

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
HP INC., DELL INC., DELL TECHNOLOGIES INC.,
ASUSTEK COMPUTER INC., ASUS GLOBAL PTE. LTD.,
Petitioners

v.

LITL LLC,
Patent Owner.

IPR2024-00457

U.S. Patent No. 9,880,715

DECLARATION OF DR. HENRY HOUH
REGARDING U.S. PATENT NO. 9,880,715

TABLE OF CONTENTS

I. INTRODUCTION.....	1
II. BACKGROUND AND QUALIFICATIONS.....	2
III. LEVEL OF ORDINARY SKILL IN THE ART.....	6
IV. MATERIALS CONSIDERED AND RELIED UPON.....	7
V. LEGAL STANDARDS.....	10
A. Legal Standards for Prior Art.....	10
B. Legal Standards for Priority Date	11
C. Legal Standards for Obviousness.....	11
VI. SUMMARY OF OPINIONS.....	15
VII. BRIEF DESCRIPTION OF THE TECHNOLOGY	15
VIII. OVERVIEW OF THE '715 PATENT.....	16
A. Subject Matter Overview of the '715 Patent.....	16
B. Brief Summary of '715 Patent Prosecution History	19
C. Brief Summary of Prior Patent Office Proceedings Involving the '715 Patent.....	20
IX. CLAIM CONSTRUCTION	21
A. “plurality of views”	21
B. Means-Plus-Function (“MPF”).....	22
1. “display component”	22
2. “execution component”	22
3. “storage component”	25
X. OVERVIEW OF THE CITED REFERENCES.....	25
A. Pröll (Ex. 1006).....	25
B. Martinez (Ex. 1007)	27
C. Chandhri (Ex. 1011).....	29
D. Preppernau.....	30
XI. DETAILED EXPLANATION OF GROUNDS	31
A. Ground 1: Obviousness over Pröll and Martinez (Claims 1, 19, 20)	31
1. Claim 1.....	31
2. Claim 19: The user interface of claim 1, wherein the first mode is a laptop mode where the keyboard is oriented to be accessible to the	

	operator and wherein the second mode is an easel mode or a frame mode where the keyboard is oriented to be inaccessible to the operator.	49
3.	Claim 20.....	51
B.	Ground 2: Obviousness over Pröll, Martinez, and Chandhri (Claims 2, 15-18)	53
1.	Claim 2: The user interface of claim 1, wherein in the plurality of views includes a home view configured to organize a plurality of content modes and a channel view configured to organize at least one of a single content mode and two content modes.	53
2.	Claim 15: The user interface of claim 1, wherein the plurality of views includes a channel view including a channel selector that displays a sequence of visual representations.	56
3.	Claim 16: The user interface of claim 15, wherein the execution component is further configured to transition the computer system to the channel view in response to receiving user input via at least one input device integral to or operatively connected with the computer system.	58
4.	Claim 17.....	59
5.	Claim 18 The user interface of claim 17, wherein the at least one input device includes at least one of a scroll wheel, a touchpad, and a mouse	62
C.	Ground 3: Obviousness over Pröll, Martinez, and Preppernau (Claims 3-14)	63
1.	Claim 3: The user interface of claim 1, wherein the plurality of views includes a screen saver view configured to organize selected content modes for passive viewing.....	63
2.	Claim 4: The user interface of claim 1, wherein the plurality of views includes a home view organizing a plurality of visual representations of digital content, wherein the home view comprises a header display and a body display, and wherein the header display comprises a lateral frame extending from the left of the display component to the right of the display component, wherein the body display is rendered below the header display in the display component of the computer system.	63
3.	Claim 5: The user interface of claim 4, wherein the computer system configuration comprises a physical positioning of a computer system display relative to a base of the computer system	

	that includes the keyboard about a longitudinal axis of rotation... 68	
4.	Claim 6.....	70
5.	Claim 7: The user interface of claim 1, further comprising a storage component configured to retain a previous view state.	72
6.	Claim 8: The user interface of claim 7, wherein the execution component is further configured to cause the computer system to transition to a previous view in response to execution of a navigation element by a user.	74
7.	Claim 9: The user interface of claim 7, further comprising the navigation element displayed in a header display.	76
8.	Claim 10.....	77
9.	Claim 11: The user interface of claim 10, wherein the home view further comprises an indication of visual representations displayed on adjacent display pages of the home view, wherein the indication is displayed within the body of the home view.	80
10.	Claim 12.....	83
11.	Claim 13.....	88
12.	Claim 14: The user interface of claim 1, wherein the plurality of views includes a quick access view configured to permit user generation of a mapping between digital content and a visual representation.....	92
D.	Ground 4: Obviousness over Pröll and Preppernau (Claims 1, 3-14, 19, 20)	92
1.	Motivation to Combine.....	92
2.	Claim 1.....	94
3.	Claim 3: The user interface of claim 1, wherein the plurality of views includes a screen saver view configured to organize selected content modes for passive viewing.....	101
4.	Claim 4: The user interface of claim 1, wherein the plurality of views includes a home view organizing a plurality of visual representations of digital content, wherein the home view comprises a header display and a body display, and wherein the header display comprises a lateral frame extending from the left of the display component to the right of the display component, wherein the body display is rendered below the header display in the display component of the computer system.	102
5.	Claim 5: The user interface of claim 4, wherein the computer	

	system configuration comprises a physical positioning of a computer system display relative to a base of the computer system that includes the keyboard about a longitudinal axis of rotation.	102
6.	Claim 6.....	103
7.	Claim 7: The user interface of claim 1, further comprising a storage component configured to retain a previous view state. ..	103
8.	Claim 8: The user interface of claim 7, wherein the execution component is further configured to cause the computer system to transition to a previous view in response to execution of a navigation element by a user.	104
9.	Claim 9: The user interface of claim 7, further comprising the navigation element displayed in a header display.	104
10.	Claim 10.....	105
11.	Claim 11: The user interface of claim 10, wherein the home view further comprises an indication of visual representations displayed on adjacent display pages of the home view, wherein the indication is displayed within the body of the home view.	106
12.	Claim 12.....	106
13.	Claim 13.....	106
14.	Claim 14: The user interface of claim 1, wherein the plurality of views includes a quick access view configured to permit user generation of a mapping between digital content and a visual representation.....	108
15.	Claim 19: The user interface of claim 1, wherein the first mode is a laptop mode where the keyboard is oriented to be accessible to the operator and wherein the second mode is an easel mode or a frame mode where the keyboard is oriented to be inaccessible to the operator.	109
16.	Claim 20.....	109
E.	Ground 5: Obviousness over Pröll, Preppernau, and Chandhri (Claims 2, 15-18).....	111
	1. Claim 2: “The user interface of claim 1, wherein in the plurality of views includes a home view configured to organize a plurality of content modes and a channel view configured to organize at least one of a single content mode and two content modes.”	111
	2. Claim 15: “The user interface of claim 1, wherein the plurality of views includes a channel view including a channel selector that	

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.