

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS
AMERICA, INC.,

Petitioners

v.

KEYLESS LICENSING LLC,

Patent Owner.

Case No. IPR2025-00527
U.S. Patent No. 10,976,922

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 10,976,922**

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LIST OF EXHIBITS

Exhibit	Description
Ex. 1001	U.S. Patent No. 10,976,922 to Ghassabian (“’922 patent”)
Ex. 1002	Declaration of Dr. Benjamin B. Bederson (“Bederson”)
Ex. 1003	Curriculum Vitae of Dr. Benjamin B. Bederson
Ex. 1004	Prosecution File History of the ’922 patent
Ex. 1005	Prosecution File History of U.S. Application No. 14/767,606
Ex. 1006	U.S. Provisional Application No. 61/765,751
Ex. 1007	U.S. Provisional Application No. 61/766,747
Ex. 1008	U.S. Provisional Application No. 61/769,285
Ex. 1009	U.S. Provisional Application No. 61/772,066
Ex. 1010	U.S. Provisional Application No. 61/774,605
Ex. 1011	U.S. Provisional Application No. 61/777,102
Ex. 1012	U.S. Provisional Application No. 61/778,888
Ex. 1013	U.S. Provisional Application No. 61/802,690
Ex. 1014	U.S. Provisional Application No. 61/803,456
Ex. 1015	U.S. Provisional Application No. 61/804,681
Ex. 1016	U.S. Provisional Application No. 61/810,805
Ex. 1017	U.S. Provisional Application No. 61/811,756
Ex. 1018	U.S. Provisional Application No. 61/813,271
Ex. 1019	U.S. Provisional Application No. 61/814,290
Ex. 1020	U.S. Provisional Application No. 61/819,598

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Ex. 1021	U.S. Provisional Application No. 61/821,331
Ex. 1022	U.S. Provisional Application No. 61/822,934
Ex. 1023	U.S. Provisional Application No. 61/823,971
Ex. 1024	U.S. Provisional Application No. 61/825,049
Ex. 1025	U.S. Provisional Application No. 61/827,020
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Ex. 1039	U.S. Provisional Application No. 61/865,254
Ex. 1040	U.S. Provisional Application No. 61/866,119
Ex. 1041	U.S. Provisional Application No. 61/868,172

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Ex. 1042	U.S. Provisional Application No. 61/869,722
Ex. 1043	U.S. Provisional Application No. 61/875,192
Ex. 1044	U.S. Provisional Application No. 61/878,695
Ex. 1045	U.S. Provisional Application No. 61/879,152
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Ex. 1053	U.S. Provisional Application No. 61/920,572
Ex. 1054	U.S. Provisional Application No. 61/926,474
Ex. 1055	U.S. Provisional Application No. 61/927,039
Ex. 1056	U.S. Provisional Application No. 61/929,187
Ex. 1057	U.S. Provisional Application No. 61/931,633
Ex. 1058	U.S. Provisional Application No. 61/937,545
Ex. 1059	U.S. Patent Application Pub. No. 2013/0234945 to Goktekin (“ <i>Goktekin</i> ”)
Ex. 1060	U.S. Patent Application Pub. No. 2012/0113023 to Koch et al. (“ <i>Koch</i> ”)
Ex. 1061	U.S. Patent Application Pub. No. 2012/0110486 to Sirpal et al. (“ <i>Sirpal</i> ”)

Exhibit	Description
Ex. 1062	U.S. Patent No. 8,744,173 to Vincent et al. (“ <i>Vincent</i> ”)
Ex. 1063	U.S. Patent Application Pub No. 2012/0215533 to Aravamudan et al. (“ <i>Aravamudan</i> ”)
Ex. 1064	U.S. Patent No. 7,340,686 to Matthews et al. (“ <i>Matthews</i> ”)
Ex. 1065	U.S. Patent No. 8,547,354 to Koch et al.
Ex. 1066	Reserved
Ex. 1067	U.S. Provisional Patent Application No. 61/389,000 to Sirpal et al. (“ <i>Sirpal-000</i> ”)
Ex. 1068	Reserved
Ex. 1069	Reserved
Ex. 1070	Plaintiff’s Infringement Contentions in <i>Keyless Licensing LLC v. Samsung Electronics America, Inc.</i> , No. 2:24-cv-00464-JRG (E.D. Tex. Oct. 9, 2024)
Ex. 1071	Reserved
Ex. 1072	Johan Himberg et al., <i>On-line Personalization of a Touch Screen Based Keyboard</i> , PROCEEDINGS OF THE 8TH INT’L CONFERENCE ON INTELLIGENT USER INTERFACES (IUI ’03) (Jan. 12-15, 2003) at 77-84, Assn. for Computing Machinery, accessible at https://doi.org/10.1145/604045.604061
Ex. 1073	Eric S. Missimer et al., <i>Customizable Keyboard</i> , PROCEEDINGS OF THE 12TH INT’L ACM SIGACCESS CONFERENCE ON COMPUTERS AND ACCESSIBILITY (ASSETS ’10) (OCT. 25-27, 2010) at 249-250, Assn. for Computing Machinery, accessible at https://doi.org/10.1145/1878803.1878855
Ex. 1074	Reserved
Ex. 1075	U.S. Patent No. 7,917,286 to Taylor et al.

Exhibit	Description
Ex. 1076	Reserved
Ex. 1077	U.S. Patent Application Pub No. 2005/0215278 to Liow et al. (“ <i>Liow</i> ”)
Ex. 1078	U.S. Patent No. 7,912,700 to Bower et al. (“ <i>Bower</i> ”)

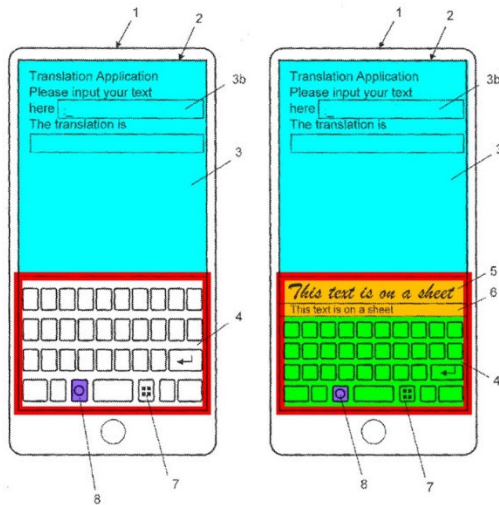
I. PRELIMINARY STATEMENT

Petitioners Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., request IPR of claims 1-21 of U.S. Patent No. 10,976,922 (the “’922 patent”), assigned to Patent Owner Keyless Licensing LLC. The ’922 patent describes an electronic touchscreen device, wherein an on-screen keyboard is “reduced in size” such that “screen area(s) usually allocated to a full-sized input method/keyboard ... may be made available to another [second] application.” Ex. 1001, 85:19-27. More specifically, the claims require an interface of the “second application” and a “reduced interface corresponding to [a] keyboard” to be displayed “on at least a portion of [the] ... zone” assigned to the original full-sized keyboard. *Id.*, Claim 1. Those features were well known.

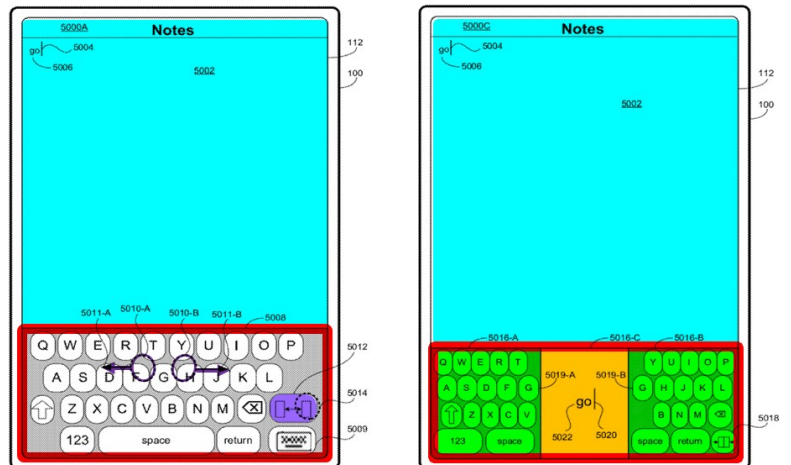
For example, *Goktekin* (Ex. 1059), filed nine months before the earliest potential priority date for the ’922 patent’s claims,¹ disclosed displaying both a **second application interface** and a **reduced keyboard** interface in the zone previously occupied by a **full-sized keyboard**, as illustrated below-left. As another example, *Koch* (Ex. 1060), filed over two years before the ’922 patent, disclosed

¹ Although claiming an earlier priority date, the ’922 patent claims subject matter first filed on December 24, 2013; therefore, the AIA provisions apply.

displaying similar features as illustrated below-right.² Both references warrant claim cancellation.



Goktekin, Figs. 1a, 1b



Koch, Figs. 5A, 5C

Petitioners thus request that the Board institute IPR and cancel all claims.

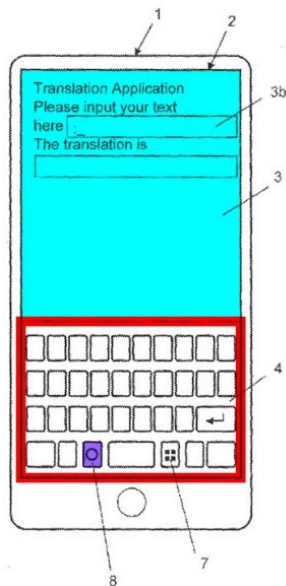
II. OVERVIEW OF TECHNOLOGY

Years before the '922 patent was filed, “[t]he use of touch-sensitive surfaces as input devices for computers and other electronic computing devices ha[d] increased significantly.” *Koch*, ¶[0004]. Such devices “include[d] soft keyboards” with capabilities for “selecting a soft keyboard, adjusting the position and/or size of the soft keyboard, and activating keys in the soft keyboard.” *Id.*, ¶[0005].

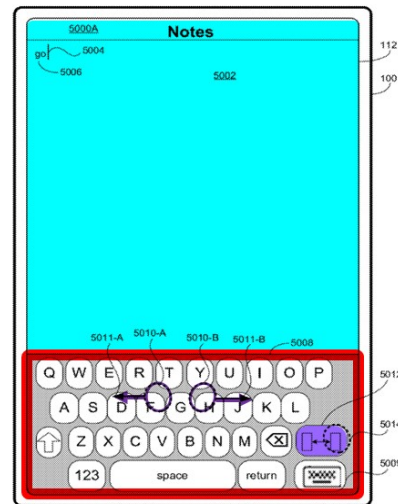
Typically, the **keyboard** appeared at the bottom portion of the touchscreen, with

² All colors and colored annotations added to figures unless otherwise noted.

an **application's graphical user interface** at the top portion, as *Goktekin* and *Koch* illustrate. Bederson, ¶¶60; *Koch*, ¶¶[0231]-[0232]; *Goktekin*, ¶[0046].

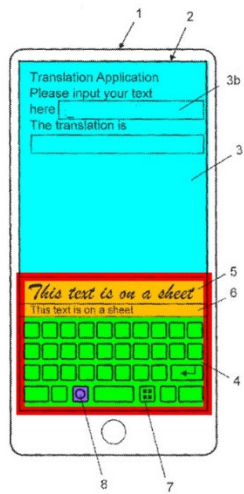


Goktekin, Fig. 1a

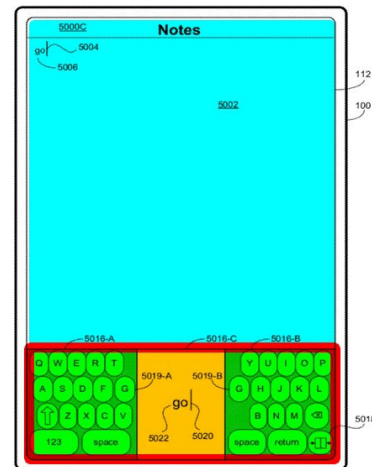


Koch, Fig. 5A

Reducing the keyboard's size was known to accommodate alternate text-entry modes or improve typing efficiency on wider screens. Bederson, ¶¶64, 66. To that end, *Goktekin* and *Koch* taught to shrink and/or split the keyboard by pressing a **keyboard key**. *Goktekin*, ¶¶[0046]-[0047]; *Koch*, ¶¶[0232]-[0233], [0235]; Bederson, ¶70. Thereafter, the **reduced keyboard interface** accommodates a **second application**, with both fitting into the original keyboard's **zone**. *Goktekin*, ¶[0047], Fig. 1b (below-left); *Koch*, ¶[0235], Fig. 5C (below-right); Bederson, ¶¶64, 66.



Goktekin, Fig. 1b



Koch, Fig. 5C

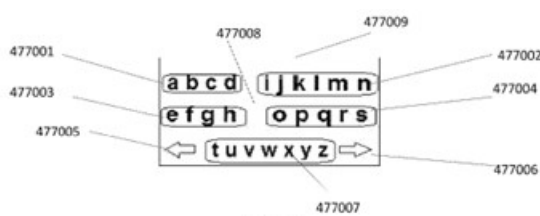
Thus, the challenges of accommodating a second application on a touchscreen display, and the solution of using a keyboard action to display the second application and a reduced-interface keyboard, were well understood before the '922 patent. Bederson, ¶68.

III. THE '922 PATENT

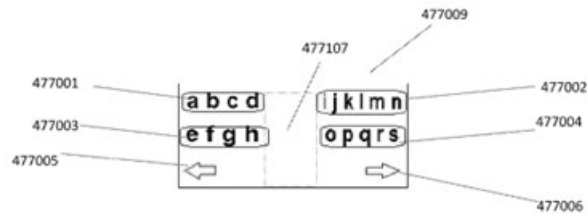
A. Alleged Invention

The '922 patent alleges that "text entry ... is problematic due to the[] small size of a [mobile] device." Ex. 1001, 1:15-17. According to the patent, "[h]aving a full keyboard with many keys on the screen covers a significant portion of the screen, hindering the use of many current applications and limiting creation of many other applications." *Id.*, 1:35-38. The patent thus proposes "a switching method ... to reduce the size of the/a keypad." *Id.*, 38:20-22. The patent illustrates

“switching the keypad to such a mode” in Figures 35A and 35B, below. *Id.*, 38:20-26.



Ex. 1001, Fig. 35A



Ex. 1001, Fig. 35B

The patent further describes that “screen area(s) usually allocated to a full-sized input method/keyboard ... may be made available to another application.” *Id.*, 85:19-27. The apportioned screen area “may contain a chat application, such as, for example[,] Skype, image editing method/application of the invention (described herein), [or] video chat application, while a regular application area ... of an operating system may be occupied by other application(s), such as, for example[,] WhatsApp.” *Id.*, 85:27-35. In this manner, a “user can chat on an instant messaging application(s) ..., and at the same time the user can[,] for example, send pictures, edit pictures ... from the application(s) operating in the extra input method resources” or “share pictures with other users through any application(s).” *Id.*, 85:40-49. “For example, [a] picture edited as such may be share[d] through a chat application such as WhatsApp[,] preferably operating in the regular application area of an operating system.” *Id.*, 85:49-52. The '922 patent does not illustrate this embodiment.

B. Prosecution History

The '922 patent was filed as Application No. 15/412,026, a divisional of Application No. 14/767,606. Ex. 1004 (the "'026 application"). Application claim 1 originally recited a "keyboard for entering text in a first application ... wherein a first zone of said touchscreen is assigned to said first application and a second zone of said touchscreen is assigned to said keyboard; ... wherein based on accomplishment of a condition[,] the system displays an interface of a second application on at least a portion of said second zone." *Id.*, 864.

Applicant amended claim 1 to require: (1) a keyboard-based condition "activates a second application," (2) displaying both the second-application interface and a "reduced interface corresponding to said keyboard" on the second zone, and (3) both application interfaces and the reduced keyboard interface are "simultaneously displayed." *See id.*, 579 [12/2/2019 Amendment], 551 [3/16/2020 Examiner Amendment]. Based on those amendments, the claims were allowed. *Id.*, 557.

C. The Claims of the '922 Patent Are Not Entitled to Priority Earlier than December 24, 2013, and the AIA Applies

The patent asserts priority to 53 provisional applications filed between February 17, 2013, and February 9, 2014. Exs. 1006-1058. Keyless asserts entitlement to the earliest date. Ex. 1070, 9. Challenged claims 1-21, however, are

not entitled to the earliest date, because their subject matter was not disclosed in the manner required by 35 U.S.C. § 112 until, at the earliest, December 24, 2013, when Provisional Application No. 61/920,572 (the “’572 provisional application”) was filed.

1. Legal requirement for determining entitlement to priority to prior-filed application(s)

Under 35 U.S.C. § 120, a patent claim receives the benefit of an earlier U.S. application filing date only if the earlier-filed application adequately disclosed the claimed subject matter under 35 U.S.C. § 112. *In re NTP, Inc.*, 654 F.3d 1268, 1277 (Fed. Cir. 2011). Under § 112, the earlier application must “reasonably convey[] to those skilled in the art that the inventor had possession of” and “actually invented” the claimed subject matter. *Ariad Pharms., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (en banc); *accord Hologic, Inc. v. Smith & Nephew, Inc.*, 884 F.3d 1357, 1361 (Fed. Cir. 2018) (citing *Ariad*). “[T]he hallmark of written description is disclosure.” *Ariad*, 598 F.3d at 1351.

The test for adequate written description support “requires an objective inquiry into the four corners of the specification from the perspective of a person of ordinary skill in the art.” *Id.* Although the specification need not “recite the claimed invention *in haec verba*, a description that merely renders the invention obvious does not satisfy the [written description] requirement.” *Id.* at 1352.

Instead, “[i]t is the disclosures of the applications that count. Entitlement to a filing date does not extend to subject matter which is not disclosed but would be obvious over what is expressly disclosed. It extends only to that which is disclosed.”

Lockwood v. Am. Airlines, Inc., 107 F.3d 1565, 1571-72 (Fed. Cir. 1997).

Moreover, “the disclosure must describe the claimed invention with all its limitations.” *Tronzo v. Biomet, Inc.*, 156 F.3d 1154, 1158 (Fed. Cir. 1998); *see also Lockwood*, 107 F.3d at 1572.

2. No application before December 24, 2013, discloses the claimed features

The earliest provisional application—No. 61/765,751 (Ex. 1006)—lacks written description support for the following elements of independent claims 1 and 12:

- (1) “based on accomplishment of a condition under the control of [a] keyboard”;
- (2) “activat[ing] a second application and display[ing] an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of [the] second zone” assigned to the keyboard; and
- (3) wherein the interfaces of the first and second applications and the reduced interface corresponding to the keyboard “are simultaneously displayed.”

Ex. 1001, Claims 1, 12; Bederson, ¶80. The earliest application also lacks support for a “search application” interface displayed “on at least a portion of [the] second zone” and typing a “keyword” into such an application, as further required by claims 8-9 and 15-17. Bederson, ¶80.

At best, the earliest provisional application describes that “one of the keys of the keypad may represent the ‘Google search’ application” and, “[b]y providing a predefined interaction with said key, the operating system may focus/activate the Google Search application.” Ex. 1006, 106; Bederson, ¶¶82-84. But the application is silent about combining (1) displaying the focused/activated search application *on the keyboard zone*, (2) displaying a reduced keyboard interface on the keyboard zone, and (3) displaying another (“first”) application simultaneously. Bederson, ¶¶83-84; *see* Ex. 1006, 106. None of the subsequent 46 provisional applications describes that combination. Bederson, ¶85; *see* Exs. 1007-1052.

Moreover, a “description that merely renders the invention obvious does not satisfy the [written description] requirement.” *Ariad*, 598 F.3d at 1352. Thus, even if the provisionals disclosed each element separately, Keyless cannot derive adequate written description support by combining them. *Novozymes A/S v. DuPont Nutrition Biosci. APS*, 723 F.3d 1336, 1349 (Fed. Cir. 2013) (written description analysis requires “[t]aking each claim ... as an integrated whole rather than as a collection of independent limitations”).

Therefore, the first 47 provisional applications do not “describe the claimed invention with all its limitations.” *Tronzo*, 156 F.3d at 1158. Nor do they “indicate to a person skilled in the art that the inventor was ‘in possession’ of the invention as later claimed.” *PowerOasis, Inc. v. T-Mobile USA, Inc.*, 522 F.3d 1299, 1306 (Fed. Cir. 2008) (citation omitted).

To the extent any provisional application even arguably discloses some combination of some of the foregoing features, that did not happen until December 24, 2013, when the *48th provisional* was filed. *See* Ex. 1053, 21-22; *Bederson*, ¶85.³ Additionally, the subject matter of claims 2 and 20 (“upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application”) and claims 3 and 13 (keyboard used “with both of said applications”) first appear in the December 24, 2013, provisional. Ex. 1053, 22 (“[U]pon an interaction with an area corresponding to an application ..., that application gains focus of the input method.... Alternatively, the input information provided by the input method [keyboard] is provided to both applications.”). Thus, except as otherwise stated, a December 24, 2013, priority date is applied herein.

³ Petitioners reserve the right in litigation to challenge whether any application provides adequate written description.

Furthermore, the AIA applies to “any application for patent, and to any patent issuing thereon,” with a claim “that has an effective filing date on or after March 16, 2013.” *See* 35 U.S.C. § 100 (note); Pub. L. 112-29, sec. 3(n)(1), 125 Stat. 284, 293 (2011). Thus, because at least claims 1, 2, 3, 8-9, 12-13, 15-17, and 20 were not disclosed before December 24, 2013,⁴ the AIA provisions apply to the ’922 patent. Notably, the patent examiner *also* determined that the AIA provisions applied, which the applicant never disputed. *See* Ex. 1004, 617. The same provisions should apply during IPR review.

D. Claim Construction

The Board construes claims per *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005) (en banc). Claims must be construed only to the extent necessary to resolve a controversy. *Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 868 F.3d 1013, 1017 (Fed. Cir. 2017). Here, no terms need construction to resolve the controversy in this forum.⁵

⁴ For the same reasons, none of the pre-AIA applications (Exhibits 1006-1012) disclose the claimed subject matter. *See* Bederson, ¶85.

⁵ Petitioners reserve the right to argue in an appropriate forum that certain limitations in the challenged claims are indefinite. Petitioners also reserve the right to challenge the priority date here and/or in other proceedings.

IV. STATEMENT OF PRECISE RELIEF REQUESTED

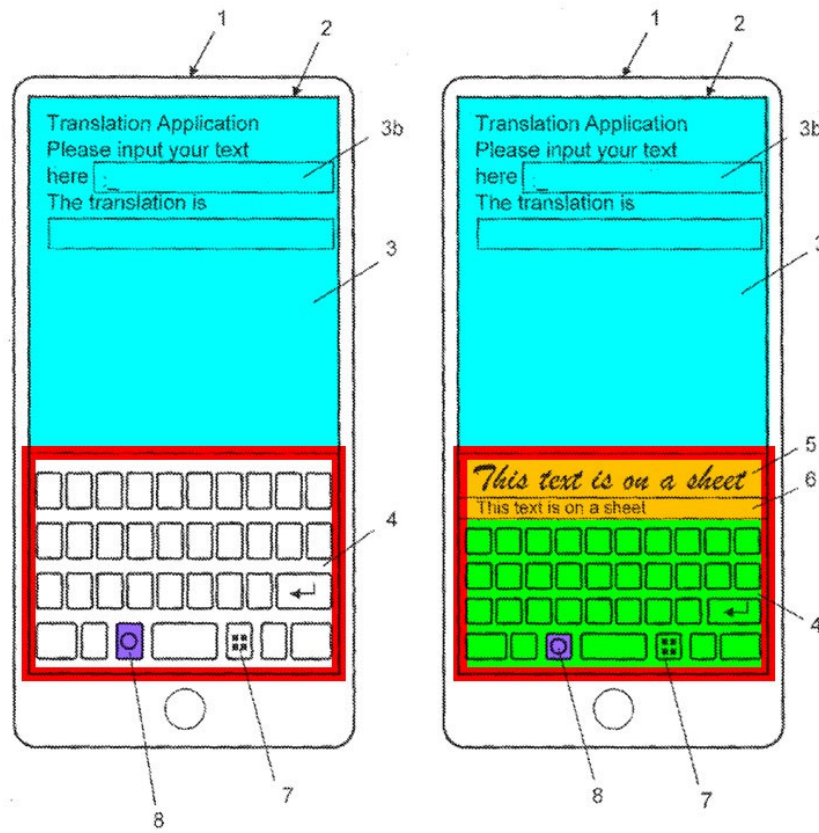
A. Prior Art

None of the asserted prior art in this petition was considered during prosecution.

1. *Goktekin* (Ex. 1059)

Goktekin, filed March 5, 2013, and published September 12, 2013, is prior art under at least 35 U.S.C. § 102(a)(1). Moreover, *Goktekin* claims priority to March 6, 2012, via a European patent application, qualifying *Goktekin* as prior art under 35 U.S.C. § 102(a)(2).

Goktekin's touchscreen displays “an **application window** 3 with a graphical user interface (GUI) of the application” and a “[**virtual**] **keyboard** being the A-Z-keyboard in the first field 4” (illustrated below-left). *Goktekin*, ¶[0046]. Pressing “a **camera mode key** 8 to switch over to the camera mode” (illustrated below-right), wherein an **interface for a second application** uses a camera to recognize and capture text. *Id.*, ¶[0047]. In camera mode, the **reduced-size keyboard** and **second application interface** appear “without overlapping the **application** more than originally planned by a usage of the **original keyboard** module.” *Id.*



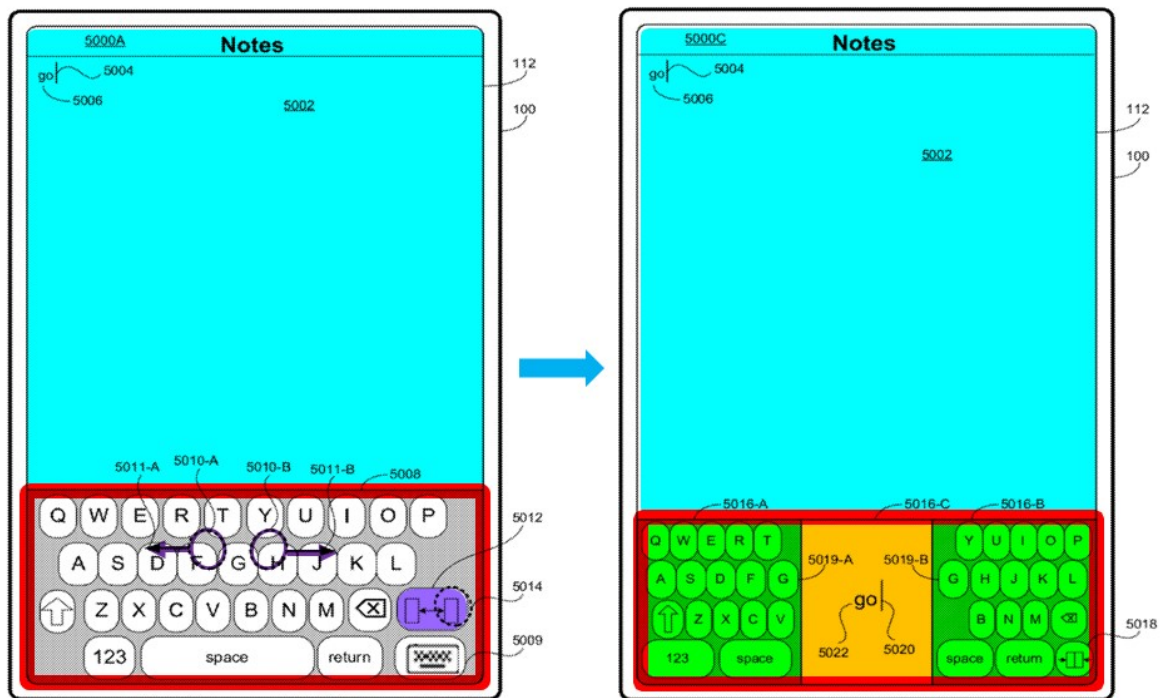
Goktekin, Figs. 1a-1b

2. Koch (Ex. 1060)

Koch, filed March 20, 2011, and published May 10, 2012, is prior art under at least 35 U.S.C. § 102(a)(1) and/or (a)(2), or pre-AIA § 102(a) and (e) (even under a February 17, 2013, priority date).

Koch “depicts **user interface (UI)** 5000A displayed on touch-sensitive display 112 of a device,” where UI 5000A “may be a user interface in an application (e.g., a notes application, a web browser application, etc.).” *Koch*, ¶[0231]. As illustrated below-left, “[u]nsplit soft **keyboard 5008** is displayed on display 112.” *Id.*, ¶[0232]. In response to tapping the **keyboard split key 5012**, or

to a “de-pinch gesture” **5010-A and 5010-B**, “device 100 changes unsplit soft keyboard 5008 (FIG. 5A [below-left]) into integrated input area 5016 (FIG. 5C [below-right]).” *Id.*, ¶¶[0233]-[0234].



Koch, Figs. 5A, 5C

As illustrated above, “[i]ntegrated input area 5016 includes **left split keyboard portion 5016-A** and **right split keyboard portion 5016-B**, and **center area 5016-C** between” the two. *Id.*, ¶[0235]. Several tasks (or applications) correspond to the center area 5016-C application interface, including clipboard functionality (¶¶[0261]-[0262]), handwriting recognition (¶[0266]), drawing (¶[0267]), and entry of emoticons or special Unicode characters (¶¶[0270]-[0273]). See Bederson, ¶242.

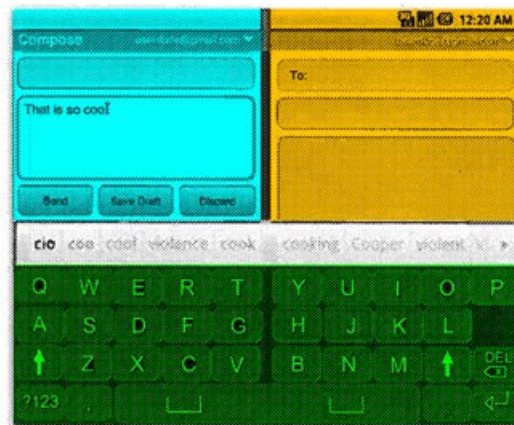
3. *Sirpal* (Ex. 1061)

Sirpal, filed September 28, 2011, and published May 3, 2012, is prior art under at least 35 U.S.C. § 102(a)(1) and/or (a)(2), or pre-AIA § 102(a) and (e) (even under a February 17, 2013, priority date).

Sirpal claims priority to and incorporates by reference the “entirety” of Provisional Application No. 61/389,000 (*Sirpal-000*, Ex. 1067) “for all that [it] teach[es] and for all purposes.” *Sirpal*, ¶[0011]. “Incorporation by reference provides ‘a method for integrating material from various documents into a host document[] ... by citing such material in a manner that makes clear that the material is effectively part of the host document as if it were explicitly contained therein.’” *Paice LLC v. Ford Motor Co.*, 881 F.3d 894, 906 (Fed. Cir. 2018) (quoting *Advanced Display Sys., Inc. v. Kent State Univ.*, 212 F.3d 1272, 1282 (Fed. Cir. 2000)). *Sirpal*’s incorporation statement broadly and unambiguously “states that [*Sirpal-000*] ‘is,’ without qualification, incorporated into [*Sirpal*] ‘by this reference’—i.e., the reference contained in the sentence.” *See Paice*, 881 F.3d at 907. “Such language is plainly sufficient to incorporate [*Sirpal-000*] in its entirety.” *Id.* Thus, *Sirpal-000* is prior art through its incorporation into *Sirpal* as of

the prior art date of *Sirpal*.⁶ Unless otherwise stated, citations to “*Sirpal*” refer collectively to the published application and its incorporated materials, whereas “*Sirpal-000*” refers specifically to the incorporated provisional application.

Sirpal discloses displaying “two apps [cyan and orange below], [and] one keyboard that spans both apps and operates within an app[,] depending on focus.” *Sirpal-000*, 147. “The user can tap [one] screen to move the focus to that screen”—a feature that “allows the user to tap back and forth to enter text in both screens in a seamless fashion.” *Id.*; Bederson, ¶191.



Sirpal-000, 147

⁶ Further, *Sirpal-000* was made publicly available upon publication of *Sirpal* on May 3, 2012. 37 C.F.R. § 1.11(a) (“all papers relating to the file of: [a] published application ... are open to inspection by the public”).

Sirpal further describes functionality to copy/paste between various applications. *See Sirpal-000*, 152, 154, 177-82.

4. *Vincent* (Ex. 1062)

Vincent, filed September 15, 2012, and issued June 3, 2014, is prior art at least under 35 U.S.C. § 102(a)(1) and/or (a)(2), or pre-AIA § 102(a) and/or (e).

Vincent describes using OCR text from images as input for a search query. *Vincent*, Abstract.

5. *Aravamudan* (Ex. 1063)

Aravamudan, filed January 25, 2012, and published August 23, 2012, is prior art at least under 35 U.S.C. § 102(a)(1) and/or (a)(2), or pre-AIA § 102(a) and/or (e).

Aravamudan describes supplementing OCR-recognized text with user-typed inputs for a search application. *See Aravamudan*, ¶[0038].

6. *Matthews* (Ex. 1064)

Matthews, filed March 22, 2005, and issued March 4, 2008, is prior art under 35 U.S.C. § 102(a)(1) and/or (a)(2), or pre-AIA § 102(a), (b), and/or (e).

Matthews describes pressing a key to launch a search application, as well as typing keywords into the search application. *Matthews*, 3:46-62, 18:29-39, 19:2-8.

B. Grounds of Unpatentability

Claims 1-21 are unpatentable in view of the following grounds:

Ground	Claims	Statutory Basis	Prior Art
1	1-5, 7, 10-14, 18-21	35 U.S.C. § 102 and/or § 103	<i>Goktekin</i> (Ex. 1059)
2	2, 6, 20	35 U.S.C. § 103	<i>Goktekin</i> in view of <i>Sirpal</i> (Ex. 1061)
3	8, 15	35 U.S.C. § 103	<i>Goktekin</i> in view of <i>Vincent</i> (Ex. 1062)
4	9, 16, 17	35 U.S.C. § 103	<i>Goktekin</i> in view of <i>Vincent</i> and <i>Aravamudan</i> (Ex. 1063)
5	1-5, 7, 10-14, 18-21	35 U.S.C. § 102 and/or § 103	<i>Koch</i> (Ex. 1060)
6	6	35 U.S.C. § 103	<i>Koch</i> in view of <i>Sirpal</i>
7	8, 9, 15-17	35 U.S.C. § 103	<i>Koch</i> in view of <i>Matthews</i>

V. LEVEL OF ORDINARY SKILL

A skilled artisan would have had at least a bachelor's degree in electrical engineering, computer science, or a similar field and two to three years of

experience designing graphical user interfaces. Bederson ¶¶92-93. Additional education could substitute for professional experience and vice versa. *Id.*

VI. CLAIMS 1-21 ARE UNPATENTABLE OVER THE PRIOR ART

A. Ground 1: *Goktekin* Anticipates or Renders Obvious Claims 1-5, 7, 10-14, and 18-21

1. Independent Claim 1

- a. [1pre] A system for using multiple applications on a screen of a device, comprising:

Goktekin discloses [1pre]. Bederson, ¶113. In *Goktekin*, “[t]ext may be input via keyboard or camera mode.” *Goktekin*, Abstract. In “camera mode,” a second application outputs “recognized character text as the input text to [another] application” (*Goktekin*, Abstract), and both applications are on a screen of a device, as discussed *infra*. Bederson, ¶114.

- b. [1a] an electronic device having a touchscreen;

Goktekin discloses [1a]. Bederson, ¶¶115-116. *Goktekin* discloses an electronic “mobile device 1 with the display 2 being [a] touch screen.” *Goktekin*, ¶[0046].

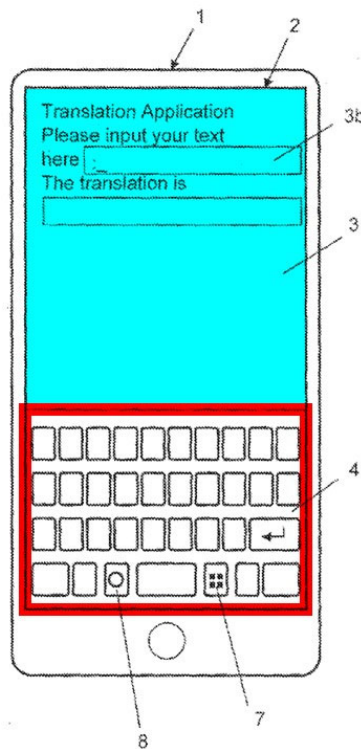
- c. [1b] an on-screen keyboard for entering text in a first application running within said device

Goktekin discloses [1b]. Bederson, ¶¶117-119. *Goktekin* discloses “multimodal text input on a mobile device either via a **keyboard** or in a camera based mode,” such that “input text [from the keyboard] or the [camera] recognized

text, respectively, is output as the input text to an **application** receiving the input text.” *Id.*, ¶[0002]; Bederson, ¶118. *Goktekin*’s keyboard is “a touch screen keyboard,” which is an “on-screen keyboard,” as claimed. *Goktekin*, ¶[0039]; Bederson, ¶119.

- d. **[1c] wherein a first zone of said touchscreen is assigned to an interface of said first application and a second zone of said touchscreen is assigned to said keyboard; and**

Goktekin discloses [1c]. Bederson, ¶120. “*Goktekin*’s **first application interface** appears on an upper portion of the touch screen, while its **keyboard** appears on a lower portion,” i.e., a “first zone” and a “second zone,” respectively. Bederson, ¶121.



Goktekin, Fig. 1a

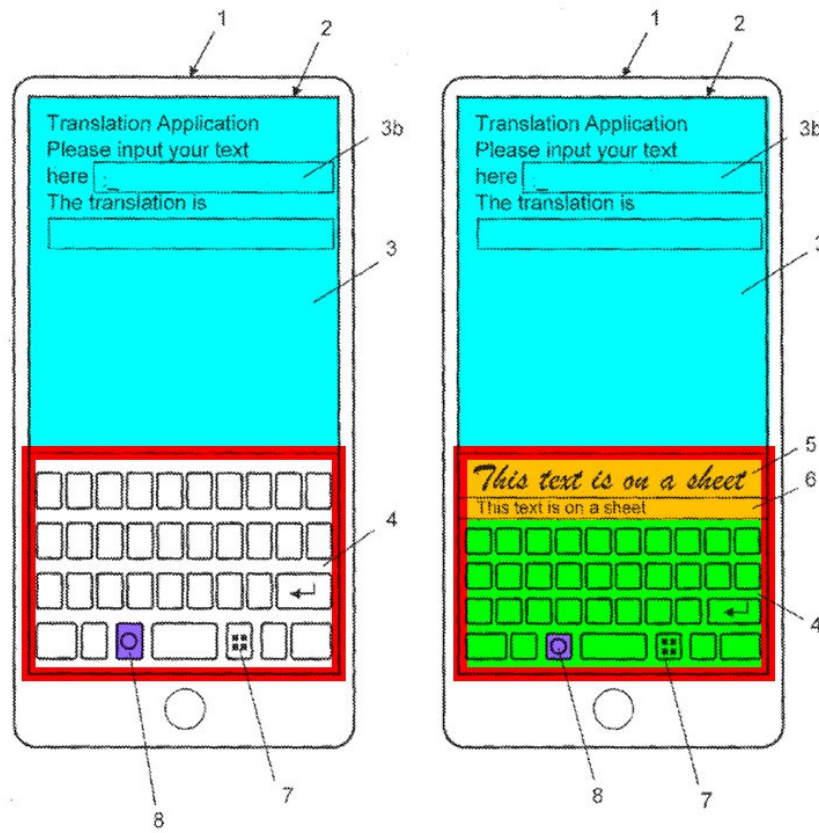
Dr. Bederson explains that an electronic computer device with a screen “necessarily includes computer code that prescribes where on the screen any given element (such as an application GUI or keyboard GUI) is to appear”—i.e., the device “assigns” each element to a “zone.” Bederson, ¶122.

Thus, the first and second zones are inherently “assigned” to *Goktekin*’s first application interface and keyboard, respectively. Bederson, ¶123.

- e. [1d] wherein based on accomplishment of a condition under the control of said keyboard, the system activates a second application and displays an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of said second zone, and

Goktekin discloses or renders obvious [1d]. *Goktekin* discloses “press[ing] a **camera mode key 8** to switch over to the camera mode,” meaning that a camera mode application is activated “based on accomplishment of a condition under the control of said keyboard,” as claimed. *Goktekin*, ¶[0046]; Bederson, ¶¶124-125.

As illustrated below, “[i]n the camera mode [FIG. 1b,] the **first field 4 for the keyboard** is preferably smaller compared to a size in the **keyboard mode of FIG. 1a**, such that the difference between the size of the first field 4 in the keyboard mode and the smaller size in the camera mode is used for displaying the **second field 5 wherein a part of the captured written text is displayed** and for displaying the **third field 5 wherein the recognized text is displayed.**” *Goktekin*, ¶[0047]. Thus, in camera mode, *Goktekin* displays both an interface of a second application and a reduced interface for the keyboard on at least a portion of the “second zone.” Bederson, ¶127. Further, *Goktekin* “activates” the camera mode application by making it “active,” e.g., such that it can receive input, capture images and recognize text. Bederson, ¶125.



Goktekin, Figs. 1a-1b

The **interface (5, 6)** is for a second application that may be “a separate camera text input module”—separate from the keyboard—“wherein the camera text input module is like a complement or supplement to the original keyboard module.” *Goktekin*, ¶[0033]; *Bederson*, ¶126. The **interface (5,6)** is used to “display[] a part of the respective image [captured by the device’s camera] in the second field 5” as well as to display “recognized text in the third field 6” based on the results of the second application’s optical character recognition (OCR) analysis. *Goktekin*, ¶[0048]; *Bederson*, ¶126. “If the recognized and displayed text is correct and desired[,] the user selects the recognized text as input text,

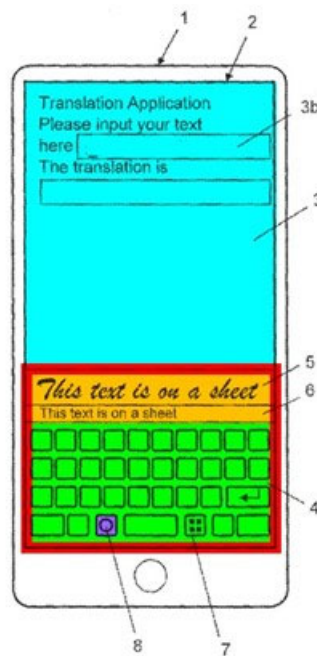
whereupon the selected text is output to the application preferably in the same way as the text would have been input via the keyboard.” *Goktekin*, ¶[0048].

To the extent *Goktekin*’s camera text input module is not considered an “application,” it would have been obvious to implement it as such. Bederson, ¶128. As Dr. Bederson explains, whether computer functionality is implemented as an “application” or, e.g., a “component ... of the operating system or ... keyboard” was a simple “matter of design choice and ... semantics.” *Id.* It was well-known to implement camera and OCR tasks, such as *Goktekin*’s, via an “application.” Bederson, ¶129; *Vincent*, 11:8-17 (“character recognition process is performed using an available character recognition application, for example, an optical character recognition (‘OCR’) application”); *Liow*, ¶[0007] (“character recognition engine may comprise ... character recognition application”); *Koch*, ¶[0107] (“device typically supports ... a digital camera application”). Thus, because implementing *Goktekin*’s camera mode via an “application” was one of “a finite number of identified, predictable solutions,” the feature would have been obvious. Bederson, ¶129; *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 421 (2007). Moreover, a POSITA would have been motivated to implement *Goktekin*’s camera mode as an “application” to maximize resource efficiency (e.g., by exploiting pre-existing camera/OCR applications) and minimize bloat and disruption to other

components (e.g., keyboard code), and would have had a reasonable expectation of success because the feature was well known. Bederson, ¶130.

- f. [1e] wherein said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touchscreen.

Goktekin discloses [1e]. As discussed in [1d] and as illustrated below, “said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touchscreen.” Bederson, ¶¶131-132; see *Goktekin*, ¶[0047].

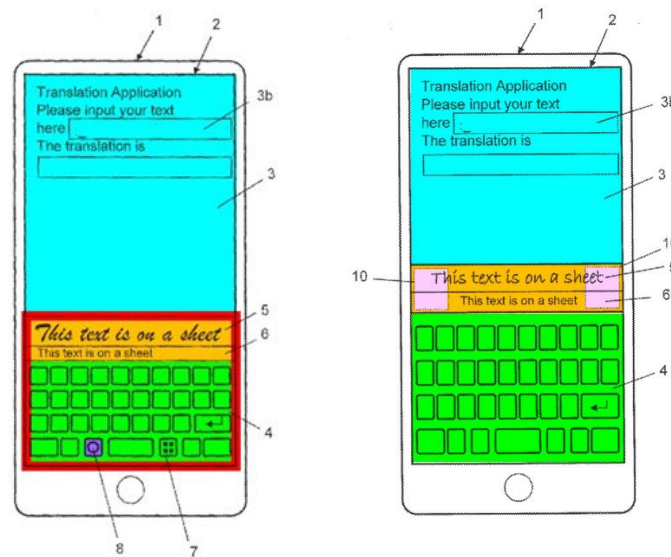


Goktekin, Fig. 1b

Thus, *Goktekin* discloses every limitation and anticipates or renders obvious claim 1. Bederson, ¶133.

2. **Claim 2. The system of claim 1, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.**

Goktekin discloses the additional limitations of claim 2. The **interface of the first application** comprises a text input field 3b and a user may “activate[]” the “text input field 3b” within the application so the keyboard/camera-input can enter text into the field. *Goktekin*, ¶[0047], Fig. 1b (below-left); Bederson, ¶136. Thus, the focus of the system’s keyboard/camera-input is given to the first application. Bederson, ¶136.



Goktekin, Figs. 1b, 4

In addition, “a user would interact with the interface—for example, by touching—to activate the text input field 3b,” and “[s]uch an interaction would cause the focus of *Goktekin*’s touchscreen input system to be on the interacted application.” Bederson, ¶137.

Goktekin also discloses interactions with the **interface of the second application** that direct system focus to the second application because, in *Goktekin*, a user interacts with the interface of the second application—e.g., “by touching or pressing ... on the word on the touch screen,” by “select[ing] whatever fits best as the input text,” or by “[a] keypress on one of the hidden **touch keys 10** within the preferred embodiment of FIG. 4 [illustrated above-right]”—to enter text recognized by OCR. Bederson, ¶¶138; *Goktekin*, ¶¶[0050], [0055], [0063].

Thus, *Goktekin* also discloses every limitation and anticipates or renders obvious claim 2. Bederson, ¶¶139-140.

3. Claim 3. The system of claim 1, wherein said keyboard is used with both of said applications.

Goktekin discloses the additional limitations of claim 3. In *Goktekin*, “text can be input ... via the keyboard ... and the input text will be sent to the [first] application.” *Goktekin*, ¶[0033]. Further, the keyboard is used with the second application (camera mode application) in that (a) the user “may press a camera mode key 8 [on the keyboard] to switch over to camera mode,” and (b) selection of text recognized by the camera mode application “can be made preferably by a second keypress on the camera key or a keypress ... on the RETURN key or the like.” *Id.*, ¶¶[0046], [0049]; Bederson, ¶¶142-143.

Thus, *Goktekin* also discloses every limitation and anticipates or renders obvious claim 3. Bederson, ¶144.

- 4. Claim 4. The system of claim 1, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touchscreen.**

Goktekin discloses the additional limitations of claim 4, because *Goktekin* further discloses that when “the recognized and displayed text [in the second application] is correct and desired[,] the user selects the recognized text as input text, whereupon the selected text is output to the [first] application preferably in the same way as the text would have been input via the keyboard.” *Goktekin*, ¶[0048]. *Goktekin* illustrates both applications displayed simultaneously (see Section VI.A.1.f), and as Dr. Bederson explains, both applications would be displayed during this step so the user can see what and where information is being shared. Bederson, ¶146.

Thus, *Goktekin* also discloses every limitation and anticipates or renders obvious claim 4. Bederson, ¶147.

- 5. Claim 5. The system of claim 4, wherein said information includes at least one of, a text, an image, a video, a webpage and a URL.**

Goktekin discloses the additional limitations of claim 5 because “said information” (of claim 4) is “a text.” See Section VI.A.4; Bederson, ¶¶148-149.

Thus, *Goktekin* also discloses every limitation and anticipates or renders obvious claim 5. Bederson, ¶150.

6. Claim 7. The system of claim 1, wherein at least one of the applications is a messaging application.

Goktekin discloses the additional limitations of claim 7 because *Goktekin* further discloses that a mobile device can include SMS functionalities. *Goktekin*, ¶[0003]. An application for SMS—i.e., *text messaging*—is a “messaging application.” Bederson, ¶152. Further, because *Goktekin* teaches that its system may be used with “any ... application requesting text input” (which encompasses text messaging applications), a POSITA would understand from *Goktekin* that its system may be used with a messaging application as “at least one of the applications,” as claimed. *Id.*; *Goktekin*, ¶[0034].

Thus, *Goktekin* also discloses every limitation and anticipates or renders obvious claim 7. Bederson, ¶153.

7. Claim 10. The system of claim 1, wherein at least one of the applications is used for sharing at least one of text, pictures, or videos.

Goktekin discloses the additional limitations of claim 10. As discussed above for claims 4 and 5, the second application is used for sharing text with the first application. Bederson, ¶155. As discussed above for claim 7, *Goktekin* discloses

that its (first) application may be a messaging application, which also is “used for sharing ... text.” *Id.*

Thus, *Goktekin* also discloses every limitation and anticipates or renders obvious claim 10. Bederson, ¶156.

8. Claim 11. The system of claim 1, wherein said device is a mobile phone.

Goktekin discloses the additional limitations of claim 11 because its system is designed to “replace the standard keyboard module on the standard mobile devices, such as[,] for instance[,] on mobile phones, smart phones[,] or the like.” *Goktekin*, ¶¶[0011], [0032]. Bederson, ¶158.

Thus, *Goktekin* also discloses every limitation and anticipates or renders obvious claim 11. Bederson, ¶159.

9. Independent Claim 12

a. [12pre] A method comprising:

Goktekin discloses [12pre]. *Goktekin* discloses “[m]ethods and modules for a multimodal text input in a mobile device.” *Goktekin*, Abstract; Bederson, ¶161.

b. [12a] assigning a first zone of a touch screen to an interface of a first application;

Goktekin discloses [12a] for the same reasons as [1c]. *See* Section VI.A.1.d.

c. [12b] assigning a second zone of said touch screen to an on-screen keyboard; and

Goktekin discloses [12b] for the same reasons as [1c]. *See* Section VI.A.1.d.

- d. **[12c] based on accomplishment of a condition under the control of said keyboard, activating a second application and displaying an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of said second zone of said touch screen and**

Goktekin discloses or renders obvious [12c] for the same reasons as [1d]. *See*

Section VI.A.1.e.

- e. **[12d] wherein said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touch screen.**

Goktekin discloses [12d] for the same reasons as [1e]. *See* Section VI.A.1.f.

For the reasons above, *Goktekin* discloses every limitation and anticipates or renders obvious claim 12. *Bederson*, ¶170.

10. Claim 13. The method of claim 12, comprising using said keyboard with both of said applications.

Goktekin discloses the additional limitations of claim 13 for the same reasons as claim 3 and, thus, anticipates or renders obvious the claim. *See* Section VI.A.3; *Bederson*, ¶172.

11. Claim 14. The method of claim 12, wherein at least one of said applications is one of, a text messaging application and an image sharing application.

Goktekin discloses the additional limitations of claim 14 for the same reasons as claim 7 and, thus, anticipates or renders obvious the claim. *See* Section VI.A.6; *Bederson*, ¶174.

- 12. Claim 18. The method of claim 12, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touch screen.**

Goktekin discloses the additional limitations of claim 18 for the same reasons as claim 4 and, thus, anticipates or renders obvious the claim. *See* Section VI.A.4; Bederson, ¶176.

- 13. Claim 19. The method of claim 18, wherein said information includes at least one of a text, an image, a video, a webpage and a URL.**

Goktekin discloses the additional limitations of claim 19 for the same reasons as claim 5 and, thus, anticipates or renders obvious the claim. *See* Section VI.A.5; Bederson, ¶178.

- 14. Claim 20. The method of claim 12, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.**

Goktekin discloses the additional limitations of claim 20 for the same reasons as claim 2 and, thus, anticipates or renders obvious the claim. *See* Section VI.A.2; Bederson, ¶180.

- 15. Claim 21. The method of claim 12, wherein said touch screen is integrated within a mobile communication device.**

Goktekin discloses the additional limitations of claim 21 for the same reasons as claim 11, e.g., because a “mobile phone” (recited in claim 11) is a “mobile communication device.” Bederson, ¶182; *see* Section VI.A.8. And the

touch screen is integrated within the mobile device as discussed in claim [1a]. *See* Section VI.A.1.b. Thus, *Goktekin* discloses every limitation and anticipates or renders obvious claim 21. *Bederson*, ¶182.

B. Ground 2: *Goktekin* in View of *Sirpal* (Claims 2, 6, and 20)

If not anticipated or rendered obvious by *Goktekin*, claims 2 and 20 would have been obvious over *Goktekin* in view of *Sirpal*. *Bederson*, ¶183. The combination further renders obvious claim 6. *Id.*

Like *Goktekin*, *Sirpal* is analogous art to the '922 patent, at least because each “is from the same field of endeavor,” namely, input methods and systems for application(s) running on a touchscreen mobile device. *Unwired Planet, LLC v. Google Inc.*, 841 F.3d 995, 1000-01 (Fed. Cir. 2016) (citation omitted); *Bederson*, ¶¶96, 99; *compare Goktekin*, Abstract (“multimodal text input in a mobile device”), *with Sirpal*, Abstract (“Inputs received on the screen displaying the universal clipboard application can cause content to be copied to an application being displayed on the other screen of the multi-screen device”), *and* Ex. 1001, 1:47-48 (“data entry system ... adapted to mobile environments”), 2:34-36 (“virtual keypad located on a touch sensitive surface ... [, e.g.,] a touch screen.”).

Goktekin and *Sirpal* address the same art-recognized needs, such as for a mobile device to be used with multiple applications. *Bederson*, ¶¶185-188. For example, *Goktekin* teaches that a “mobile device is used as ... a calendar with

planner, an address book, for receiving and writing SMS and emails and so on,” and its applications include “a translation application, a search application such as google search or the like searching for a keyword in the internet, a phone application requesting for a phone number or a name or for any other application requesting text input.” *Goktekin*, ¶¶[0003], [0034]. *Sirpal* similarly recognizes the need for a mobile device to operate with multiple applications, and specifically describes copy/paste functionalities to allow a user to share information between multiple applications. *Bederson*, ¶¶186, 188; *Sirpal-000*, 152-82 (“Copy & Paste Text, Links[,] and Universal Clipboard”), 153 (in “the current Android model,” users can “copy and paste” any number of items of information “from one app to another”—including “a text message,” “a URL,” and “text in a text field”). Indeed, *Sirpal* describes providing copy/paste functionality to several of the exemplary applications identified by *Goktekin*, including “writing SMS [text messaging] and emails” and “google search [of] the internet.” *Bederson*, ¶188; *Sirpal-000*, 158-64 and 172-75 (copying from web page into email), 166-70 (copying from web page into email), 177-82 (copying from email to a text message).

Thus, “a POSITA would consider references such as *Sirpal* to be pertinent when implementing a multi-modal input system such as *Goktekin* with a mobile electronic device having applications,” and would have been motivated to consult *Sirpal* to, for example, provide a way to “activate[]” the text input field of an

application or implement SMS or email applications as *Goktekin* teaches to do.

Bederson, ¶¶188-189.

1. Claims 2 and 20

Claims 2 and 20 would have been obvious over *Goktekin* in view of *Sirpal* because *Sirpal* discloses the additional limitations.

Sirpal discloses a mobile device system with “two apps [cyan and orange below], [and] one keyboard that spans both apps and operates within an app[,] depending on focus.” *Sirpal-000*, 147. As *Sirpal* explains, “[t]he user can tap [one] screen to move the focus to that screen”—a feature that “allows the user to tap back and forth to enter text in both screens in a seamless fashion.” *Id.*; Bederson, ¶191.



Sirpal-000, 147

As discussed above (Section VI.B), a POSITA would have been motivated to combine the teachings of *Sirpal* with *Goktekin*, such as to provide *Sirpal*'s known technique for switching the focus of a text-input system between

applications at least because the known technique advantageously “allows the user to tap back and forth to enter text in both screens in a seamless fashion.” *Sirpal-000*, 147; Bederson, ¶192. As Dr. Bederson testifies, a POSITA would have recognized that the similar device of *Goktekin* could be improved using the same focus-switching methods of *Sirpal*. Bederson, ¶194; *Intel Corp. v. PACT XPP Schweiz AG*, 61 F.4th 1373, 1380 (Fed. Cir. 2023) (citing *KSR*, 550 U.S. at 417). Moreover, the combination represents nothing more than applying a “known technique to address a known problem using ‘prior art elements according to their established functions’”; therefore, a POSITA would have been motivated to make the combination. *PACT*, 61 F.4th at 1380 (quoting *Intel Corp. v. Qualcomm Inc.*, 21 F.4th 784, 799-800 (Fed. Cir. 2021)); Bederson, ¶194.

As Dr. Bederson further explains, “combining the teachings of *Goktekin* and *Sirpal* would have required no more than ordinary skill because the combination would have been a simple modification of existing components (GUI interface for mobile electronic device applications) in a straightforward manner to achieve predictable results.” Bederson, ¶195 (further explaining that the combination “would have had a reasonable expectation of success,” given their “overall similarities,” “overlapping functionalities,” and the ease with which the relevant functionality of *Sirpal* could be integrated into *Goktekin*’s system).

Combining *Goktekin* and *Sirpal* would include causing the focus of *Goktekin*'s system to be given to an application (such as the exemplary translation application or camera text input application) in response to a touch interaction with the application's interface. Bederson, ¶193. Thus, the combination yields "wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application." Bederson, ¶196. Accordingly, claims 2 and 20 would have been obvious over *Goktekin* in view of *Sirpal*. *Id.*

2. Claim 6. The system of claim 4, wherein said information is copied from one of said applications and pasted in the other application.

Claim 6 would have been obvious over *Goktekin* in view of *Sirpal*. Bederson, ¶197. As discussed in Section VI.A.4, *Goktekin* discloses or renders obvious the system of claim 4. *Sirpal* discloses claim 6's additional requirements.

Sirpal provides functionality of "Copy & Paste Text, Links[,], and Universal Clipboard." *Sirpal-000*, 152-82. As *Sirpal* explains, in "the current Android model," users can "copy and paste" any number of items of information "from one app to another"—including "a text message," "a URL," and "text in a text field." *Id.*, 153, 154. *Sirpal* adds "more efficient copy via drag and drop[and] direct manipulation." *Id.*, 153. *Sirpal* permits a user either to copy text to a clipboard (for pasting later) or copy text with a "two finger press and hold gesture, which puts the item in move mode, and allows the user to move/paste the item to any available

drop zone,” e.g., for “images, links, paragraphs of text, messages, etc.” *Id.*, 155; Bederson, ¶199. *Sirpal* specifically illustrates numerous examples of copying information from one application to another, including copying links (URLs), text, and images between web pages, emails, and text messages. *Sirpal-000*, 158-82; Bederson, ¶199.

As discussed above (Section VI.B), a POSITA would have been motivated to combine the teachings of *Sirpal* with *Goktekin*, such as to provide *Sirpal*’s known technique for sharing information between applications—i.e., through copy/paste functionalities—at least because the known technique advantageously allows a user control over *which* information to copy from one application, as well as *where* and *when* to paste the copied information into another application. Bederson, ¶200. For example, in the combined system, a user would copy OCR text information from an image in *Goktekin*’s camera mode application, and then select a field in another application (potentially one of several fields in an application or in different applications) to paste the text information—yielding “wherein said information is copied from one of said applications and pasted in the other application.” Bederson, ¶201. As Dr. Bederson testifies, a POSITA would have recognized that the similar device of *Goktekin* could be improved using the copy/paste methods of *Sirpal*. Bederson, ¶202; *PACT*, 61 F.4th at 1380. Moreover, combining *Sirpal*’s copy/paste methods with *Goktekin* represents nothing more

than applying a “known technique to address a known problem using ‘prior art elements according to their established functions’”; therefore, a POSITA would have been motivated to make the combination. *PACT*, 61 F.4th at 1380 (citation omitted); Bederson, ¶202.

As Dr. Bederson further explains, “combining the teachings of *Goktekin* and *Sirpal* would have required no more than ordinary skill because the combination would have been a simple modification of existing components (GUI interface for mobile electronic device applications) in a straightforward manner to achieve predictable results.” Bederson, ¶203 (further explaining that the combination “would have had a reasonable expectation of success” given their “overall similarities,” “overlapping functionalities,” and the ease with which the relevant functionality of *Sirpal* could be integrated into *Goktekin*’s system).

Thus, *Goktekin* in view of *Sirpal* renders obvious claim 6. Bederson, ¶204.

C. Ground 3: *Goktekin* in View of *Vincent* (Claims 8 and 15)

- 1. Claim 8. The system of claim 1, wherein said second application is a search application activated by interacting with a button of said keyboard assigned to activating said search application.**

As discussed in Section VI.A.1, *Goktekin* discloses or renders obvious the system of claim 1. *Vincent* discloses claim 8’s limitations and, with *Goktekin*, renders claim 8 obvious.

Vincent describes “Using Extracted Image Text.” *Vincent*, Title.

Specifically, *Vincent* describes constraining character recognition by searching particular business names within a database. Bederson, ¶207. For example, the OCR process may look for specific business names, e.g., “McDonalds, Fry’s Electronics, H&R Block, and Pizza Hut, within the images” or for business information “based on a directory listing ... for [an] address range.” *Vincent*, 11:61-12:7.

As Dr. Bederson explains, “a POSITA would understand from *Vincent* that search functionality for OCR-recognized text can return filtered results matching entries in a database (e.g., a database of business names or a directory of relevant business information),” and “[c]onstraining OCR search results to a relevant database” would improve OCR quality. Bederson, ¶208.

Like *Goktekin*, *Vincent* is analogous art to the ’922 patent, at least because each “is from the same field of endeavor,” namely, input methods and systems for application(s) running on a touchscreen mobile device. *Unwired Planet*, 841 F.3d at 1000-01 (citation omitted); Bederson, ¶104; *compare Goktekin*, Abstract (“multimodal text input in a mobile device”), *with Vincent*, 15:16-19 (system “can be embedded in another device, e.g., a mobile telephone”); Ex. 1001, 1:47-48 (“data entry system ... adapted to mobile environments”), 2:34-36 (“keypad is a virtual keypad located on a touch sensitive surface ... [, e.g.,] a touch screen.”).

Vincent addresses the same art-recognized needs as *Goktekin*, such as for a mobile device to provide search functionalities. Bederson, ¶209; *Goktekin*, ¶[0034] (“search application such as google search or the like searching for a keyword in the internet”); *Vincent*, 2:29-37. And as Dr. Bederson testifies, a POSITA would recognize that *Vincent*’s improvements would enhance *Goktekin*’s existing OCR technology, as well as provide an art-recognized implementation of the search functionality that *Goktekin* already describes. Bederson, ¶209.

A POSITA considering the teachings of *Goktekin* in view of *Vincent* would have found it obvious, for example, to use *Goktekin*’s button-activated camera mode to capture text and then filter or constrain potential OCR results based on searching “values in a database,” including “particular business names within a database.” Bederson, ¶210; *Vincent*, 11:54-12:7. Thus, the combination would yield a “search application.” Bederson, ¶211. Following the existing design of *Goktekin*, the search application would be “activated by interacting with a button of said keyboard assigned to activating said search application” as discussed in [1d]. Bederson, ¶212. And the (now-improved) OCR results could then be presented to the user within the camera mode application interface (e.g., in the “third field 6” illustrated in *Goktekin* Fig. 1b), allowing the user to select the OCR result to be entered as text within the first application (e.g., the translation application illustrated in *Goktekin*, Figs. 1a-1b). Bederson, ¶210.

A POSITA would be motivated to make the combination, because it would achieve *Vincent*'s benefits, including to filter/constrain OCR suggestions within *Goktekin*'s camera mode application based on searching the contents of a database. Bederson, ¶210. Additionally, *Goktekin* already teaches to use “a search application such as google search or the like searching for a keyword in the internet” (*Goktekin*, ¶[0034]); therefore, a POSITA would have had additional motivation to consult *Vincent* for its disclosure of a camera-based search application, particularly because *Vincent* is assigned on its face to Google, Inc., the company whose “search application” *Goktekin* specifically identifies. Bederson, ¶211; see *Goktekin*, ¶[0034].

A POSITA would have reasonably expected to succeed in making the combination because “combining the teachings of *Goktekin* and *Vincent* would have required no more than ordinary skill ... [b]ecause the combination would have been a simple modification of existing components (OCR system) in a straightforward manner to achieve predictable results.” Bederson, ¶213 (further explaining that for the combination a POSITA “would have had a reasonable expectation of success,” given their “overall similarities,” “overlapping functionalities,” and the ease with which the relevant functionality of *Vincent* could be integrated into *Goktekin*'s system).

Thus, the combination of *Goktekin* in view of *Vincent* yields “wherein said second application is a search application activated by interacting with a button of said keyboard assigned to activating said search application” and claim 8 is obvious. Bederson, ¶214.

2. **Claim 15. The method of claim 12, wherein said interface of said second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of said keyboard that is related to activating said search application.**

Goktekin discloses or renders obvious the method of claim 12. *See* Section VI.A.9. *Vincent* discloses the further limitations of claim 15 and, with *Goktekin*, renders claim 15 obvious for at least the same reasons as claim 8. *See* Section VI.C.1.

Specifically, in the combination of *Goktekin* with *Vincent*, it would be obvious to implement the camera mode application as a “search application.” *See* Section VI.C.1; Bederson, ¶216. Furthermore, *Goktekin* teaches that the camera mode application is activated via a button—camera mode key 8—as discussed in Section VI.A.1.e. *See* Bederson, ¶125. Thus, the combination yields the “interface of said second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of said keyboard that is related to activating said search application,” as claimed. Bederson, ¶216.

D. Ground 4: *Goktekin* in View of *Vincent* and *Aravamudan* (Claims 9, 16, and 17)

1. Claim 9. The system of claim 8, wherein said search application use at least one keyword typed through said keyboard.

Goktekin and *Vincent* render obvious the system of claim 8, as discussed in Section VI.C.1. *Aravamudan* discloses the further limitations of claim 9 and, with *Goktekin* and *Vincent*, renders claim 9 obvious.

Aravamudan describes a search application using *both* image-based *and* keypad-based inputs. Bederson, ¶219. “FIG. 2 [below] illustrates the flow of input to the search engine and the transformation/extraction steps of speech and image input to text (such as could be provided by a multi-mode input interface, e.g., as in FIG. 5). The text input 201 by the user, in a text box interface, could be fed to the search engine system 211.” *Aravamudan*, ¶[0037]. Additionally, “[i]mage/video input 202, captured on [the] device by the mobile device camera[,] could be scanned for text by a text extraction module 204,” and “the extracted text is sent to text input interface (at 207) and, optionally, consolidated with other text input forms 206.” *Id.*, ¶[0038]. Thus, *Aravamudan* provides the ability, after an OCR text extraction is completed, to “edit the terms before feeding it to text search 212.” *Id.* From this disclosure, Dr. Bederson explains, a POSITA would recognize the advantage of combining the ability to *type* keywords in order to correct,

supplement, or otherwise modify search keywords after the keywords are generated by OCR. Bederson, ¶219.

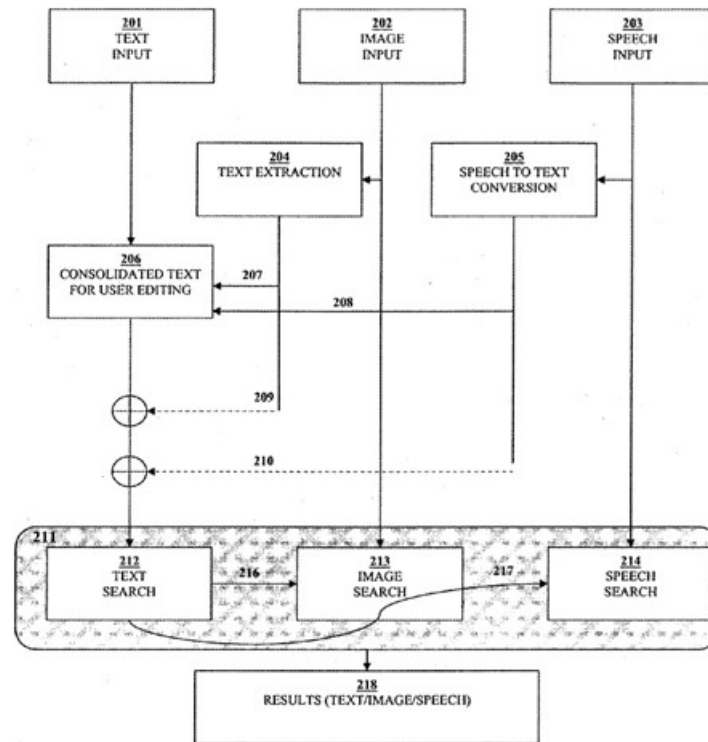


FIG. 2

Aravamudan, Fig. 2

Like *Goktekin* and *Vincent*, *Aravamudan* is analogous art to the '922 patent, at least because each “is from the same field of endeavor,” namely, input methods and systems for application(s) running on a touchscreen mobile device. *Unwired Planet*, 841 F.3d at 1000-01 (citation omitted); Bederson, ¶106; *see Aravamudan*, ¶[0030] (“Embodiments of the invention general[ly] relate to correcting errors present in user input to user interface systems”); Ex. 1001, 1:47-48 (“data entry system ... adapted to mobile environments”), 2:34-36 (“Preferably, said keypad is

a virtual keypad located on a touch sensitive surface ... [, e.g.,] a touch screen.”).

Further, *Aravamudan* teaches that its system may be implemented on any “computer program product for use with a computer system or computerized electronic device (e.g., Smartphone, PDA, tablet computing device, etc.).”

Aravamudan, ¶[0059]. A POSITA thus would recognize that *Aravamudan*’s features may be implemented with the computerized electronic device of *Goktekin*.

In view of the foregoing, a POSITA would have found it obvious over *Goktekin* in view of *Vincent*, further in view of *Aravamudan*, to incorporate “wherein said search application use[s] at least one keyword typed through said keyboard,” as claimed. Bederson, ¶¶219-221. “A POSITA would have been motivated to combine such feature(s) with the combined disclosures of *Goktekin* and *Vincent*, as an obvious and intuitive way to provide additional flexibility to a user, to provide the ability for follow-up searches, and/or to edit or refine a keyword or search result generated from an image scan or search.” Bederson, ¶223. According to Dr. Bederson, “typing a keyword through a keyboard was routine and conventional to a POSITA (as well as to a user of a device),” and “providing the ability to type keywords for search would allow the search application to function even when a suitable image cannot be taken or is otherwise unavailable.” *Id.* Furthermore, *Goktekin* already provides that the keyboard may be used as an alternative way to enter text. *Goktekin*, ¶¶[0032]-[0033], [0046]. A POSITA would

reasonably expect success making the combination because simply “extending *Goktekin*’s existing keyboard text entry functionality to accommodate entering a keyword into the search application as taught by *Aravamudan* would be a straightforward, intuitive modification, requiring no more than ordinary skill.” Bederson, ¶223.

Combining *Goktekin* and *Vincent*, further in view of *Aravamudan*, would yield the added ability to type keywords to supplement the image-based search application. Bederson, ¶224. Thus, the combination yields “wherein said search application use[s] at least one keyword typed through said keyboard,” and claim 9 is obvious. *Id.*

2. Claim 16. The method of claim 15, wherein said search application use at least one keyword typed through said keyboard.

As discussed in Section VI.C.2, *Goktekin* in view of *Vincent* renders obvious the method of claim 15. *Aravamudan* further renders obvious the additional limitations of claim 16 for the same reasons as claim 9 and, thus, the combination renders obvious claim 16. *See* Section VI.D.1; Bederson, ¶225.

3. Claim 17. The method of claim 15, wherein said search application use at least one keyword typed through said keyboard after said search application is activated.

As discussed in Section VI.C.2, *Goktekin* in view of *Vincent* renders obvious the method of claim 15. *Aravamudan* further discloses the additional limitations of

claim 17 for the same reasons as claim 16. *See* Section VI.D.2. Claim 17 further requires that the keyword be typed “after said search application is activated.” As discussed in Section VI.D.1, *Aravamudan* teaches to type keywords *after* an OCR/search application has already begun to recognize characters (i.e., the OCR/search application has already been activated); therefore, the combination further yields typing the keyword “after said search application is activated,” and renders claim 17 obvious. *Bederson*, ¶227.

E. Ground 5: *Koch* Anticipates or Renders Obvious Claims 1-5, 7, 10-14, and 18-21

1. Independent Claim 1

a. [1pre] A system for using multiple applications on a screen of a device, comprising:

Koch discloses [1pre]. *Bederson*, ¶229. *Koch*’s “device typically supports a variety of applications,” including “a drawing application,” “a word processing application,” “a telephone application,” “an e-mail application, an instant messaging application,” and “a web browsing application.” *Koch*, ¶¶[0107], [0135]-[0153]. The device includes means to “indicat[e] which applications, if any, are currently active” and “what applications, views[,], or other information occupy various regions of touch screen display 112.” *Id.*, ¶[0126]. Further, *Koch* describes simultaneously using a “user interface in [a first] application (e.g., a notes application, a web browser application, etc.),” and a “center area 5016-C”

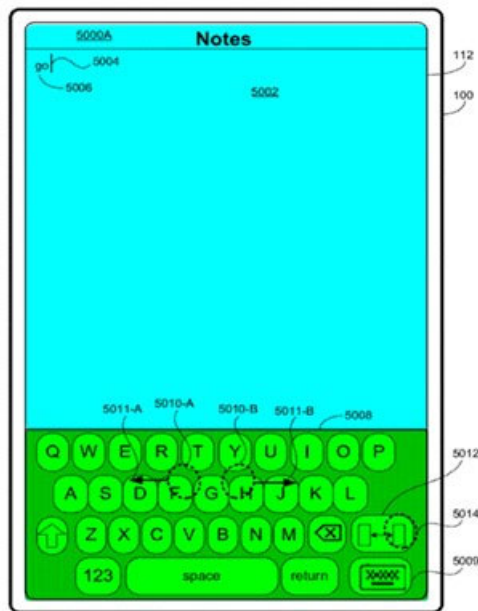
application appearing between two halves of a keyboard, as discussed in 1[b] and 1[d] below. *Id.*, ¶¶[0231]-[0235].

b. [1a] an electronic device having a touchscreen;

Koch discloses [1a]. Bederson, ¶231. *Koch* discloses improvements to “electronic devices with touch-sensitive surfaces” “(also known as a ‘touch screen’ or ‘touch screen display’).” *Koch*, ¶[0008].

c. [1b] an on-screen keyboard for entering text in a first application running within said device

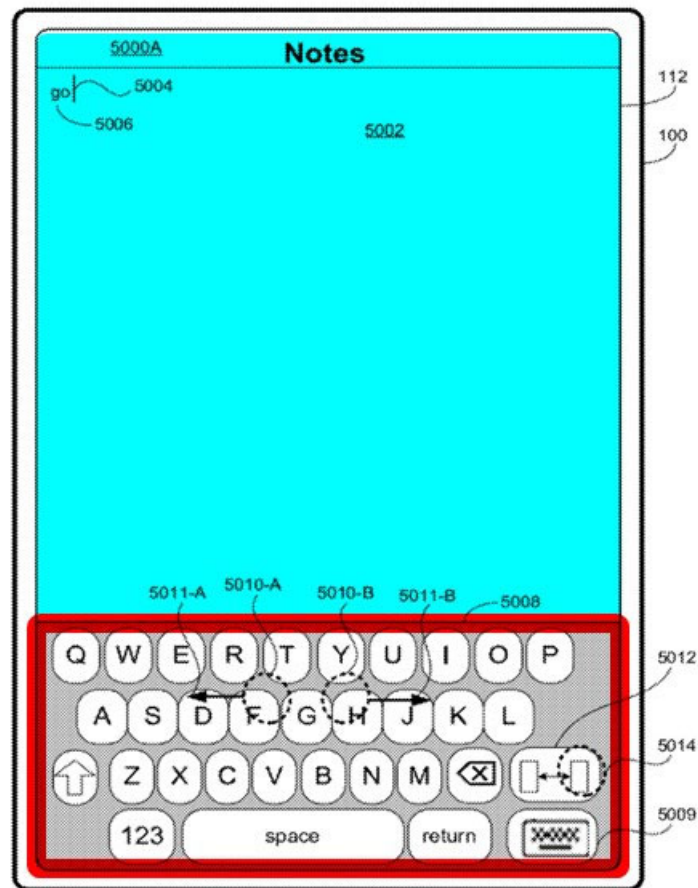
Koch discloses [1b]. Bederson, ¶233. *Koch* discloses a first application with “**user interface (UI) 5000A**,” which “may be a user interface in an application (e.g., a notes application, a web browser application, etc.) on device 100,” and “includes text entry area 5002.” *Id.*, ¶[0231]. *Koch* further provides an “[**u**]**nsplit soft keyboard 5008** ... displayed on display 112.” *Id.*, ¶[0232]. *Koch*’s keyboard 5008 is “an on-screen keyboard for entering text in a first application running within said device,” as claimed. Bederson, ¶234.



Koch, Fig. 5A

- d. [1c] wherein a first zone of said touchscreen is assigned to an interface of said first application and a second zone of said touchscreen is assigned to said keyboard; and

Koch discloses [1c]. As illustrated below, “*Koch*’s first application interface appears on an upper portion of the touch screen, while its keyboard appears on a lower portion.” Bederson, ¶236. The location of the first application interface is a “first zone” and the location of the keyboard is a “second zone,” as claimed. *Id.*



Koch, Fig. 5A

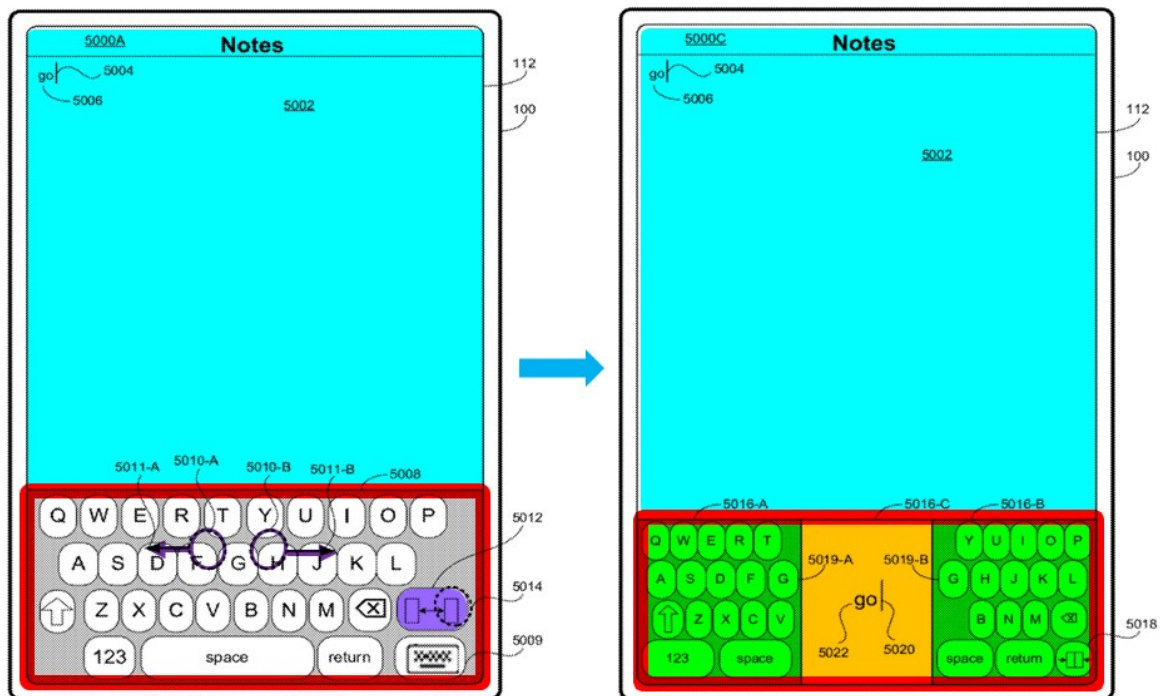
Dr. Bederson explains that an electronic computer device with a screen “includes computer code that prescribes where on the screen any given element (such as an application GUI or keyboard GUI) is to appear”—i.e., the device “assigns” each element to a “zone.” Bederson, ¶237. That zone assignment is an indispensable requisite for the device to determine, for a given touch interaction on a particular zone of the screen, *which* application is involved. Bederson, ¶237; *see Koch*, ¶[0180] (“[h]it view determination module 172 ... for determining where a

sub-event [touch] has taken place within one or more views, when touch sensitive display 112 displays more than one view”).

Thus, *Koch*’s first application interface and keyboard are inherently “assigned” to a first zone and second zone, respectively. Bederson, ¶238.

- e. **[1d] wherein based on accomplishment of a condition under the control of said keyboard, the system activates a second application and displays an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of said second zone, and**

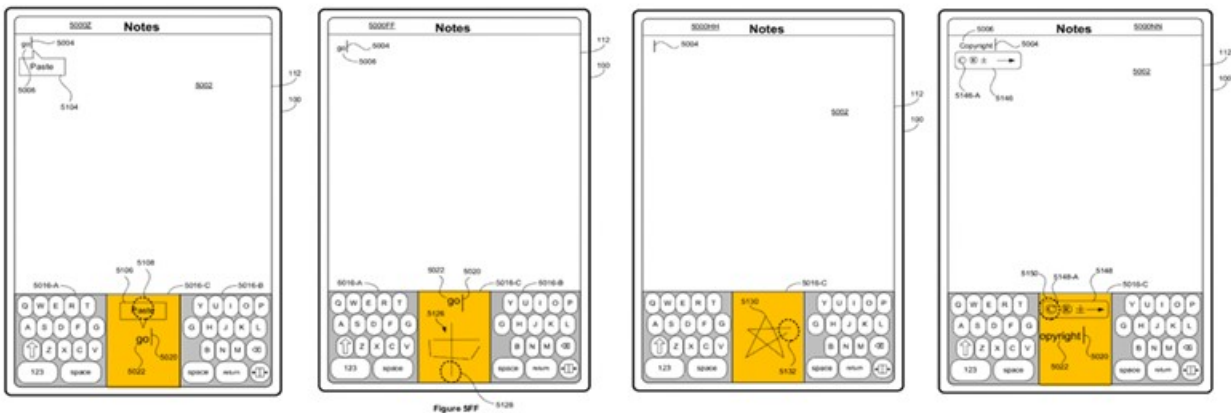
Koch discloses or renders obvious [1d]. *Koch* discloses “**gestures** that, if detected, activate splitting of unsplit soft keyboard 5008 in response.” *Koch*, ¶[0233], Fig. 5A (below-left). Specifically, “[g]esture 5010 is a two-finger de-pinch gesture performed on unsplit soft keyboard 5008” and “gesture 5014 is a tap gesture on keyboard split key 5012.” *Id.* “Both gestures are conditions under the control of said keyboard.” Bederson, ¶240.



Koch, Figs. 5A, 5C

In response to detection of either gesture (based on accomplishment of the condition), “device 100 changes unsplit soft keyboard 5008 (FIG. 5A) into integrated input area 5016 (FIG. 5C),” thereby “activat[ing]” “**center area 5016-C** between **split keyboard portions 5016-A and 5016-B**,” as illustrated above-right. *Koch*, ¶¶[0233]-[0235]; *Bederson*, ¶241; *Koch*, ¶[0233] (keyboard gesture “activate[s] splitting”). Dr. Bederson testifies that the **split keyboard** is smaller than the **original keyboard** and, thus, is a “reduced interface corresponding to said keyboard,” as claimed. *Bederson*, ¶243. Both the center area and split keyboard are displayed on at least a portion of the second zone. *Id.*

Further, the **center area 5016-C** is an interface for an application that performs several tasks. Bederson, ¶242. For example, the interface may provide (1) “text editing controls (e.g., icons, or graphical or user interface objects for selecting, cutting, copying, and/or pasting text)” (illustrated in Figs. 5Z-5AA); (2) handwriting recognition (Figs. 5FF-5GG); (3) drawing input (Figs. 5HH-5II); and (4) Unicode character input (Figs. 5NN-5OO). *Koch*, ¶¶[0261]-[0262], [0266]-[0267], [0272]-[0273], [0380]-[0381], [0387]-[0389], [0394]-[0395]; Bederson, ¶242.



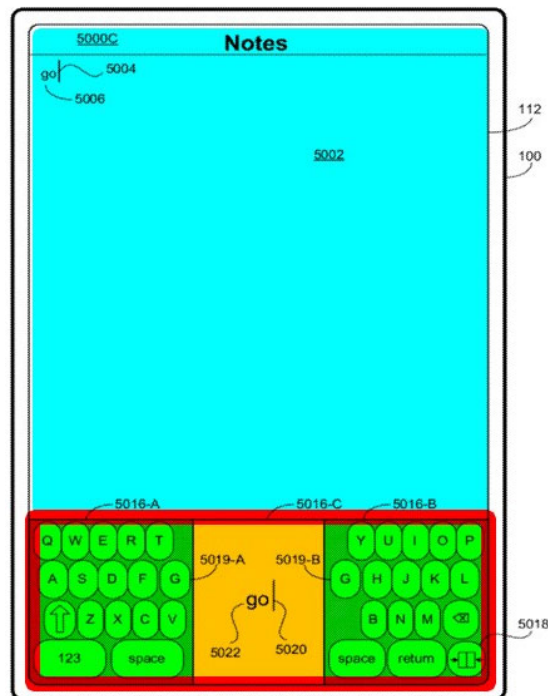
Koch, Figs. 5Z, 5FF, 5HH, 5NN

To the extent *Koch*’s center area is not considered an interface of an “application,” it would have been obvious to implement it as such. Bederson, ¶244. As Dr. Bederson explains, whether computer functionality is implemented as an “application” or, e.g., a “component ... of the operating system or ... keyboard” was a simple “matter of design choice and ... semantics.” *Id.* It was well-known to implement foregoing tasks (e.g., drawing, handwriting recognition) via an

“application.” Bederson, ¶245; *Koch*, ¶[0008] (disclosing that embodiments have a GUI “for performing multiple functions,” including “drawing”); *Bower*, 3:19-24 (application may be “an electronic handwriting recognition application”); *Liow*, ¶[0007] (mobile device with “handwriting recognition application ... and a hand-written character recognition application”). Thus, because implementing *Koch*’s center area functions via an “application” was one of “a finite number of identified, predictable solutions,” the feature would have been obvious. Bederson, ¶245; *KSR*, 550 U.S. at 421. Moreover, a POSITA would have been motivated to implement *Koch*’s features as an “application” to maximize resource efficiency (e.g., by exploiting pre-existing drawing/handwriting applications) and minimize bloat and disruption to other components (e.g., keyboard code), and would have had a reasonable expectation of success because the feature was well known. Bederson, ¶246.

- f. **[1e] wherein said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touchscreen.**

Koch discloses [1e]. As discussed in [1d] and as illustrated below, each of the **first application interface**, **second application interface**, and **reduced keyboard interface** is simultaneously displayed. Bederson, ¶248.



Koch, Fig. 5C

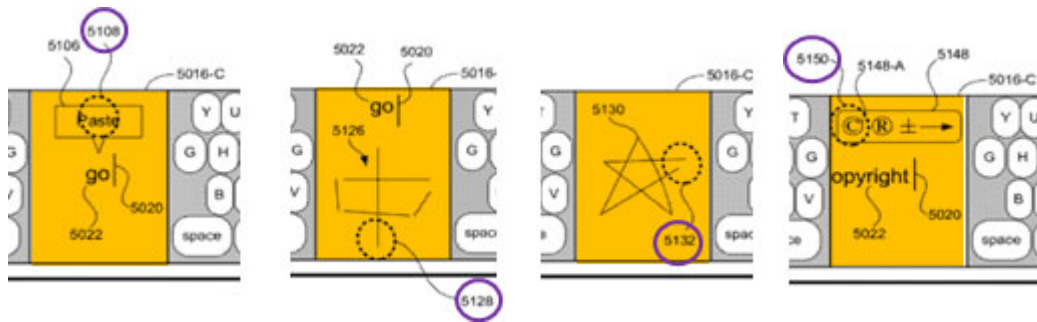
Thus, *Koch* discloses every limitation and anticipates or renders obvious claim 1. Bederson, ¶249.

2. **Claim 2. The system of claim 1, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.**

Koch discloses the additional limitations of claim 2, because *Koch* describes that its system gives the focus of the system to an interacted application, upon the interaction. Bederson, ¶251. For example, *Koch* describes an “event handling” process using an “[e]vent sorter 170 [that] receives event information and determines the application 136-1 and application view 191 of application 136-1 to which to deliver the event information.” *Koch*, ¶¶[0174]-[0175]. “Event

information” includes information about a touch interaction. *Id.*, ¶¶[0129]-[0130], [0177]; Bederson, ¶251. As Dr. Bederson explains, *Koch*’s event sorter includes components (“hit view determination module 172 and/or an active event recognizer determination module 173,” *Koch*, ¶[0179]) that operate to assign “the focus of the system” (specifically the input-system) “to the interacted application,” as claimed. Bederson, ¶251.

While the above disclosure is sufficient to meet the claim, *Koch* also specifically discloses various interactions with the interface of the second application (which is “any of said applications”) that, as Dr. Bederson explains, cause the focus of the system to be given to the second application. Bederson, ¶252. For example, *Koch* illustrates “**gesture 5108**,” “**finger strokes 5128**,” “**finger strokes 5132**,” and “[g]esture 5150” as interactions with the second application interface below. *Koch*, ¶¶[0261]-[0262], [0266]-[0267], [0272]-[0275], [0380]-[0381], [0387]-[0389], [0394]-[0397]; Bederson, ¶252. In each instance, the interactions are recognized by the system and cause certain operations to be performed, which means that the interacted application receives the “focus of the system” in the same manner that the ’922 patent describes. Bederson, ¶252; *accord* Ex. 1001, 85:56-65.

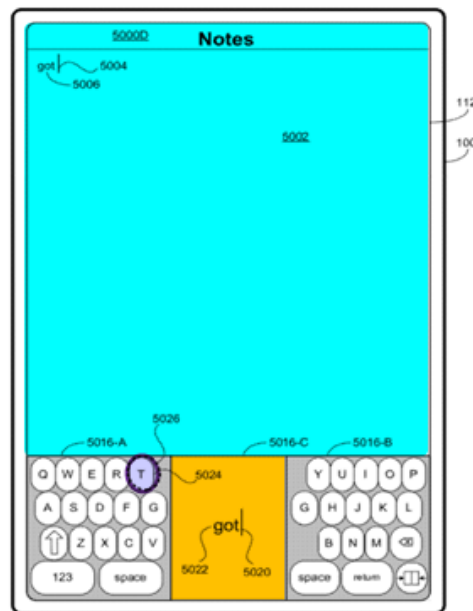


Koch, Figs. 5Z, 5FF, 5HH, 5NN (annotated excerpts)

Thus, *Koch* also discloses every limitation and anticipates or renders obvious claim 2. Bederson, ¶253.

3. Claim 3. The system of claim 1, wherein said keyboard is used with both of said applications.

Koch discloses the additional limitation of claim 3. In *Koch*, for example, “[i]n response to detection of gesture 5026 on ‘T’ key 5024 [of the keyboard], ... a ‘t’ character is entered into input text 5006 [of the first application],” and “[d]uplicate input text 5022 in [second application] center area 5016-C also shows the ‘t’ character being entered.” *Koch*, ¶[0237], Fig. 5D (below).



Koch, Fig. 5D

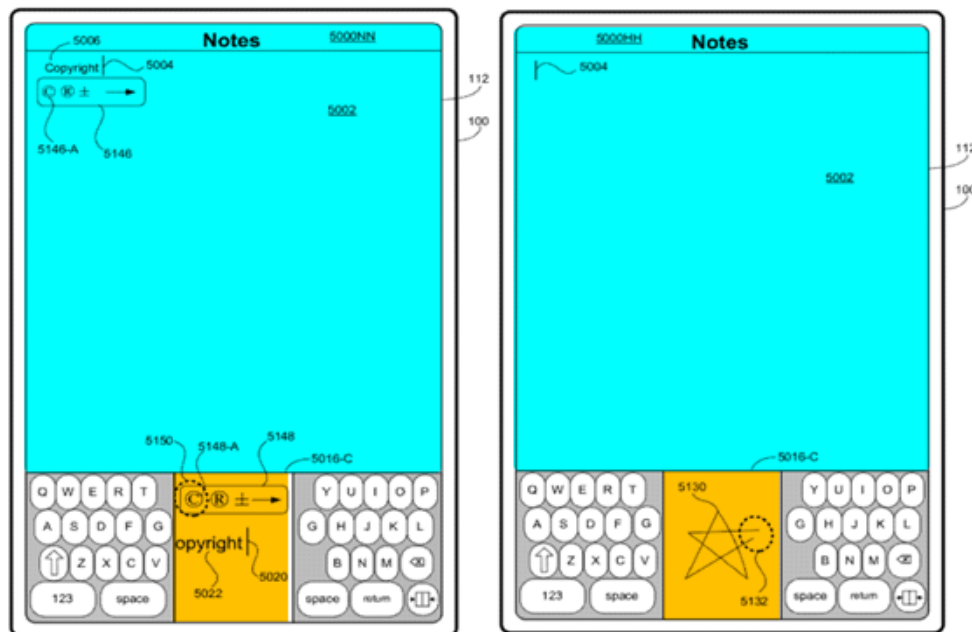
Thus, the keyboard is used with both applications, as claimed. Bederson, ¶255.

Additionally, as discussed in [1d], keyboard gestures are used to activate the center area. *See* Section VI.E.1.e. Similarly, a “keyboard unsplit key 5018” is used to un-split the keyboard and hide the second application, and is thus “used with” the second application for this additional reason. *Koch*, ¶[0238]; Bederson, ¶256.

Thus, *Koch* also discloses every limitation and anticipates or renders obvious claim 3. Bederson, ¶257.

4. **Claim 4. The system of claim 1, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touchscreen.**

Koch discloses the additional limitation of claim 4. For example, as illustrated in Figure 5NN (below-left), Unicode text character “©” received as input into the **second application** is shared with the **first application** while both interfaces are displayed. *Koch*, ¶¶[0272]-[0273] (also describing embodiment where “Unicode characters available for input are just displayed in the center area”), [0394]-[0395]; *Bederson*, ¶259. As another example, a drawing image received as input into the **second application** (Fig. 5HH, below-right) is shared with the **first application** while both interfaces are displayed (Fig. 5II). *Koch*, ¶¶[0267], [0388]-[0389]; *Bederson*, ¶259.



Koch, Figs. 5NN, 5HH

Thus, *Koch* also discloses every limitation and anticipates or renders obvious claim 4. Bederson, ¶260.

5. Claim 5. The system of claim 4, wherein said information includes at least one of, a text, an image, a video, a webpage and a URL.

Koch discloses the additional limitations of claim 5 because, as discussed in connection with claim 4, “said information” shared from the second application to the first application may be Unicode text (which is “a text”) or a drawing (which is “an image”). See Section VI.E.4; Bederson, ¶262.

Thus, *Koch* also discloses every limitation and anticipates or renders obvious claim 5. Bederson, ¶263.

6. Claim 7. The system of claim 1, wherein at least one of the applications is a messaging application.

Koch discloses the additional limitations of claim 7 because *Koch* further discloses that its electronic device “typically supports a variety of applications, such as ... an e-mail application, an instant messaging application.” *Koch*, ¶[0107]; *see also id.*, ¶¶[0114] (device supports “protocol for e-mail,” “instant messaging,” “and/or Short Message Service (SMS), or any other suitable communication protocol”), [0158] (describing messaging capabilities). *Koch*’s text input module (including the keyboard) is used with “any ... application that needs text input” (*id.*, ¶[0133]), which includes the messaging application. *Bederson*, ¶265.

Thus, *Koch* also discloses every limitation and anticipates or renders obvious claim 7. *Bederson*, ¶266.

7. Claim 10. The system of claim 1, wherein at least one of the applications is used for sharing at least one of text, pictures, or videos.

Koch discloses the additional limitations of claim 10. As discussed above for claims 4 and 5, the second application is used for sharing text or images with the first application. *Bederson*, ¶268; *see* Sections VI.E.4-VI.E.5. As discussed above for claim 7, *Koch* discloses that its (first) application may be a messaging application, which also is “used for sharing ... text.” *Bederson*, ¶268; *see* Section

VI.E.6. Accordingly, for the same reasons, *Koch* discloses every limitation and anticipates or renders obvious claim 10. Bederson, ¶269.

8. Claim 11. The system of claim 1, wherein said device is a mobile phone.

Koch discloses the additional limitations of claim 11 because its device “is a portable communications device, such as a mobile telephone.” *Koch*, ¶[0105]; Bederson, ¶271.

Thus, *Koch* also discloses every limitation and anticipates or renders obvious claim 11. Bederson, ¶272.

9. Independent Claim 12

a. [12pre] A method comprising:

Koch discloses [12pre]. Bederson, ¶¶273-274. *Koch* discloses a “Device, Method, and Graphical User Interface for Manipulating Soft Keyboards.” *Koch*, Title.

b. [12a] assigning a first zone of a touch screen to an interface of a first application;

Koch discloses [12a] for the same reasons as [1c]. See Section VI.E.1.d.

c. [12b] assigning a second zone of said touch screen to an on-screen keyboard; and

Koch discloses [12b] for the same reasons as [1c]. See Section VI.E.1.d.

- d. **[12c] based on accomplishment of a condition under the control of said keyboard, activating a second application and displaying an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of said second zone of said touch screen and**

Koch discloses or renders obvious [12c] for the same reasons as [1d]. *See* Section VI.E.1.e.

- e. **[12d] wherein said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touch screen.**

Koch discloses [12d] for the same reasons as [1e]. *See* Section VI.E.1.f.

For the reasons above, *Koch* discloses every limitation and anticipates or renders obvious claim 12. *Bederson*, ¶283.

10. Claim 13. The method of claim 12, comprising using said keyboard with both of said applications.

Koch discloses the additional limitations of claim 13 for the same reasons as claim 3 and, thus, anticipates or renders obvious the claim. *See* Section VI.E.3; *Bederson*, ¶285.

11. Claim 14. The method of claim 12, wherein at least one of said applications is one of, a text messaging application and an image sharing application.

Koch discloses the additional limitations of claim 14 for the same reasons as claims 4, 7 and 10 and, thus, anticipates or renders obvious the claim. *See* Section VI.A.4, VI.E.6-VI.E.7; *Bederson*, ¶¶287-288.

- 12. Claim 18. The method of claim 12, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touch screen.**

Koch discloses the additional limitations of claim 18 for the same reasons as claim 4 and, thus, anticipates or renders obvious the claim. *See* Section VI.E.4; Bederson, ¶290.

- 13. Claim 19. The method of claim 18, wherein said information includes at least one of a text, an image, a video, a webpage and a URL.**

Koch discloses the additional limitations of claim 19 for the same reasons as claim 5 and, thus, anticipates or renders obvious the claim. *See* Section VI.E.5; Bederson, ¶292.

- 14. Claim 20. The method of claim 12, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.**

Koch discloses the additional limitations of claim 20 for the same reasons as claim 2 and, thus, anticipates or renders obvious the claim. *See* Section VI.E.2; Bederson, ¶294.

- 15. Claim 21. The method of claim 12, wherein said touch screen is integrated within a mobile communication device.**

Koch discloses the additional limitations of claim 21 for the same reasons as claim 11, i.e., because a “mobile phone” (recited in claim 11) is a “mobile communication device” as recited in claim 21. Bederson, ¶296; *see* Section VI.E.8.

And the touch screen is integrated within the mobile device as discussed in claim [1a]. *See* Section VI.E.1.b. Thus, *Koch* also discloses every limitation and anticipates or renders obvious claim 21. *Bederson*, ¶296.

F. Ground 6: *Koch* in View of *Sirpal* (Claim 6)

1. Claim 6. The system of claim 4, wherein said information is copied from one of said applications and pasted in the other application.

Claim 6 would have been obvious over *Koch* in view of *Sirpal*. As discussed in Section VI.E.4, *Koch* discloses or renders obvious the system of claim 4. *Sirpal* further discloses “said information [to be] copied from one of said applications and pasted in the other application,” as recited in claim 6, as discussed above in Section VI.B.2.

As discussed in Section VI.B, *Sirpal* is analogous art to the '922 patent. *Koch* also is analogous art, at least because each “is from the same field of endeavor,” namely, input methods and systems for application(s) running on a touchscreen mobile device. *Unwired Planet*, 841 F.3d at 1000-01 (citation omitted); *Bederson*, ¶98; *see Koch*, ¶[0229] (“user interfaces (‘UI’) and associated processes that may be implemented on an electronic device with a display and a touch-sensitive surface”); Ex. 1001, 1:47-48 (“data entry system ... adapted to mobile environments”), 2:34-36 (“Preferably, said keypad is a virtual keypad located on a touch sensitive surface ... [, e.g.,] a touch screen.”).

Koch addresses the same art-recognized needs as *Sirpal*, such as for a mobile device to be used with multiple applications. Bederson, ¶¶299-301. For example, *Koch* teaches to provide applications for such functions as “e-mail,” “instant messaging (IM),” and “browser.” *Koch*, ¶¶[0135]-[0153], *see id.*, ¶[0158] (IM functionality includes SMS text messaging). *Koch* further provides copy/paste functionality, albeit without explicitly describing copying *from* one application to another. Bederson, ¶301; *Koch*, ¶¶[0261]-[0262], [0278], Figs. 5Z-5AA, 5TT.

Sirpal similarly recognizes the need for a mobile device to operate with multiple applications, and specifically describes copy/paste functionalities to allow a user to share information “from one app to another,” as discussed above in Section VI.B.2. Indeed, as Dr. Bederson explains, *Sirpal* describes providing copy/paste functionality to several of the exemplary applications identified by *Koch*, including “an e-mail application, an instant messaging application,” and “a web browsing application.” Bederson, ¶301; *Koch*, ¶¶[0107], [0135]-[0153]; *Sirpal-000*, 158-64, 166-70, 172-75, 177-82.

For the foregoing reasons, “a POSITA would consider references such as *Sirpal* to be pertinent when implementing a system such as *Koch* with a mobile electronic device having applications.” Bederson, ¶302. In particular, a POSITA implementing *Koch* would have been motivated to provide *Sirpal*’s known technique for sharing information between applications—i.e., through copy/paste

functionalities—at least because the known technique advantageously allows a user control over *which* information to copy from one application, as well as *where* and *when* to paste the copied information into another application. Bederson, ¶303. For example, in the combined system, a user would copy text or drawing information from the center area application of *Koch*, and then select a field in another application (potentially one of several fields in an application or in different applications) to paste the text information—yielding “wherein said information is copied from one of said applications and pasted in the other application.” Bederson, ¶304. As Dr. Bederson testifies, a POSITA would have recognized that the similar device of *Koch* could be improved using the copy/paste methods of *Sirpal*. Bederson, ¶305; *PACT*, 61 F.4th at 1380. Moreover, combining *Sirpal*’s copy/paste methods with *Koch* represents nothing more than applying a “known technique to solve a known problem using ‘prior art elements according to their established functions’”; therefore, a POSITA would have been motivated to make the combination. *PACT*, 61 F.4th at 1380 (citation omitted); Bederson, ¶305.

As Dr. Bederson further explains, “combining the teachings of *Koch* and *Sirpal* would have required no more than ordinary skill because the combination would have been a simple modification of existing components (GUI interface for mobile electronic device applications, use of copy/paste functionalities) in a straightforward manner to achieve predictable results.” Bederson, ¶306 (further

explaining that the combination “would have had a reasonable expectation of success,” given their “overall similarities,” “overlapping functionalities,” and the ease with which the relevant functionality of *Sirpal* could be integrated into *Koch*’s system).

Thus, *Koch* in view of *Sirpal* renders claim 6 obvious. Bederson, ¶307.

G. Ground 7: *Koch* in View of *Matthews* (Claims 8, 9, and 15-17)

- 1. Claim 8. The system of claim 1, wherein said second application is a search application activated by interacting with a button of said keyboard assigned to activating said search application.**

As discussed in Section VI.E.1, *Koch* discloses or renders obvious the system of claim 1. *Matthews* discloses the further limitations of claim 8 and, with *Koch*, renders claim 8 obvious. Bederson, ¶¶309-316.

Koch’s computer device includes a “search module 151” that “includes executable instructions to search for text, music, sound, image, video, and/or other files in memory 102 that match one or more search criteria (e.g., one or more user-specified search terms) in accordance with user instructions.” *Koch*, ¶[0166]. *Koch* does not, however, describe an interface for launching and/or using its search functionality. Bederson, ¶310.

Matthews describes “methods and system for a search box and search capabilities in a graphical user interface of a program launch menu for an operating

system.” *Matthews*, 1:15-18. In *Matthews*, a “user can type text into search box 327,” illustrated in Figure 3 below, “to search for Start menu items” as well as “perform a character by character search across the programs, user files, Internet links, and communications on his or her system.” *Id.*, 16:52-62.

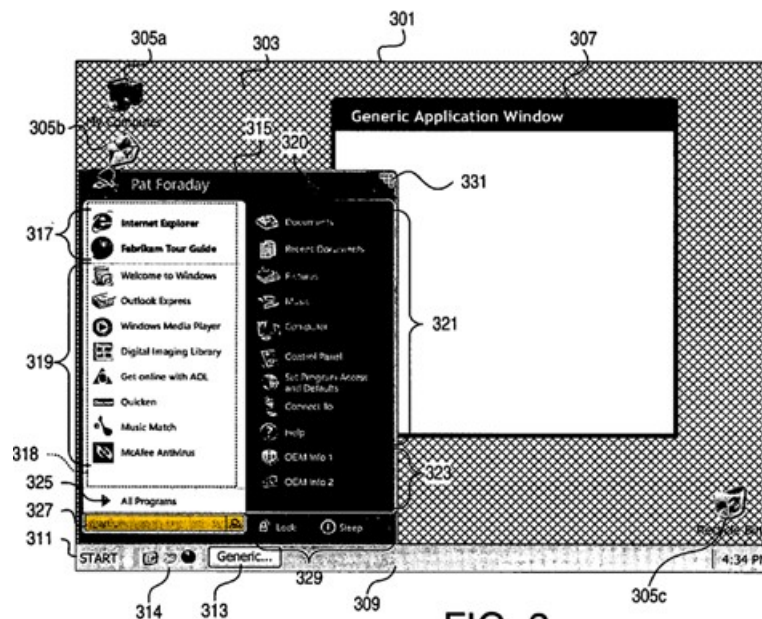


FIG. 3

Matthews, Fig. 3

The Start menu search box may be launched by pressing a keyboard key, i.e., “when the user presses the <Windows> key (not shown), the operating system displays the Start menu, and the search box 327 has input focus by default” so “[t]he user can immediately start typing text for which he or she would like to search for an item.” *Id.*, 19:31-39. Thus, *Matthews* teaches a “search application activated by interacting with a button of said keyboard assigned to activating said search application,” as claimed. *Bederson*, ¶¶311-312.

Matthews is analogous art to the '922 patent because it “is reasonably pertinent to the particular problem with which the inventor is involved,” namely, improving the speed and efficiency of interfaces for computer search functionalities. See *Unwired Planet*, 841 F.3d at 1000-01 (citation omitted); Bederson, ¶108; compare *Matthews*, 19:31-39 (using a button to activate a “search box” allows a “user [to] immediately start typing text for which he or she would like to search”), with Ex. 1001, 103:24-34 (“[e]ntering text with many different characteristics ... used in ... a search application/function ... for faster and more accurate/relevant search results”), 104:20-28 (“search box ... may be provided by the searching system/application/engine”).

A POSITA implementing the system of *Koch*—and particularly *Koch*’s “search module”—would have considered references such as *Matthews* to be pertinent for their disclosure of efficient search interfaces. Bederson, ¶313. For example, *Matthews* teaches that a user may quickly use the equivalent of “keyboard shortcuts” to access desired results “without being required to previously manually link or set up a keyboard shortcut as corresponding to a specific file.” *Matthews*, 19:42-51; Bederson, ¶313. A POSITA would recognize such functionality to be applicable to *Koch* and advantageous, as it would provide *Koch* with an art-recognized, efficient search functionality. Bederson, ¶313.

Furthermore, a POSITA would have recognized the functional similarities between *Koch*'s keyboard split button, which is used to launch the "center area" second applications, and *Matthews*'s <Windows> button, which is used to "display[] the Start menu[] and the search box 327" for immediate searching after the search application is activated. Bederson, ¶314. A POSITA thus would have found it obvious to modify *Koch*'s keyboard split button to provide the search functionality of *Matthews*'s <Windows> button and display *Matthews*'s search box 327 in place of *Koch*'s "center area." Bederson, ¶314. In the combination, *Koch*'s center area application would be a "search application," yielding "wherein said second application is a search application activated by interacting with a button of said keyboard assigned to activating said search application." Bederson, ¶314. As Dr. Bederson explains, "combining the teachings of *Koch* and *Matthews*" in this fashion "would have required no more than ordinary skill ... because the combination would have been a simple substitution of one GUI (for a search function) in place of another GUI (for, e.g., drawing and text entry) in a straightforward manner to achieve predictable results." Bederson, ¶315. And a POSITA would reasonably expect to be successful in combining the teachings given their "overall similarities," "overlapping functionalities," and the ease with which the relevant functionality of *Matthews* could be integrated into the system of *Koch*. Bederson, ¶315.

Thus, *Koch* in view of *Matthews* renders obvious claim 8. Bederson, ¶316.

2. Claim 9. The system of claim 8, wherein said search application use at least one keyword typed through said keyboard.

As discussed above, *Koch* in view of *Matthews* renders obvious the system of claim 8. *See* Section VI.G.1. The combination also renders obvious the further limitations of claim 9. Bederson, ¶317.

Matthews describes, for example, a “search for <foo>” in which “the computer system 100 may initiate a broader search for the user-entered text, e.g., by launching a full-text search or full-text search window,” where “the user may be able to search the computer for <foo>, search the Internet for <foo>, and/or search some other computer or database for <foo>, regardless of where the text <foo> appears.” *Matthews*, 19:2-8. *Matthews* further teaches that the system “may display any items first where the item’s name begins with text matching the user-entered text, second where the item has a word other than its starting word that starts with text matching the user-entered text, and third where the item has any text matching the user-entered text.” *Id.*, 18:24-28. As Dr. Bederson explains, *Matthews*’s functionality encompasses “keyword” “search,” wherein “said search application use[s] at least one keyword typed through said keyboard.” Bederson, ¶318.

Thus, *Koch* in view of *Matthews*, as combined above in Section VI.G.1, further yields “wherein said search application use[s] at least one keyword typed through said keyboard,” and claim 9 is obvious. Bederson, ¶319.

3. Claim 15. The method of claim 12, wherein said interface of said second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of said keyboard that is related to activating said search application.

As discussed in Section VI.E.9, *Koch* discloses the method of claim 12. *Matthews* discloses the further limitations of claim 15 and, in combination with *Koch*, renders claim 15 obvious for at least the same reasons as claim 8. See Section VI.G.1.

Specifically, in the combination of *Koch* with *Matthews*, the center area application is obviously a “search application.” See Section VI.G.1; Bederson, ¶321. Furthermore, *Koch* teaches that the center area application is activated via a button—keyboard split key—as discussed in Section VI.E.1.e. See Bederson, ¶240. Thus, the combination yields the “interface of said second application is displayed on the touch screen by using a search application activated by providing a predefined interaction with a button of said keyboard that is related to activating said search application,” as claimed. Bederson, ¶321.

4. Claim 16. The method of claim 15, wherein said search application use at least one keyword typed through said keyboard.

Koch in view of *Matthews* renders obvious the additional limitations of claim 16. As discussed in Section VI.G.3, *Koch* in view of *Matthews* renders obvious the method of claim 15. *Matthews* further discloses the additional limitations of claim 16 for the same reasons as claim 9 and, thus, claim 16 is obvious. *See* Section VI.G.2; Bederson, ¶322.

5. Claim 17. The method of claim 15, wherein said search application use at least one keyword typed through said keyboard after said search application is activated.

Koch in view of *Matthews* renders obvious the additional limitations of claim 17. As discussed in Section VI.G.3, *Koch* in view of *Matthews* renders obvious the method of claim 15. *Matthews* further discloses the additional limitations of claim 17 for the same reasons as claim 16. *See* Section VI.G.4. Claim 17 further requires that the keyword be typed “after said search application is activated.” As Dr. Bederson explains, in the obvious combination, *Koch*’s center area application is a “search application” that is activated by pressing the keyboard split key. Bederson, ¶323. And because *Matthews* teaches to type keywords *after* the <Windows> key has been pressed to initiate the search functionality, the combination further yields typing the keyword “after said search application is activated,” and claim 17 is obvious. Bederson, ¶¶323-324.

VII. DISCRETIONARY DENIAL IS NOT WARRANTED

A. Denial of Institution Is Not Warranted Under *Fintiv*

Consistent with *Sotera Wireless, Inc.*, Petitioners hereby stipulate “that, if the PTAB institutes inter partes review, Petitioner[s] ‘will not pursue in [*Keyless Licensing LLC v. Samsung Electronics America, Inc., et al.*, Case No. 2:24-cv-00464-JRG (E.D. Tex.)] the specific grounds [asserted in IPR2025-00527], or ... any other ground ... that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications).” *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A).

The Director’s Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation (“Interim Procedure”⁷) directs that “the PTAB will not discretionarily deny institution of an IPR or PGR in view of parallel district court litigation where a petitioner stipulates not to pursue in a parallel district court proceeding the same grounds as in the petition or any

⁷ Available at

https://www.uspto.gov/sites/default/files/documents/interim_proc_discretionary_denials_aia_parallel_district_court_litigation_memo_20220621_.pdf.

grounds that could have reasonably been raised in the petition.” Interim Procedure, 3, 7-8. Petitioners have so stipulated.

Denial of institution is not warranted under *Fintiv*.

B. Denial of Institution Is Not Warranted Under § 325(d)

During prosecution, the Examiner did not consider, let alone rely on, any of the prior art asserted in this Petition. Thus, the Examiner did not consider the same (or substantially the same) prior art and arguments presented here. The Board should not exercise its discretion to deny institution under 35 U.S.C. § 325(d).

VIII. MANDATORY NOTICES

A. Real Parties-in-Interest

The real parties-in-interest are Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc.

B. Related Matters

The '922 patent is currently asserted in *Keyless Licensing LLC v. Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd.*, No. 2:24-cv-00464-JRG (E.D. Tex.). Petitioners are not aware of any other judicial or administrative matter that would affect, or be affected by, a decision in this proceeding.

On its face, the '922 patent purports to claim priority to the following U.S. Patent Applications: International Application No. PCT/US2014/016777; U.S. Application No. 14/767,606 (now abandoned); and now-expired U.S. Provisional

Application Nos. 61/765,751; 61/766,747; 61/769,285; 61/772,066; 61/774,605;
61/777,102; 61/778,888; 61/802,690; 61/803,456; 61/804,681; 61/810,805;
61/811,756; 61/813,271; 61/814,290; 61/819,598; 61/821,331; 61/822,934;
61/823,971; 61/825,049; 61/827,020; 61/830,114; 61/833,512; 61/833,991;
61/834,889; 61/835,704; 61/837,662; 61/838,288; 61/838,403; 61/841,360;
61/843,391; 61/846,030; 61/858,210; 61/860,396; 61/865,254; 61/866,119;
61/868,172; 61/869,722; 61/875,192; 61/878,695; 61/879,152; 61/882,160;
61/893,291; 61/899,240; 61/902,242; 61/908,122; 61/908,248; 61/913,472;
61/920,572; 61/926,474; 61/927,039; 61/929,187; 61/931,633; 61/937,545.

According to the records of the U.S. Patent and Trademark Office, U.S.
Patent No. 12,056,349 claims priority to the '922 patent, as do pending U.S. Patent
Application No. 18/738,092 and abandoned U.S. Patent Application No.
18/238,497.

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Please address all correspondence to counsel at the addresses above.

Petitioners consent to electronic service by email at the above email addresses.

IX. GROUNDS FOR STANDING

Petitioners certify that the '922 patent is available for IPR, and that
Petitioners are not barred or estopped from requesting IPR challenging the patent
claims on the grounds identified herein.

X. CONCLUSION

For the reasons above, Petitioners request institution of IPR and cancellation of each challenged claim. The Office may charge any required fees to Deposit Account No. 06-0916.

Date: February 14, 2025

Respectfully Submitted,

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CERTIFICATION OF WORD COUNT

Pursuant to 37 C.F.R. § 42.24(a)(1)(i), the undersigned hereby certifies that the foregoing PETITION FOR *INTER PARTES* REVIEW contains 13,805 words, excluding the parts of this Petition that are exempted under 37 C.F.R. § 42.24(a), as measured by the word-processing system used to prepare this paper.

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CLAIMS APPENDIX

1. **[1pre]** A system for using multiple applications on a screen of a device, comprising:
 - [1a]** an electronic device having a touchscreen;
 - [1b]** an on-screen keyboard for entering text in a first application running within said device
 - [1c]** wherein a first zone of said touchscreen is assigned to an interface of said first application and a second zone of said touchscreen is assigned to said keyboard; and
 - [1d]** wherein based on accomplishment of a condition under the control of said keyboard, the system activates a second application and displays an interface of the second application and a reduced interface corresponding to said keyboard on at least a portion of said second zone, and
 - [1e]** wherein said interface of said first application, said interface of said second application, and the reduced interface corresponding to said keyboard are simultaneously displayed on said touchscreen.
2. The system of claim 1, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.

3. The system of claim 1, wherein said keyboard is used with both of said applications.
4. The system of claim 1, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touchscreen.
5. The system of claim 4, wherein said information includes at least one of, a text, an image, a video, a webpage and a URL.
6. The system of claim 4, wherein said information is copied from one of said applications and pasted in the other application.
7. The system of claim 1, wherein at least one of the applications is a messaging application.
8. The system of claim 1, wherein said second application is a search application activated by interacting with a button of said keyboard assigned to activating said search application.
9. The system of claim 8, wherein said search application use at least one keyword typed through said keyboard.
10. The system of claim 1, wherein at least one of the applications is used for sharing at least one of text, pictures, or videos.

11. The system of claim 1, wherein said device is a mobile phone.
12. A method comprising:
 - [12a] assigning a first zone of a touch screen to an interface of a first application;
 - [12b] assigning a second zone of said touch screen to an on-screen keyboard; and
 - [12c] based on accomplishment of a condition under the control of said keyboard, activating a second application and displaying an interface of the second application and a reduced Interface corresponding to said keyboard on at least a portion of said second zone of said touch screen and
 - [12d] wherein said interface of said first application, said interface of said second application, and the reduced Interface corresponding to said keyboard are simultaneously displayed on said touch screen.
13. The method of claim 12, comprising using said keyboard with both of said applications.
14. The method of claim 12, wherein at least one of said applications is one of, a text messaging application and an image sharing application.
15. The method of claim 12, wherein said interface of said second application is displayed on the touch screen by using a search application activated by

providing a predefined interaction with a button of said keyboard that is related to activating said search application.

16. The method of claim 15, wherein said search application use at least one keyword typed through said keyboard.
17. The method of claim 15, wherein said search application use at least one keyword typed through said keyboard after said search application is activated.
18. The method of claim 12, wherein an information received from one of said applications is shared with at least the other application while said interface of said first application and said interface of said second application are simultaneously displayed on said touch screen.
19. The method of claim 18, wherein said information includes at least one of a text, an image, a video, a webpage and a URL.
20. The method of claim 12, wherein upon interacting with the interface of any of said applications, the focus of the system is given to the interacted application.
21. The method of claim 12, wherein said touch screen is integrated within a mobile communication device.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e) and 42.105(a), the undersigned certifies that on February 14, 2025, a copy of the foregoing **Petition for *Inter Partes* Review of U.S. Patent No. 10,976,922**, the **associated powers of attorney**, and **Exhibits 1001-1065, 1067, 1070, 1072-1073, 1075, 1077-1078** were served by FedEx International on the correspondence address of record indicated in the Patent Office's public Patent Center system for U.S. Patent No. 10,976,922:

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A courtesy copy of the foregoing was also served by FedEx Priority Overnight on litigation counsel:

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Dated: February 14, 2025

Respectfully submitted,

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