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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

ARABILITY IP LLC,

Plaintiff,

v.

HTC AMERICA, INC.,

Defendant.

CASE NO. 2:22-CV-1051

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Arability IP LLC files this Complaint for Patent Infringement against HTC America, Inc., and would respectfully show the Court as follows:

I. NATURE OF THE LAWSUIT

1. This is an action for patent infringement under the Patent Laws of the United States, Title 35 United States Code (“U.S.C.”) resulting from HTC America, Inc. infringing, in an illegal and unauthorized manner and without authorization and/or consent from Arability IP LLC, United States Patent No. 11,262,908 pursuant to 35 U.S.C. §271, and to recover damages, attorney’s fees, and costs.

II. THE PARTIES

1 2. Plaintiff Arability IP LLC (“Arability” or “Plaintiff”) is a Texas
2 limited liability company having an address at 6009 W Parker Rd, Ste 149 – 1090,
3 Plano, TX 75093-8121.
4

5 3. On information and belief, Defendant HTC America, Inc.
6 (“Defendant”) is a corporation organized and existing under the laws of
7 Washington, with its principal place of business at 308 Occidental Ave S, Ste. 300,
8 Seattle, WA 98104. Defendant has a registered agent at Cogency Global, Inc.,
9
10 1780 Barnes Blvd SW, Tumwater, WA, 98512.
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III. JURISDICTION AND VENUE

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14 4. This action arises under the patent laws of the United States, Title 35
15 of the United States Code. This Court has subject matter jurisdiction of such
16 action under 28 U.S.C. §§ 1331 and 1338(a).
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18 5. On information and belief, Defendant is subject to this Court’s
19 specific and general personal jurisdiction, pursuant to due process and the
20 Washington Long-Arm Statute, due at least to its business in this forum, including
21 at least a portion of the infringements alleged herein. Furthermore, Defendant is
22 subject to this Court’s specific and general personal jurisdiction because Defendant
23 maintains its principal place of business in Washington.
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6. Without limitation, on information and belief, within this State and this District, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Washington and the Western District of Washington. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Washington and the Western District of Washington. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Washington and the Western District of Washington. Defendant has committed such purposeful acts and/or transactions in Washington and the Western District of Washington such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

7. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant maintains its principal place of business within this District. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

8. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

IV. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 11,262,908)

9. Plaintiff incorporates the above paragraphs herein by reference.

10. On March 1, 2022, United States Patent No. 11,262,908 (“the ‘908 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘908 Patent is titled “Method of Adjusting an UI and User Terminal Using the Same.” A true and correct copy of the ‘908 Patent is attached hereto as Exhibit A and incorporated herein by reference.

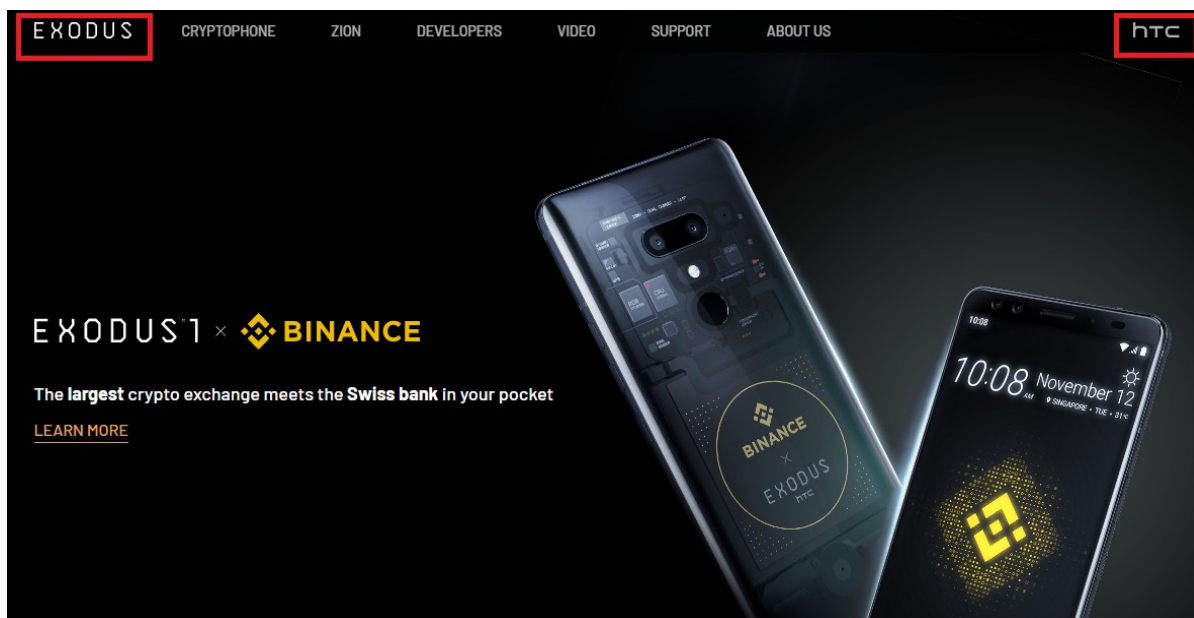
11. Arability is the assignee of all right, title, and interest in the ‘908 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘908 Patent. Accordingly, Arability possesses the exclusive right and standing to prosecute the present action for infringement of the ‘908 Patent by Defendant.

12. The invention in the ‘908 Patent relates to the field of user interfaces (“UI”) and adjusting the UI for a user terminal. (Ex. A at 1:25-26).

13. The invention solves the problem of UIs failing to provide a sufficient interface to allow one handed use. (*Id.* at 1:30-37). In recent times the display size of smart phones has increased making it easier to view video clips and other visual displays. (*Id.* at 1:30-30-32). However, as the size of the smartphones get larger, it

1 becomes more difficult to manipulate the smartphone with one hand. (*Id.* at 1:32-
2 33). When manipulating a smart phone with one hand, the thumb is used in most
3 cases, but since the thumb is shorter compared to the other fingers, manipulation of
4 the smartphone display becomes more difficult as the display size increases. (*Id.* at
5 1:33-37). The inventors therefore created a new method for adjusting a user
6 interface to allow the screen to be more easily manipulated using one hand and
7 with a thumb. (*Id.* at 1:65-2:3).

9 14. **Direct Infringement.** Upon information and belief, Defendant has
10 been directly infringing claims 1-2, 4-5, and 9 of the ‘908 Patent in Washington,
11 and elsewhere in the United States, by performing the claimed method for
12 adjusting a user interface on a user terminal using the HTC Exodus 1 (“Accused
13 Instrumentality”):
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(E.g., <https://www.htcexodus.com/us/>).

WHAT IS THE EXODUS 1?

EXODUS 1 is a Cryptophone - a next-generation device that combines the usability of the smartphone and the security of a hardware wallet. With Zion - the Bank of EXODUS - the user can easily buy, receive, store crypto assets all on the phone, without the risk of hacking and other forms of malware.

STORING CRYPTO ON YOUR PHONE: WHAT'S THE BIG DEAL?

Most app-based wallets (where you automatically store your newly-purchased crypto) is always connected to the internet and therefore susceptible to hacking and stealing. With EXODUS 1, it is more than meets the eyes. Under the hood, we use the best hardware and software technologies to create Zion - the perfect wallet with an easy-to-use software integrated with on-board hardware security.



Zion - Bank of EXODUS

The Zion Vault uses the Trusted Execution Environment (TEE) to protect your private keys and sensitive data. When signing transactions, the TEE activates and temporarily isolates the operating



Trusted UI




The keyboard is prone to attacks from malware and fake interfaces trying to phish your information. The trusted UI uses the TEE to guard your assets and sensitive data.

(E.g., <https://www.htcexodus.com/us/cryptophone/exodus1/>).

Using One-handed mode

In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-handed mode so you can make the screen smaller within easy reach.

1. To switch to One-handed mode, do one of the following:

- o Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation Bar. Then tap  on the Navigation Bar.
- o In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the Navigation Bar.
- o Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

Edge Sense double-tap gesture

By default, double-tapping the lower left or right side of your phone changes your screen to One-hand mode.

You can assign a different action or app and adjust the double-tap sensitivity level.

1. From the Home screen, swipe up and then tap Settings > Edge Sense.
2. Tap Set double tap action.

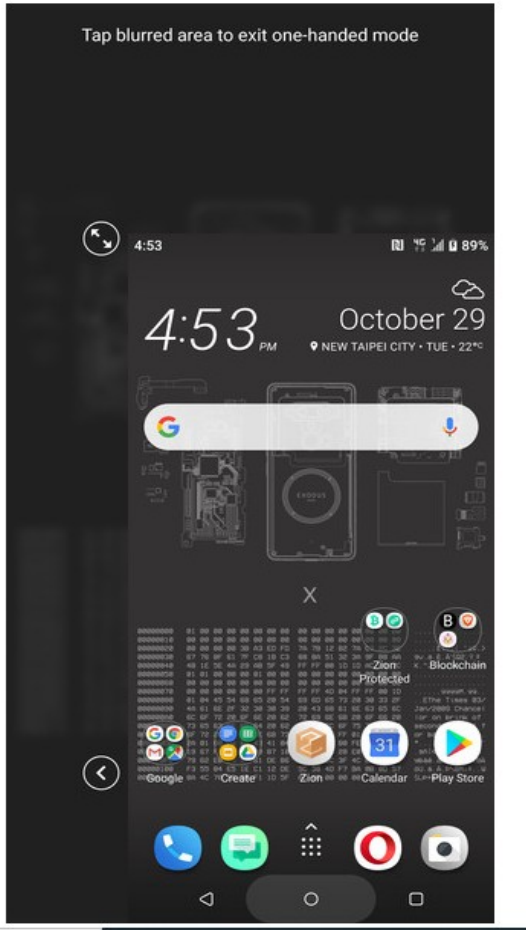
(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).



[mode.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)).

(E.g.,

<https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).



(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

15. As shown below, the Accused Instrumentality performs the step of displaying a UI on a display unit of a user terminal (e.g., display screen of the Accused Instrumentality), wherein the display unit includes a screen that defines a screen size.



(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

FULL SPECS

Display	6.0" Quad HD+ display with 18:9 aspect ratio
Battery	3500mAh
Camera	12MP + 16MP main camera with high quality zoom 8MP+8MP dual front camera with natural Bokeh

(*E.g.*, <https://www.htcexodus.com/us/cryptophone/exodus1/>).

1 16. As shown below, the Accused Instrumentality performs the step of
2 displaying a UI, wherein the UI includes an upper area displaying status
3 information (*e.g.*, battery, signal strength, etc.) pertaining to the user terminal,
4 wherein the status information includes an indication of battery charge, and a lower
5 area displaying a plurality of selectable input receiving units (*e.g.*, input receiving
6 interfaces); wherein the plurality of selectable input receiving units comprises one
7 or more software applications (*e.g.*, applications like phone, camera, etc.)
8 represented by graphical icons (*e.g.*, icons of applications); wherein a size of the
9 upper area and lower area in relation to the UI defines a ratio. As shown, the upper
10 area and lower area changes in proportion, during one-hand mode, defining a ratio.
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Upper area displaying status information

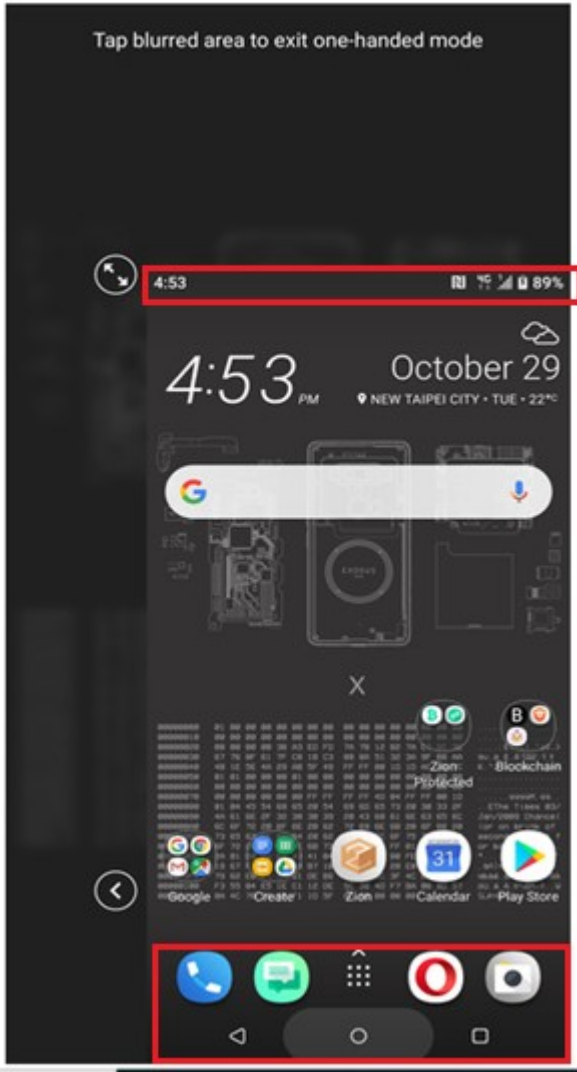
Lower area displaying a plurality of selectable input receiving units

(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

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(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).



(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

17. As shown below, the Accused Instrumentality performs the step of displaying a UI, wherein the UI and the screen size are initially substantially equal in size, thereby defining an initial UI size.






UI and the screen size are initially substantially equal

(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

Using One-handed mode

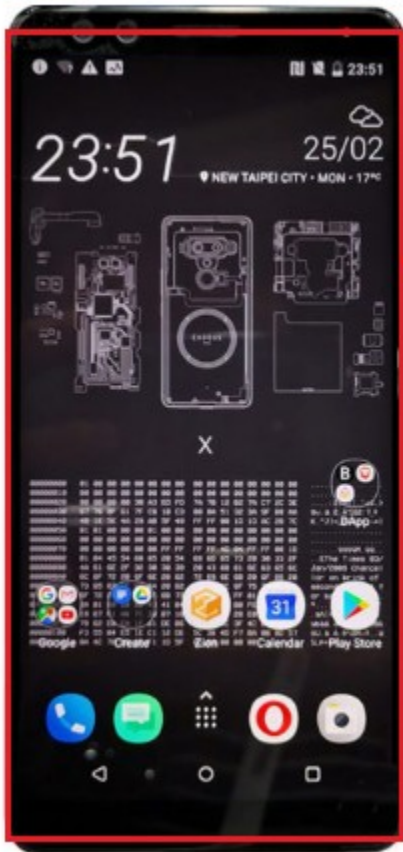
In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-handed mode so you can make the screen smaller within easy reach.

1. To switch to One-handed mode, do one of the following:

- o Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation Bar. Then tap  on the Navigation Bar.
- o In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the Navigation Bar.
- o Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

18. As shown below, the Accused Instrumentality performs the step of receiving a first touch event (e.g., Double-tapping the lower left or right side of the phone).





UI and the screen size are initially substantially equal


(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

Using One-handed mode

1 In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-
2 handed mode so you can make the screen smaller within easy reach.

3 1. To switch to One-handed mode, do one of the following:

- 4 ○ Add the One-handed mode icon  to the Navigation Bar. See [Customizing the Navigation](#)
5 Bar. Then tap  on the Navigation Bar.

- 6 ○ In [Settings > Display & gestures](#), turn on [One-handed mode](#). Then tap  thrice on the
7 [Navigation Bar](#).

- 8 ○ [Double-tap the lower left or right side of your phone](#) See [Edge Sense double-tap gesture](#).

9 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
10 [mode.html](#)).

11 Edge Sense double-tap gesture

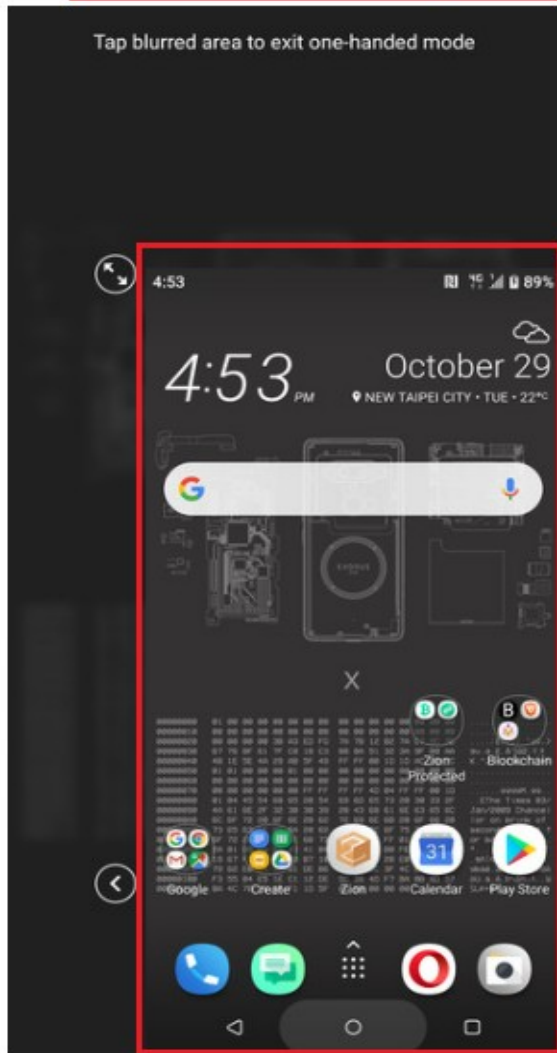
12 By default, double-tapping the lower left or right side of your phone changes your screen
13 to One-hand mode.

14 You can assign a different action or app and adjust the double-tap sensitivity level.

- 15 1. From the Home screen, swipe up and then tap [Settings > Edge Sense](#).
- 16 2. Tap [Set double tap action](#).

17 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/edge-sense-double-
18 [tap.html](#)).

- o Double-tap the lower left or right side of your phone. See [Edge Sense double-tap gesture](#).



a first touch event


18 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).


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21 19. As shown below, the Accused Instrumentality performs the step of
22 resizing the UI into a reduced form to define a reduced UI according to the first
23 touch event (e.g., Double-tapping the lower left or right side of the phone), wherein
24 the reduced UI is smaller than the screen size and wherein a difference in area
25 between the reduced UI and the screen size defines a space.
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Using One-handed mode

1 In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-
2 handed mode so you can make the screen smaller within easy reach.

3 1. To switch to One-handed mode, do one of the following:

- 4 o Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation

5 Bar. Then tap  on the Navigation Bar.

- 6 o In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the
7 Navigation Bar.

- 8 o Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

9 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
10 [mode.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)).

11 Edge Sense double-tap gesture

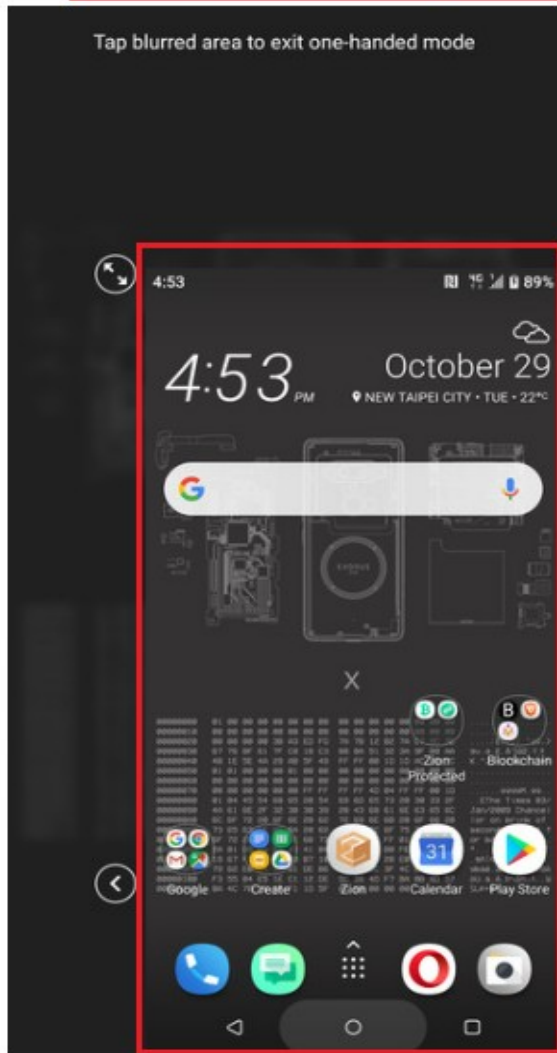
12 By default, double-tapping the lower left or right side of your phone changes your screen
13 to One-hand mode.

14 You can assign a different action or app and adjust the double-tap sensitivity level.

- 15 1. From the Home screen, swipe up and then tap Settings > Edge Sense.
16 2. Tap Set double tap action.

17 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/edge-sense-double-
18 [tap.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/edge-sense-double-tap.html)).

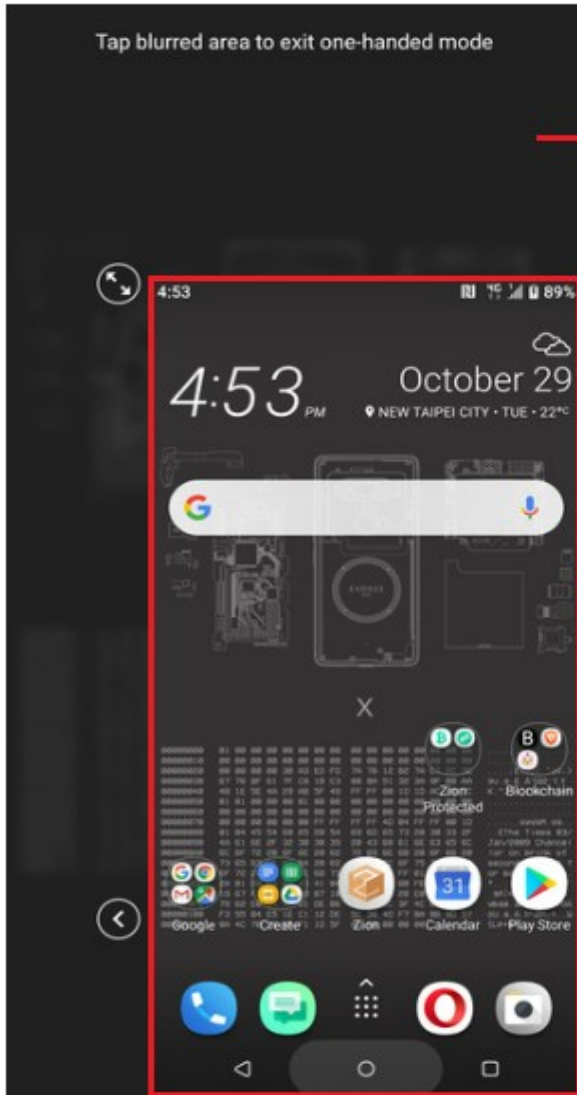
- o Double-tap the lower left or right side of your phone. See [Edge Sense double-tap gesture](#).



a first touch event

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(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).



Difference in area between the reduced UI and the screen size defines a space

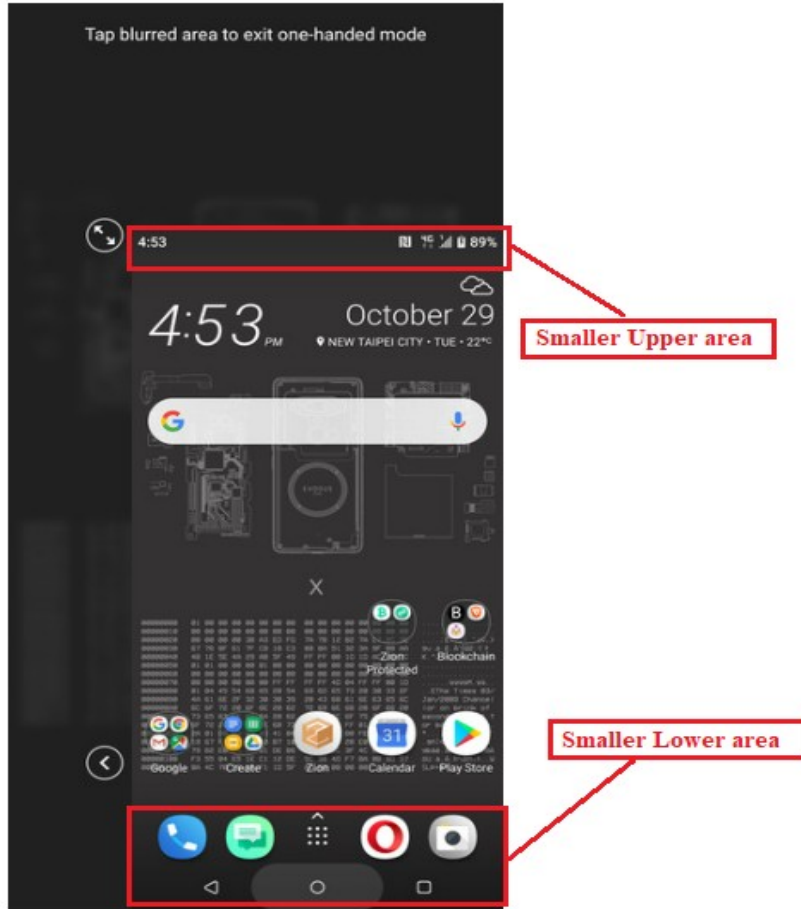
Reduced UI - Smaller than the screen size

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(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

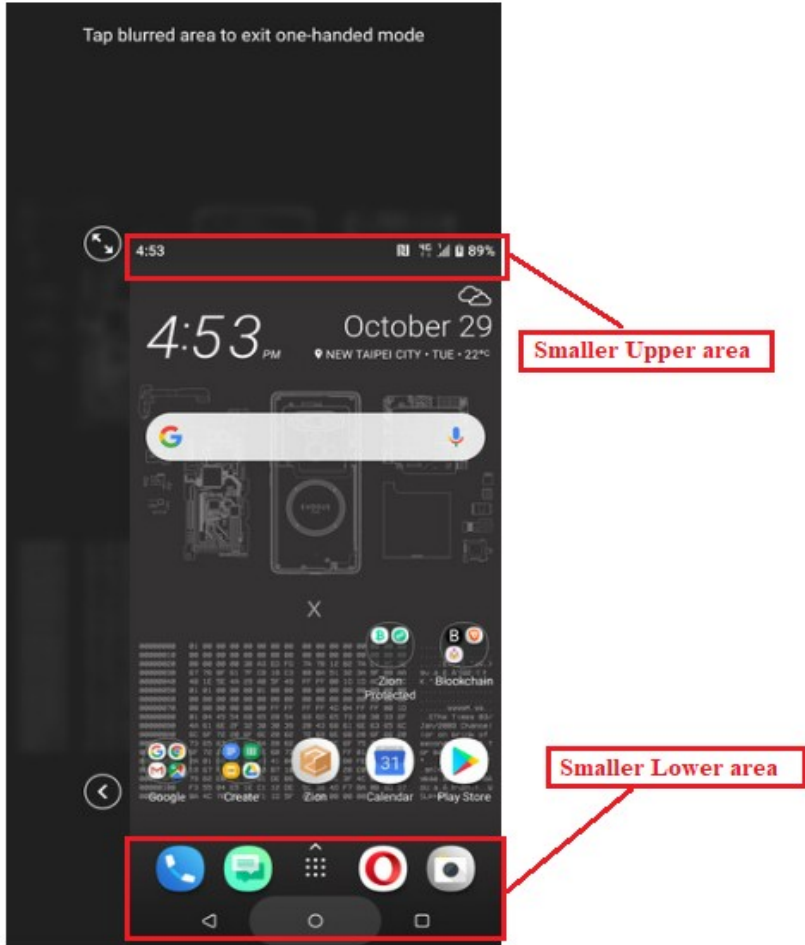
20. As shown below, the Accused Instrumentality performs the step of displaying the reduced UI wherein the reduced UI defines a smaller upper area and a smaller lower area, wherein a size of the smaller upper area and smaller lower area in relation to the reduced UI substantially maintains the ratio. As shown

below, the upper area and lower area changes in proportion, during one-hand mode, defining a ratio.

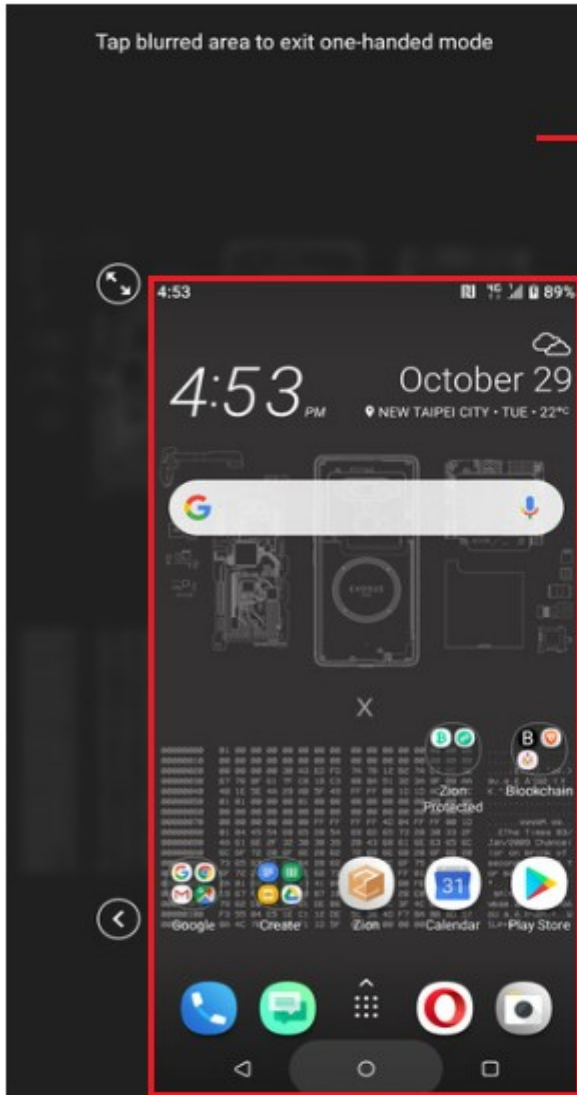


(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

21. As shown below, the Accused Instrumentality performs the step of defining the space wherein the space excludes the smaller upper area and smaller lower area.



(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).



Difference in area between the reduced UI and the screen size defines a space

Reduced UI - Smaller than the screen size

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(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).




22. As shown below, the Accused Instrumentality performs the step of executing an application (e.g., phone, camera, settings, etc.) within the reduced UI when the application is requested to be executed by a user while the reduced UI is

being displayed. As shown below, the Accused Instrumentality practices executing the settings application within the reduced UI.

Using One-handed mode

In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-handed mode so you can make the screen smaller within easy reach.

1. To switch to One-handed mode, do one of the following:

- o Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation Bar. Then tap  on the Navigation Bar.
- o In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the Navigation Bar.
- o Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

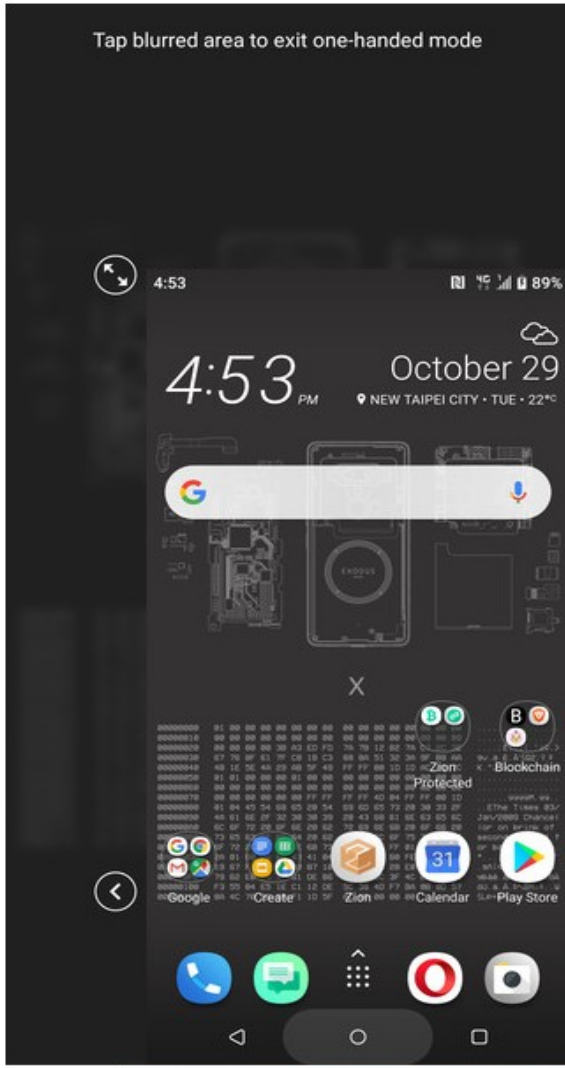
Edge Sense double-tap gesture

By default, double-tapping the lower left or right side of your phone changes your screen to One-hand mode.

You can assign a different action or app and adjust the double-tap sensitivity level.

1. From the Home screen, swipe up and then tap Settings > Edge Sense.
2. Tap Set double tap action.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/edge-sense-double-tap.html).





(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).


23. As shown below, the Accused Instrumentality performs the step of receiving a second touch event (e.g., a second touch event to enlarge the display).

Using One-handed mode

1 In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-
2 handed mode so you can make the screen smaller within easy reach.

3 1. To switch to One-handed mode, do one of the following:



- 4 ○ Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation
5 Bar. Then tap  on the Navigation Bar.



- 6 ○ In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the
7 Navigation Bar.

- 8 ○ Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

9 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
10 [mode.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)).

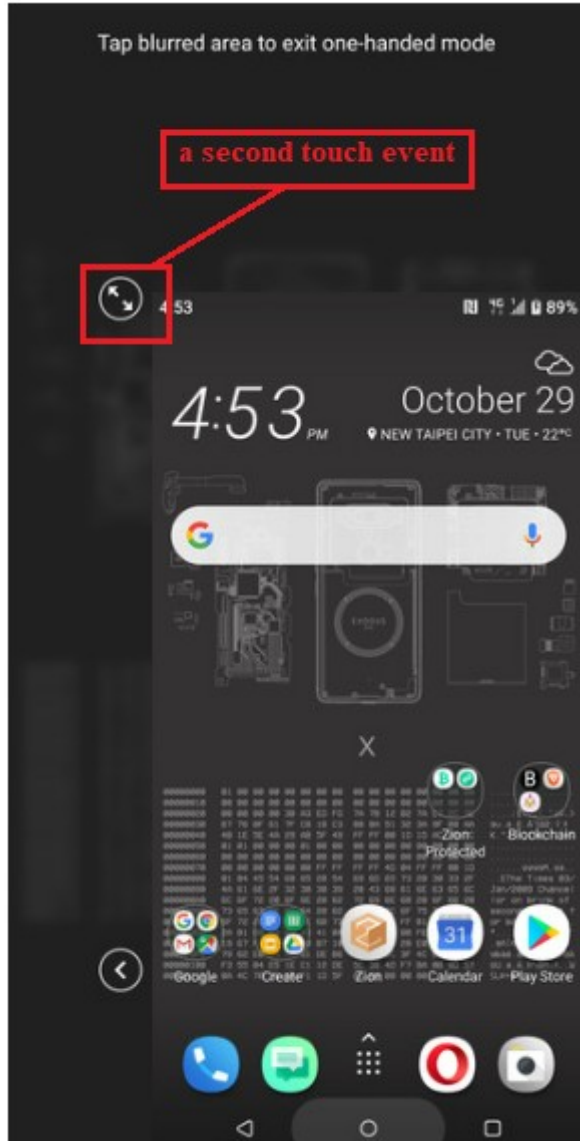
11 2. With the screen shrunk, you can:

- 12 ○ Tap  or  to display the screen on the left or right side.

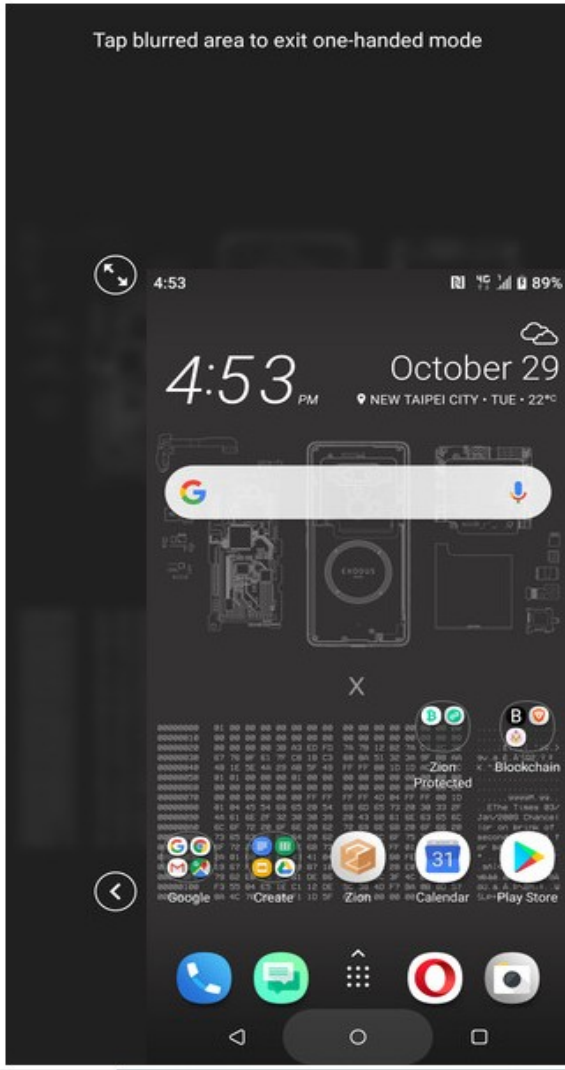
- 14 ○ Drag  or  to resize the screen.

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16 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
17 [mode.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)).

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(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).





(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).


24. As shown below, the Accused Instrumentality performs the step of resizing the reduced UI into an enlarged UI according to the second touch event (e.g., a second touch event to enlarge the display), wherein the enlarged UI is larger than the reduced UI; wherein the enlarged UI defines an enlarged upper area and enlarged lower area.

Using One-handed mode

1 In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-
2 handed mode so you can make the screen smaller within easy reach.

3 1. To switch to One-handed mode, do one of the following:



- 4 ○ Add the One-handed mode icon  to the Navigation Bar. See [Customizing the Navigation](#)
5 Bar. Then tap  on the Navigation Bar.

- 6 ○ In [Settings > Display & gestures](#), turn on [One-handed mode](#). Then tap  thrice on the
7 [Navigation Bar](#).

- 8 ○ [Double-tap the lower left or right side of your phone](#) See [Edge Sense double-tap gesture](#).

9 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
10 [mode.html](#)).

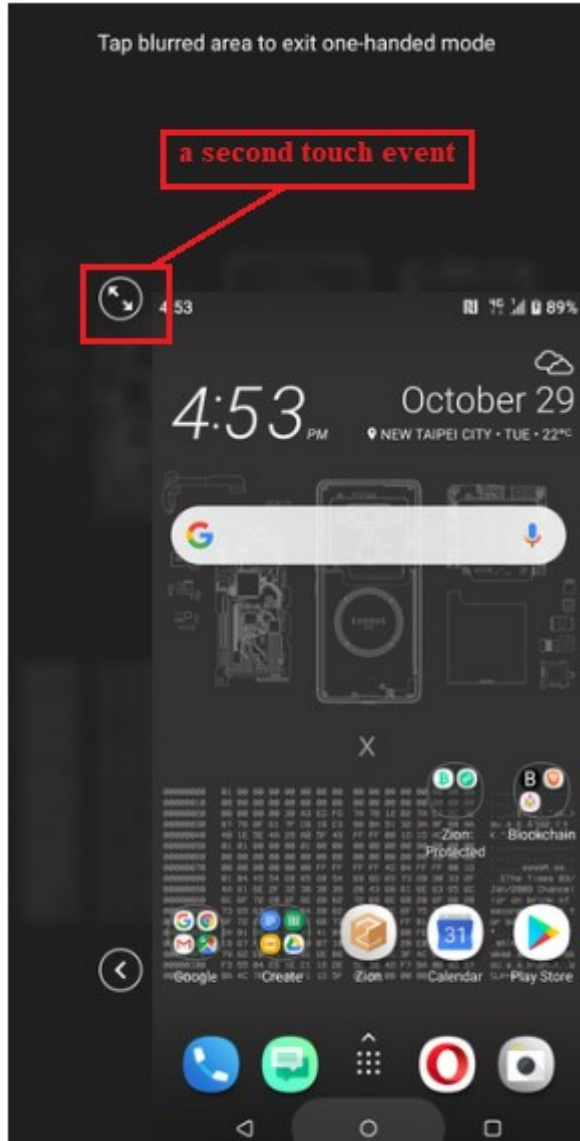
11 2. With the screen shrunk, you can:

- 12 ○ Tap  or  to display the screen on the left or right side.

- 14 ○ [Drag !\[\]\(5950fde355bafc747b20583b30242b59_img.jpg\) or !\[\]\(2ba4b990a9f2ed1d09a614c2477547e9_img.jpg\) to resize the screen.](#)

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16 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
17 [mode.html](#)).

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(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).



**Enlarged UI
larger than the
reduced UI**

14 (E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

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(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

25. As shown below, the Accused Instrumentality performs the step of wherein a size of the enlarged upper area and enlarged lower area in relation to the enlarged UI maintains the ratio. As shown below, the upper area and lower area changes in proportion, during one-hand mode, defining a ratio.

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**Enlarged UI
larger than the
reduced UI**

(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

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**Enlarged Upper
and enlarged
lower area**

(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

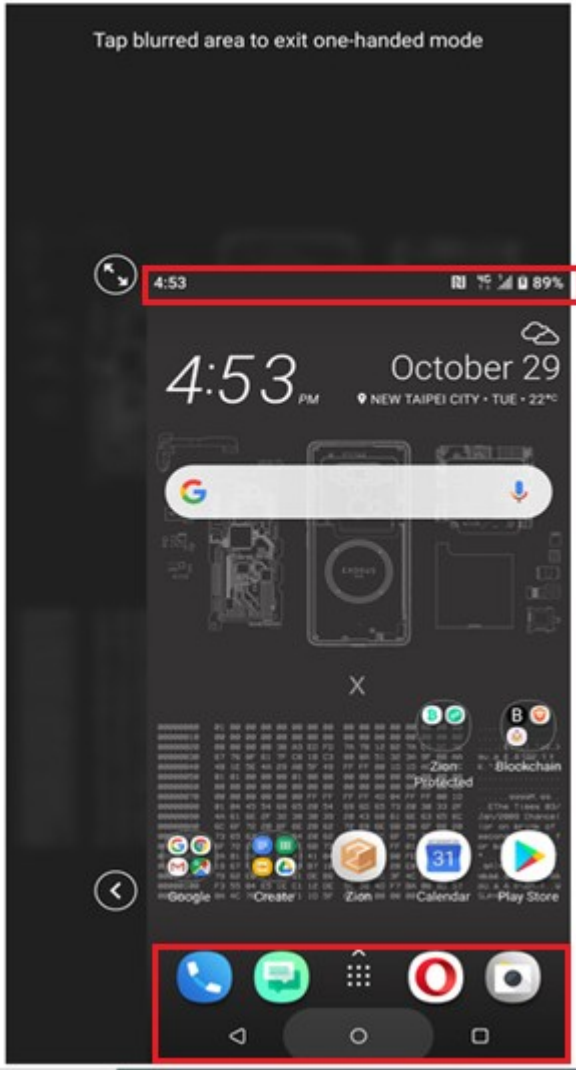
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Upper area displaying status information

Lower area displaying a plurality of selectable input receiving units

(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).



18 (E.g., [https://www.htcexodus.com/us/support/exodus-one/category_howto/using-](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)
19 [one-handed-mode.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)).




20
21 26. The Accused Instrumentality satisfies the limitation of dependent
22 claim 2 because, as shown below, the Accused Instrumentality performs the step of
23 wherein the reduced UI is displayed on a left side, a lower left side, a right side, or
24

a lower right side of the display unit. As shown below, the reduced UI can be displayed on a lower left side or a lower right side of the display unit.

Using One-handed mode

In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-handed mode so you can make the screen smaller within easy reach.

1. To switch to One-handed mode, do one of the following:

- o Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation Bar. Then tap  on the Navigation Bar.
- o In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the Navigation Bar.
- o Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

Edge Sense double-tap gesture

By default, double-tapping the lower left or right side of your phone changes your screen to One-hand mode.

You can assign a different action or app and adjust the double-tap sensitivity level.

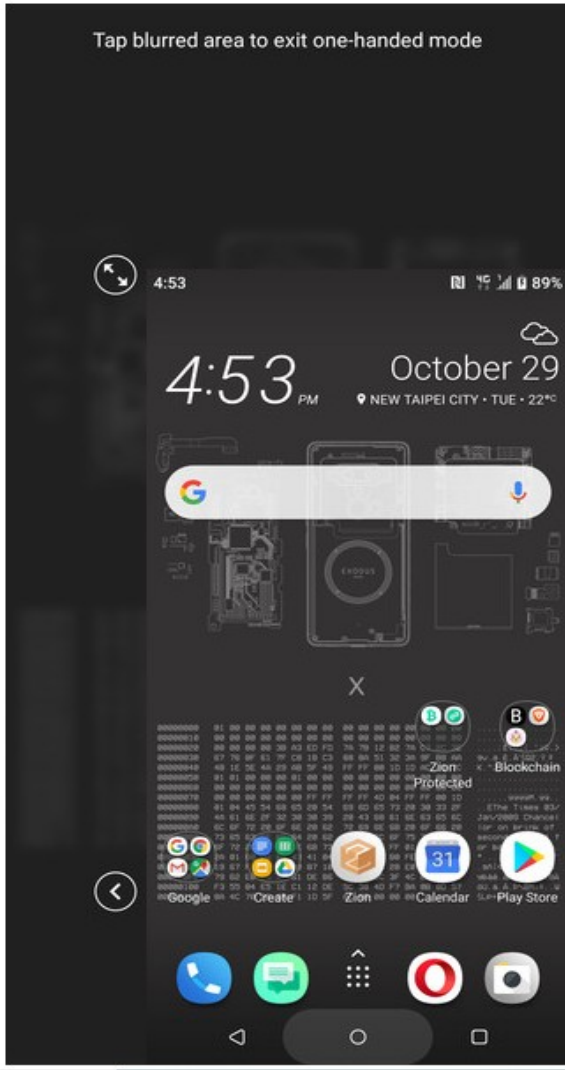
1. From the Home screen, swipe up and then tap Settings > Edge Sense.
2. Tap Set double tap action.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/edge-sense-double-tap.html).

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(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).



(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).




27. The Accused Instrumentality satisfies the limitation of dependent claim 4 because, as shown below, the Accused Instrumentality performs the step of receiving a third touch event (e.g., swipe up diagonally from bottom left corner of the screen); shifting the reduced UI to a position that is adjacent to a left side of the display unit in accordance with the third touch event. As shown below, the

Accused Instrumentality displays an icon for adjusting the position of the reduced form of display.

Using One-handed mode





In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-handed mode so you can make the screen smaller within easy reach.

1. To switch to One-handed mode, do one of the following:

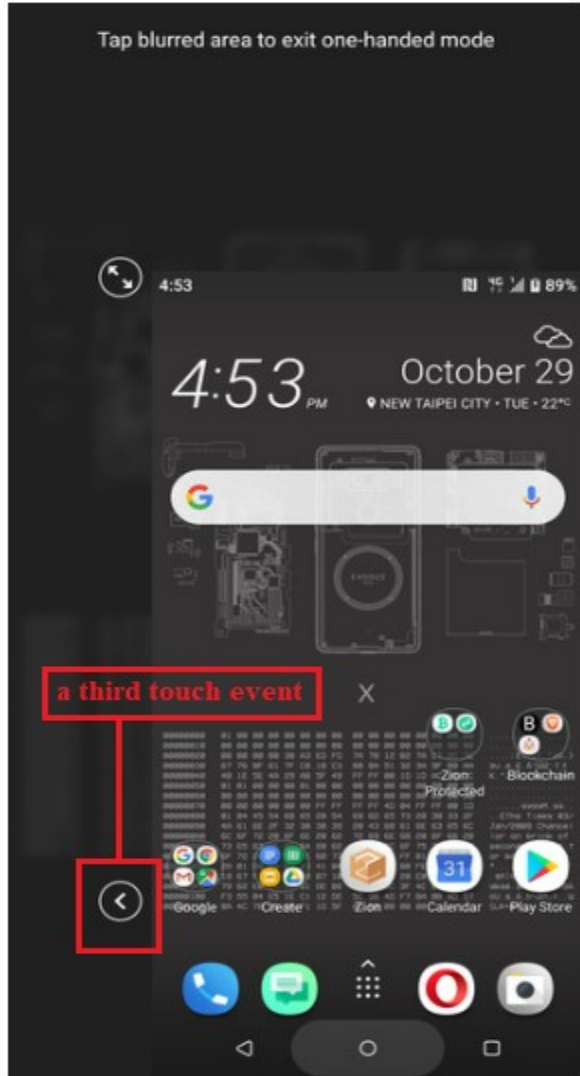
- Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation Bar. Then tap  on the Navigation Bar.
- In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the Navigation Bar.
- Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

2. With the screen shrunk, you can:

- Tap  or  to display the screen on the left or right side.
- Drag  or  to resize the screen.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).



(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).




28. The Accused Instrumentality satisfies the limitation of dependent claim 5 because, as shown below, the Accused Instrumentality performs the step of receiving a third touch event (e.g., swipe up diagonally from bottom right corner of the screen); shifting the reduced UI to a position that is adjacent to a right side of

the display unit in accordance with the third touch event. As shown below, the
1 Accused Instrumentality displays an icon for adjusting the position of the reduced
2 form of display.

3 Using One-handed mode





4 In certain large-screen phones, navigating the screen single-handedly may not be easy. Switch to One-
5 handed mode so you can make the screen smaller within easy reach.

6 1. To switch to One-handed mode, do one of the following:

- 7
- 8 ○ Add the One-handed mode icon  to the Navigation Bar. See Customizing the Navigation
9 Bar. Then tap  on the Navigation Bar.
 - 10 ○ In Settings > Display & gestures, turn on One-handed mode. Then tap  thrice on the
11 Navigation Bar.
 - 12 ○ Double-tap the lower left or right side of your phone. See Edge Sense double-tap gesture.

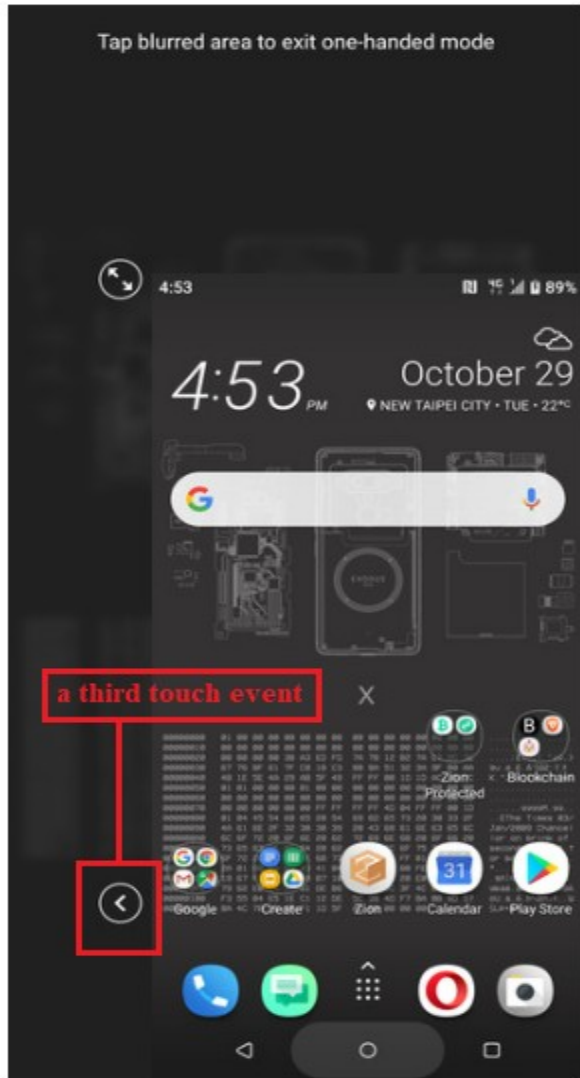
13 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
14 [mode.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)).

15 2. With the screen shrunk, you can:

- 16 ○ Tap  or  to display the screen on the left or right side.
- 17
- 18 ○ Drag  or  to resize the screen.

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20 (E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-
21 [mode.html](https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html)).







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(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).


29. The Accused Instrumentality satisfies the limitation of dependent claim 9 because, as shown below, the Accused Instrumentality performs the step of receiving a fourth touch event (e.g., tapping outside reduced display area); resizing

the reduced UI to the initial UI size (full screen) in accordance with the fourth touch event.

2. With the screen shrunk, you can:

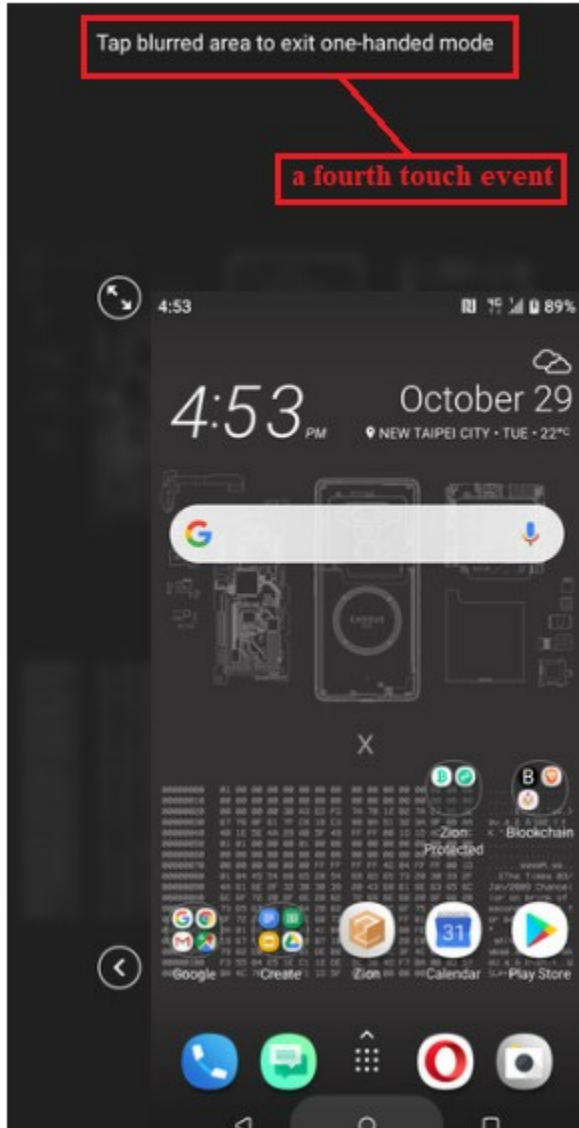
- Tap  or  to display the screen on the left or right side.
- Drag  or  to resize the screen.

3. To switch back to the normal screen size, do one of the following:

- Tap  on the Navigation Bar.
- Tap the blurred area on your screen.
- Double-tap the lower left or right side of your phone.

(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

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(E.g., https://www.htcexodus.com/us/support/exodus-one/category_howto/using-one-handed-mode.html).

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Reduced UI resized to initial UI in accordance with the fourth touch event

(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).



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(E.g., <https://www.deepspecs.com/item/htc-exodus-1/#aps-specs>).

30. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '908 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

31. Arability is only asserting method claims in this complaint and as such the marking requirements of 35 U.S.C. 287(a) do not apply and have thus

1 been complied with. *Crown Packaging Technology, Inc. v. Rexam, Beverage Can*
2 *Co.*, 559 F.3d 1308, 1316-1317 (Fed. Cir. 2009) (“Because Rexam asserted only
3 the method claims of the ‘839 patent, the marking requirement of 35 U.S.C.
4 287(a) does not apply.”); *Hanson v. Alpine Valley Ski Area, Inc.*, 718 F.2d 1075,
5 1083 (Fed.Cir. 1983) (“It is ‘settled in the case law that the notice requirement of
6 this statute does not apply where the patent is directed to a process or method.”
7
8 (Quoting *Bandag, Inc. v. Gerrard Tire Co.*, 704 F.2d 1578, 1581, 217 USPQ 977,
9 979 (Fed. Cir. 1983)); *Intellectual Ventures I LLC v. Symantec Corp.*, 2015 U.S.
10 Dist. LEXIS 6399 *3 (D.Del. Jan. 21, 2015).

11 12 **JURY DEMAND**

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14 Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a
15 trial by jury of any issues so triable by right.
16

17 **VI. PRAYER FOR RELIEF**

18
19 WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and
20 against Defendant, and that the Court grant Plaintiff the following relief:

- 21 a. Judgment that one or more claims of United States Patent No.
22 11,262,908 have been infringed, either literally and/or under the
23 doctrine of equivalents, by Defendant;
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1 b. Judgment that Defendant account for and pay to Plaintiff all
2 damages to and costs incurred by Plaintiff because of Defendant's
3 infringing activities and other conduct complained of herein, and an
4 accounting of all infringements and damages not presented at trial;

5 c. That Plaintiff be granted pre-judgment and post-judgment
6 interest on the damages caused by Defendant's infringing activities
7 and other conduct complained of herein; and

8 d. That Plaintiff be granted such other and further relief as the
9 Court may deem just and proper under the circumstances.
10

11
12 DATED this 29th day of July, 2022.

13
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15 Philip P. Mann, WSBA No. 28860
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Attorneys for Plaintiff Arability IP LLC

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