Filed on behalf of:

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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 - 01151

Patent 8,288,952

EXHIBIT 1014

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



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	A.	Jahagirdar taught the limitations of claim 1's preamble, "A method implementing a user interface of a product, the product comprising		



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		power source, or a connection for a power source and at least one energy consuming load, said method including the step of"	25		
	B.	Recitation [a] of claim 1: Jahagirdar combined with Schultz renders obvious "using an electronic module comprising an electronic circui including a microchip and a touch sensor said microchip implementing the touch sensor functions"	it		
	C.	Recitation [b] of claim 1: Jahagirdar taught "activating a visible indication [to provide] information on at least one [of]: a state or condition of the product, location of the user interface, a battery power level indication."	37		
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XXI.	Independent Claim 26 would have been obvious over Jahagirdar in combination with Schultz			
	A.	Jahagirdar taught the limitations of claim 26's preamble, "An electronic module for use with a product, the product comprising a power source or a connection for a power source, and at least one energy consuming load"		
	B.	Limitation [a] of Claim 26: Jahagirdar combined with Schultz renders obvious "said module comprising a microchip and a touch sensor said microchip implementing the touch sensing functions"52		
	C.	Limitation [b] of Claim 26: Jahagirdar described "activate[s] a visible indication [to provide] information on at least one [of]: a state or condition of the product, a location of the user interface, a battery power level indication"		
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XXV		Challenged Claims are also invalid even if "the touch sensor functions the touch sensing function" mean "functions controlled by the touch		



I. Introduction & Qualifications

- I, Mark N. Horenstein, declare as follows:
- 1. I understand that Microsoft Corporation ("Microsoft") and Nokia Inc. ("Nokia") are petitioning the Patent Office for an *inter partes* review of claims 1-4, 14, 16, 17, 19, 22-24, 26, 27, and 38-40 of U.S. Patent No. 8,288,952 ("'952 patent"). I have been retained by the Petitioners, Microsoft and Nokia, to offer technical opinions relating to the '952 patent and certain prior-art references relating to its subject matter. I understand that an *inter partes* ("between the parties") review begins with a petition for review made by third parties like Microsoft and Nokia and responded to by the owner of the patent.
- 2. I am a Professor of Electrical Engineering in the Department of Electrical and Computer Engineering at Boston University, where I have been a faculty member since 1979. I also have held various other positions at Boston University, including the Associate Dean for Graduate Programs and Research for the College of Engineering (1999-2007), Associate Chair for Undergraduate Programs for the ECE Department (1990 1998 and 2012 present), as well as appointments at the rank of Associate Professor (1985-2000) and Assistant Professor (1979-1985).
- 3. I have a Ph.D. in Electrical Engineering from the Massachusetts Institute of Technology (MIT), which I earned in 1978 while working in the



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