EXHIBIT 31



Claim Chart Applying Newton 2.0 Programmer's Guide Against the '843 Patent

The "Newton Programmer's Guide: For Newton 2.0" ("Newton Guide") was published by Apple Press in 1996. It therefore constitutes prior art under pre-AIA 35 U.S.C. § 102(b). As shown below, Newton Guide anticipates and/or renders obvious claims 1, 8, 13, 15, 17-19, 23 and 30 of the '843 patent. If the Judge or Jury finds that Newton Guide does not anticipate a particular claim, then Newton Guide still renders the claim obvious for the reasons discussed in Exhibit F.

Disclosure
To the extent this preamble is found to be limiting, Newton Guide discloses this preamble. For example, Newton Guide states: About the Notes Application Notes is a simple application based on NewtApp that allows the user to create new stationery, scroll up and down, route and file notes, and scan in overview." 5. 19-31. Notes This section describes the Notes API. The Notes application uses three types of stationery: regular notes, checklists, and outlines. Figure 19-6 shows a note and a checklist; an outline (not shown) is like the checklist without the checkboxes." 5. 19-30.

'843 Patent Claims	Disclosure
	Built-in Applications and System Data
	Figure 19-6 Notes note and Checklist views
	9:41 Fri 3/22
	□ ° Call Debbie □ ° Print Staff Report
	₩° Distribute
	o mail to HQ
	₩ ° Write Speech
	i@www.New X
	p. 19-31.
	"A key part of the Newton information architecture is the Intelligent Assistant. The Intelligent Assistant is a system service that attempts to complete actions for the user according to deductions it makes about the task that the user is currently performing. The Assistant is always instantly available to the user through the Assist button, yet remains nonintrusive.
	The Assistant knows how to complete several built-in tasks; they are Scheduling (adding meetings), Finding, Reminding (adding To Do items), Mailing, Faxing, Printing, Calling, and getting time information from the Time Zones map. Each of these tasks has several synonyms; for example, the user can write 'call,' 'phone,' 'ring,' or 'dial' to make a phone call."
	p. 1-8.
displaying the document electronically using the first computer program;	Newton Guide discloses this element. For example, Newton Guide states:
	"About the Notes Application
	Notes is a simple application based on NewtApp that allows the user to create new stationery, scroll up and down, route and file notes, and scan an overview."



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'843 Patent Claims	Disclosure
	p. 19-31.
	"Notes
	This section describes the Notes API. The Notes application uses three types of stationery: regular notes, checklists, and outlines. Figure 19-6 shows a note and a checklist; an outline (not shown) is like the checklist without the checkboxes."
	p. 19-30.
	Built-in Applications and System Data
	Figure 19-6 Notes note and Checklist views
	9:41 Fri 3/22
	■ Thu 3/21 — □ ☑ ☑ Mon 3/18 — □ ☑
	Call Debbie
	□ ° Print Staff Report
	✓ O Distribute
	o mail to HQ
	₩ ° Write Speech
	ilental X ilental New X
	ile Willer (X)
	p. 19-31.
	"When a user writes a line of text on the Newton screen, the Newton
	system software performs a series of operations, as follows:
	• The raw data for the input is captured as ink, which is also known
	 as sketch ink or raw ink. Raw ink is stored as a sequence of strokes or stroke data.
	 Raw like is stored as a sequence of strokes of stroke data. If the view in which the ink was drawn is configured for ink text,
	the recognition system groups the stroke data into a series of ink
	words, based on the timing and spacing of the user's
	handwriting. A user can insert, delete, and move ink words in
	the same way as recognized text. Ink words can be scaled to
	various sizes for display and printing. They can also be

Disclosure
recognized at a later time, by a process known as deferred recognition. If the view in which the ink was drawn supports or is configured for text recognition, the ink words are processed by the recognition system into recognized text and displayed in a typeface." p. 8-2.
Newton Guide discloses this element. For example, Newton Guide states: "A key part of the Newton information architecture is the Intelligent Assistant. The Intelligent Assistant is a system service that attempts to complete actions for the user according to deductions it makes about the task that the user is currently performing. The Assistant is always instantly available to the user through the Assist button, yet remains nonintrusive. The Assistant knows how to complete several built-in tasks; they are Scheduling (adding meetings), Finding, Reminding (adding To Do items), Mailing, Faxing, Printing, Calling, and getting time information from the Time Zones map. Each of these tasks has several synonyms; for example, the user can write 'call,' 'phone,' 'ring,' or 'dial' to make a phone call." p. 1-8.
"When the user invokes the Assistant, the system passes the current text selection to it. If no text is selected, the system passes to the Assistant the contents of a buffer that holds the most recent text input. The Assistant then attempts to match words in the input string with templates and dictionaries that classify the words as actions, targets, or unknown entities." p. 18-1. "When an action is specified but required information is still missing, the Assistant tries to supply as much of the required information as possible. For example, if the input string is 'fax bob', the Assistant can query the Names soup for information such as Bob's name and fax number. However, the user may still need to correct the input if the Assistant chooses the wrong Bob from the Names soup, cannot find Bob in the Names soup, or cannot find Bob's fax number in this soup. The user can resolve ambiguities or provide additional information from



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