

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

Patent Owner Demonstratives
IPR2025-00059 (Patent 9,141,135)
February 24, 2026

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Claim Construction: Displays Information Selectively

“[D]isplays information selectively across the annunciator window” should be construed as “displays information in a way that involves intentionally choosing some information to display and not others.”

Paper 25, 1

Claim Construction: Displays Information Selectively

Patent Owner's proposed construction is consistent with the masking limitation recited by dependent claims 3, 8, and 12 because the masking limitation should be read narrower than Patent Owner's proposed construction of "displays information selectively."

Paper 25, 1-2

Claim Construction: Displays Information Selectively

‘135 Col. 26 ln. 45-50 describes “masking”:
“In another aspect of the invention, it is also contemplated that ***a longer alert or message having greater text or data content can span across the entire annunciator window 1100, thereby temporarily masking or covering the other icons for a period of time until the alert or message is cleared by the user.***”

Paper 13, 15 (*citing* Ex.1001, 26:45-50)

Claim Construction: Displays Information Selectively

The '135 Patent explains that “masking” as used in claims 3, 8, and 12 refers to “temporarily masking or covering the other icons.”

Paper 13, 15

Petitioners' Reply does not dispute that this is the correct way to read the masking limitation in claims 3, 8, and 12.

Paper 25, 2

Claim Construction: Displays Information Selectively

The Reply argues that the last step of claim 1 (which reads in full “modifying, by the processor, the display of the annunciator window in response to a changed state of at least one of the device status, connectivity status, and messaging status, wherein the modified display of the annunciator window displays information selectively across the annunciator window”) requires “displays information selectively” to include updating a status icon because updating a status icon is “modifying... the display of the annunciator window in response to a changed state of at least one of the device status, connectivity status, and messaging status.”

Claim Construction: Displays Information Selectively

This argument erroneously conflates the first part of the “modifying” step (“modifying, by the processor, the display of the annunciator window in response to a changed state of at least one of the device status, connectivity status, and messaging status”) with the second part of the “modifying” step (“wherein the modified display of the annunciator window displays information selectively across the annunciator window”).

Paper 25, 2

Claim Construction: Displays Information Selectively

Updating a status icon to show a new icon falls within the scope of “modifying, by the processor, the display of the annunciator window in response to a changed state of at least one of the device status, connectivity status, and messaging status.”

Paper 25, 2-3

Claim Construction: Displays Information Selectively

The additional clause “wherein the modified display of the annunciator window displays information selectively across the annunciator window” must require more than simply updating a status icon to show a new icon.

Paper 25, 2-3

Yook does not disclose “the modified display of the annunciator window displays information selectively across the annunciator window”

The Petition has not alleged that Yook’s status bar selects some information to display as required by the claim language. There is no allegation that Yook displays only some of the status icons but does not display other status icons—thus Yook does not disclose “display[ing] information selectively.”

Paper 13, 35

Dr. Rodriguez's Testimony

Q. Okay. And do you see a bar on top of A.App and B.App?

A. I see some -- a couple of horizontal lines.

Q. And do you know what that is?

A. I don't recall the reference specifically discussing that region in Figure 3.

Q. Do you know what is depicted by the elongated rectangle to a person of ordinary skill?

A. It appears to be a status bar.

Ex.2006, 39:19-40:8

Yook does not disclose “the modified display of the annunciator window displays information selectively across the annunciator window”

Even if the Board disagrees with Patent Owner’s construction, Yook does not disclose that anything is selectively displayed in any manner. Absent any disclosure of how the information in the status bar is selected for display, a POSITA cannot conclude that Yook suggests selectively displaying icons on the alleged status bar shown in Fig. 3 of Yook – under any construction.

Paper 25, 5

Claim 15

Petitioners rely on Yook's Figures 3 and 10 as allegedly suggesting claim 15, even though Yook never discloses the dimensions of these Figures or whether they are in portrait mode; and the Federal Circuit has repeatedly held that proportions of features in a drawing are not evidence of the actual proportions of those features and may not be relied on to show any particular proportion. *Hockerson-Halberstadt, Inc. v. Avia Group Int'l, Inc.*, 222 F.3d 951, 956 (Fed. Cir. 2000)

Paper 25, 8

Claim 15

This is particularly problematic here because Yook's Fig. 3 shows two alleged displays A.App and B.App each with approximately the same width and height:



FIG. 3 <301>

Paper 25, 9-10

Claim 15

The relative dimensions of Yook's Fig. 3 is ambiguous.

Paper 25, 10

Claim 15

This is not a case like Yook's Fig. 4e that is described as portrait mode and shows a height significantly greater than the width. Rather, similar to *Regents of Univ. of California*, the closeness of the width and height in Yook's Fig. 3 merely indicates that the screen is divided into A.App and B.App, and not that the division creates two portrait mode screens.

Paper 25, 10

Claim 15

Regents of Univ. of California, 2024 WL 4972639, at *3 (“We think that this is not a case in which the boldness of certain lines can be read as disclosing relative thickness, since the figures could just as well demonstrate only the existence of a separate structure.”).

Paper 25, 10

Claim 9

The '135 Patent states that “[t]he term “screen” ... refers to a physical structure that includes one or more hardware components that provide the device with the ability to render a user interface and/or receive user input.” Ex.1001, 4:11-14.

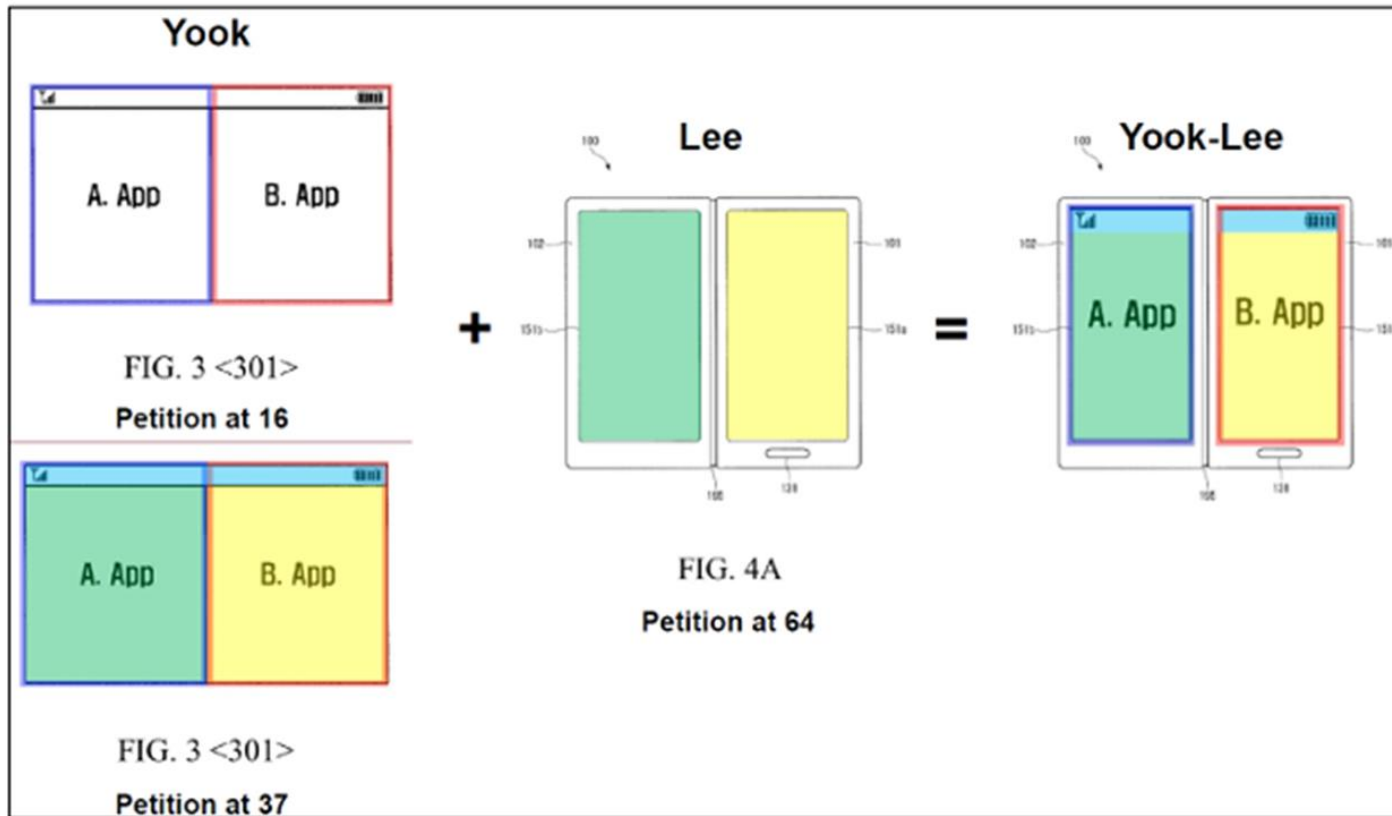
Paper 13, 18

Claim 9

Claim 9 requires displaying an annunciator window across adjacent upper or lower edges of displays on two different physical screens.

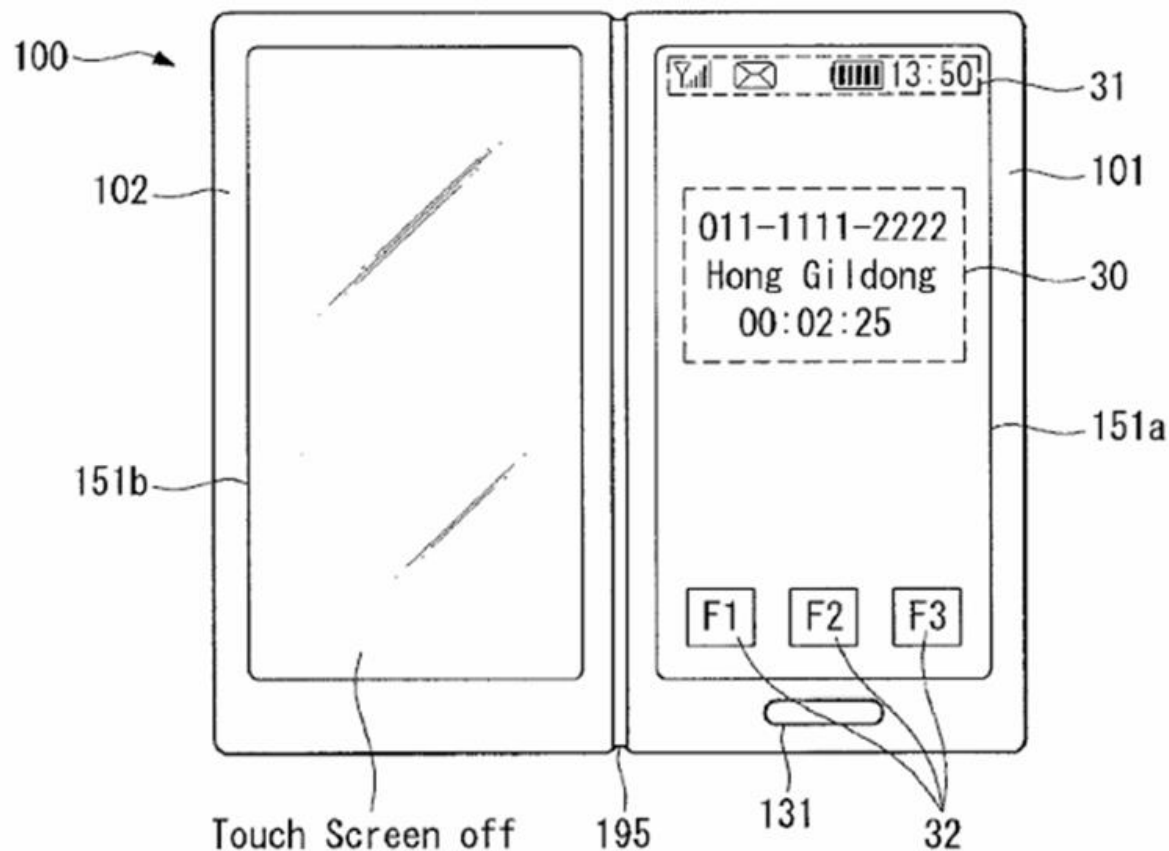
Paper 25, 12

The Reply's Alternative, New Theory



Paper 25, 13

Lee Teaches The Left Touch Screen Is Off



Paper 25, 14