

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,**
Petitioners

v.

MAXELL LTD.,
Patent Owner

Inter Partes Review No. IPR2025-01311
U.S. Patent No. 11,812,091

**PETITIONERS' PRELIMINARY REPLY TO
PATENT OWNER'S PRELIMINARY RESPONSE**

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1022	Client/Server Software Architectures--An Overview, available at https://web.archive.org/web/20050228093112/http://sei.cmu.edu/str/descriptions/clientserver_body.html (February 2005), <i>last</i>

Exhibit No.	Description
	<i>accessed</i> September 3, 2025
1023	S. A. Bly and J. K. Rosenberg. 1986. A comparison of tiled and overlapping windows. In Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (CHI '86). Association for Computing Machinery, New York, NY, USA, 101–106. https://doi.org/10.1145/22627.22356
1024	Didier Le Gall. 1991. MPEG: a video compression standard for multimedia applications. <i>Commun. ACM</i> 34, 4 (April 1991), 46–58. https://doi.org/10.1145/103085.103090
1025	Amy K. Karlson, Benjamin B. Bederson, & John SanGiovanni. 2005. AppLens and launchTile: two designs for one-handed thumb use on small devices. In Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (CHI '05). Association for Computing Machinery, New York, NY, USA, 201–210. https://doi.org/10.1145/1054972.1055001
1026	Bederson, B. B., Clamage, A., Czerwinski, M. P., & Robertson, G. G. (2004). DateLens. <i>ACM Transactions on Computer-Human Interaction</i> , 11(1), 90–119. https://doi.org/10.1145/972648.972652
1027	Petitioners’ “Sotera Plus” Stipulation
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1034	Letter from Maxell to Samsung dated July 7, 2021.
1035	Email thread between Maxell and Samsung from July 2021 to January 2022.
1036	Letter from Maxell to Samsung dated December 29, 2021.
1037	IPR2024-00867, Paper 40 (Petitioner’s Response to Patent Owner’s Request for Authorization to File Materials from Related Matters).
1038	IPR2024-00717, Paper 33 (Order Denying Patent Owner’s Request

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1042	IPR2024-00735, Paper 41 (Petitioner’s Opposition to Motion to Submit Supplemental Information).
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1044	Petitioner’s Motion to Stay Pending <i>Inter Partes</i> Review from <i>Maxell, Ltd. v. Samsung Elecs. Co.</i> , No. 5:25-cv-00052 (E.D. Tex. Oct. 24, 2025).
1045	“Order Focusing Patent Claims and Prior Art” from <i>Maxell, Ltd. v. Samsung Elecs. Co.</i> , No. 5:25-cv-00052 (E.D. Tex. Aug. 18, 2025).
1046	Order on Samsung’s Motion to Stay from <i>Maxell, Ltd. v. Samsung Elecs. Co.</i> , No. 5:25-cv-00052 (E.D. Tex. Dec. 15, 2025).
1047	Maxell’s Amended Infringement Contentions, Appendix 5: October 20, 2025 Infringement Contentions Applying Claims 1-3, 6, 7, 10, 13-17, and 20 of U.S. Patent No. 11,812,091 to the Accused Samsung ’091 Products (Redline)
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I. INTRODUCTION

Petitioners submit this Reply to alert the Director to PO's inconsistent constructions of the claimed first and second operation panels in its POPR and in its infringement contentions in related district court litigation, *Maxell, Ltd. v. Samsung Electronics Co., Ltd.*, Case No. 5-25-CV-00052 (E.D. Tex.). Petitioners also clarify that there is no evidence Phillips, Wallis, Ellis and Uchida were substantively considered by the examiner during prosecution, even though they are listed on the face of the '091 patent.

II. ARGUMENT

In both its original and amended infringement contentions, PO asserts that the claimed "first operation panel" may include both linear and interactive controls. *See, e.g.*, EX1047 at 47, 66; *see also* EX1048 at 47, 66. But in its POPR, PO argues that each of the claimed first and second operation panels is limited to only a single type of control function; either linear or interactive, not both. Paper No. 11 at 32, 50.

PO's infringement contentions state that an accused Galaxy S25 smartphone displays a claimed "first operation panel" which includes both linear controls (*e.g.*, progress bar and pause button) *and* interactive controls (*e.g.*, "Episodes" button). EX1047 at 47, 66; *see also* EX1048 at 47, 66.

However, in its POPR, while referring to the claimed first and second operation panels, PO states that "the system alternates between two different

operation panels – one linear and one interactive ...” and that “this limitation [the claimed first and second operation panels] presupposes the existence of two distinct operation panels – a linear operation panel and an interactive operation panel.” Paper No. 11 at 32, 50.

Thus, in its infringement contentions, PO takes the position that the claimed first and second operation panels may each include both linear and interactive controls, but in its POPR, PO limits each control panel to only one type of control function, either linear or interactive, but not both. PO offers no explanation for these inconsistent claim constructions in either its POPR or in its infringement contentions. Making matters worse, PO’s position was the same in two sets of infringement contentions: first, in its original infringement contentions on August 12, 2025 (EX1048), and then again in its proposed supplemental infringement contentions on October 20, 2025 (EX1047). Then, without explanation, almost two months later, PO took the opposite position regarding these claim terms in its POPR. Paper No. 11. More significantly, under either one of these inconsistent constructions, the prior art cited in the Petition renders the challenged claims unpatentable. *See, e.g.*, Petition (Paper No. 1) at 29 (showing operation panels with only interactive control buttons), 31 (showing an operation panel with only linear control buttons), 54 (showing operation panels with both linear and interactive control buttons).

Petitioners also clarify their statements in the Petition that Phillips, Wallis, Ellis, and Uchida were “not considered” during prosecution, despite being listed on the face of the ’091 patent. As Petitioners already acknowledged, each of those references was before the examiner during prosecution. *See* Petitioners’ Discretionary Denial Opp. at 10. However, because the ’091 patent issued without an Office action and without the examiner applying any of those references, there is no evidence the examiner substantively considered any of them during prosecution. PO’s claim that materially false statements were made in the Petition are incorrect and should be rejected.

III. CONCLUSION

The Director should institute this IPR for the reasons discussed above and for the reasons discussed in the Petition (Paper 1) and Petitioners’ opposition to PO’s request for discretionary denial (Paper 9).

Date: January 16, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. §§ 42.6(e) and 42.105 that on January 16, 2026, a true and correct copy of this brief and any new exhibits were served by emailing a copy of the same (by agreement) to the following attorneys for PO:

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