UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

GOOGLE LLC and MOTOROLA MOBILITY LLC,
Petitioners,

v.

MULTIFOLD INTERNATIONAL INC. PTE. LTD.,
Patent Owner.

_____

Case IPR2025-00060
Patent 8,842,080

_____

EXHIBIT 2002

DECLARATION OF RAJEEV SURATI, Ph.D.

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I. INTRODUCTION

1. My name is Dr. Rajeev Surati. I have been retained as an expert witness to provide my independent opinion in regards with matters at issue in the *inter partes* review IPR2025-00060 concerning U.S. Pat. No. 8,842,080 ("the '080 Patent"). I have been retained by Multifold International Inc. Pte. Ltd. ("Multifold"), the Patent Owner, in this proceeding. I have been informed that the Petitioners are Motorola Mobility LLC and Google LLC.

2. Unless otherwise noted, the statements made herein are based on my personal knowledge, and if called to testify about this declaration, I could and would do so competently and truthfully.

3. A detailed record of my professional qualifications including cases in which I was an expert is being submitted herewith as Exhibit 2003 and is summarized in Section II, *infra*.

4. I am being compensated for my work in this matter at the rate of $665/hour. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony.

5. I am not a legal expert and offer no opinions on the law. However, I have been informed by counsel of the various legal standards that apply, and I have applied those standards in arriving at my conclusions.

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6. In this declaration, I have been asked to address certain invalidity opinions relating to the ’080 Patent, specifically those provided by Google and Motorola in their Petition, Paper 1 (“Petition”) challenging the ’080 Patent and the accompanying declaration of Dr. Sandeep Chatterjee, Ex. 1002 (“Chatterjee declaration”), regarding the alleged invalidity of the ’080 Patent. The Petition and Dr. Chatterjee contend that claims 1, 2, 4-9, 12-16, and 20 (“Challenged Claims”) are unpatentable. This declaration addresses the validity of the Challenged Claims.

7. In this expert declaration, I provide my opinions in response to Grounds 1-4 for the Challenged Claims in the Petition and the Chatterjee declaration, as well as the basis for my opinions. As I explain in detail later in this expert report, based on my study of the ’080 Patent, the Chatterjee declaration, and various references cited by Petitioner and Dr. Chatterjee, it is my opinion that the cited references have deficiencies that do not render the Challenged Claims unpatentable, either alone or in combination.

8. I have found limitations in the Challenged Claims that are not disclosed by any reference or proposed combination of references. I identify these undisclosed limitations below. My decision not to address a limitation of a claim should not be interpreted as an admission that such a limitation is found in the art in the Ground cited by Petitioner and Dr. Chatterjee, or that a POSITA would have an apparent reason to combine or modify references in a manner meeting the limitation.

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9. I submit this declaration having reviewed the '080 Patent, the Challenged Claims, the Institution Decision in this IPR, and the prior art cited by Petitioners in the Petition. The material I have considered includes but is not limited to the items set forth below:

MATERIALS CONSIDERED	
Paper 1	Petition
Paper 8	Institution Decision
Ex. 1001	'080 Patent
Ex. 1002	Declaration of Dr. Chatterjee
Ex. 1005	Certified English-language Translation of Japanese Patent Publication No. H09-204288 ("Ogawa"), Original Japanese Patent Publication No. H09-204288, and Translation Certificate
Ex. 1006	U.S. Patent No. 8,649,824 ("Choi")
Ex. 1007	U.S. Patent No. 2010/0248788 ("Yook")

10. My opinions as set forth in this expert declaration are based on these sources of information, together with my education, training, and experience, including my work in the field of the '080 Patent.

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II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

11. My complete qualifications and professional experience are described in my Curriculum Vitae, a copy of which is submitted as Ex. 2003. The following is a brief summary of my relevant qualifications and professional experience.

12. I have provided my full background in the curriculum vitae included here as Exhibit 2003. My CV details my experience in electrical engineering and computer science and also includes a list of publications I have authored or co-authored.

13. I attended the Massachusetts Institute of Technology (MIT) from 1988 to 1999, during which, I earned a Bachelor of Science (1992), Master of Science (1995) and a Doctor of Philosophy (1999) in Electrical Engineering and Computer Science. My Ph.D. thesis was entitled "Scalable Self-Calibrating Technology for Large Scale Displays."

14. Between 1989-1999 I was employed as a researcher/programmer at the MIT Artificial Intelligence Lab. At the lab I worked for Thomas F. Knight Jr. Ph.D., one of the noted inventors of the first bit mapped displays for computers as well as many other notable accomplishments. The lab is also noted for its excellence in machine vision.

15. In 1996 I began working on a Ph.D. thesis related to display of multimedia. My Ph.D. thesis system was a special kind of display allowing one to

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create ultra-high resolution displays composed of multiple projectors tiled with a slight overlap so that a camera-based feedback system could create an inverse map to drive the system such that a person would only see a continuous seamless display with no bezel or overlap. The camera-based system required imaging and decoding of 2d fiducials, and thus I became an expert at machine vision for the purpose of decoding and encoding 2d fiducials such as bar codes – the optical systems involved, the systems programming, etc. Today, this technology is better known as automatic calibration for projection mapping or structured light. My experience, along with a patent I developed and licensed based on my Ph.D. thesis, were used to create a new startup company named Scalable Display Technologies that works with a variety of Pro AV display companies' products.

16. I am a named inventor on U.S. Pat. No. 6,456,339, "Super-resolution Display," which reflects my Ph.D. work.

17. In 2004, I founded Scalable Display Technologies (SDT), and I have been the President and Chairman of the company since the founding. Among its operations, SDT operates in the Audio Video domain and has licensed software and firmware to various companies including Hitachi and NEC. I also wrote a network-synchronized media playback system involving encoding and decoding of video and audio content as well as real time recording and video capture, a product known as "ScalablePlayer." This product was written on top of the DirectShow system from

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Microsoft. In conjunction with this, for some show demonstration systems, I wrote a desktop application in C# that allowed one to preview and select different inputs and outputs.

18. As part of this system I worked on several home theater systems that involved graphical user interfaces (GUIs) for displaying multimedia. These were computer systems and hardware systems that managed the input and display of content on 110 inch plus often curved screens. In these systems, GUIs managed the display of a multitude of input and output ranging from tv tuners, to cablebox input etc, to dvd and xbox360s.

19. Additionally, at SDT I have worked with most of the major video wall control manufacturers on customizing their displays. These include Jupiter Systems, RGB Spectrum Matrox, and Datapath. In addition, I helped architect and specify some special video wall GPU functions for both AMD and NVIDIA.

20. I have received additional patents, including: U.S. Pat. No. 8,817,111, "System and method of calibrating a display system free of variation in system input resolution"; U.S. Pat. No. 8,994,757, "System and method for providing improved display quality by display adjustment and image processing using optical feedback"; U.S. Pat. No. 9,215,455, "System and method of calibrating a display system free of variation in system input resolution"; U.S. Pat. No. 9,369,683, "System and method for calibrating a display system using manual and semi-manual techniques"; and

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U.S. Pat. No. 9,497,447, "System and method for color and intensity calibrating of a display system for practical usage."

21. As part of my work, I am familiar with user interfaces in digital displays as of October 2010.

22. In 2000, I started a company known as "photo.net" which was a large online photography community where I worked with many consumer electronics manufacturers in the digital camera business. There, I implemented a photo sharing system involving the delivery of multimedia content. Additionally, I worked on e-commerce capabilities that involved some product configuration options. The photo.net system includes user interfaces for sharing and displaying multimedia, as well as super high performance image encoding/decoding systems and real time delivery of high bandwidth content.

23. In 1996, I founded Flash Communications, which was focused on technology related to U.S. Pat. No. 5,943,478 and associated technology that I had developed related to pop-up two-way messaging over the Internet. I am one of the named co-inventors of U.S. Pat. No. 5,943,478, which is entitled "System for Immediate Popup Messaging across the Internet," which describes a two-way messaging system like AOL Instant Messenger and MIT's Zephyr service built at Internet scale.

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24. In 1998, Flash Communications was sold to Microsoft Corporation, and Flash Communications' messaging technology was incorporated into Microsoft's Messenger service and Microsoft Exchange 2000 Instant Messaging Server.

25. While working at Microsoft between 1999 and 2000, I implemented an XML-based protocol that formed a basis for the Extensible Messaging and Presence Protocol (XMPP), which is now an IETF standard for the Exchange Instant Messaging Server. I participated internally with the program management team on helping specify this protocol for the IETF standardization process.

26. Also while at Microsoft, I invented and was named as an inventor on other patents related to instant messaging, including: U.S. Pat. No. 6,415,318, "Inter-enterprise messaging system using bridgehead servers"; U.S. Pat. No. 6,604,133, "Inter-enterprise messaging system using bridgehead servers"; and U.S. Pat. No. 6,260,148, "Methods and systems for message forwarding and property notifications using electronic subscriptions."

27. Between 2000 and 2004, I worked as a consultant and investor at Nexaweb Corporation, where I helped implement several two-way messaging features over HTTP.

28. I am on the advisory boards of several technology companies, including UnifySquare, which is a unified communications/real time collaboration consultancy; Paneve, which develops general purpose ASICs coupled with compiler

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technology; Nexaweb, which develops real time web application frameworks using HTTPS; Antix Labs, which develops compiler technology for universal gaming platform; and Permabit, which develops content addressable storage.

29. For my contributions as an inventor and entrepreneur, I have received several awards, including the Global Indus Technovator Award 2009 and Laureate of 2009 Computer World Honors Program.

III. RELEVANT LEGAL STANDARDS

A. Burden of Proof

30. I understand that Petitioner has the burden of proving unpatentability by a preponderance of the evidence. 35 U.S.C. § 316(e). Preponderance of the evidence "means the greater weight of evidence, evidence which is more convincing than the evidence which is offered in opposition to it." *Hale v. Dep't of Transp.*, 772 F.2d 882, 885 (Fed. Cir. 1985).

B. Anticipation (35 U.S.C. § 102)

31. I have been informed that to obtain a patent the claimed invention must have, as of the date of the invention, been novel over the prior art. I understand that an invention is not novel if it is anticipated by the prior art. I understand that an invention is anticipated if a single prior art reference discloses all the limitations or elements as set forth in the claim. To anticipate, the identical invention must be shown in as complete detail as is contained in the claim and exactly as arranged. I

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understand that in some cases an element or limitation, while not explicitly or expressly disclosed in a prior art reference, may still be disclosed by the prior art reference if that element or limitation is inherent in the reference. I understand that an element or limitation is inherent if the nature of the reference is such that the element or limitation is necessarily present, or put another way, that it would have to follow from the disclosed system or method that the element or limitation must be present.

C. Obviousness (35 U.S.C. § 103)

32. I also understand that a patent may be rendered "obvious" based on an alleged prior art reference or a combination of such references in view of what a person of ordinary skill in the art would understand based on his or her knowledge and the references. I understand that a patent cannot be properly granted for subject matter that would have been obvious to a person of ordinary skill in the art at the time of the alleged invention, and that a patent claim directed to such obvious subject matter is invalid under 35 U.S.C. § 103. It is also my understanding that in assessing the obviousness of claimed subject matter one should evaluate obviousness over the prior art from the perspective of one of ordinary skill in the art at the time the invention was made (and not from the perspective of either a layman or a genius in that art).

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33. I have been informed that the following factors must be evaluated to determine whether the Petitioner has met its burden of proof that a claimed invention is obvious:

1. The scope and content of the prior art relied upon by Petitioner;
2. The difference or differences, if any, between each claim of the patent and the prior art;
3. The level of ordinary skill in the art at the time the invention of the patent was made; and
4. Any objective indicia of non-obviousness, such as: (1) commercial success of an embodiment; (2) a long-felt need; (3) skepticism; (4) failure by others to find the solution provided by the claimed invention; (5) copying by others of the subject matter of the claim invention; (6) unexpected results of the claimed invention; (7) acceptance of others and industry praise; and (8) licensing of the patents.

34. I have been informed that to prevail on obviousness the Petitioner must establish that (1) the prior art teaches or suggests each of the limitations of the claim; (2) there exists an apparent reason to combine and/or modify the prior art as proposed; and (3) a person of ordinary skill would have a reasonable expectation of success that the proposed combination and/or modification of the prior art would operate for its intended purpose.

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35. I have been informed that a claim is not proved obvious merely by demonstrating that each of the elements was independently known in the prior art. I have been informed that many, if not all, inventions rely on building blocks already known, and claimed inventions almost of necessity will likely be combinations of what is already known.

36. I have been informed that it is important in the obviousness inquiry to identify whether a POSITA at the time of the invention would have motivation to combine or modify the prior art references in the manner proposed by the Petitioner so as to arrive at the claimed invention. Put another way, a finding of obviousness should be supported by an apparent reason to combine or modify the prior art references as proposed by the Petitioner.

37. I have been informed that it is important in the obviousness inquiry that it is understood how the references are combined, including how the combination of references is supposed to work. An explanation of the operation of the combined references is often a prerequisite to determining whether a POSITA would have been motivated or had a reason to make the proposed combination/modification and would have had a reasonable expectation of success.

38. In assessing obviousness, I have been instructed to consider both the ordinary creativity and common sense of the person of ordinary skill in the art. I also understand that it is normally impermissible for common sense or common

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knowledge to be applied to fill gaps in prior art that fails to teach or suggest a limitation of the claim. I also understand that the obviousness inquiry should guard against hindsight bias or hindsight reconstruction where after-the-fact reasoning is applied to combine prior art elements using the claim as a template, without establishing that, as of the date of the invention, there exists a motivation to combine or apparent reason to combine or modify the prior art as proposed.

39. In assessing obviousness, I have been instructed that, in order to qualify as proper prior art for an obviousness analysis, a reference must qualify as analogous art. I have been informed that a reference qualifies as analogous art with respect to the claims if it is either: (1) from the same field or endeavor as the patent; or (2) the reference is reasonably pertinent to the particular problem addressed by the invention. I have also been informed that for a reference to be reasonably pertinent, it must logically have commended itself during the ordinary course of development to an inventor's attention in considering the problem.

40. In assessing obviousness, I have also been instructed that, as noted above, secondary considerations can often be probative evidence of non-obviousness and can serve to avoid hindsight bias. I have been instructed that secondary considerations can be sufficient to overcome a prima facie case of obviousness.

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IV. LEVEL OF ORDINARY SKILL IN THE ART AND PRIORITY DATE

41. My opinions in this declaration are based on the understandings of a person of ordinary skill in the art, which I understand is sometimes referred to as an "ordinary artisan" or by the acronym "POSITA" (Person of Ordinary Skill in the Art), as of the time of the invention. For purposes of this Declaration, I have been instructed to use October 1, 2010, as the time of invention (priority date), which I understand is the date that the Petitioner is using. *See* Pet., 5.

42. I understand that the person of ordinary skill in the art is a hypothetical person who is presumed to have known the relevant art at the time of the invention. By "relevant," I mean relevant to the Challenged Claims of the '080 Patent.

43. I understand that, in assessing the level of skill of a person of ordinary skill in the art, one should consider the type of problems encountered in the art, the prior solutions to those problems found in the prior art, the rapidity with which innovations are made, the sophistication of the technology, the level of education of active workers in the field, and my own experience working with those of skill in the art at the time of the invention.

44. In this case, Petitioner asserts that a person of ordinary skill in the art as of the time of the '080 Patent "would have had an undergraduate degree in electrical engineering, computer engineering, computer science or a related field along with two years of work experience in the field of user interface technologies,

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including e.g., graphical user interface technologies, or a related field. More education can supplement practical experience and vice versa." Pet., 5-6.

45. I have applied this definition in my analysis for the purposes of this declaration. I was at the time of invention, and am currently, one of more than ordinary skill in the art through my education, research, and work experience. As of the date of the invention, I was very familiar with the types of problems encountered in the field. Indeed, I am very familiar with people having this level of skill in the area of user interfaces and human-computer interaction in the field of display systems.

V. THE '080 PATENT

46. The Petition challenges the Challenged Claims of the '080 Patent as anticipated or obvious under four grounds:

- Ground 1: Claims 1, 2, 12, 13, and 20 as anticipated by Ogawa;
- Ground 2: Claims 4-9 as obvious over Ogawa and Yook;
- Ground 3: Claims 1, 2, 12-16, and 20 as obvious over Ogawa and Choi; and
- Ground 4: Claims 4-9 as obvious over Ogawa, Choi, and Yook.

See Pet., i-iii.

A. Overview of the '080 Patent and Invention

47. The '080 Patent relates to "[m]ethods and apparatus for indicating a status of an application that is displayable on one or more displays of a handheld

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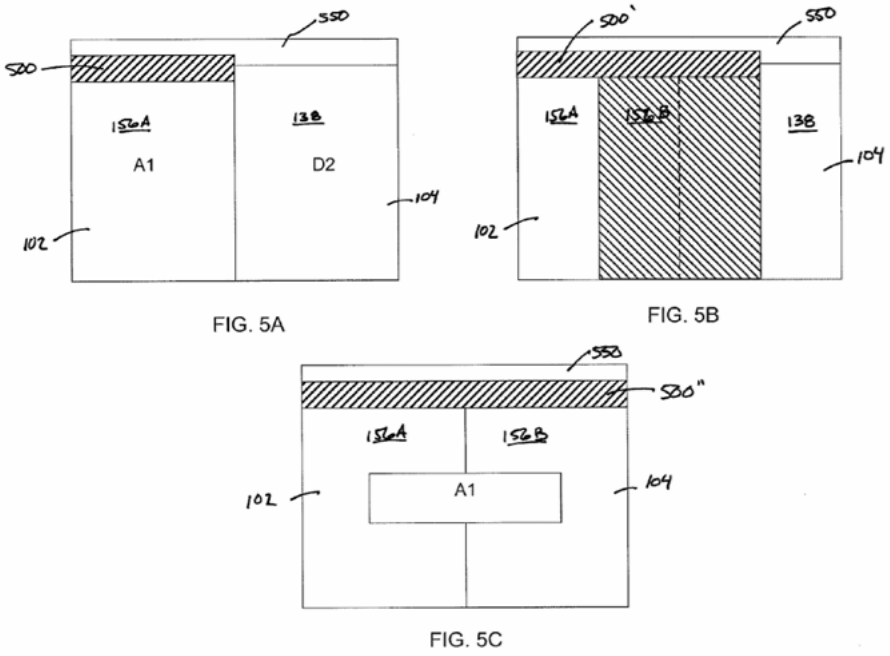
computing device." Ex. 1001, Abstract. Figure 5 illustrates an example embodiment of the invention:



'080 Patent, Fig. 5.

48. In Figure 5A, the expandable multi-screen application 156 is shown in state 156A, displayed only on display 102. In this state, icon 500 appears, indicating that the application is in an open state and can be expanded. '080 Patent, 13:40–45.

49. The user can expand application 156 to state 156B, where it spans display 102 and partially covers display 104. In this case, icon 500 changes to icon 500', as shown in Figure 5B. '080 Patent, 13:66–14:13.

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50. Alternatively, the user may further expand the application to fully cover both displays 102 and 104. In this state, icon 500 changes again, becoming icon 500'', as shown in Figure 5C. '080 Patent, 13:66–14:13.

51. In each of these examples, icon 500 is associated with application 156 itself—not with the displays (102 or 104). As stated in the abstract, the icon "indicates the status and/or potential statuses of the application," not the display or screen. '080 Patent, Abstract.

VI. CLAIM CONSTRUCTION

52. I understand that claims of the patent-at-issue in this IPR are generally interpreted according to their ordinary and customary meaning in the art taking into consideration the so-called "intrinsic evidence" of the patent consisting of (1) the claim language; (2) the specification; and (3) the prosecution history.

53. I understand that claim terms may be explicitly defined in the patent specification, or they may be implicitly defined through consistent usage in the specification. I also understand that the scope of claim terms may be limited by statements in the specification or prosecution history where the applicant clearly disavows or disclaims subject matter, acts as his/her own lexicographer or otherwise indicates the meaning of claim terms through statements made by the applicant.

54. I understand that for purposes of the institution stage, the Board did not expressly construe any claim term. Instn. Dec., 10-12. Although no terms were

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expressly construed, the Institution Decision does state that the plain and ordinary meaning of the term "open application state" is "that an application screen is open in the display." Instn. Dec., 18.

55. I have been informed that Patent Owner has requested that the Board modify its construction of "open application state" to "that the application is open in the corresponding display condition" for consistency with the remaining claim language. Because my opinions are based on the claim language as a whole, my opinions do not change regardless of whether the plain and ordinary meaning of "open application state" is as stated in the Institution Decision or as modified by Patent Owner.

56. Besides "open application state," I have also applied the plain and ordinary meaning of the claim terms in establishing the patentability of the claims of the '080 Patent.

VII. SUMMARY OF THE PRINCIPLE APPLIED REFERENCES

A. Ogawa (Ex. 1005)

57. Ogawa is a Japanese patent application that, according to the translation, describes a "pen input type electronic device" having split-screen functionality. Ogawa, Abstract. Ogawa discloses a screen-splitting menu 41 that divides the display input surface 13 into two screens: a left screen 13A and a right screen 13B:

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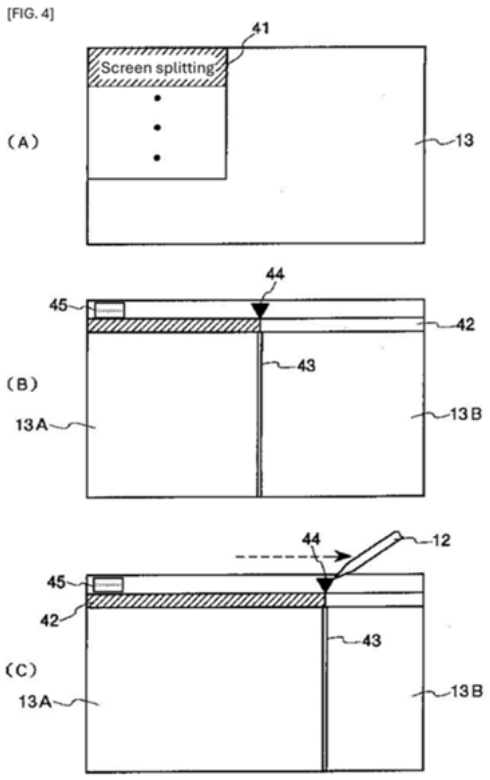
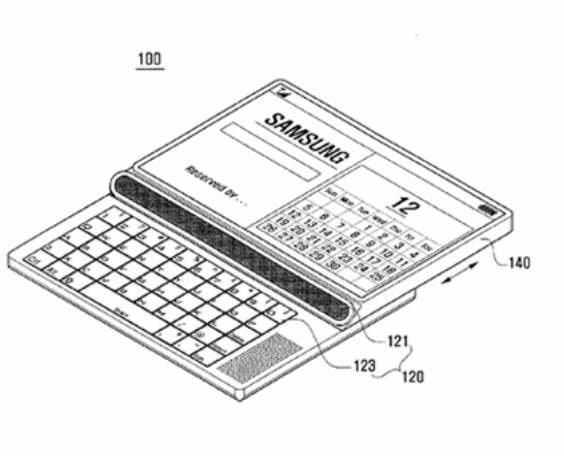


Ogawa, Fig. 4, 17.

58. Ogawa Figure 4 shows an access bar above the split screens, which the translation discloses to indicate which of the two screens—13A or 13B—is currently active. Ogawa, 18. The user can use a pen 12 to move the split line 43 left or right, allowing them to increase the size of one screen (13A or 13B) while decreasing the size of the other. Ogawa, 19.

B. Yook (Ex. 1007)

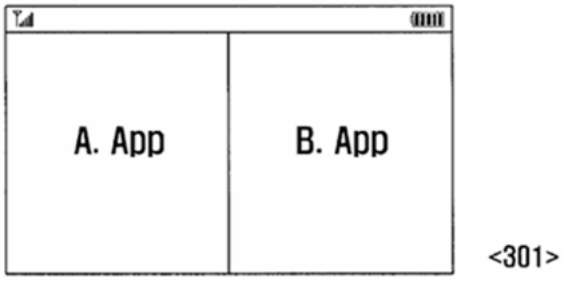
59. Yook describes a single-screen mobile terminal as shown in Fig. 1:



Yook, Fig. 1.

60. A screen 140 can be divided into multiple "screen areas," as illustrated in Fig. 3:

FIG . 3



Yook, Fig. 3.

61. Fig. 3 also shows a bar at the top of the screen, spanning across the entire screen. However, Yook does not specify how the icons on this bar are selected or displayed.

62. Fig. 4 in Yook's disclosure illustrates possible functions for these divided areas. For instance, Fig. 4A shows the division of the touchscreen 140 into

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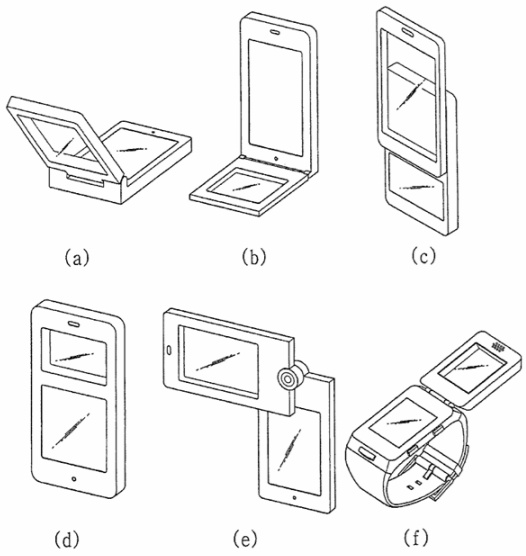
two areas A and B. Yook, 44. Fig. 4B demonstrates different display options: function A may occupy the entire touchscreen 140, function C may do the same, or the screen may be divided into two areas, with function A in one and function C in the other. Yook, 46.

C. Choi (Ex. 1006)

63. Choi relates to a photography terminal. Choi, Abstract. The terminal includes a camera, a display, a user input with a camera shutter key, and a controller. Choi, Abstract. The controller may control displayed menu icons. Choi, abstract.

64. Figure 6 illustrates example embodiments of Choi's terminal:

FIG. 6



Choi, Fig. 6.

65. Embodiments of the terminal may be in either a single display or a dual display configuration. Choi, 13:54–60.

VIII. CLAIMS 1, 2, 4-9, 12-16, AND 20 ARE PATENTABLE OVER THE PRIOR ART

A. Ogawa do not suggest "the icon indicates that the application is in a first state" or "the icon [indicates] that the application is in a second state" "wherein the first and the second states comprise an open application state" as in claims 1 and 12

66. Claim 1 reads:

> 1. A method for controlling a handheld computing device including one or more displays, comprising:
>
> displaying a first screen of an application in a first display condition;
>
> displaying an icon with the first screen of the application, wherein the icon indicates that the application is in a first state corresponding to the first display condition;
>
> receiving a gesture input at a gesture sensor;
>
> modifying the manner in which the application is displayed in response to the receiving step;
>
> changing the application to a second display condition; and
>
> morphing the icon to indicate that the application is in a second state corresponding to a second display condition the morphing comprising changing the shape and size of the icon;
>
> wherein the first and the second states comprise an open application state.

Claim 12 similarly reads "the icon indicates that the application is in one of two or more states associated with a display status of the application with respect to the first and second displays; wherein the first and the second states comprise an open application state."

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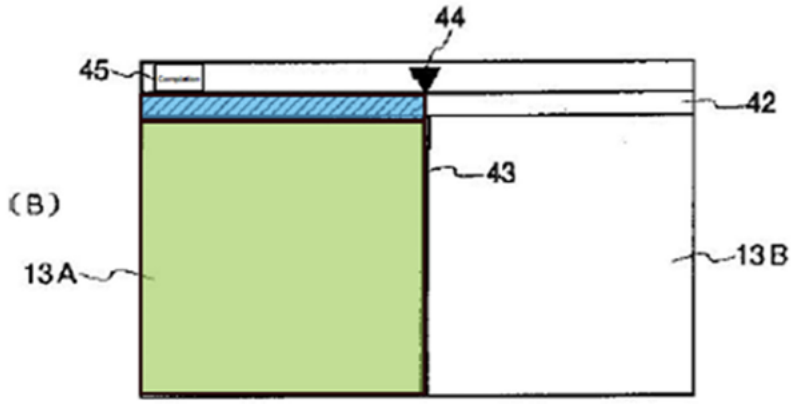
67. The second and sixth steps of claim 1 require: (1) "displaying an icon [that] indicates that the application is in a first state," and (2) "morphing the icon to indicate that the application is in a second state," "where the first and the second states comprise an open application state." Therefore, claim 1 and claim 12 require the icon to indicate that the application is in an "open application state."

68. I discuss the plain and ordinary meaning of "open application state" in Section VI above. Regardless of the plain and ordinary meaning applied, the icon indicating the "open application state" indicates that the application of claim 1 in the corresponding display condition is open.

69. In my opinion, Ogawa does not disclose or suggest an icon indicating an "open application state" as claimed. The Petition identifies the colored shaded portion of access bar 42 shown in Ogawa's Figure 4 as the claimed icon indicating an open application state:



Pet., 18.

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70. The shaded portion of access bar 42 however does not indicate whether an application is open in the corresponding display condition.

71. For example, Ogawa does not teach that its active screen always contains the same open application. If the active screen can display different applications at different times, then the shading of access bar 42 only reflects which screen is active—it does not indicate whether a particular application is open in that screen's display condition. The shading appears whenever the screen is active, regardless of whether the relevant application is open or not.

72. A person of ordinary skill would understand that Ogawa's access bar 42 only conveys whether the left screen 13A or the right screen 13B is active. As shown by this example, Ogawa's access bar 42 does not convey whether an application meeting all the requirements of claim 1 is open in the corresponding display condition.

73. As another example, the same application could be active on both of Ogawa's screens 13A and 13B. In this example, if screen 13A is active, the left side of access bar 42 is shaded.

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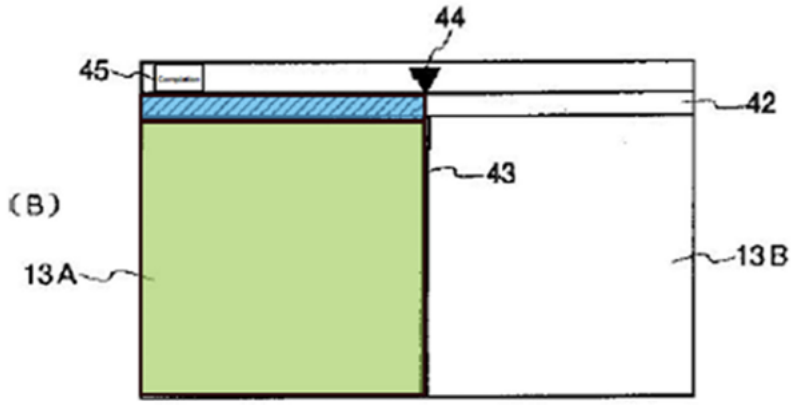
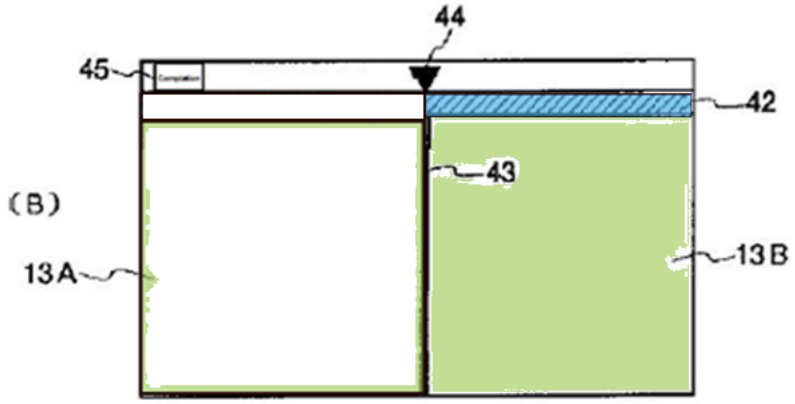


If screen 13B is active, the right side is shaded.



In both cases, the shading indicates which screen is active—not whether the application is open in that screen's display condition.

74. In the case where the same application is open on both screens, the left side of access bar 42 is shaded when screen 13A is active and unshaded when it is inactive. The right side of access bar 42 is shaded when screen 13B is active and unshaded when it is inactive. Thus, the shading of access bar 42 does not indicate whether an application is open on a particular screen. Instead, it only

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indicates which screen is active. Moreover, because access bar 42 reflects screen activity, not application state, it is not associated with any specific application and cannot be used to infer whether an application is open or closed. It simply denotes which screen is currently active. Therefore, Ogawa does not disclose or suggest an icon associated with an application that indicates whether that application is in an open state, as required by the claims.

75. For these reasons, a person skilled in the art would not understand Ogawa to suggest an icon indicating that the application of claim 1 or claim 12 is in an open application state.

B. Ogawa and Choi do not suggest "the icon is changed in proportion to the relative position of the application with respect to the first and second display" as in claim 2

76. Claim 2 reads:

> The method according to claim 1, wherein the icon is changed in proportion to the relative position of the application with respect to the first and second display.

77. The '080 Patent states that "the term 'display' is intended to connote device hardware." '080 Patent, 4:19-20. Based on this statement, a person of ordinary skill would understand that the icon of claim 2 is changed in proportion to the relative position of the application across two distinct hardware displays—the first and second displays.

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78. Neither Ogawa nor Choi suggests an icon that changes in proportion to the application's position relative to two separate hardware displays as claimed. Ogawa cannot anticipate claim 2 because it describes only a single physical display (display 13). *See* Ogawa, Fig. 1. Since Ogawa only discloses a single physical display, it cannot suggest an icon that changes based on the application's position relative to two distinct hardware displays, as required by claim 2.

79. In the alternative, Petitioners contend that, if claim 2 does require two physical displays, then the combination of Ogawa and Choi renders the claim obvious. Pet., 75. Petitioners propose that the Ogawa-Choi combination is achieved by replacing Ogawa's single display, which is logically divided into screens 13A and 13B, with two physically distinct displays, as shown in Choi (*e.g.*, Figures 7A–7B and 39). Pet., 78–79. Petitioners believe this would result in Ogawa's program being displayed across multiple physical displays.

80. In my opinion, this combination does not address the entirety of claim 2. While this combination has two physically distinct displays as taught by Choi, the combination still does not suggest that the icon is changed in proportion to the application's relative position across the two physically distinct displays. For instance, if a person of ordinary skill were to implement Petitioners' proposal by displaying Ogawa's screen 13A on Choi's display 151 (Fig. 7) and screen 13B on

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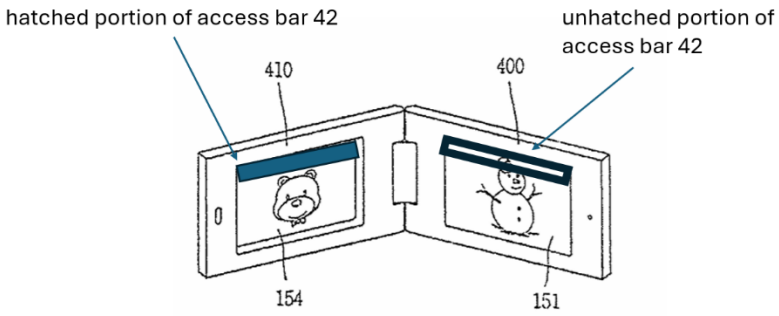
Choi's display 154, then the access bar 42 would span the entire top of each display. This is illustrated in the annotated version of Choi Fig. 7:



Choi, Fig. 7 (annotated).

81. Even in the Ogawa-Choi combination, the icon does not change in proportion to the relative position of the application with respect to two different hardware displays. Petitioners' proposed combination results in the icon occupying the top of one entire display, regardless of the relative position of the application with respect to the two different hardware displays. Therefore, the icon does not change in proportion to the application's relative position as in claim 2.

IX. CONCLUSION

82. I hereby declare that all statements made herein of my own knowledge are true and all statements made herein on information and belief were and are believed by me to be true, and that all statements herein were and are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code

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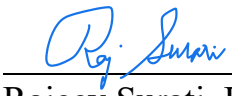
and that any such willful false statements may jeopardize the validity of the application or any patents issued thereon.

Respectfully submitted,



Rajeev Surati, Ph.D.

Dated: August 15, 2025

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