

Exhibit 2


U.S. Patent No. 7,818,691 (“’691 Patent”) for Microsoft Accused Instrumentality


Accused Products


Each of Microsoft’s touch-enabled notebook and laptop computers (e.g. Microsoft Surface Book 2) (“Accused Instrumentality”) infringes at least Claim 2 of the ’691 Patent.

Claim 2

Claim 2	Accused Instrumentality
<p>[pre] A graphical user interface (GUI), which may comprise an update of an existing program, that may fully operate a GUI by a two step method of movement of a pointer (0) to operate one or more functions within the GUI,</p>	<p>The preamble is not a limitation. To the extent the preamble is construed as a limitation, the Accused Instrumentality includes a graphical user interface (GUI) that may fully operate a GUI by a two step method of movement of a pointer (0) to operate one or more functions within the GUI.</p> <p><i>See</i> elements [d]-[e] below.</p> <p>The Accused Instrumentality may also include the optional claimed update of an existing program.</p>
<p>[a] wherein, said existing program is any existing program that can operate the movement of the pointer (0) over a screen (300) and has one or more functions operated by one or more other methods apart from said two step method,</p>	<p>The Accused Instrumentality may include the optional claimed update of an existing program that can operate the movement of the pointer (0) over a screen (300) and has one or more functions operated by one or more other methods apart from said two step method.</p>
<p>[b] and/or one or more functions operated by said one or more other methods in said existing program can be updated to operate by said two step method,</p>	<p>The Accused Instrumentality may include the optional claimed update of an existing program that has one or more functions operated by said one or more other methods in said existing program can be updated to operate by said two step method.</p>
<p>[c] wherein said GUI executes one or more functions within the GUI by the completion of the following said two step method:</p>	<p>The Accused Instrumentality includes a GUI that executes one or more functions within the GUI by the completion of the two step method as claimed.</p> <p><i>See</i> elements [d]-[e] below.</p>

Claim 2	Accused Instrumentality
<p>[d] first said pointer (0) is immediately adjacent or passes within a control area (1), which is an area of the screen (300) that may be any size including from a pixel on the screen (300) to occupying the whole screen (300),</p>	<p>The Accused Instrumentality performs the step of a first said pointer adjacent or passes within a control area (1), which is an area of the screen (300) that may be any size including from a pixel on the screen (300) to occupying the whole screen (300).</p> <p>For example, the Accused Instrumentality has a first pointer (0) on the screen with a finger. Under certain conditions, the first pointer (0) is adjacent to a control area (1) graphically on the screen.</p> 

Claim 2	Accused Instrumentality
	<p>Exemplary photograph of Accused Instrumentality showing screen graphical representation of pointer (0) under user's finger.</p> <p>In the situation when the "lock screen" is displayed, there is a control screen (300). The user may place the pointer within or immediately adjacent to the control area, <i>e.g.</i> by touching the screen.</p>  <p>Exemplary photograph of Accused Instrumentality with user placing pointer (1) on control area (1).</p>

Claim 2	Accused Instrumentality
<p>[e] and second by the completion of a subsequent movement of said pointer (0) according to a specified movement generates a 'click' event, thereby triggering one or more functions within the GUI.</p>	<p>The Accused Instrumentality performs the step of the completion of movement of said pointer (0) according to a specified movement generating event, thereby triggering one or more functions within the GUI.</p> <p>For example, after the user places pointer (0) within the control area on the screen as described in element [d] above, the user may move the pointer</p>  <p>Exemplary photograph of Accused Instrumentality showing vertical</p>

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