

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC and MOTOROLA MOBILITY LLC
Petitioners

v.

MULTIFOLD INTERNATIONAL INCORPORATED PTE. LTD.,
Patent Owner

Case IPR2025-00060
Patent No. 8,842,080

**PETITIONER'S REPLY TO
PATENT OWNER'S RESPONSE**

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Cases

<i>Power Integrations, Inc. v. Fairchild Semiconductor Int'l, Inc.</i> , 843 F.3d 1315 (Fed. Cir. 2016)	8, 13, 19-20
<i>Realtime Data, LLC v. Iancu</i> , 912 F.3d 1368 (Fed. Cir. 2019)	3

LIST OF EXHIBITS

Exhibit #	Description	Previously Submitted
EX1001	U.S. Patent No. 8,842,080 (“the ’080 patent”)	X
EX1002	Declaration of Sandeep Chatterjee, Ph.D.	X
EX1003	Curriculum Vitae of Sandeep Chatterjee, Ph.D.	X
EX1004	Prosecution History of U.S. Patent App. No. 12/948,686	X
EX1005	Certified English-language Translation of Japanese Patent Publication No. H09-204288 (“Ogawa”), Original Japanese Patent Publication No. H09-204288, and Translation Certificate	X
EX1006	U.S. Patent No. 8,649,824 (“Choi”)	X
EX1007	U.S. Patent No. 2010/0248788 (“Yook”)	X
EX1008	Mobile Phone Museum, Nokia 9000 Communicator (https://www.mobilephonemuseum.com/phone-detail/nokia-9000-communicator)	X
EX1009	U.S. Patent No. 6,912,664 (“Ranganathan”)	X
EX1010	U.S. Patent No. 8,265,705 (“Lee”)	X
EX1011	U.S. Patent No. 9,692,881 (“Jyonoshita”)	X
EX1012	An Introduction to Graphical User Interfaces with Java Swing, Paul Fisher, Addison Wesley, 2005 (excerpt)	X
EX1013	Scheduling Order for <i>Multifold International Incorporated Pte. Ltd. v. Motorola Mobility LLC</i> , Case No. 1:23-cv-01173 (D. Del.)	X

EX1014	Scheduling Order for <i>Multifold International Incorporated Pte. Ltd. v. Google LLC</i> , Case No. 1:23-cv-01323 (D. Del.)	X
EX1015	Appendix A-7 to Multifold's Infringement Contentions served in <i>Multifold International Incorporated Pte. Ltd. v. Google LLC</i> , Case No. 1:23-cv-01323 (D. Del.)	X
EX1016	Deposition transcript of Rajeev Surati, Ph.D., taken on October 22, 2025	
EX1017	Joint Claim Construction Brief, <i>Multifold International Incorporated Pte. Ltd. v. Motorola Mobility LLC</i> , Case No. 1:23-cv-01173 (D. Del.)	

I. INTRODUCTION

Petitioners reply to the Patent Owner Response (Paper No. 11, “POR”) concerning challenged claims 1, 2, 4-9, 12-16, and 20 (“the challenged claims”) of U.S. Patent No. 8,842,080 (“the ’080 patent”).

The POR rehashes the same arguments from the Patent Owner Preliminary Response (Paper 7, “POPR”) against Ogawa with respect to independent claims 1 and 12. Patent Owner’s arguments are premised on the belief that Ogawa’s access bar 42 indicates an active screen on which an application is displayed but not an “**open application state**”¹ of the application being displayed. But Patent Owner’s understanding of Ogawa is simply incorrect, as evidenced by Ogawa’s express disclosures presented in the Petition (Paper 1, “Pet.”), Petitioners’ expert Dr. Sandeep Chatterjee’s supporting testimony, the Board’s preliminary findings in the Institution Decision (Paper 8), and the record further developed during trial, including admissions by Patent Owner’s expert, Dr. Rajeev Surati. And while Patent Owner attempts to manufacture a claim construction dispute regarding the “**open application state**” term, Patent Owner’s proposed construction is irrelevant to whether Ogawa discloses the limitation(s) at issue, as conceded by Patent Owner’s

¹ All claim language is bolded; other emphasis in italics.

expert. Patent Owner's arguments regarding claim 2 fare no better as they fail to address all of Petitioners' arguments and evidence.

Accordingly, the challenged claims are unpatentable for the reasons presented in the Petition and the additional reasons discussed below.

II. CLAIM CONSTRUCTION

Patent Owner proposes "**open application state**" to be construed as "that the application is open and being displayed in the corresponding display condition/status." (POR, 7.) As discussed below, this term does not require any construction and its plain meaning should be applied. Moreover, Patent Owner fails to justify its proposed construction.

First, there is no reason to construe the "**open application state**" term. As discussed below in Section III.A.3, Ogawa discloses this feature under its plain meaning or under Patent Owner's construction. Indeed, Patent Owner's expert conceded that he did not offer an opinion on the construction of "**open application state**" (EX1016, 44:22-45:5) and further agreed that the construction of this term is irrelevant to whether the prior art discloses the claims (EX1016, 45:6-17; EX2002, ¶55).² Moreover, neither party proposed a construction for the "**open application**

² While Dr. Surati acknowledges that Patent Owner requests a construction of "**open application state**," the construction referenced by Patent Owner's expert is not the

term” in the related district court litigation. (*See generally* EX1017 (Joint Claim Construction Brief).) As such, the Board does not need to construe this term. *Realtime Data, LLC v. Iancu*, 912 F.3d 1368, 1375 (Fed. Cir. 2019).

Second, Patent Owner does not provide any basis for Patent Owner’s proposed construction in the claim language, the ’080 patent specification, or prosecution history. For context, the relevant portions of claim 1 are reproduced below (labeling added from Petition):

[1.pre] A method for controlling a handheld computing device including one or more displays, comprising:

...

[1.b] 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;*

...

[1.f] *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;*

same proposed by Patent Owner. (*Compare* POR, 7 (proposing “that the application is open and being displayed in the corresponding display condition/status”) *with* EX2002, ¶55 (referencing the construction as “that the application is open in the corresponding display condition.”).)

[1.g] *wherein the first and the second states comprise an open application state.*

(EX1001, 14:60-15:9 (emphasis added).)

Independent claim 12 similarly recites, in relevant part:

[12.pre] A handheld computing device, comprising:

[12.a] a processor;

...

[12.e] wherein the processor is operable to:

...

[12.g] displaying an icon associated with the application in at least one of the first display and the second display;

[12.h] *wherein 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;*

[12.i] *wherein the first and second states comprise an open application state.*

(EX1001, 15:42-16:19 (emphasis added).)

Claims 1 and 12 thus require displaying an icon indicating that the application is in a first/second state corresponding to a first/second display condition or display status. The claims then separately recite that “**the first and second states *comprise an open application state.***” In other words, the claims do not require that the displayed icon indicate that the application is in an open application state, they only require that the icon indicate that the application is in a state corresponding to the

display condition/status of the application, and separately state that the first and second states include an open application state. The Board recognized this at institution, explaining that “the plain and ordinary meaning [of this term is] *that an application screen is open in the display.*” (Institution Decision, 18.)

Patent Owner’s construction is premised on a misreading of the claims, conflating (i) the displayed icon indicating a “**first state**” and “**second state**” tied to the “[**first/second**] **display condition**” (claim 1) or “**display status**” (claim 12) with (ii) the “**first and second states comprising an open application state.**” (POR, 9 (“Thus, claim 1 requires that the ‘open application state’ correspond to the respective display condition . . . [and] claim 12 requires that each ‘open application state’ corresponds to a respective display status of the application.”).) Patent Owner’s expert agreed that the claimed “**first state**” and “**second state**,” which are tied to the application’s “[**first/second**] **display condition**,” are not limited to an “**open application state.**” (EX1016, 49:1-51:3; *see also id.*, 45:18-48:17.) The claim language simply does not support the proposed construction. And Patent Owner fails to point to any portion of the ’080 patent specification and prosecution history to support its proposed construction. (POR, 7-9; *see also* EX1016, 35:21-39:4 (Patent Owner’s expert conceding the term “**open application state**” is not described in the specification).)

Accordingly, the term “**open application state**” should be given its plain meaning, which encompasses the Board’s understanding at institution, i.e., “that an application screen is open in the display” (Institution Decision, 18).

III. PETITIONERS SHOWED THAT ALL CHALLENGED CLAIMS ARE UNPATENTABLE

Patent Owner presented arguments with respect to independent claims 1 and 12 along with dependent claim 2. But as discussed below, Patent Owner’s arguments are insufficient to overcome the record evidence and arguments demonstrating unpatentability of these claims.³

A. Independent Claims 1 and 12: Ogawa’s Access Bar 42 Discloses All the Features Related to the Claimed Icon

Patent Owner’s arguments are focused on the claimed “**icon**” set forth in independent claims 1 and 12. (POR, 10.) Petitioners relied on Ogawa in Grounds 1 and 3 to disclose the “**icon**”-related features (Pet., 4, 18, 24, 72-75), and Patent Owner does not distinguish between the two Grounds in the POR (POR, 10-16).

³ While Patent Owner references claim 9 in the POR’s introduction section (POR, 1), it does not submit any arguments regarding claim 9 in the POR (*see generally* POR). In any event, claim 9 is unpatentable for the reasons provided in the Petition. (Pet., 62, 87-88.)

Accordingly, Petitioners' arguments below are applicable to the unpatentability of claims 1 and 12 under both Grounds 1 and 3.⁴

Limitation [1.b] of claim 1 recites “**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.**” (EX1001, 14:64-66; Pet., 18.)

Limitation [1.f] recites “**morphing the icon to indicate that the application is in a second state corresponding to a second display condition [].**” (EX1001, 15:4-7; Pet., 24.) Limitation [1.g] recites “**wherein the first and second states comprise an open application state.**” (EX1001, 15:8-9; Pet. 27.)

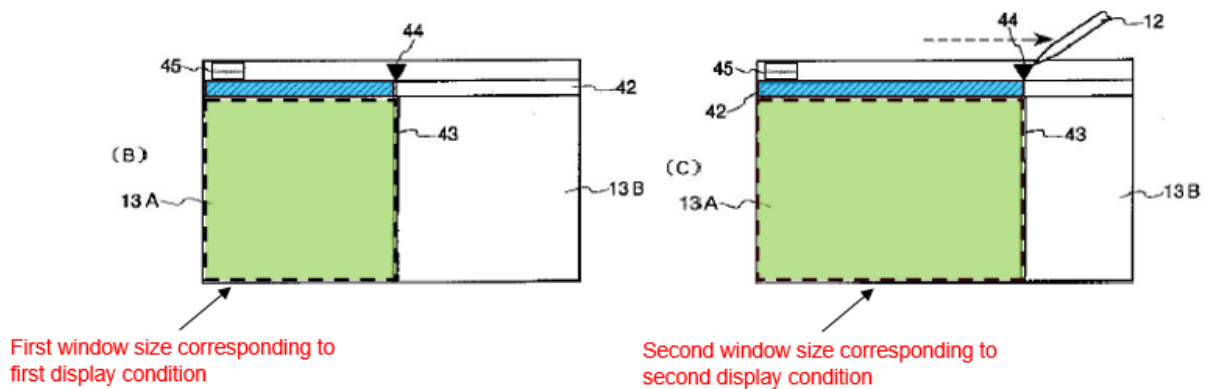
Independent claim 12 recites similar features, but does not require the icon to morph like in claim 1. For example, limitation [12.g] recites “**displaying an icon associated with the application in at least one of the first display and the second display.**” (EX1001, 16:12-13; Pet., 42.) Limitation [12.h] recites “**wherein 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.**” (EX1001, 16:14-17; Pet., 43.) Limitation [12.i] recites “**wherein the first and second states comprise an open application state.**” (EX1001, 16:18-19; Pet., 45.)

⁴ Patent Owner did not submit any separate arguments rebutting Grounds 2 and 4, which address claims 4-9. (POR, 10-19.)

Petitioners address these limitations of claims 1 and 12 collectively, like Patent Owner. (POR, 10-11, 16; *see also* EX1016, 22:12-23:7.)

1. Ogawa’s Access Bar 42 Maps to the Claimed Icon in Independent Claims 1 and 12

The Petition explains that Ogawa discloses these limitations because the colored portion of access bar 42 (“**icon**”) indicates a state of a program (“**application**”) being displayed on a split screen 13 such as first screen 13A (“**first screen**”), the state corresponding to a window size (“**first display condition**” or “**second display condition**”) of the displayed program, as shown in Ogawa’s annotated figures 4(B)-4(C) below. (Pet., 18-19, 24-27; EX1005, [0017]-[0019], [0023]-[0024], [0027]-[0028], [0033], FIGS. 4(B)-4(C).) Moreover, because the program is being displayed on the active screen (e.g., screen 13A in the below figures) in Ogawa, the program is necessarily open and the colored portion of access bar 42 thus indicates an “**open application state.**” (Pet., 27; EX1005, [0024], [0033].) *See also Power Integrations, Inc. v. Fairchild Semiconductor Int’l, Inc.*, 843 F.3d 1315, 1336-37 (Fed. Cir. 2016) (finding claim feature anticipated where prior art met the feature sometimes during operation).



(EX1005, FIG. 4(B) (left, annotated), FIG. 4(C) (right, annotated); EX1002, ¶80.)

2. The Board Preliminarily Rejected Patent Owner's Arguments Regarding Ogawa's Access Bar 42

In the POPR, Patent Owner argued that Ogawa's colored portion of access bar 42 does not indicate that an application is an **"open application state."** (POPR, 6-10.) Patent Owner specifically argued that in Ogawa, "[t]he size of the colored and uncolored portions of access bar 42 indicates the size of Ogawa's active and inactive screens" but "[t]here is no teaching in Ogawa that its active screen always contains the same open application." (POPR, 9 (citing paragraph [0033] of Ogawa).)

The Board rejected Patent Owner's characterization of Ogawa, noting that "[t]his argument is unsupported by paragraph 33 of Ogawa." (Institution Decision, 20.) The Board explained: "In fact, Ogawa discloses that 'even if a program different from the program being processed on the first screen 13A is executed, the first screen 13A is not affected.' EX1005 ¶ 33. *The clear implication from this text is both applications may remain open regardless of which screen is active.*" (*Id.*)

3. Patent Owner's Rehashed Arguments in the POR Should Be Rejected Based on the Additional Evidence Developed During Trial, Which Further Supports Petitioner's Mapping

Patent Owner's arguments in its POR are essentially the same as those it previously submitted in the POPR. Patent Owner's arguments are all based on its erroneous construction. (POR, 10-11, 16 ("Ogawa does not suggest an icon associated with an application that indicates an open application state of the application as claimed because the icon does not indicate the display condition/status of the application (with respect to the first and second displays).").) Thus, Patent Owner's arguments necessarily fail if that construction is not adopted. Patent Owner's arguments also fail even if its construction is applied.

Patent Owner again argues that the colored portion of access bar 42 ("**icon**") only indicates that one of screens 13A or 13B in Ogawa is active, but does not indicate that the program being displayed on the active screen is in an "**open application state**," as claimed. (POR, 11-16; *see also* POPR, 7-9.) Patent Owner's arguments miss the mark because Ogawa discloses the argued limitations of claims 1 and 12 under Petitioners' mapping provided in the Petition (as discussed below), and under the scenarios presented by Patent Owner (as discussed in Section III.A.4). This is true under both the plain meaning of the "**open application state**" term, or the construction proposed by Patent Owner.

For example, Patent Owner does not dispute that Ogawa discloses that the program is open on the screen. Patent Owner does not contest the Board's preliminary finding that in Ogawa, "*both applications may remain open regardless of which screen is active.*" (Institution Decision, 20 (citing EX1005, [0033]).) Notably, Patent Owner's summary of the Board's reasoning in its Institution Decision does not reference this preliminary finding by the Board. (POR, 11-12.) In fact, Patent Owner concedes that Ogawa's screen "*may or may not be displaying the claimed application.*" (POR, 12.) Similarly, Patent Owner's expert, Dr. Surati, conceded that "*this reference [Ogawa] talks about programs being shown on the screen.*" (EX1016, 66:22-68:5.)

Dr. Chatterjee similarly testified that, depending on the setting of the active screen flag in Ogawa, the program running on the corresponding screen 13A or 13B would be active, i.e., open:

Q. So is it fair to say that Figure 4 does not show 13B as active?

A. *The program running in 13A would be understood to be active.*

Q. Does any figure in Ogawa show 13B as active?

A. Well, for example, if you look at Figure 3, it's showing the active screen flag. *So depending on the setting of active screen flag, that would – that would indicate if, for example, 13 -- the program running at 13B is active.*

(EX2005, 159:10-20 (objections omitted, emphasis added).)⁵

Dr. Chatterjee also made this point in his opening declaration, and further explained that a portion of the access bar 42 would be colored based on the splitting ratio used to split screens 13A and 13B, i.e., the colored portion of the access bar 42 would indicate the window size of the program open on the active screen. (EX1002, ¶¶89-91.) In particular, Dr. Chatterjee explained that the program in first screen 13A in both the first state (figure 4(B)) and second state (figure 4(C)) is in an active state (“**open application state**”) because the colored portion of access bar 42 corresponds

⁵ Dr. Chatterjee explained in his opening declaration that Ogawa’s active screen flag, stored in active screen flag register 28B, “specifies which of the two screens (windows) generated by the split screen is active” (EX1002, ¶90 (citing and quoting EX1005, [0016])).

to the active screen on the display input surface 13. (EX1002, ¶89.) Dr. Chatterjee provided the basis for this understanding by noting that in Ogawa, “*a portion of the access bar 42 is colored based on the active screen flag and the splitting length to indicate the active state.*” (EX1002, ¶90 (citing and quoting EX1005, [0023]).) That is, the size of the colored portion of access bar 42 is commensurate with the window size (“**first display condition**” or “**second display condition**”) of the program being displayed on the screen. (*Id.*; *see also id.*, ¶¶65, 69, 80, 84; Pet., 15-19, 24-27.)⁶; *see also Power Integrations, Inc.*, 843 F.3d at 1336-37.

Further supporting Petitioners’ mapping, Patent Owner’s expert also agreed, based on at least aforementioned paragraph [0033] of Ogawa, that the window size of a program being displayed on Ogawa’s screen (i.e., an open program), would change in response to and commensurate with a change in screen size dictated by the screen splitting ratio:

⁶ Dr. Chatterjee similarly explained that in Ogawa, each program is independently displayed on screens 13A and 13B based on first and second editing areas 27A and 27B, the contents of which are based on the splitting ratio between the screens 13A and 13B. (EX2005, 165:6-166:17 (discussing EX1005, [0033], [0035], [0058]).)

Q So do you agree that in paragraph 33 of Ogawa, Ogawa describes how programs being displayed on the two screens are displayed according to the splitting ratio of the screens, correct?

A *I think that's reasonable to say that the screens are surfaces where images or text display can show up, sure, and -- perhaps can show up, and it's based on the splitting ratio.*

Q And you agree that when one screen in Ogawa is extended, then the program being displayed on that screen is also extended, correct?

A *Yeah. So whatever was being displayed on that screen is extended, yes.*

Q Okay. And what is the basis for your understanding?

A So it seems to say in the careful – in the case, Therefore, two different programs, such as a -- they give an example where a calendar and a schedule can be executed independently using the first and second editing areas and can be displayed independently on the two split screens –

Oh, sorry, I'm not quite sure where I go with that. I'm going to have to zoom in. Sorry. Oh, that's much better.

So it talks about, *the contents of the first and second VRAMS 29B and 29C are combined in the actual VRAM 29A according to the splitting ratio, and displayed.*

So the splitting ratios gets used there.

Q If the programs being displayed on Ogawa's screens 13A and 13B are displayed according to the splitting ratio, then the

access bar 42 is also changed according to the splitting ratio,
correct?

A *I think that's correct.*

(EX1016, 65:8-66:21; *see also id.*, 71:4-22 (Dr. Surati similarly agreeing that that as the program that is being displayed on one of the screens 13A or 13B is expanded, the colored portion of the access bar is being expanded in commensurate fashion).)

Thus, under Petitioners' mapping where a program is displayed on Ogawa's active screen, it is undisputed that the program is open and the colored portion of access bar 42 indicates the corresponding window size of the program. In other words, the colored portion of access bar 42 ("**icon**") indicates both (i) a state corresponding to the window size of the displayed program ("**first display condition**" or "**second display condition**") and (ii) that the displayed program is open ("**open application state**," e.g., the program is open in the display under the Board's plain meaning interpretation).

For the same reasons, Ogawa discloses that "**the first and second states comprise an open application state**" limitation under Patent Owner's proposed construction of "**open application state**," i.e., "that the application is open and being displayed in the corresponding display condition/status." (POR, 7.) For instance, as discussed, Ogawa discloses that the splitting ratio determines the size of the colored portion of access bar 42 and the window size of the program on the active

screen. (Ex. 1005, [0033]; EX1002, ¶¶69-70; 84-85; EX2005, 165:6-166:17; EX1016, 65:8-66:21, 71:4-22.) As also discussed, Ogawa discloses that the colored portion of access bar 42 indicates that the program being displayed on the active screen is open (e.g., because the window size of the program is being adjusted commensurate with the colored portion of access bar 42). (Ex. 1005, [0023], [0033]; EX1002, ¶¶89-91; EX2005, 159:10-20; EX1016, 65:8-66:21, 71:4-22; Institution Decision, 20.) Thus, Ogawa discloses that “**the first and second states**” of the displayed program (“**application**”) include an “**open application state**” under Patent Owner’s construction, because the states indicate that the program is open and is being displayed in a window size corresponding to the size of the colored portion of access bar 42.

Accordingly, for the reasons given above and those set forth in the Petition, Ogawa discloses limitations [1.b], [1.f], and [1.g] of claim 1 and similarly limitations [12.g]-[12.i] of claim 12.⁷

⁷ It is worth noting that as Petitioners demonstrated in the Petition with reference to Ogawa’s figures 4(B)-4(C) and the ’080 patent’s figures 5(A)-5(B), Ogawa’s disclosures track the disclosures of the ’080 Patent as they relate to the challenged claims. (See, e.g., Pet., 16-17, 19, 21, 23-24, 25-26.) In this regard, Patent Owner’s expert also confirmed that the claimed “**first display condition**”/“**second display**

4. Patent Owner's Arguments Rely on Scenarios Not Relied Upon in the Petition

Patent Owner's arguments are premised on two scenarios that Patent Owner created. These scenarios (which are not expressly described in Ogawa) were not relied on in the Petition, and in any event, are unavailing.

Patent Owner's First Scenario

Patent Owner sets out its first scenario as follows: "If Ogawa's active screen can contain one open application at one point in time and a different open application at another point in time, then the colored shaded portion of access bar 42 only indicates whether the screen is active and the size of the screen—and not whether the claimed application is open in one of the display conditions/statuses." (POR, 12-13.) This argument fails for at least two reasons.

condition" correspond to a window size of the application in figures 5(A)-5(B) of the '080 patent, and the claimed **"state"** indicated by the **"icon"** similarly corresponds to the size of the application window size in the '080 patent. (EX1016, 24:19-26:4, 32:14-33:9, 39:17-40:21, 49:6-50:3.) This further substantiates Petitioners' mapping of Ogawa to these claim features, which similarly points to the window size of the displayed program for the **"first display condition"** and **"second display condition"** and the corresponding size of colored portion of access bar 42 for the claimed **"state"** indicated by the **"icon."** (*See supra*, Section III.A.1.)

First, as explained above, Petitioners did not rely on a scenario where different applications are displayed at different times in the active portion of the screen 13 in Ogawa. Patent Owner's expert agreed. (EX1016, 72:8-74:17.) Thus, Patent Owner's argument fails to distinguish Ogawa from the claims as it is not responsive to Petitioners' mapping.

Second, this scenario where an application may be closed (in favor of another application opening in its place) is unsupported by Ogawa's disclosures, as the Board also recognized in its Institution Decision. (Institution Decision, 19-20.) To the contrary, as explained above in Section III.A.3, and acknowledged by Patent Owner's expert, the window size of the program being displayed on the active screen corresponds to the size of the colored portion of access bar 42 based on the splitting ratio. In other words, Patent Owner does not explain how the colored portion of access bar 42 does not correspond to the window size of the displayed program on the active screen when the window size of the program is tied to the size of the colored portion of access bar 42.

Patent Owner's Second Scenario

Patent Owner sets out its second scenario as follows: "In this example, where the same application is open on 13A and 13B, the access bar 42 simply indicates which screen is active, but does not indicate the display condition/status of the

application with respect to the displays.” (POR, 14.) This argument fails for at least two reasons.

First, as explained above, Petitioners did not rely on a scenario where the same application is shown on both screens 13A and 13B in Ogawa. Patent Owner’s expert agreed. (EX1016, 81:10-17.) Thus, Patent Owner’s argument fails to distinguish Ogawa from the claims as it is not responsive to Petitioner’s mapping.

Second, even under this proposed scenario, Ogawa meets the limitations related to the claimed “**icon**.” For example, Dr. Surati agreed that in this example, the colored portion of access bar 42 would indicate that the open application window on that side of the screen is active.

Q The example is that the application is open on both screens?

A With two different windows from that application.

Q *And so when the left side of the screen is indicated as active based on the access bar 42 being colored or shaded –*

A Right.

Q *-- that means that the application window on that side of the screen is active?*

A *Yeah, I think that's fair.*

(EX1016, 80:8-19 (objections omitted, emphasis added); *see also id.*, 74:18-80:7.)

Accordingly, Ogawa discloses the “**icon**”-related limitations of claims 1 and 12 under Patent Owner’s second scenario in Ogawa. *See also Power Integrations*,

Inc., 843 F.3d at 1336-37 (finding claim feature anticipated where prior art met the feature sometimes during operation).

For all of the foregoing reasons, independent claims 1 and 12 are unpatentable. The remaining challenged claims, namely claims 2, 4-9, 13-16, and 20, are unpatentable at least by virtue of their dependency on independent claims 1 or 12. Claim 2 is also unpatentable for the additional reasons discussed below.

B. Claim 2: Patent Owner Fails to Show Claim 2 is Not Anticipated by Ogawa or Not Rendered Obvious by the Ogawa-Choi Combination

Claim 2 depends from claim 1, and recites: “**wherein the icon is changed in proportion to the relative position of the application with respect to the first and second display.**” (EX1001, 15:10-12; Pet., 27.)

Petitioners presented two grounds showing the unpatentability of claim 2 based on two possible interpretations of the “**first and second display**” terms in claim 2: (i) Ground 1: where a single physical display divided into two or more logical displays discloses the “**first and second display,**” as encompassed by Patent Owner’s infringement contentions and (ii) Ground 3: where the “**first and second display**” terms are interpreted to be physically distinct from each other, consistent with the description of a display in the ’080 patent specification. (Pet., 9-10 (citing EX1001, 4:18-22).)

As discussed below, claim 2 is unpatentable under both interpretations.

1. Ground 1: Ogawa’s Physical Display Divided Into Two Logical Displays Discloses the “First and Second Display” of Claim 2

Patent Owner argues that the “**first and second display**” terms should be limited to the description in the ’080 patent specification, i.e., the “**first and second display**” are “two different hardware displays.” (POR, 16.) Based on this narrower interpretation, Patent Owner argues that Ogawa’s single display divided into first and second logical displays cannot disclose the features of claim 2. (POR, 16-17.)⁸

In Patent Owner’s infringement contentions, it mapped two logically divided parts of a single physical display in the accused product as a “**first display**” and “**second display**,” which are similar terms recited in claim 12. (*See, e.g.*, EX1015, 33-34; Pet., 10.) In fact, Patent Owner has doubled down on this position in the related litigation, arguing that the ’080 patent specification supports a reading of these terms (with respect to claim 12) where the first and second displays may comprise separate portions of a unitary display and thus, “the specification discloses embodiments of two displays that are not entirely separate and distinct.” (EX1017 (Joint Claim Construction Brief), 21-22.) Ogawa discloses the features of claim 2

⁸ Patent Owner’s expert agreed that he did not provide an opinion on claim 2 under the interpretation of display encompassing two logically divided displays. (EX1016, 82:9-84:8.)

under the broader interpretation of the “**display**” terms for the reasons provided in the Petition. (Pet., 27-28.) Patent Owner did not contest the analysis in the Petition aside from its attorney argument that the display terms should be restricted to physically distinct displays.⁹

2. The Ogawa-Choi Combination Teaches That Access Bar 42 Is Changed in Proportion to the Relative Position of the Displayed Program With Respect to Physically Distinct “First and Second Display[s]”

Patent Owner alleges that the Ogawa-Choi combination presented for claim 2 “ignores most of the language in claim 2.” (POR, 17.) In particular, Patent Owner alleges that the Petition does not address that in the proposed combination, “the icon is changed in proportion *to the relative position of the application with respect to two different hardware displays.*” (POR, 18 (emphasis in original).) Not so. Patent

⁹ Though Patent Owner submits arguments with respect to claim 2 under Grounds 1 and 3 contingent on the interpretation of the “**first and second display**” terms (POR, 16-17), Patent Owner does not make any similar arguments with respect to independent claim 12 (POR, 10-16), which also similarly recites “**first display**” and “**second display**” (EX1001, 15:42-16:3). (*See also* Pet., 9-10, 31-39, 79-80.) Thus, Patent Owner has forfeited any such argument with respect to claim 12. In any event, as discussed above, Patent Owner fails to demonstrate that a “**first display**” and “**second display**” in the claims are restricted to physically distinct displays.

Owner seems to ignore how the resulting Ogawa-Choi combination would operate, as explained in the Petition.

First, in the Ogawa-Choi combination, Ogawa's single physical display unit logically divided to display first and second screens 13A and 13B would have been replaced by two physically distinct displays that respectively display the first and second screens 13A and 13B, resulting in Ogawa implementing its process of displaying the program across multiple logically divided displays such that the program would have instead been displayed across multiple physically distinct displays. (Pet., 75-79, EX1002, ¶¶170–175.) Notably, Patent Owner does not dispute that this proposed combination of Ogawa and Choi would have been obvious. (POR, 17-19.) Patent Owner's expert similarly agreed that the Ogawa-Choi combination results in Ogawa's process being implemented using two physically distinct displays:

Q So if you look at pages 78 to 79 of the petition, so going to that paragraph that's bridging pages 78 to 79. We established a few minutes ago –

A Right.

Q -- that in the Ogawa-Choi combination, instead of the two logically divided screens that Ogawa shows, you would have two physically distinct displays, correct?

A Yeah.

(EX1016, 88:3-11; *see also id.*, 86:15-87:6, 90:12-91:4.)

Thus, there is no dispute between the parties that the Ogawa-Choi combination would result in Ogawa using two physically distinct screens in place of its logically divided displays (screens 13A and 13B).

With this context, Patent Owner's argument that Petitioners did not address all of the claim 2 language makes little sense as Petitioners did exactly that in the Petition. For example, the Petition explained:

Accordingly, . . . the proposed modification to Ogawa would have resulted in Ogawa implementing its process of displaying the program across multiple logically divided displays such that the program would have instead been displayed across multiple physically distinct displays. (EX1002, ¶174.) *For example, with reference to claim 2, in the Ogawa-Choi combination, the colored/shaded portion of access bar 42 ("icon") would have changed in proportion to the relative position of the program ("application") with respect to the first display (which would have displayed first screen 13A) and the physically distinct second display (which would have displayed second screen 13B). (Id.; EX1005, FIGS. 4(B)-(C); EX1006, FIGS. 59 (59-1)-(59-2).)*

(Pet. 78-79.)

As explained in the Petition, in the Ogawa-Choi combination, the colored portion of access bar 42 ("**icon**") is changed "**in proportion to the relative position**" of the displayed program ("**application**") with respect to the first and second physically distinct displays. (*Id.*) In other words, if the displayed program

being displayed on a first display is extended across that display into the second physically distinct display such that the window size of the displayed program now spans the two displays, the colored portion of access bar 42 would also extend across the two displays in commensurate fashion. (*Id.*; EX1002, ¶174.)

When confronted with this argument regarding how the proposed Ogawa-Choi combination would have taught claim 2, Patent Owner's expert simply acknowledged that he did not provide a responsive opinion in this regard:

Q *Could we go to the paragraph bridging pages 78 to 79 of the '080 petition.*

A Yeah.

Q Okay. So do you see there --

A Just one second. I'm still trying to get --

Q Take your time.

A Okay. So I think what I'm trying to say is that I don't know that -- I mean, I would just say -- so I'm looking at it. Sorry about that.

Can you go ahead and ask your question?

Q *So you did not opine on this part of the argument, correct?*

A *Yeah, I did not --*

A *Yeah, I didn't opine on this part of the argument.*

(EX1016, 94:5-21 (objections omitted; emphasis added); *see also id.*, 90:12-91:4 (when asked how the Ogawa-Choi combination would work, Patent Owner's expert

responding that “. . . *I don’t know that I’ve opined on using a split screen where the split screen occurs across both physically distinct displays.*”), 91:19-94:4.)

To the extent Patent Owner’s expert opined on the Ogawa-Choi combination, he seemed to admit that the resulting combination would include the access bar 42 extending across the two physically distinct displays commensurate with the window size of a displayed application, i.e., **“the icon is changed in proportion to the relative position of the application with respect to the first and second display,”** as claimed. For instance, when asked about how Ogawa’s process would have been implemented with two physically distinct displays and an application screen is extended from a first display into a second display, Patent Owner’s expert answered that “I think that it would snap it [access bar] to that whole display, *or extend it*, as – to split the screen . . .” (EX1016, 91:19-93:6.) When asked a similar question earlier, Patent Owner’s expert indicated “I think it [Dr. Chatterjee’s declaration] *may* [show the required mapping], but I don’t think I agree with that mapping.” (*Id.*, 88:15-91:9.) Patent Owner’s expert also conceded that he is “*not disputing that they [the Petition and Dr. Chatterjee’s declaration] show it* [the features of claim 2],” but qualified his answer by alleging that he “thinks it’s *a difference of could versus would*. And I think you could do that, but I don’t know that you would do that.” (*Id.*, 91:10-18.) But as noted earlier, the Petition set forth how a POSITA *would*

have been motivated to combine Ogawa with Choi to arrive at the totality of claim 2, and neither Patent Owner nor its expert refute this position with any evidence.

Accordingly, the Ogawa-Choi combination teaches the features of claim 2.

IV. CONCLUSION

For the reasons above, the challenged claims are unpatentable and should be cancelled.

Respectfully submitted,

Dated: November 7, 2025

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner Google

CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing Petitioner's Reply to Patent Owner's Response contains, as measured by the word-processing system used to prepare this paper, 5,593 words. This word count does not include the items excluded by 37 C.F.R. § 42.24 as not counting towards the word limit.

Respectfully submitted,

Dated: November 7, 2025

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner Google

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2025, I caused a true and correct copy of the foregoing Petitioner's Reply to Patent Owner's Response and supporting exhibits to be served electronically on counsel for Patent Owner at the following addresses:

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