

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner,

v.

DAMAKA, INC.,

Patent Owner.

Patent No. 9,027,032

Filing Date: September 11, 2013

Issue Date: May 5, 2015

Inventors: Sivakumar Chaturvedi, Satish Gundabathula, and Rashmi Hiremath

Title: SYSTEM AND METHOD FOR PROVIDING
ADDITIONAL FUNCTIONALITY TO EXISTING
SOFTWARE IN AN INTEGRATED MANNER

PATENT OWNER'S PRELIMINARY RESPONSE

Case No. IPR2026-00206

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2002	Complaint for Patent Infringement (Dkt. 1) in <i>Damaka, Inc. v. Cisco Sys., Inc.</i> , Case No. 2:25-cv-00593-RWS-RSP, May 30, 2025
2003	Defendant Cisco Systems, Inc.’s Invalidity and Subject Matter Eligibility Contentions in <i>Damaka, Inc. v. Cisco Sys., Inc.</i> , Case No. 2:25-cv-00593-RWS-RSP, dated January 15, 2026
2004	Declaration of Siva Chaturvedi, dated March 19, 2026
2005	Webpage capture, Cisco Careers, <i>available at</i> https://careers.cisco.com/global/en/search-results?keywords=WebEx (captured March 19, 2026)

I. INTRODUCTION

On January 13, 2026, Cisco Systems, Inc. (“Petitioner”) submitted a Petition (Paper 2, “Petition” or “Pet.”) to institute *inter partes* review (“IPR”) of U.S. Patent No. 9,027,032 (Ex. 1001, the “’032 Patent”), challenging Claims 1-21 (the “Challenged Claims”). The Petition asserts that: (i) Claims 1-7, 9-20 are rendered obvious over United States Patent Application Publication No. US 2011/0249077 to Abuan (“Abuan” or Ex. 1005), United States Patent Application Publication No. US 2012/0092438 to Guzman Suarez (“Guzman” or Ex. 1006); and United States Patent Application Publication No. US 2013/0019297 to Lawson (“Lawson” or Ex. 1007); and (ii) Claims 8 and 21 are rendered obvious over United States Patent No. US 5,689,641 to Ludwig (“Ludwig” or Ex. 1008) in addition to Abuan, Guzman and Lawson. The Board should deny the Petition for at least the reasons described briefly below.

II. CLAIM CONSTRUCTION

As noted below, the Petition fails to comply with 37 C.F.R. § 42.104(b)(3) because it does not set out “[h]ow the challenged claim[s] are to be construed.” In the District Court Litigation, Petitioner identified multiple terms as allegedly indefinite, but in this proceeding, it argues that no construction is necessary without explanation for the inconsistency. Patent Owner believes that claim construction is not required to deny the Petition. Pet. at 16.

III. LEVEL OF ORDINARY SKILL IN THE ART

For the purposes of this Preliminary Response only, Patent Owner utilizes Petitioner's proposed level of skill in the art: "a bachelor's degree in computer science, computer engineering, or an equivalent, and three years of professional experience relating to computer programming. Lack of professional experience can be remedied by additional education, and vice versa." Pet. at 10-11 (citations omitted).

IV. THE PETITION SHOULD BE DENIED

The question of obviousness is resolved on the basis of underlying factual determinations, including: (1) the scope and content of the prior art, (2) any differences between the claimed subject matter and the prior art, (3) the level of skill in the art, and (4) so-called secondary considerations where in evidence. *Graham v. John Deere Co. of Kansas City*, 383 U.S. 1, 17-18 (1966); *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 406 (2007). The question is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 1537 (Fed. Cir. 1983).

The Board has held that a failure to identify the differences between the claimed subject matter and the prior art is fatal to an obviousness challenge. *See, Apple, Inc. v. Contentguard Holdings, Inc.*, IPR2015-00355, Decision Denying

Institution of *Inter Partes* Review, Paper 9 at 9-10 (P.T.A.B. June 26, 2015) (denying institution for failure to identify the differences between the claimed subject matter and the prior art).

In arriving at an obviousness determination, the Board must sufficiently explain and support the conclusions that the prior art references disclose all the elements recited in the Challenged Claims and a relevant, skilled artisan not only could have made, but would have been motivated to combine all the prior art references in the way the patent claims and reasonably expected success. *Pers. Web Techs., LLC v. Apple, Inc.*, 848 F.3d 987, 994 (Fed. Cir. 2017). That is, even if all the claim elements are found across a number of references, an obviousness determination must consider whether a person of ordinary skill in the art would have the motivation to combine those references. *Intelligent Bio-Sys., Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359, 1368 (Fed. Cir. 2016); *Los Angeles Biomedical Rsch. Inst. at Harbor-UCLA Med. Ctr. v. Eli Lilly & Co.*, 849 F.3d 1049, 1067 (Fed. Cir. 2017) (vacating and remanding an obviousness determination, in part, because the Board did not make factual finding as to whether there was an apparent reason to combine all three prior art references to achieve the claimed invention and whether a person of skill in the art would have had a reasonable expectation of success from such a combination). This combinability determination, as supported by an

articulated motivation to combine, requires a plausible rationale as to why those prior art references would have worked together. *Broadcom Corp. v. Emulex Corp.*, 732 F.3d 1325, 1335 (Fed. Cir. 2013). Absent some articulated rationale, a “common sense” finding is no different than the conclusory statement “would have been obvious.” *In re Van Os*, 844 F.3d 1359, 1361 (Fed. Cir. 2017). Of additional importance, “knowledge of a problem and motivation to solve it are entirely different from motivation to combine particular references” *Innogenetics, N.V. v. Abbott Lab’ys.*, 512 F.3d 1363, 1373 (Fed. Cir. 2008).

To demonstrate inherent obviousness, an inherent limitation must necessarily be present in the combination of references. *See Pers. Web Techs., LLC v. Apple, Inc.*, 917 F.3d 1376 (Fed. Cir. 2019); *LBT IP I LLC v. Apple Inc.*, No. 2022-1613, 2023 WL 3914920, at *3 (Fed. Cir. June 9, 2023). It is not enough to merely show that it is likely to be present. *Id.*

A. The Petition is Defective Because Petitioner Presents Inconsistent Claim Construction Positions With No Explanation

The Petition should be denied because Petitioner has advanced inconsistent claim construction positions in this proceeding and in the parallel District Court Litigation without sufficient explanation. The Petition therefore fails to comply with 37 C.F.R. § 42.104(b)(3) and is defective.

In the Petition, Petitioner states that “no terms require express construction” and that the Challenged Claims should be given their plain and ordinary meaning. Pet. at 16. In the District Court Litigation, Petitioner contends the opposite: Petitioner’s Invalidity Contentions assert that fourteen separate claim terms of the ’032 Patent — including “function block,” “superblock,” “establishing, by the function block, the A/V call between the Superblock application and the resource via a network interface,” “wherein the establishing is not supported by the superblock application,” “a video window within a display window of the superblock application on the mobile device,” “wherein the video window is displayed simultaneously with the display window of the Superblock application,” “initializing the function block, by the superblock application, when the superblock application is loaded into the memory and executed,” and “the request is an application programming interface (API) call from the super block application to the function block” — are “indefinite under 35 U.S.C. § 112(b) for failure to inform, with reasonable certainty, those skilled in the art about the scope of the invention.” Ex. 2003 at 60-61. Petitioner further asserts in the District Court Litigation that many of these same terms are “§112(f) nonce term[s] lacking corresponding structure.” *Id.* Petitioner offers no explanation in the Petition for how these inconsistent positions can be reconciled.

The Director has repeatedly held that such inconsistency, left unexplained, is an independent ground for denying institution. In *Revvo Techs., Inc. v. Cerebrum Sensor Techs., Inc.*, IPR2025-00632, Paper 20 (P.T.A.B. Nov. 3, 2025) (precedential), the Director held that “when a petitioner takes alternative positions before the Board and a district court, that petitioner should, at a minimum, explain why alternative positions are warranted.” *Id.* at 3-4. In *Tesla, Inc. v. Intell. Ventures II LLC*, IPR2025-00340, Paper 18 (P.T.A.B. Nov. 5, 2025) (informative), the Director applied *Revvo* to deny institution where petitioner argued in district court that a claim limitation was indefinite while simultaneously telling the Board that “no claim term requires express construction.” *Id.* at 3.

Most recently, in *Carbyne, Inc. v. Tritech Software Sys.*, IPR2025-00959, Paper 20 (Director Feb. 19, 2026), the Director applied *Revvo* and *Tesla* to a fact pattern that is materially identical to this one. In *Carbyne*, the petitioner argued in District Court that claim terms reciting certain “modules” were indefinite because they should be construed as means-plus-function terms lacking corresponding structure, while arguing before the Board that the same terms required only plain and ordinary meaning. *Id.* at 2-3. The petitioner there—like Petitioner here—attempted to explain away the inconsistency by reframing its District Court position as merely challenging improper functional claiming rather than proposing specific

means-plus-function constructions. *Id.* at 4. The Director rejected that explanation: “Petitioner has engaged in the same inconsistency *Tesla* discourages; namely, arguing indefiniteness in district court and plain and ordinary meaning in this proceeding. . . . [T]his approach ‘detracts from[] the Office’s goal of ‘providing greater predictability and certainty in the patent system.’” *Id.* (quoting *Tesla*, IPR2025-00340, Paper 18 at 4). The Director accordingly granted Director Review, vacated the institution decision, and denied the petition. *Id.* at 4-5.

Petitioner’s posture here is indistinguishable from *Carbyne*. Petitioner tells the Board that claim construction is not required (Pet. at 16) while simultaneously arguing to the District Court that fourteen of the very same claim terms are indefinite and that many of them, including “function block” and “superblock” themselves, are “§112(f) nonce term[s] lacking corresponding structure.” Ex. 2003 at 60-61. Petitioner has provided no explanation for this divergence — not in the Petition, not in the supporting Declaration of Bruce McNair, and nowhere else in the record. Under *Revvo*, *Tesla*, and *Carbyne*, Petitioner’s failure to explain this inconsistency alone justifies denial of institution. *See also Sun Pharms. Indus. Inc. v. Nivagen Pharms., Inc.*, IPR2025-00893, Paper 18 at 3-4 (P.T.A.B. Sept. 19, 2025) (granting discretionary denial where, among other factors, “Petitioner has taken different claim construction positions in this proceeding and the” parallel district court case).

**B. Ground 1: Abuan, Guzman, and Lawson Do Not Render
Claims 1-7 and 9-20 Obvious**

**i. Abuan, Guzman, and Lawson Do Not Disclose or Render
Obvious That the Superblock and Function Block Are Stored
in the Same Memory**

(1) Claims 1 and 15 – “stored in the memory”

The Petitioner argues that Abuan alone discloses “receiving, by a function block stored *in the memory* of the mobile device, a request for an audio/video (A/V) call from a superblock application stored *in the memory* of the mobile device,” as required by Claims 1 and 15 of the ’032 Patent (emphasis added). The Petitioner does not argue that this limitation is inherent or disclosed in view of any reference other than Abuan. Pet. at 32-33. While the Petitioner raises certain arguments regarding “additional functions described by Guzman and Lawson to also be incorporated into Abuan’s modules and components” in view of Guzman and Lawson, these arguments do not bear on the requirement that the superblock and function block be “stored in *the* memory of the mobile device.” *Id.*

This limitation requires that the superblock and function block be stored in the same given memory as each other. Indeed, the storage of the superblock and function block in the same memory is relevant to the advantages of certain patented inventions. See ’032 Patent at 2:36-39 (teaching that running the superblock and function block in a given memory simultaneously provides counterintuitive

advantages to performance and battery life by avoiding “switches between applications . . . [in which] the device 100 may have to swap instructions into and out of physical memory, which impacts performance and battery life.”); *see also id.* at 2:39-54 (explaining that these issues are a particular concern in mobile devices due to limited memory footprint).

But the Petitioner fails to address this requirement, let alone show that it is disclosed.

With respect to the superblock, the Petitioner asserts only that “Abuan’s ‘applications are implemented as software processes that are specified as a set of instructions recorded on a computer readable storage medium,’ such as the memory of Abuan’s mobile device. The modules are comprised of software instructions, such as video conferencing instructions 1986, that are stored in memory.” Pet. at 33 (internal citations omitted). With respect to the function block, the Petitioner asserts only that “Abuan’s various modules and components implementing functions provided to the client application 1365 (e.g., the video conference module 1302) correspond to the claimed ‘function block.’ In other words, the video conferencing and processing module 1300, but excluding client application 1365, corresponds to the claimed ‘function block.’” *Id.* (internal citations omitted). These statements amount to an assertion that Abuan’s client application, mapped to the superblock

application, and Abuan's video conference module, mapped to the function block, are stored in *a* memory of a mobile device, but not that they are stored in *the same* memory as required by this limitation.

This deficiency is compounded by the fact that Abuan discloses numerous different memories in which portions of its client application and video conference module could be stored. For example, Abuan's Figures 13 and 14—on which the Petition itself relies for identification of the superblock and function block—identify numerous different buffers within the video conference module. Pet. at 34. Abuan states that data of its video conference module may be stored on multiple different buffers without any disclosure that such buffers (or the client application) are part of the same memory. *See* Ex. 1005 at [0170] (“In some embodiments, the buffer 1325 is a frame buffer that stores images of a video for display . . .”); *id.* at [0174] (“As shown in FIG. 13, the video conference module 1302 includes . . . buffers 1306, 1310, 1312, 1316, and 1318.”). Abuan discloses these buffers separately from “memory 1970,” and the Petitioner fails to advance any evidence that these buffers are part of memory 1970. Given the Petitioner's reliance on multiple different memories within the video conference module, its failure to even assert that the client and video conference are stored in the same given memory is fatal.

Because the Petitioner fails to show any disclosure of a superblock application and function block that are both “stored in the memory” as recited in independent Claims 1 and 15, the Petition should be denied.

(2) Claim 9 – “a memory . . . including instructions for a superblock application having instructions for a function block included therein”

Claim 9 of the '032 Patent similarly requires “a memory coupled to the processor and configured to store a plurality of instructions executable by the processor, the instructions including instructions for a superblock application having instructions for a function block included therein.”

The Petitioner incorporates the same argument for this limitation as discussed above with respect to the “memory” limitations of Claims 1 and 15, with the added conclusory assertion that it would be obvious to “include therein instructions for the video conference module 1302 and other modules (‘the function block’).” Pet. at 58. Petitioner’s argument suffers from the same deficiencies as above. In addition to failing to show any disclosure that Abuan’s client application and video conference module are stored in the same memory, especially in view of Abuan’s multiple different buffers, the Petitioner fails to show that any related instructions would be stored in the same location. It is far more plausible that those instructions would instead be stored in different buffers related to their corresponding submodule.

Moreover, while Petitioner makes an unsupported assertion that this limitation is obvious, it offers no rationale for storing these elements in the same memory. *Id.*

Petitioner's remaining argument regarding this limitation asserts that it would be obvious to incorporate the function block and superblock application in a single unitary application, but does not address whether various components of that limitation (or related instructions) are stored in the same memory.

ii. Abuan, Guzman, and Lawson Do Not Disclose or Render Obvious a Display Window of the Superblock Application

(1) Claims 1 and 15 – “a video window within a display window of the superblock application”

Independent Claims 1 and 15 each require “providing, by the function block, video output for the A/V call to a video window within a display window *of the superblock application* on the mobile device.” ’032 Patent, Cls. 1, 15 (emphasis added). The Petitioner contends that Abuan discloses this limitation because Abuan's Figure 8 depicts “a picture-in-picture display” of videoconference participants, which Petitioner labels as the “video window,” appearing within what Petitioner labels as the “UI of [the] client application (‘display window’).” Pet. at 48-49. As to Petitioner's theory of the superblock application, the Petitioner maps the claimed “superblock application” to Abuan's client application 1365, while mapping the claimed “function block” to Abuan's “video conferencing and processing module 1300, but excluding client application 1365.” *Id.* at 33.

But there is no disclosure in Abuan that the display window in Figure 8 is *of the superblock application*—that is, of the client application 1365, rather than of the function block (the video conference module 1302, or more specifically the video conference manager 1304 that actually generates the composite images). The Petitioner offers only labels, not evidence, for its conclusion that the display window belongs to the superblock rather than to the function block.

First, the Petitioner acknowledges that the “composite images” depicted in Abuan’s Figure 8 are generated by the video conference manager 1304—which Petitioner admits is part of the *function block*, not the superblock. Pet. at 47 (“Abuan’s video conference manager 1304 is part of ‘the function block.’ Abuan illustrates in Fig. 15 a videoconferencing process performed by videoconference manager 1304.”). Petitioner further admits that the video conference manager 1304 “generate[s] (at 1520) composite images for displaying on the dual camera mobile device (i.e., local display).” *Id.* (quoting Ex. 1005, [0186], [0190]). The Petitioner’s own theory, therefore, has the function block — not the superblock — producing the image being displayed. Petitioner offers no evidence that the *window* in which that image is displayed belongs to the superblock as opposed to the function block that generates the image.

Second, the Petitioner's asserted basis for concluding that the "display window" belongs to the superblock is a string-cite to Abuan paragraphs [0108], [0110], [0112], [0117]-[0129], and [0171]-[0172], and to paragraphs 125 through 127 of the McNair Declaration. Pet. at 49. None of these citations close the gap.

Abuan's paragraphs [0108]-[0129] describe the general user experience of a videoconferencing session on a mobile device—they do not assign ownership of the displayed PIP window to the client application 1365 as distinguished from the video conference module 1302 or the video conference manager 1304 within it.

Abuan's paragraphs [0171]-[0172] describe the client application 1365 and its role in the videoconferencing architecture. The most Abuan says about the client application and displays is that the client application "generates user interfaces that are displayed on the dual camera mobile device and allow a user to interact with the application." Ex. 1005, [0172]. But that sentence is addressed to the client application's own user interfaces—the interfaces "with the application" (i.e., with the VoIP, Skype-like, or instant-messaging client application itself, *see id.*, [0171])—not to the videoconferencing PIP display at issue. The PIP display is generated by a different component: the video conference manager 1304, which Abuan expressly states "generates the PIP or other composite views to display on the mobile device." *Id.*, [0176]. Petitioner cannot paper over that distinction by citing

[0172]’s reference to the client application’s own UIs and using it as evidence that the *videoconferencing* display window is of the client application.

Paragraphs 125-127 of the McNair Declaration compound, rather than cure, the deficiency. McNair para. 125 relies on the same Abuan [0172] sentence just discussed, recasting it as an assertion that “the UI 805 ... is the UI of the client application 1365.” Ex. 1003, ¶ 125. But McNair’s own paragraph 127 then admits that it is “the video conference manager 1304 of the video conference module 1302 (part of ‘the function block’)” that “outputs a PIP display (‘a video window’) of videos from the audio/video conference call.” *Id.*, ¶ 127. McNair thus confirms, not refutes, Patent Owner’s point: the entity that generates and outputs the displayed content is the function block, not the superblock, and the Petitioner offers no non-conclusory showing that the window containing that content is *of* the superblock.

Third, Petitioner’s annotations of Figure 8 cannot substitute for disclosure. Petitioner labels the UI shown in Figure 8 as the “UI of client application” and thereby the “display window.” Pet. at 48. But Abuan itself nowhere states that the user interface shown in Figure 8 is “of” the client application 1365 as opposed to “of” the video conference module 1302. To the contrary, Abuan itself confirms that it is the video conference manager 1304 (part of the function block under Petitioner’s mapping), not the client application 1365, that generates what is displayed: “the

video conference manager 1304 generates the PIP or other composite views to display on the mobile device.” Ex. 1005, [0176]. Petitioner cannot both (i) map the video conference manager 1304 to the function block and (ii) rely on the video conference manager 1304’s generation of the displayed PIP to satisfy a limitation requiring the display window to be *of the superblock*.

Fourth, Petitioner’s annotation of Figure 8 is not evidence of what Abuan discloses. Patent drawings, and particularly party-labeled drawings, cannot supply limitations absent from the written description. *See Hockerson-Halberstadt, Inc. v. Avia Grp. Int’l, Inc.*, 222 F.3d 951, 956 (Fed. Cir. 2000). Abuan’s own text describes the video conference manager 1304, not the client application 1365, as the entity responsible for the composite image displayed in Figure 8.

Petitioner’s reliance on Guzman and Lawson does not cure this defect. Guzman is cited in Ground 1 only for “additional features to also be incorporated into Abuan’s modules and components”—not for any disclosure regarding which entity owns the display window. Pet. at 33. Lawson is cited only for authentication and authorization features. *Id.* at 29, 47. Neither reference addresses whether the display window is of the superblock application as opposed to of the function block, and the Petitioner does not contend otherwise. *See id.* at 47-49.

Because the Petitioner fails to show that Abuan (alone or in combination with Guzman and Lawson) discloses or renders obvious a “video window within a display window *of the superblock application*” as recited in independent Claims 1 and 15, Ground 1 fails with respect to these independent claims for this additional reason.

(2) Claim 9 – “video data to the superblock application for rendering by the superblock application”

Claim 9 of the '032 Patent contains a related but distinct limitation requiring “providing, by the function block, video data to the superblock application for rendering by the superblock application.” '032 Patent, Cl. 9. Claim 9 further requires that “the superblock application renders the video data in a video window that is superimposed on a display of the superblock application.” *Id.*

The Petitioner’s theory for Claim 9 is materially the same as for Claim 1: Petitioner maps the client application 1365 to the superblock and the video conference module 1302 (excluding client application 1365) to the function block, and points again to Abuan’s Figure 8 picture-in-picture display as allegedly satisfying these limitations. Pet. at 67-69. But Claim 9 imposes an additional requirement that Claim 1 does not — namely, that *the superblock application* (not the function block) actually performs the rendering.

The Petitioner offers no disclosure in Abuan that Abuan's client application 1365—the mapped superblock—performs any rendering. Abuan's specification nowhere uses the term “render” or “rendering” to describe any operation attributed to the client application 1365. To the contrary, the only entity Abuan identifies as generating the images that appear in the PIP display is the video conference manager 1304, which Petitioner concedes is part of the function block, not the superblock. Abuan states that “the video conference manager 1304 generates the PIP or other composite views to display on the mobile device.” Ex. 1005, [0176]. Petitioner's own declarant reinforces this point, describing the video conference manager 1304 (not the client application 1365) as the component that “outputs a PIP display (‘a video window’) of videos from the audio/video conference call.” Ex. 1003, ¶ 127. Petitioner's cited disclosures thus support the opposite of the claim requirement: in Abuan, it is the function block — not the superblock — that produces the displayed PIP content. Petitioner does not even attempt to identify any Abuan teaching that the client application 1365 itself renders video content, and Petitioner cannot bridge that gap by substituting the function block's “generation” of composite views for the superblock-performed “rendering” that Claim 9 requires.

Guzman and Lawson do not cure this deficiency either. Neither reference addresses whether rendering is performed by the client application or by the video conference module. The Petitioner makes no contrary argument. Pet. at 67-69.

For these reasons, the Petitioner fails to show that Abuan, Guzman, and Lawson disclose or render obvious the “rendering by the superblock application” requirement of Claim 9, and Ground 1 fails as to Claim 9 for this additional, independent reason.

iii. The Dependent Claims Fall with the Independent Claims

Ground 1 challenges dependent claims 2-7, 10-14, and 16-20 based solely on their dependence from the independent Claims 1, 9, and 15. Pet. at 50-57, 70-71. Because the Petitioner fails to show that the independent claims are rendered obvious for the reasons set forth above, the dependent claims necessarily stand with their respective independents. *See In re Fine*, 837 F.2d 1071, 1076 (Fed. Cir. 1988) (“Dependent claims are nonobvious under section 103 if the independent claims from which they depend are nonobvious.”). No additional disclosure from Abuan, Guzman, or Lawson that Petitioner advances for any dependent claim addresses the deficiencies identified above with respect to the “stored in the memory,” “display window of the superblock application,” or “rendering by the superblock application” limitations. Ground 1 therefore fails in its entirety.

C. Ground 2: The Addition of Ludwig to Abuan, Guzman, Lawson Do Not Render Claims 8 and 21 Obvious and Do Not Cure the Deficiencies of Ground 1

Ground 2 challenges dependent Claims 8 and 21, which depend from independent Claims 1 and 15, respectively. Pet. at 71-80. Ground 2 adds Ludwig to the Abuan-Guzman-Lawson combination of Ground 1, but only for the additional subject matter recited in Claims 8 and 21 (collaboration on “at least one of a document, a file, or an application” via the function block). Pet. at 76-80.

Because Claims 8 and 21 depend from independent Claims 1 and 15, Ground 2 fails for the same reasons Ground 1 fails with respect to Claims 1 and 15. The addition of Ludwig does not cure Petitioner’s failure to show that Abuan (alone or in combination with Guzman and Lawson) discloses a superblock application and function block “stored in the memory” of the same mobile device, nor does it cure Petitioner’s failure to show that the display window is “of the superblock application.” The Petitioner does not argue otherwise: Ludwig is offered only for collaboration features, not for the memory or display-window limitations. Pet. at 76-80. *See In re Fine*, 837 F.2d at 1076. Ground 2 therefore fails.

V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board deny institution of the Petition in its entirety.

Respectfully submitted,

Dated: April 20, 2026

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CERTIFICATE OF WORD COUNT

The undersigned hereby certifies that the portions of the above-captioned PATENT OWNER'S PRELIMINARY RESPONSE specified in 37 C.F.R. § 42.24 has 4,441 words in compliance with the 14,000 word limit set forth in 37 C.F.R. § 42.24. This word count was prepared using Microsoft Word for Office 365.

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CERTIFICATE OF SERVICE

A copy of the foregoing PATENT OWNER'S PRELIMINARY RESPONSE
has been served on Petitioners' counsel of record as follows:

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