

EXHIBIT K

EXHIBIT G-7
SAMSUNG'S INVALIDITY CLAIM CHARTS FOR DTFLASH¹ COMMERCIALY SOLD, PUBLICLY KNOWN, OR PUBLICLY USED BEFORE JANUARY 7, 2007 ("DTFLASH")

U.S. Patent No. 7,469,381	DTFlash
[1A] A computer-implemented method, comprising:	<p>The DiamondTouch table running DTFlash discloses a computer-implemented method.</p> <p>For example, MERL TR 2005-105 discloses that "DTFlash is the latest toolkit to emerge for building applications on DiamondTouch." MERL TR 2005-105 at Conclusion.</p>
[1B] at a device with a touch screen display	<p>DTFlash runs on Diamond Touch table. The DiamondTouch table running DTFlash discloses a device with a touch screen display.</p> <p>For example, MERL TR 2005-105 discloses that "DTFlash is designed so that those familiar with Macromedia Flash authoring tools can add multi-user multi-touch gestures and behaviors to web-enabled games and other applications for the DiamondTouch table." MERL TR 2005-105 at Abstract. MERL TR 2002-48 discloses that "DiamondTouch is a multi-touch input technology." MERL TR 2002-48 at Abstract.</p>
[1C] displaying a first portion of an electronic document;	<p>The DiamondTouch table running DTFlash discloses displaying a first portion of an electronic document.</p> <p>The electronic document is shown below, outlined in yellow.</p>

¹ DTFlash was disclosed in "Multi-User Multi-Touch Games on DiamondTouch with the DTFlash Toolkit," Alan Esenther and Kent Wittenburg, Mitsubishi Electric Research Laboratories, TR 2005-105, Dec. 2005 ("MERL TR 2005-105"). DTFlash is an authoring toolkit that runs on the DiamondTouch table. DiamondTouch was disclosed in "DiamondTouch SDK: Support for Multi-User, Multi-Touch Applications," Alan Esenther, Cliff Forlines, Kathy Ryall, Sam Shipman, Mitsubishi Electric Research Laboratories, TR 2002-48, Nov. 2002 ("MERL TR 2002-48").

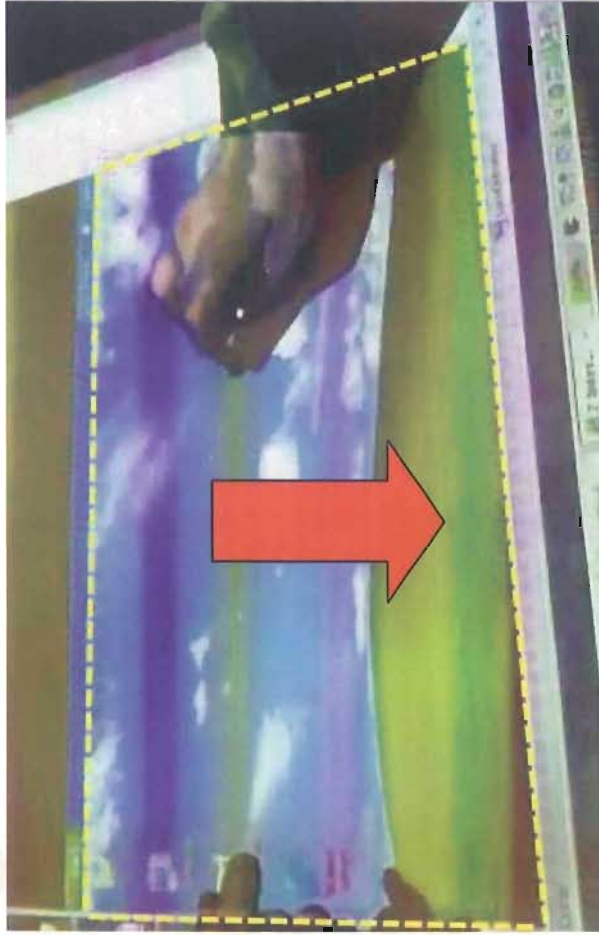
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DTFlash



Electronic document

Translating the electronic document slightly downward causes a first portion of the electronic document to be displayed. The first portion is depicted in the picture below, outlined in yellow.



First portion

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<p>[1D] detecting a movement of an object on or near the touch screen display; in response to detecting the movement, translating the electronic document displayed on the touch screen display in a first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion;</p>	<p>The DiamondTouch table can detect a movement of an object (e.g. a finger) on or near the touch screen display. The DiamondTouch table running DTFlash discloses that in response to detecting the movement, the electronic document is translated in a first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion.</p> <p>DiamondTouch will detect movement of a finger on the touch screen and translate the electronic document in the direction of the movement of the finger. Starting at the first portion referenced above, obtained by having previously scrolled the electronic document slightly downward, continuing from this position, if the user moves his finger upward, the electronic document will move upward. A second portion of the electronic document is then displayed. This second portion of the document is different from the first portion of the document. This is depicted in the figure below:</p>

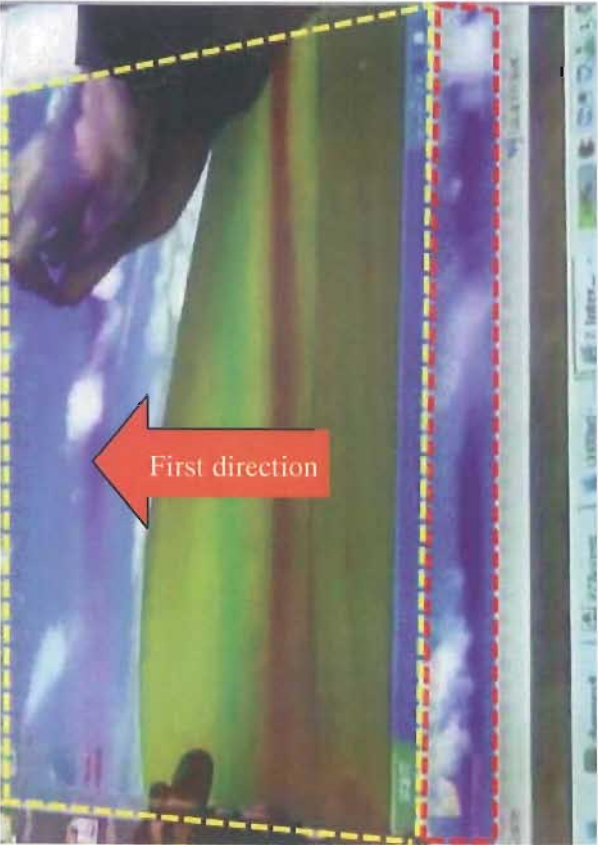


Second portion

[1E] in response to an edge of the electronic document being reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen: displaying an area beyond the edge of the document, and displaying a third portion of the electronic document, wherein the third portion is smaller than the first

The DiamondTouch table running DTFIflash discloses that in response to an edge of the electronic document being reached while translating the electronic document in the first direction while the object (e.g. finger) is still detected on or near the touch screen, displaying an area beyond the edge of the document, and displaying a third portion of the electronic document, wherein the third portion is smaller than the first portion.

As the user reaches the bottom edge of the electronic document while scrolling upward in the example discussed above, an area beyond the bottom edge of the electronic document will be displayed. That area consists of a copy of the top portion of the electronic document, but is not part of the electronic document. A third portion of the electronic document is displayed that is smaller than the first portion of the electronic document because more of the electronic document has been scrolled off the screen. The third portion (outlined in yellow) and the area beyond the edge

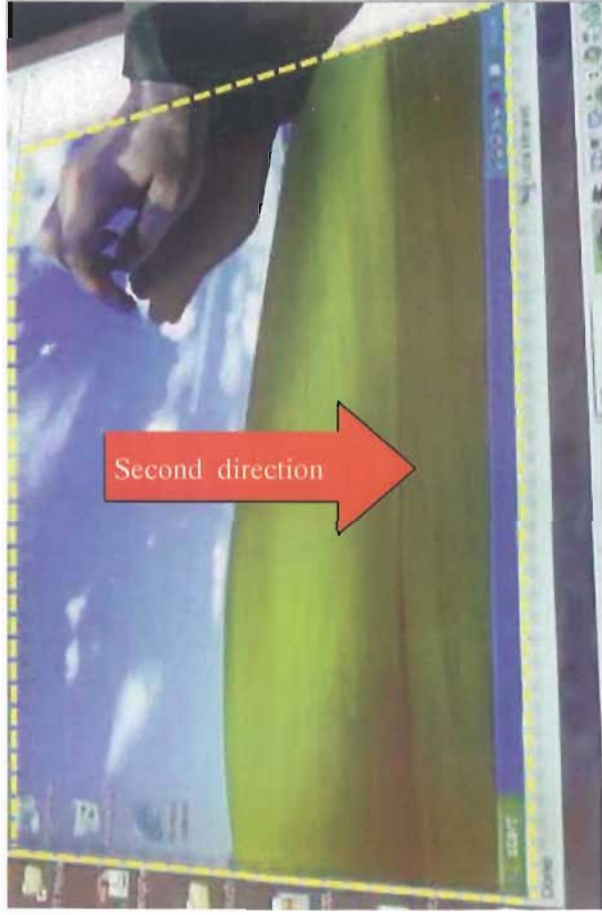
<p>U.S. Patent No. 7,469,381</p>	<p>DTFlash</p> <p>(outlined in red) of the electronic document are displayed in the picture below:</p> 
<p>portion; and</p>	<p>The DiamondTouch table running DTFlash discloses that in response to detecting that the object is no longer on or near the touch screen display, translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion.</p> <p>If the user lifts his finger while in the process of scrolling, the interface will automatically snap back to realign the electronic document with the display. This snap-back feature will cause the electronic document to be translated in a second direction, which will be opposite to the first direction, until</p>
<p>[1F] in response to detecting that the object is no longer on or near the touch screen display, translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth</p>	<p>portion.</p> <p>If the user lifts his finger while in the process of scrolling, the interface will automatically snap back to realign the electronic document with the display. This snap-back feature will cause the electronic document to be translated in a second direction, which will be opposite to the first direction, until</p>

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portion of the electronic document, wherein the fourth portion is different from the first portion.

DTFlash


the area beyond the edge of the electronic document can no longer be seen. As a result, a fourth portion of the document is displayed. The fourth portion is different from the first portion.



Fourth portion

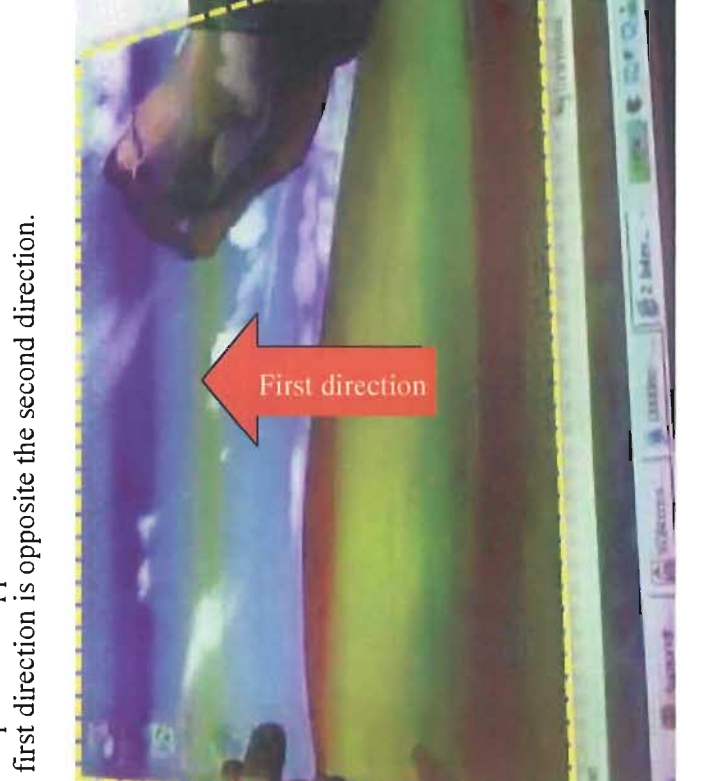
[2] The computer-implemented method of claim 1, wherein the first portion of the electronic document, the second portion of the electronic document, the third portion of the electronic document, and the fourth portion of the electronic document are displayed at the

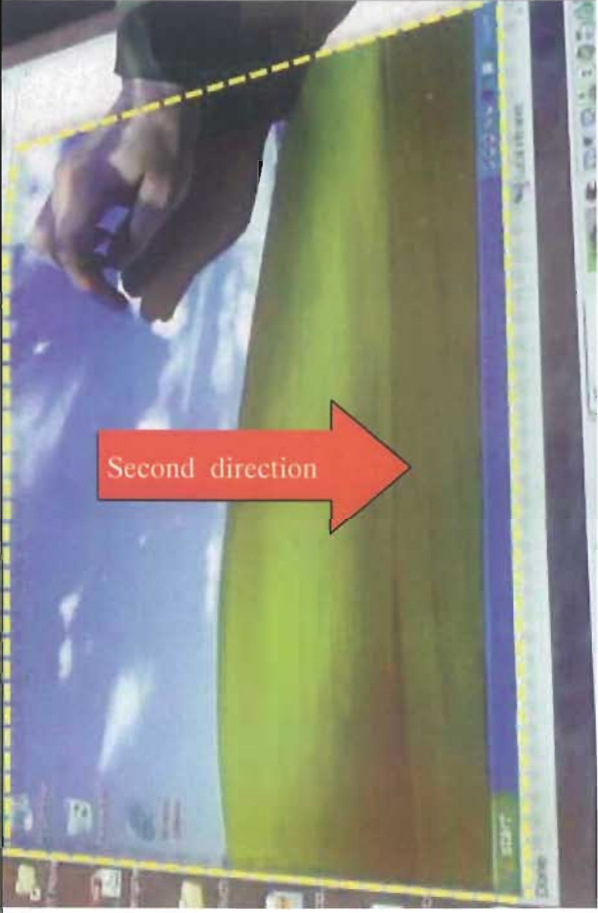
The DiamondTouch table running DTFlash discloses the first, second, third, and fourth portions are all at the same magnification. For example, the four portions previously described are all displayed at the same magnification.

DTFlash	
<p>U.S. Patent No. 7,469,381 same magnification.</p>	<p>The DiamondTouch table running DTFlash can detect movement of an object on a touch screen display. For example, the touch screen display can accept input based on a touch from a finger on the display. See 1[B].</p>
<p>[3] The computer implemented method of claim 1, wherein the movement of the object is on the touch screen display.</p> <p>[4] The computer-implemented method of claim 1, wherein the object is a finger.</p>	<p>The DiamondTouch table running DTFlash discloses that the object used to interact with the touch screen is a finger. For example, the touch screen display can accept input based on a touch from a finger on the display. See 1[B].</p>
<p>[5] The computer-implemented method of claim 1, wherein the first direction is a vertical direction, a horizontal direction, or a diagonal direction.</p>	<p>The DiamondTouch table running DTFlash discloses the first direction is a vertical direction. For example, DTFlash permits the first direction to be vertical. The figure below depicts movement in a vertical direction:</p> 

DTFlash	
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[6] The computer-implemented method of claim 1, wherein the electronic document is a web page.	<p>The DiamondTouch table running DTFlash discloses that the electronic document can be a web page. For example, MERL TR 2005-105 discloses that “DTFlash applications can also work as regular web pages.” MERL TR 2005-105 at DTFlash Authoring Environment.</p> <p>To the extent that the DiamondTouch table running DTFlash does not disclose this claim element, having a web page would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to have a web page. For example, Lira, another graphical user interface, discloses a web page. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Lira, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-1.</p> <p>Samsung reserves the right to supplement this disclosure after claim construction. The term “web page” has not been construed by the court. Samsung further reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung’s subpoena.</p>
[7] The computer-implemented method of claim 1, wherein the electronic document is a digital image.	<p>It would have been obvious to one of ordinary skill in the art to apply DiamondTouch table running DTFlash to an electronic document that is a digital image. A digital image provides input to the user where to touch the touchscreen to manipulate the electronic document.</p> <p>To the extent that the DiamondTouch table running DTFlash does not disclose this claim element, having an electronic document that is a digital image would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art that an electronic document could be a digital image. For example, Van Den Hoven discloses the use of digital images. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Van Den Hoven, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices.</p>

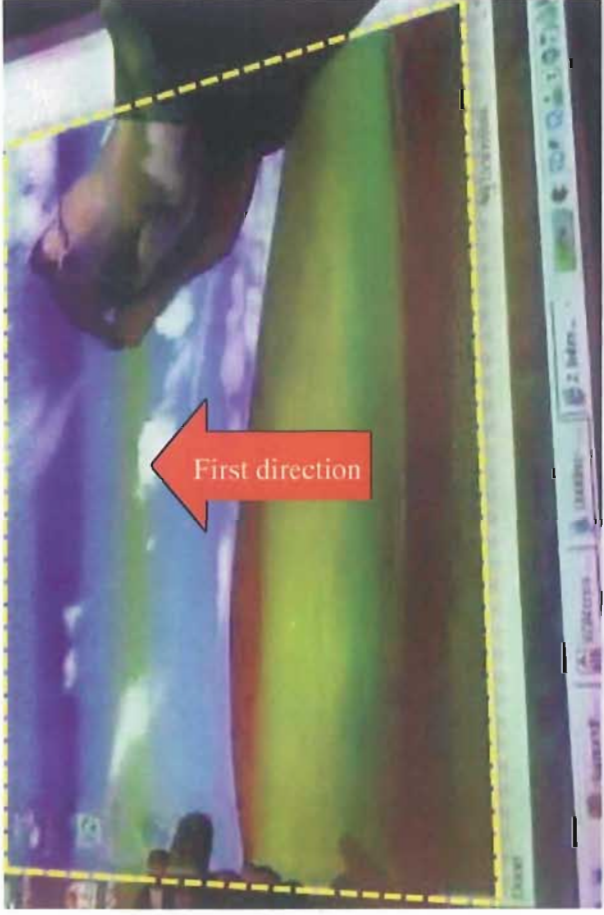
U.S. Patent No. 7,469,381	DTFlash
	<p>Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-2.</p> <p>Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p>
<p>[8] The computer-implemented method of claim 1, wherein the electronic document is a word processing, spreadsheet, email or presentation document.</p>	<p>It would have been obvious to one of ordinary skill in the art to apply DiamondTouch table running DTFlash to an electronic document that is a word processing, spreadsheet, email or presentation document. DTFlash is disclosed as a "toolkit ... for building applications on DiamondTouch." MERL TR 2005-105 at Conclusion.</p> <p>Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p>
<p>[9] The computer-implemented method of claim 1, wherein the electronic document includes a list of items.</p>	<p>It would have been obvious to one of ordinary skill in the art to apply DiamondTouch table running DTFlash to an electronic document that includes a list of items. DTFlash is disclosed as a "toolkit ... for building applications on DiamondTouch." MERL TR 2005-105 at Conclusion.</p> <p>To the extent that the DiamondTouch table running DTFlash does not disclose this claim element, having an electronic document that includes a list of items would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art that an electronic document could be a digital image. For example, Van Den Hoven and Ording both disclose the use of a list of items. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Van Den Hoven and Ording, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibits G-2 and G-3.</p> <p>Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p>

<p>U.S. Patent No. 7,469,381</p>	<p>DTFlash</p>
<p>[10] The computer-implemented method of claim 1, wherein the second direction is opposite the first direction</p>	<p>The DiamondTouch table running DTFlash discloses that the second direction is opposite the first direction. When the electronic document snaps back after the user lifts his finger, the direction of the snap back is opposite the direction in which the user was scrolling. The figures below show that the first direction is opposite the second direction.</p> 

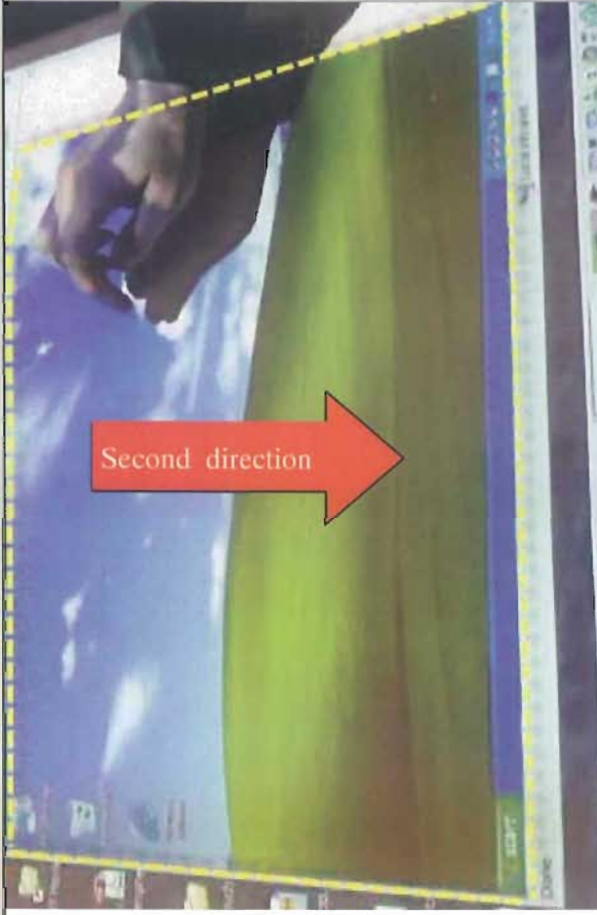
<p>U.S. Patent No. 7,469,381</p>	<p style="text-align: center;">DTFlash</p> 
<p>[11] The computer-implemented method of claim 1, wherein translating in the first direction prior to reaching an edge of the document has an associated speed of translation that corresponds to a speed of movement of the object.</p>	<p>The DiamondTouch table running DTFlash discloses that translating in the first direction prior to reaching an edge of the document has an associated speed of translation that corresponds to a speed of movement of the object.</p>



To the extent that the DiamondTouch table running DTFIash does not disclose this claim element, having an associated speed of translation that corresponds to a speed of movement of the object would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to have an associated speed of translation that corresponds to a speed of movement. For example, both Ording and Van Den Hoven, which also involve graphical user interfaces, disclose having an associated speed of translation that corresponds to a speed of movement. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFIash with any one of Van Den Hoven or Ording, because all of these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, all of these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibits G-2 and G-3.

DTFlash	
<p>U.S. Patent No. 7,469,381</p>	<p>Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p> <p>The DiamondTouch table running DTFlash discloses that translating in the first direction is in accordance with a simulation of an equation of motion having friction.</p>  <p>To the extent that the DiamondTouch table running DTFlash does not disclose this claim element, a simulation of an equation of motion having friction would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use a simulation of an equation of motion having friction. For example, both Ording and Van Den Hoven, which also involve graphical user interfaces, disclose a simulation of an equation of motion having friction. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the</p>

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	<p>DiamondTouch table running DTFlash with any one of Van Den Hoven or Ording, because all of these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, all of these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibits G-2 and G-3. Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p>
<p>[13] The computer-implemented method of claim 1, wherein the area beyond the edge of the document is black, gray, a solid color, or white.</p>	<p>The DiamondTouch table running DTFlash discloses the area beyond the edge of the document is black, gray, a solid color, or white. The area beyond the edge appears the same as the opposite edge of the document. If the opposite edge of the document is black, gray, a solid color, or white, then the area beyond the edge will be black, gray, a solid color, or white.</p>
<p>[14] The computer-implemented method of claim 1, wherein the area beyond the edge of the document is visually distinct from the document.</p>	<p>The DiamondTouch table running DTFlash discloses the area beyond the edge of the document is visually distinct from the document. The area beyond the edge appears the same as the opposite edge of the document. If the opposite edge of the document is visually distinct, then the area beyond the edge of the document will be visually distinct.</p>
<p>[15] The computer-implemented method of claim 1, wherein translating the document in the second direction is a damped motion.</p>	<p>The DiamondTouch table running DTFlash discloses that translating the document in the second direction is a damped motion.</p>



To the extent that the DiamondTouch table running DTFlash does not disclose this claim element, translating the document in the second direction with a damped motion would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use a damped motion. For example, both Ording and Van Den Hoven, which also involve graphical user interfaces, disclose using a damped motion. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with any one of Van Den Hoven or Ording, because all of these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, all of these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibits G-2 and G-3.

DTFlash	
U.S. Patent No. 7,469,381	Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.
<p>[16] The computer-implemented method of claim 1, wherein changing from translating in the first direction to translating in the second direction until the area beyond the edge of the document is no longer displayed makes the edge of the electronic document appear to be elastically attached to an edge of the touch screen display or to an edge displayed on the touch screen display.</p>	<p>See [1F].</p> <p>Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p>
<p>[17] The computer-implemented method of claim 1, wherein translating in the first direction prior to reaching the edge of the electronic document has a first associated translating distance that corresponds to a distance of movement of the object prior to reaching the edge of the electronic document; and wherein displaying an area beyond the edge of the electronic document comprises translating the electronic document in the first direction</p>	<p>To the extent that the DiamondTouch table running DTFlash does not disclose this claim element, having the second associated translating distance be less than a distance of movement of the object after reaching the edge of the electronic document would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to have a second translating distance less than a distance of movement of the object. For example, both Ording and Van Den Hoven, which also involve graphical user interfaces, disclose Claim 17. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with any one of Van Den Hoven or Ording, because all of these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, all of these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibits G-2 and G-3.</p> <p>Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p>

DTFlash	
<p>U.S. Patent No. 7,469,381</p> <p>for a second associated translating distance, wherein the second associated translating distance is less than a distance of movement of the object after reaching the edge of the electronic document.</p> <p>[18] The computer-implemented method of claim 1, wherein translating in the first direction prior to reaching the edge of the electronic document has a first associated translating speed that corresponds to a speed of movement of the object, and wherein displaying an area beyond the edge of the electronic document comprises translating the electronic document in the first direction at a second associated translating speed, wherein the second associated translating speed is slower than the first associated translating speed.</p> <p>[19A] A device, comprising:</p> <p>[19B] a touch screen display;</p> <p>[19C] one or more processors;</p> <p>[19D] memory; and</p>	<p>To the extent that the DiamondTouch table running DTFlash does not disclose this claim element, Claim 18 would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to have the second associated translating speed slower than the first associated translating speed. For example, both Ording and Van Den Hoven, which also involve graphical user interfaces, disclose Claim 18. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with any one of Van Den Hoven or Ording, because all of these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, all of these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibits G-2 and G-3.</p> <p>Samsung reserves the right to supplement this disclosure after Mitsubishi Electronics Research Laboratories responds to Samsung's subpoena.</p> <p>See [1A].</p> <p>See [1B].</p> <p>See [1A].</p> <p>See [1A].</p>

DTFlash	
<p>U.S. Patent No. 7,469,381</p> <p>[19E] one or more programs, wherein the one or more programs are stored in the memory and configured to be executed by the one or more processors, the programs including:</p>	<p>See [1A].</p> <p>Moreover, to the extent that the DiamondTouch table running DTFlash does not disclose this claim element, the use of one or more programs, wherein the one or more programs are stored in the memory and configured to be executed by the one or more processors, would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use one or more programs. For example, Ording, which also involves graphical user interfaces, discloses the use of one or more programs. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Ording, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-3.</p>
<p>[19F] instructions for displaying a first portion of an electronic document;</p>	<p>See [1C].</p> <p>Moreover, to the extent that the DiamondTouch table running DTFlash does not disclose this claim element, the use of instructions for displaying a first portion of an electronic document would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use instructions for displaying a first portion of an electronic document. For example, Ording, which also involves graphical user interfaces, discloses the use of instructions for displaying a first portion of an electronic document. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Ording, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-3.</p>
<p>[19G] instructions for detecting a movement of an object on or near the touch screen display; instructions for translating the electronic document displayed on the touch screen display in a</p>	<p>See [1D].</p> <p>Moreover, to the extent that the DiamondTouch table running DTFlash does not disclose this claim element, the use of instructions would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use instructions. For example, Ording, which also involves graphical user interfaces, discloses the use of instructions. It would have been</p>

DTFlash	
<p>U.S. Patent No. 7,469,381</p> <p>first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion, in response to detecting the movement;</p> <p>[19H] instructions for displaying an area beyond an edge of the electronic document and displaying a third portion of the electronic document, wherein the third portion is smaller than the first portion, in response to the edge of the electronic document being reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen display; and</p> <p>[19I] instructions for translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion, in response to detecting that the object is no longer on or near the touch</p>	<p>obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Ording, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-3.</p> <p>See [1E].</p> <p>Moreover, to the extent that the DiamondTouch table running DTFlash does not disclose this claim element, the use of instructions would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use instructions. For example, Ording, which also involves touch screen user interfaces, discloses the use of instructions. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Ording, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-3.</p> <p>See [1F].</p> <p>Moreover, to the extent that the DiamondTouch table running DTFlash does not disclose this claim element, the use of instructions would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use instructions. For example, Ording, which also involves touch screen user interfaces, discloses the use of instructions. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Ording, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-3.</p>

DTFlash	
<p>U.S. Patent No. 7,469,381</p> <p>screen display.</p> <p>[20A] A computer readable storage medium having stored therein instructions, which when executed by a device with a touch screen display, cause the device to:</p>	<p>See [1A]-[1B].</p> <p>Moreover, to the extent that the DiamondTouch table running DTFlash does not disclose this claim element, a computer readable storage medium having instructions would have been a simple design choice representing a trivial and predictable variation. It was well-known in the art to use a computer readable storage medium having instructions. For example, Ording, which also involves touch screen user interfaces, discloses a computer readable storage medium having instructions. It would have been obvious to one of ordinary skill in the art to combine the disclosures of the DiamondTouch table running DTFlash with Ording, because these references describe graphical user interfaces involving scrolling on touch-screen display-based electronic devices. Furthermore, these references describe the specific use of reversal of scrolling direction to convey information to the user. See Exhibit G-3.</p>
<p>[20B] display a first portion of an electronic document;</p>	<p>See [1C]</p>
<p>[20C] detect a movement of an object on or near the touch screen display; translate the electronic document displayed on the touch screen display in a first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion, in response to detecting the movement;</p>	<p>See [1D].</p>
<p>[20D] display an area beyond an edge of the electronic document and display a third portion of the electronic document, wherein the third</p>	<p>See [1E].</p>

DTFlash	
<p>U.S. Patent No. 7,469,381</p> <p>portion is smaller than the first portion, if the edge of the electronic document is reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen display; and</p>	<p>See [1F].</p>
<p>[20E] translate the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion, in response to detecting that the object is no longer on or near the touch screen display.</p>	