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#### UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

Microsoft Corporation and Nokia Inc.,

Petitioner

V.

Global Touch Solutions, LLC,

Patent Owner

IPR2015 - 01149

Patent 7,329,970

# **EXHIBIT 1012**

DECLARATION OF MARK N. HORENSTEIN, PH.D., P.E.



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	A. "does not form a serial link" (claim 1 from which claims 3-5, 10-1 48, 49, and 51 ultimately depend) and "is not a serial link" (claim 52).	, ,
	B. "not connected to a mains supply" (claim 1 from which claims 3-5, 14, 19, 48, 49, and 51 ultimately depend)	
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X.	Independent Claim 1 would have been obvious over Jahagirdar in combination with Schultz
	A. Jahagirdar taught the limitations of claim 1's preamble, "An electronic module for use with a product comprising an energy consuming load and a power source or a connection to a power source, said module comprising a microchip, and a switch;"
	B. Recitation [a] of claim 1: Jahagirdar described "said switch being a user interface and does not form a serial link in a circuit that transfers power from the power source to power the load"
	C. Recitation [b] of claim 1: Jahagirdar taught "and said microchip controlling a luminous visible location indicator that is not the load"31
	D. Recitation [c] of claim 1: Jahagirdar taught "a) wherein the visible indicator at least indicates a condition of the product upon receiving a signal from the user interface switch, and wherein the switch is a touch sensor type switch;"
	E. Recitation [d] of claim 1: Jahagirdar taught "b) wherein the visible indicator is activated at least to indicate an activation signal from the switch when the load is not activated;"
	F. Recitation [e] of claim 1: Jahagirdar taught "and c) wherein the visible indicator is also used to indicate a power level of the power source when the load is switched off and the product is not connected to a mains supply."44
XI.	Dependent Claim 3 would have been obvious over Jahagirdar in combination with Schultz
XII.	Dependent Claim 4 would have been obvious over Jahagirdar in combination with Schultz
XIII.	Dependent Claim 5 would have been obvious over Jahagirdar in combination with Schultz 49



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XXIII	I.Independent Claim 52 would have been obvious over Jahagirdar in combination with Schultz	.61
	A. Jahagirdar taught the limitations of claim 52's preamble, "A method of operating a product which includes a visible luminous indicator, an energy consuming load and a power source for powering the load, the method including the steps of"	7
	B. Recitation [a] of claim 52: Jahagirdar described "operating a user interface switch, that is a touch sensor type switch which is not a serial link	k



	in a circuit from the power source to the load to power the load, to control the operation of a microchip,"63
	C. Recitation [b] of claim 52: Jahagirdar described "using the microchip to control the connection of the power source to the load and the activation of
	the indicator,"
	D. Recitation [c] of claim 52: Jahagirdar described "activate the indicator to show at least one of the following when the load is not activated: a condition of the product, an activation of the switch, and a power level of the power source."
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