-00058 POR, 95

minimization input, the child page is displayed, and display of the parent page is discontinued.

The Petition’s only argument for obviousness of the minimization function recited in Claims 14[m] and 18[c] is a recitation back to Claim 1[d]. Petition, 71 (“Seo discloses, suggests, and/or renders obvious this claim limitation for the same reasons discussed for claim element 1[d].”); Petition, 73 (“Seo discloses and/or suggests the claimed instructions for the reasons discussed for claim elements 1[d] and 14[m]”). But, fatal to Petitioners’ analysis, claim 1[d] requires the opposite of limitations 14[m] and 18[c].

IPR2025-00058 POR, 96