UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD _____

MOTOROLA MOBILITY LLC, GOOGLE INC. AND APPLE INC. Petitioners

v.

ARENDI S.A.R.L. alleged Patent Owner

Patent No. 8,306,993

Issue Date: Nov. 6, 2012

Title: METHOD, SYSTEM AND COMPUTER READABLE MEDIUM FOR ADDRESSING HANDLING FROM AN OPERATING SYSTEM

Inter Partes Review No. Unassigned

DECLARATION OF DENNIS R. ALLISON



TABLE OF CONTENTS

I	INTRODUCTION AND QUALIFICATIONS	5
II.	SUMMARY OF OPINION	7
III.	UNDERSTANDING OF THE LAW	8
IV.	RELEVANT TIMEFRAME FOR OBVIOUSNESS	10
V.	LEVEL OF ORDINARY SKILL IN THE ART	11
VI.	OVERVIEW OF THE '993 PATENT SPECIFICATION	19
A	. SIMILARITY OF CLAIM SETS	28
VII.	CONSTRUCTION OF CLAIM TERMS	29
A	. Contact Database	29
В	. Initiating Electronic Communication	30
C	. Allowing the User to Make a Decision Whether to Store or to Update	.31
D	1	
E.	. Button	34
VIII MA	. FIRST AND SECOND GROUNDS FOR INVALIDITY: BONURA, GNANELLI, AND GIORDANO	34
A	. DISCLOSURE OF BONURA AND MILLER ARTICLE	34
	1. Claim 1: Computer Implemented Method	36
	2. Claim 1: Contact Database, Separately Accessible and Editable	36
	3. Claim 1: Contact Database Entry Fields	38
	4. Claim 1: Analyzing Text to Identify Contact Information	39
	5. Claim 1: Nature and Content of Text Identified	40
	6. Claim 1: Initiating Search of the Contact Database	41
	7. Claim 1: Displaying Second Contact Information	42
	8. Claim 1: Nature and Content of Second Contact Information	42
	9. Claim 1: Initiating Electronic Communication	43
	10. Claim 1: Storing Contact Information in the Database	
	11. Claim 1: Execute Command Causing the Performing	
	12. Claim 2: Method Embodied in a Client	



13. Claim 3: Name, address and computer	46
14. Claim 4: First information is a telephone number	47
15. Claim 6: Menu	47
16. Claim 7: Button	47
17. Claim 8: Email address	47
B. DISCLOSURE OF MAGNANELLI ARTICLE	48
18. Claim 1: Method of Information Handling	49
19. Claim 1: Contact Database, Separately Accessible and Editable	50
20. Claim 1: Nature of First Contact Information	50
21. Claim 1: Analyzing Text to Identify Contact Information	50
22. Claim 1: No User Designation of Portion to Analyze	51
23. Claim 1: Allowing a User to Choose Whether to Update a Contact	52
24. Claim 2: Client Computer	53
C. Disclosure of Giordano	53
D. OBVIOUSNESS OF CLAIMS 1-4, 6-12, 14-20, AND 22-24 OVER BONURA IN VIEW OF MAGNENLLI	54
E. OBVIOUSNESS OF CLAIMS 5, 13 AND 21 OVER BONURA, MAGNANELLI AND GIORDANO	62
IX. THIRD AND FOURTH GROUND FOR INVALIDITY: LUCIW, BATAND GIORDANO	
A. DISCLOSURE OF LUCIW PATENT	64
25. Claim 1: Information Handling	65
26. Claim 1: Contact Database, Separately Accessible and Editable	66
27. Claim 1: Contact Database Entry Fields	69
28. Claim 1: Analyzing Text to Identify Contact Information	70
29. Claim 1: Document Configured to be Stored for Later Retrieval	71
30. Claim 1: No User Designation of Portion to Analyze	71
31. Claim 1: Nature and Content of Contact Information Identified	72
32. Claim 1: Initiating Search of Contact Database	72
33. Claim 1: Displaying Second Contact Information	74



	34. Claim 1: Nature and Content of Second Contact Information	75
	35.Claim 1: Allowing a user to make a decision whether to storeor [whether to] update	76
	36. Claim 1: Execute Command Causing the Performing	76
	37. Claim 2: Method Embodied in a Client	77
	38. Claim 3: Types of Contact Information; Use of Computer	78
	39. Claim 4: Other Types of Contact Information	78
	40. Claim 6: Menu	79
	41. Claim 7: Button	80
	42. Claim 8: Sending E-mail	80
	43. Claim 9: Non-transitory Computer Readable Medium	81
	44. Claim 17: Apparatus – Processor and Memory	81
B.	ANTICIPATION BY LUCIW	81
C.	DISCLOSURE OF BATES PATENT	81
	45. Claim 1: Contact Database, Separately Accesible and Editable	82
	46. Claim 1: Adding and Updating Database Contacts	83
D.	FURTHER DISCLOSURE OF GIORDANO PATENT	85
	47. Claim 1: Analyzing Text to Identify Contact Information	86
	48. Claim 1: Creating a New Contact	86
	49. Claim 1: Nature and Content of Second Contact Information	87
	50. Claim 5: Using a Phone number With a Cell Phone Client	87
E.	OBVIOUSNESS OVER LUCIW IN VIEW OF BATES AND	
GI	ORDANO	88



I. INTRODUCTION AND QUALIFICATIONS

- 1. I, Dennis R. Allison, make this declaration in connection with the petition for inter partes review of U.S. Patent No. 8,306,993 ("the '993 patent"; Exhibit 1001 to the petition). All statements made herein made of my own knowledge are true. I am over the age of 18 and otherwise competent to make this declaration. Although I am being compensated for my time in preparing this declaration, the opinions herein are my own, and I have no stake in the outcome of the inter partes review or any related litigation.
- 2. Attached as Exhibit 1008 is my curriculum vitae. As shown in my CV, I have an A.B. from the University of California, Berkeley in Physics (1961). Since 1975, I have been a Lecturer at Stanford University in the Computer Systems Laboratory, Electrical Engineering Department. At Stanford, I have taught graduate and upper division courses in Computer Architecture, Advanced Computer Architecture, Software Engineering, Software Projects, and Computer Programming.
- 3. From 1962-1972, I worked as a Physicist at the Radio Physics Laboratory of SRI International (aka Stanford Research Institute).
- 4. Since 1972, I have been a consultant in the computer industry. I have worked with a diverse client base with an equally diverse project base



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

