

EXHIBIT 7

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

SLYDE ANALYTICS, LLC,

Patent Owner.

Patent No. 9,651,922
Filing Date: December 22, 2011
Issue Date: May 16, 2017

Inventors: Jörg Hysek and Pascal Pozzo Di Borgo
Title: WRISTWATCH WITH A TOUCH SCREEN AND
METHOD FOR DISPLAYING ON A TOUCH-SCREEN WATCH

PATENT OWNER'S PRELIMINARY RESPONSE

Case No. IPR2024-00002

Claim 24 is an independent claim, which is not rendered obvious by Louch in view of Duarte, for at least the same reasons as noted for Ground 1 on which Petitioner's Ground 3 relies. Pet. at 48-49.

D. Ground 4: Claim 1 is Not Obvious Over the Combination of Louch in view of Park

Claim 23 is an independent claim, which is not rendered obvious by Louch in view of Park, for at least the same reasons as noted for Ground 1 on which Petitioner's Ground 4 relies. Pet. at 51.

E. Ground 5: Claim 1 is Not Obvious Over the Combination of Duarte, Biggs, and Hotelling

- 1. The Petition Does Not Show that the Combination of Duarte, Biggs, and Hotelling Discloses “*wherein said processing circuit is specifically laid out so as to cause said several available cards to scroll past in order to lastingly replace the initially displayed card with a replacement card selected between said several available cards, wherein each card of said several available cards has a distinct fixed or periodically refreshed image,*” as Required by Claim Element 1[e]**

Claim 1 of the '922 Patent recites “wherein said processing circuit is specifically laid out so as to cause said several available cards to scroll past in order to lastingly replace the initially displayed card with a replacement card selected between said several available cards, wherein each card of said several available cards has a distinct fixed or periodically refreshed image.” Petitioner only relies on Duarte to disclose this claim limitation. Pet. at 59-61.

The Petition does not cite any evidence that Duarte discloses the claimed “said several available cards to scroll past.” The sole portion of Duarte’s specification relied on by Petitioner, Ex. 1010, 7:51-56, shows that the display’s focus can move from window 301B to window 301E. Pet., 60. The Petition does not disclose how Duarte accomplishes this change in focus. In fact, the specification discloses that “the user can repeatedly drag windows 301 in a leftward direction to cause windows 301C, 301D, and 301E to successively occupy the central position.” Ex. 1010, 7:60-63. In another embodiment, the user can click on a partially displayed window to move it to a central position. *Id.*, 7:63-8:2. Petitioner points to no evidence that Duarte discloses a scrolling operation that causes “several available cards to scroll past.”

Additionally, the Petition does not cite evidence that Duarte discloses the claimed “said several available cards has a distinct fixed or periodically refreshed image.” With respect to this claim limitation, Petitioner only describes that Duarte’s windows “show applications or other activities in operation.” Pet., 60-61 (citing Ex. 1010, 7:18-21). However, just because applications or activities are operating does not automatically imply that images of those applications are refreshed or even that they have a distinct fixed image associated with them. Notably, Petitioner relies solely on one sentence of unsupported expert testimony to close the gap between Duarte’s disclosure and the claimed limitation. *See* Pet. at 61 (“[t]o reflect the

progress of the activities, windows 301 would be “periodically refreshed”) (citing Ex-1002 ¶ 276).

For these reasons, the Petition is deficient because it fails to show that the combination of Duarte, Biggs, and Hotelling renders obvious claim element 1[e].

2. The Petition Does Not Show that the Combination of Duarte, Biggs, and Hotelling Discloses “*wherein the size of the image corresponds to the size of said digital matrix display so that the displayed card occupies the whole of said digital matrix display,*” as Required by Claim Element 1[f]

Claim 1 of the ’922 Patent recites “wherein the size of the image corresponds to the size of said digital matrix display so that the displayed card occupies the whole of said digital matrix display.” Petitioner only relies on Duarte to disclose this claim limitation. Pet. at 61.

In particular, Petitioner relies on only one phrase from Duarte, which discloses a “full-screen mode.” *Id.* (citing Ex. 1010, 2:62-63). On its face, Duarte does not disclose this claim limitation because in Duarte’s “full-screen mode, *one activity* occupies *substantially* an entire display screen” – not the claimed “whole of said digital matrix display.” *Id.* (emphasis added).

Therefore, the Petition is deficient because it fails to show that the combination of Duarte, Biggs, and Hotelling renders obvious this claim limitation.

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