IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

KEYLESS LICENSING LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 2:24-CV-00464-JRG JURY TRIAL DEMANDED

DEFENDANTS' SUBJECT MATTER ELIGIBILITY CONTENTIONS

Pursuant to the Docket Control Order and the Standing Order Regarding Subject Matter Eligibility Contentions Applicable to All Patent Infringement Cases Assigned to Chief District Judge Rodney Gilstrap (the "Standing Order"), Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. ("Defendants") by and through counsel, submit these Subject Matter Eligibility Contentions.

RESERVATION OF RIGHTS

Defendants' Subject Matter Eligibility Contentions, in some instances, rely at least in part on Plaintiff Keyless Licensing LLC's ("Plaintiff") apparent positions regarding the scope of its claims for purposes of asserting infringement. Nothing in these disclosures or the attached charts should be understood as an admission relating to infringement, either literally or under the doctrine of equivalents, or as an admission relating to Defendants' understanding of the proper interpretation or scope of the asserted claims. Defendants reserve the right to rely on additional citations or sources of evidence that may also be applicable, or that may become applicable in light of any Court Order on claim construction, changes in infringement contentions, or information obtained during discovery as the case proceeds.

Keyless EX2004
Samsung v. Keyless
IPR2025-00526

These contentions are based on information currently available to Defendants following a reasonable investigation and reflect Defendants' investigations of the state of the art of the patents-in-suit at issue in this case. These contentions address claims 1-13, 15-19, and 21-36 of U.S. Patent No. 9,304,602 ("the '602 patent"), claims 1-21 of U.S. Patent No. 10,976,922 ("the '922 patent"), and claims 1-5 and 7-20 of U.S. Patent No. 11,503,144 ("the '144 patent") (collectively, the "Challenged Claims"). If Plaintiff is allowed to assert additional claims, Defendants reserve the right to supplement these contentions to address such claims.

Defendants reserve all rights to supplement, revise, and/or amend these responses in accordance with the Standing Order.

I. Challenged Claims

In accordance with Paragraph (a)(1) of the Standing Order, the description below and the following claim charts identify the exception(s) to eligibility for the Challenged Claims of the '602, '922, and '144 patents, and the factual and legal bases therefor, and whether each Challenged Claim is representative of any other Challenged Claims.

Each of the Challenged Claims of the '602, '922, and '144 patents contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. "The abstract idea exception prevents patenting a result where 'it matters not by what process or machinery the result is accomplished.'" *McRO, Inc. v. Bandai Namco Games Am. Inc.*, 837 F.3d 1299, 1312 (Fed. Cir. 2016) (quoting *O'Reilly v. Morse*, 56 U.S. (15 How.) 62, 113 (1854)); *accord*, *Ubisoft Entm't, S.A. v. Yousician Oy*, 814 F. App'x 588, 591 (Fed. Cir. 2020). Therefore, courts "look to whether the claims in the patent focus on a specific means or method, or are instead directed to a result or effect that itself is the abstract idea and merely invokes generic processes and machinery." *Two-Way Media Ltd. v. Comcast Cable Commc'ns, LLC*, 874 F.3d 1329, 1337 (Fed.

Cir. 2017). The Challenged Claims are directed to a result itself and invoke generic processes and machinery. For example, as in *Two-Way Media*, the Challenged Claims use "result-based functional language … but do[] not sufficiently describe how to achieve these results in a non-abstract way." *See id.*; *see also Interval Licensing LLC v. AOL, Inc.*, 896 F.3d 1335, 1346 (Fed. Cir. 2018) ("[T]he claims do not recite any arguably inventive method of how the secondary information is displayed . . . That is, while the specification and claims of the '652 patent purport to describe an improved user experience which allows the presentation of an additional set of information, the patent is wholly devoid of details which describe how this is accomplished."); *Apple, Inc. v. Ameranth, Inc.*, 842 F.3d 1229, 1241 (Fed. Cir. 2016) (claims directed to an abstract idea because they "do not claim a particular way of programming or designing the software to … have these features, but instead merely claim the resulting systems."); *In re TLI Commc'ns LLC Patent Litig.*, 823 F.3d 607, 613 (Fed. Cir. 2016) ("[t]he purely functional nature of the claim confirms that it is directed to an abstract idea."). The Federal Circuit has long held that merely collecting and analyzing information and "merely presenting the results of abstract processes of collecting and analyzing information" is nothing more than an abstract idea. *See Int'l Bus. Machines Corp. v. Zillow Grp., Inc.*, 50 F.4th 1371, 1377-1380 (Fed. Cir. 2022) ("We agree that the claims here fail to 'recite any assertedly inventive technology for improving computers as tools and are instead directed to an abstract idea for which computers are invoked merely as a tool. The claims are directed to limiting and coordinating the display of information based on a user selection. . . . The representative claims here merely organize and arrange sets of visual information into layers and then present said layers on a generic display device. While the claimed methods may speed up that organizational process by using a computer, they do not recite an improvement in any computing technology." (internal citations omitted)); *PersonalWeb*

Techs. LLC v. Google LLC, 8 F.4th 1310, 1318 (Fed. Cir. 2021) ("'[T]he focus of the claims is not on . . . an improvement in computers as tools, but on certain independently abstract ideas that use computers as tools.'" (quoting *Credit Acceptance Corp. v. Westlake Servs.*, 859 F.3d 1044, 1045 (Fed. Cir. 2017))); *Customedia Techs., LLC v. Dish Network Corp.*, 951 F.3d 1359, 1365 (Fed. Cir. 2020) ("We have also held that improving a user's experience while using a computer application is not, without more, sufficient to render the claims directed to an improvement in computer functionality . . . to be directed to a patent-eligible improvement to computer functionality, the claims must be directed to an improvement to the functionality of the computer or network platform itself."); *Ameranth, Inc. v. Domino's Pizza, LLC*, 792 F. App'x 780, 787 (Fed. Cir. 2019) ("Those claims 'fail[ ] to recite a practical way of applying an underlying idea ... [and] instead were drafted in such a result-oriented way that they amounted to encompassing 'the principle in the abstract' no matter how implemented."); *Trading Techs. Int'l, Inc. v. IBG LLC*, 921 F.3d 1084, 1092 (Fed. Cir. 2019) (Limitations reciting "'selecting' and 'moving' an order icon to a location . . . does not change our determination that the claims are directed to an abstract idea."); *Electric Power Group, LLC v. Alstom S.A.*, 830 F.3d 1350, 1353-54 (Fed. Cir. 2016) (citing *Internet Patents Corp. v. Active Network, Inc.*, 790 F.3d 1343, 1349 (Fed. Cir. 2015); *OIP Techs., Inc. v. Amazon.com, Inc.*, 788 F.3d 1359, 1363 (Fed. Cir. 2015); *Content Extraction & Transmission LLC v. Wells Fargo Bank, Nat'l Ass'n*, 776 F.3d 1343, 1347 (Fed. Cir. 2014); *Digitech Image Techs., LLC v. Elecs. for Imaging, Inc.*, 758 F.3d 1344, 1351 (Fed. Cir. 2014); *CyberSource Corp. v. Retail Decisions, Inc.*, 654 F.3d 1366, 1370 (Fed. Cir. 2011); *In re TLI*, 823 F.3d at 613; *SmartGene, Inc. v. Advanced Biological Labs., SA*, 555 Fed.Appx. 950, 955 (Fed. Cir. 2014); *Bancorp Servs., L.L.C. v. Sun Life Assurance Co. of Canada (U.S.)*, 687 F.3d 1266, 1278 (Fed. Cir. 2012); *CyberSource Corp. v. Retail Decisions, Inc.*, 654 F.3d

1366, 1372 (Fed. Cir. 2011); *SiRF Tech., Inc. v. Int'l Trade Comm'n*, 601 F.3d 1319, 1333 (Fed. Cir. 2010); *Ultramercial, Inc. v. Hulu, LLC*, 772 F.3d 709, 715 (Fed. Cir. 2014)); *see also Talent Broker Tech. LLC v. Musical.ly, Inc.*, 2018 WL 3019641, *6-*10 (C.D. Cal. 2018) ("Similarly, claim 12 of the '154 Patent describes 'a system for providing assessment information,' which makes use of a processor and memory capable of: (1) receiving assessment information for content; (2) searching the content using the assessment information; and (3) providing search results based on the parameters of the search. Again, this merely describes the process of retrieving, organizing and outputting information—concepts that courts have routinely found to be abstract.").

A. U.S. Patent No. 9,304,602

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
1	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Claim 1 is directed to the abstract idea of displaying information on a user interface using a gesture because it merely recites generic actions performed on conventional user interface elements displayed on the phone's screen. For example, windows are standard user interface elements, gliding actions were well known for touch screens, and activating functions on a user interface is the purpose of such gestures. This abstract idea was routine and	For purposes of the eligibility analysis, claim 1 is representative of claims 2-13, 15-19, 21-36

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea. Indeed, the ’602 patent does not purport to have invented gliding actions, touch screens, the use of windows or bars to activate functions, or any improvement to the hardware of the device itself.	
2	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 2 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software aspects, such as the gliding action activating a different function than a mouse click or cursor movement. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
3	Abstract idea	This claim contains an abstract idea without any inventive concept and is	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 3 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as the bar being located on an edge of the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
4	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 4 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		This claim does not recite significantly more than conventional software user interface aspects, such as a bar extending along a substantial portion of the edge of the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
5	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 5 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as a bar in the form of a line being located on an edge of the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
6	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants'	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 6 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying an interface on the screen using a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
7	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 7 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		portion of an interface on the screen using a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
8	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 8 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a portion of an interface on the screen based on a length of a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
9	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		in combination are well understood, routine, and conventional. Like claim 1, claim 9 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying an interface on the screen using a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
10	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 10 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a portion of an interface on the screen using a gesture. The additional	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
11	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 11 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a portion of an interface on the screen based on a length of a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
12	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		Like claim 1, claim 12 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying an interface based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
13	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 13 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as positioning an interface on the screen based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		inventive advance beyond this simple abstract idea.	
15	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 15 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as having multiple windows located on the edges of the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
16	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 16 is directed to the abstract idea of displaying information on a user interface using a gesture. This	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as having a window extending along a substantial portion of an edge of the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
17	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 17 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as dragging a window based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
18	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 18 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as presenting an interface based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
19	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Claim 19 is directed to the abstract idea of displaying information on a user interface using a gesture because it merely recites generic actions performed on conventional user interface elements displayed on the phone's screen. For	For purposes of the eligibility analysis, claim 19 is representative of claims 21-36

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		example, windows and bars are standard user interface elements, gliding actions were well known for touch screens, and activating functions on a user interface is the purpose of such gestures. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea. Indeed, the ’602 patent does not purport to have invented gliding actions, touch screens, the use of windows or bars to activate functions, or any improvement to the hardware of the device itself.	
21	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 21 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as positioning an interface on the screen based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
22	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 22 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as bars being located on edges of the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
23	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 23 is directed to the abstract idea of displaying information on a user interface using a gesture. This	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as a zone in a form of a visible or invisible line on the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
24	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 24 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying an interface based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
25	Abstract idea	This claim contains an abstract idea without any inventive concept and is	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 25 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a portion of an interface based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
26	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 26 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a portion of an interface on the screen based on a length of a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
27	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 27 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as a visible or invisible bar on the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
28	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 28 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying an interface based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
29	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 29 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		portion of an interface based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
30	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 30 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a portion of an interface on the screen based on a length of a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
31	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		in combination are well understood, routine, and conventional. Like claim 19, claim 31 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as dragging a window based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
32	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 32 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as presenting an interface based on a gesture. The additional limitations recited in this	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
33	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 33 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such swiping inwards from the edge of a screen to activate software functionality. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
34	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		Like claim 19, claim 34 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as presenting a portion of an interface based on a gesture. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
35	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 35 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as displaying a portion of an interface on the screen based on a length of a gesture. The additional limitations recited in this claim amount to insignificant post-	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
36	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 19, claim 36 is directed to the abstract idea of displaying information on a user interface using a gesture. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '602 patent. This claim does not recite significantly more than conventional software user interface aspects, such as a zone extending along a substantial portion of the edge of the screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	

B. U.S. Patent No. 10,976,922

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
1	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Claim 1 is directed to the abstract idea of organizing information on an electronic device screen because it merely recites generic relationships between conventional user interface elements displayed on the phone's screen. For example, the use of on-screen keyboards, changing the sizes of applications, and displaying multiple application windows and a keyboard were all well known in the art. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	For purposes of the eligibility analysis, claim 1 is representative of claims 2-11, and claims 12-21
2	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 2 is directed to the abstract idea of organizing information	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than conventional software user interface aspects, such as giving focus to the application being used. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
3	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 3 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than conventional user interface elements, such as using a keyboard with more than one application. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
4	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 4 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than communicating data, such as sharing information between displayed applications. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
5	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 5 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than communicating data, such as sharing text, an image, a video, a webpage, or a URL between displayed applications. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
6	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 6 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than conventional user interface elements for communicating data, such as copying and pasting information. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
7	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 7 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than conventional software, such as the application being a messaging app. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
8	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 8 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than conventional user interface elements, such as activating a search	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		application using a search button on the display screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
9	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 9 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than conventional user interface elements, such as activating a search application using a search button on the display screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
10	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		in combination are well understood, routine, and conventional. Like claim 1, claim 10 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than communicating data, such as sharing text, pictures, or videos. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
11	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 11 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than generic conventional hardware, such as the device being a mobile phone. The additional limitations recited in this claim amount to insignificant post-solution activity.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
12	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Claim 12 is directed to the abstract idea of organizing information on an electronic device screen because it merely recites generic relationships between conventional user interface elements displayed on the phone's screen. For example, the use of on-screen keyboards, changing the sizes of applications, and displaying multiple application windows and a keyboard were all well known in the art. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	For purposes of the eligibility analysis, claim 12 is representative of claims 13-21
13	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		Like claim 12, claim 13 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than conventional user interface elements, such as a common keyboard for applications. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
14	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 14 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than conventional software, such as an application being a text messaging app or an image sharing app. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		constitutes an inventive advance beyond this simple abstract idea.	
15	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 15 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than conventional user interface elements, such as searching for an application using a search button on the display screen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
16	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 16 is directed to the abstract idea of organizing information on an electronic device screen. This	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than conventional software aspects, such as searching with keywords. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
17	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 17 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’922 patent. This claim does not recite significantly more than conventional software aspects, such as searching with keywords in a search app. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
18	Abstract idea	This claim contains an abstract idea without any inventive concept and is	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 18 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than communicating data, such as sharing information between displayed applications. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
19	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 19 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		This claim does not recite significantly more than communicating data, such as sharing text, an image, a video, a webpage, or a URL between displayed applications. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
20	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 20 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than conventional software user interface aspects, such as giving focus to the application being used. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
21	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions)	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 12, claim 21 is directed to the abstract idea of organizing information on an electronic device screen. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '922 patent. This claim does not recite significantly more than conventional hardware elements, such as a mobile phone's touchscreen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	

C. U.S. Patent No. 11,503,144

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
1	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Claim 1 is directed to the abstract idea of a rectangular mobile phone device because it merely recites generic	For purposes of the eligibility analysis, claim 1 is representative of claims 2-5, 7-8, and claims 9-20

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		relationships of the phone housing without specificity. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
2	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 2 is directed to the abstract idea of a rectangular mobile phone device. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than generic relationships of the phone housing without specificity, such as it having rounded corners. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
3	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		in combination are well understood, routine, and conventional. Like claim 1, claim 3 is directed to the abstract idea of a rectangular mobile phone device. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than conventional user interface elements, such as swiping between different user interface screens on a mobile phone. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
4	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 4 is directed to the abstract idea of a rectangular mobile phone device. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than conventional user interface elements, such as clicking an icon to open an app on a mobile phone. The additional limitations recited in this claim amount to insignificant	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
5	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 5 is directed to the abstract idea of a rectangular mobile phone device. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '144 patent. This claim does not recite significantly more than conventional user interface elements, such as display of text entered on a virtual keyboard in landscape or portrait mode. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
7	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 7 is directed to the abstract idea of a rectangular mobile phone device. This abstract idea was	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than generic relationships of the phone housing without specificity, such as relative width and length of the phone housing. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
8	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 1, claim 8 is directed to the abstract idea of a rectangular mobile phone device. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than generic relationships of the phone housing without specificity, such as relative thickness and width of the phone housing. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
9	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Claim 9 is directed to the abstract idea of a rectangular mobile phone having a virtual keyboard because it merely recites generic relationships of the phone housing without specificity and conventional user interface elements, such as display of text entered on a virtual keyboard in landscape or portrait mode. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '144 patent. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	For purposes of the eligibility analysis, claim 9 is representative of claims 10-14
10	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 9, claim 10 is directed to the abstract idea of a rectangular mobile phone having a virtual keyboard. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		claimed priority date of the ’144 patent. This claim does not recite significantly more than generic relationships of the phone housing without specificity, such as its speaker and microphone lining up with a user’s ear and mouth. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
11	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 9, claim 11 is directed to the abstract idea of a rectangular mobile phone having a virtual keyboard. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than generic relationships of the phone housing without specificity, such as it having rounded corners. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
12	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 9, claim 12 is directed to the abstract idea of a rectangular mobile phone having a virtual keyboard. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than conventional user interface elements, such as swiping between different user interface screens on a mobile phone. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
13	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 9, claim 13 is directed to the abstract idea of a rectangular mobile phone device having a virtual keyboard. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than conventional user interface	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		elements, such as clicking an icon to open an app on a mobile phone. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
14	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 9, claim 14 is directed to the abstract idea of a rectangular mobile phone having a virtual keyboard. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '144 patent. This claim does not recite significantly more than generic relationships of the phone housing without specificity, such as the components of the mobile phone are integrated into the phone housing (e.g., the phone's antenna does not protrude). The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
15	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions)	Yes, claims 16-20

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		illustrate that the elements of this claim in combination are well understood, routine, and conventional. Claim 15 is directed to the abstract idea of a rectangular mobile phone having multiple user interface screens because it merely recites generic relationships of the phone housing without specificity and conventional user interface elements, such as swiping between different user interface screens on the phone. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
16	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 15, claim 16 is directed to the abstract idea of a rectangular mobile phone device having multiple interfaces. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than conventional user interface elements, such as performing the swiping action between different user interface screens on a touch screen	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		display. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
17	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 15, claim 17 is directed to the abstract idea of a rectangular mobile phone device having multiple interfaces. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '144 patent. This claim does not recite significantly more than conventional user interface elements, such clicking an icon to open an app on a mobile phone. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
18	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional.	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		Like claim 15, claim 18 is directed to the abstract idea of a rectangular mobile phone device having multiple interfaces. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than conventional hardware elements, such as a full-length touchscreen. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
19	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants’ accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 15, claim 19 is directed to the abstract idea of a rectangular mobile phone device having multiple interfaces. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the ’144 patent. This claim does not recite significantly more than generic relationships of the phone housing without specificity, such as the components of the mobile phone are integrated into the phone housing (e.g., the phone’s antenna does not protrude). The additional limitations recited in this claim amount to	

Challenged Claim	Exception to Eligibility	Factual and Legal Basis	Representative of Other Claims
		insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	
20	Abstract idea	This claim contains an abstract idea without any inventive concept and is thus invalid under 35 U.S.C. § 101. The state-of-the-art documents addressed below (and in Defendants' accompanying invalidity contentions) illustrate that the elements of this claim in combination are well understood, routine, and conventional. Like claim 15, claim 20 is directed to the abstract idea of a rectangular mobile phone device having multiple interfaces. This abstract idea was routine and conventional in the field of mobile devices with touch screens and was well known in the art prior to the earliest claimed priority date of the '144 patent. This claim does not recite significantly more than conventional user interface elements, such as display of text entered on a virtual keyboard in landscape or portrait mode. The additional limitations recited in this claim amount to insignificant post-solution activity. Nothing in this claim constitutes an inventive advance beyond this simple abstract idea.	

II. Claim Charts

In accordance with Paragraph (a)(2) and Paragraph (a)(3) of the Standing Order, the claim charts, which accompany these Eligibility Contentions as Exhibits 1-3, identify a description of the industry, at the relevant time, in which the Challenged Claims were well

understood, routine, and conventional, and the factual and legal bases therefor, as well as any other factual or legal basis for how the Challenged Claims are otherwise ineligible for patent protection. The accompanying charts also include a description of how each element of each Challenged Claim, both individually and in combination with the other elements of that claim, was well understood, routine, and conventional in the relevant industry at the relevant time and the legal and factual bases therefor.

III. Accompanying Document Production

The materials upon which Defendants seek to rely to show the lack of eligibility of the Challenged Claims are identified in Tables 1-6 and Exhibits A1-A8, B1-B7, and C1-C12 of Defendants' Invalidity Contentions, which are incorporated herein by reference.

Dated: January 29, 2025

Respectully submitted,

/s/ *Christopher T. Blackford*

Melissa R. Smith

Texas State Bar No. 24001351
GILLAM & SMITH LLP
303 South Washington Ave.
Marshall, TX 75670
903.934.8450 (Telephone)
903.934.9257 (Facsimile)
melissa@gillamsmithlaw.com

Gerald F. Ivey
Parmanand K. Sharma (*pro hac vice*)
Christopher T. Blackford (*pro hac vice*)
Tyler M. Akagi (*pro hac vice*)
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
901 New York Avenue, N.W.
Washington, D.C. 20001-4413
(202) 408-4000
parmanand.sharma@finnegan.com
christopher.blackford@finnegan.com

Charles H. Suh (*pro hac vice*)
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
1875 Explorer Street, 8th Floor
Reston, VA 20190-6023
(571) 203-2700
charles.suh@finnegan.com

Kara A. Specht
Robert K. High (*pro hac vice*)
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
271 17th St. NW Suite 1400
Atlanta, GA 30363-6209
(404) 653-6400
kara.specht@finnegan.com
robert.high@finnegan.com

ATTORNEYS FOR DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. & SAMSUNG ELECTRONICS AMERICA, INC

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2025, I caused to be served copies of the foregoing Defendants' Subject Matter Eligibility Contentions and Exhibits on the following counsel via email:

Robert F. Kramer
CA Bar No. 181706 (Admitted E.D. Texas)
rkramer@krameralberti.com
David Alberti
CA Bar No. 220265 (Admitted E.D. Texas)
dalberti@kramerablerti.com
Sal Lim
CA Bar No. 211836 (Admitted E.D. Texas)
slim@krameralberti.com
Russell S. Tonkovich
CA Bar No. 233280 (Admitted E.D. Texas)
rtonkovich@krameralberti.com
Zachariah A. Higgins
CA Bar No. 190225 (Admitted E.D. Texas)
zhiggins@krameralberti.com
Curt Holbreich
CA Bar No. 168053 (Admitted E.D. Texas)
cholbreich@krameralberti.com
Nicholas Martini
CA Bar No. 237687
nmartini@krameralberti.com
KRAMER ALBERTI LIM
& TONKOVICH LLP
950 Tower Lane, Suite 1725
Foster City, CA 94404
Telephone: (650) 825-4300
Facsimile: (650) 460-8443
Nicole Glauser
Texas Bar No. 24050694
nglauser@krameralberti.com

KRAMER ALBERTI LIM
& TONKOVICH LLP
500 W 2nd Street, Suite 1900
Austin, TX 78701
Telephone: (737) 256-7784
Facsimile: (650) 460-8443
Deron R. Dacus

Texas Bar No. 00790553
ddacus@dacusfirm.com
THE DACUS FIRM, PC
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Telephone: (903) 705-1117
Facsimile: (903) 581-2543

Counsel for Plaintiffs

/s/ Seth D. Katz
Seth D. Katz
Case Manager