Case: IPR2015-00533 Patent: 7,218,313

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY COMPUTER ENTERTAINMENT AMERICA LLC Petitioner

v.

APLIX IP HOLDINGS CORPORATION
Patent Owner

Case No. IPR2015-00533

Patent No. 7,218,313

DECLARATION OF DR. KARON MACLEAN

Mail stop PATENT BOARD Patent Trial and Appeal Board U.S. Patent & Trademark Office P.O. Box 1450 Alexandra, VA 22313-145



APLIX EXHIBIT 2007 SCEA v. APLIX IPR2015-00533

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		1. Short history of handheld computing devices up to 2003		
		2. Short History of touchpads and use on computers generally and also on handheld devices up to 2003		
		3. Designing Handheld Devices		
	В.	Summary of the '313 Patent		
	C.	Person of ordinary skill in the art		



D.	It is not obvious to combine Pallakoff and Ishihara with respect to claims 15 and 20				
	1.	Pallakoff teaches modifier buttons on the side, and teaches away from modifier buttons on the back, making implementation with Ishihara's rear touchpad incompatible			
	2.	Ishihara does not teach use of a rear surface touchpad for modification of front-surface input elements or their functions, nor does Ishihara's touchpad implementation support such a use			
	3.	Ishihara's invention, intended to facilitate selection from a displayed list, is not functionally compatible (using methods taught by Ishihara) with front-surface key function modification. It would need substantial modification to be combined			
	4.	Pallakoff requires simultaneous activation of a combination of side-buttons, but multiple-touch sensing is not taught or available in Ishihara's invention			
	5.	It is impractical to replace Pallakoff's side-located modifier buttons with Ishihara's back-surface touch pad due to user feedback needs			
	6.	The 533 Petition does not propose a benefit for combination that is compelling enough to motivate a skilled artisan to consider it			
	7.	The benefits of combination proposed by the 533 Petition are of limited viability and are incompatible with Pallakoff and Ishihara			
Е.		Combination of Pallakoff and Ishihara does not disclose certain '313 limitations of the claims for which the proceeding has been instituted . 5			
F.	Hed	lberg is not analogous to the '313 patent			
G.	It is not obvious to combine Liebenow and Hedberg with respect to claims 50 and 51				



	1.	Not obvious to use Liebenow's device for panning and zooming as taught by Hedberg, and supported by Hedberg's motion sensors	
	2.	Hedberg teaches using accelerometer-type sensors to control a graphical portal through panning and zooming	56
	3.	Liebenow does not teach any uses that would benefit from pan/zooming	57
	4.	The pan/tilt interactions taught by Hedberg could interfere with Liebenow's main purpose of data entry	
	5.	Not obvious how Hedberg's motion sensors could be used for the text and digit entry taught by Liebenow	59
Н.	surfac define	37's requirements that the "selectively configurable sensing se" enables "provid[ing] a plurality of delineated active areas" which a mapping of the sensing surface to the areas which are stored each application" is not met in Liebenow	
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I. Background & Qualifications

1. I have summarized in this section my educational background, career history, and other relevant qualifications. I have also attached a current version of my Curriculum Vitae as **Ex. 2008**.

A. Educational background and career history

- 2. I am presently a Full Professor at the University of British Columbia, with a regular appointment in Computer Science in the Faculty of Science, and a courtesy appointment in Mechanical Engineering in the Faculty of Applied Science. I have recently been a Visiting Professor at the University of Colorado (Boulder, Colorado, USA) and at the University of Canterbury (Christchurch, NZ).
- 3. In 1986 I received a B.S. degree in Mechanical Engineering and Biological Sciences from Stanford University. In 1988 I received a M.S. in Mechanical Engineering from Massachusetts of Technology, and 1996 a Ph.D. in Mechanical Engineering from Massachusetts of Technology.
- 4. From 1989 to 1991 I worked as a project engineer at the University of Utah's Center for Engineering Design in Salt Lake City, UT. From 1996 to 2000 I was a Member of Research Staff and Project Lead at Interval Research Corporation in Palo Alto, CA.



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