Case: 21-1060 Document: 21 Page: 1 Filed: 03/24/2021

Nos. 2021-1060, 2021-1122

United States Court of Appeals for the Federal Circuit

UUSI, LLC, D/B/A NARTRON, *Appellant*

v.

SAMSUNG ELECTRONICS CO., LTD., Cross-Appellant

On Appeal from the Patent Trial and Appeal Board in IPR2016-00908

APPELLANT NARTRON'S CORRECTED PRINCIPAL BRIEF

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March 24, 2021



Representative Claim: U.S. Pat No. 5,796,183, Claim 40

40. A capacitive responsive electronic switching circuit comprising:

an oscillator providing a periodic output signal having a predefined frequency;

a microcontroller using the periodic output signal from the oscillator, the microcontroller selectively providing signal output frequencies to a plurality of small sized input touch terminals of a keypad, wherein the selectively providing comprises the microcontroller selectively providing a signal output frequency to each row of the plurality of small sized input touch terminals of the keypad;

the plurality of small sized input touch terminals defining adjacent areas on a dielectric substrate for an operator to provide inputs by proximity and touch; and

a detector circuit coupled to said oscillator for receiving said periodic output signal from said oscillator, and coupled to said input touch terminals, said detector circuit being responsive to signals from said oscillator via said microcontroller and a presence of an operator's body capacitance to ground coupled to said touch terminals when proximal or touched by the operator to provide a control output signal,

wherein said predefined frequency of said oscillator and said signal output frequencies are selected to decrease a first impedance of said dielectric substrate relative to a second impedance of any contaminate that may create an electrical path on said dielectric substrate between said adjacent areas defined by the plurality of small sized input touch terminals, and wherein said detector circuit compares a sensed body capacitance change to ground proximate an input touch terminal to a threshold level to prevent inadvertent generation of the control output signal.



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FORM 9. Certificate of Interest

Form 9 (p. 1) July 2020

UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT

CERTIFICATE OF INTEREST

Case Number	21-1060, 21-1122
Short Case Caption	UUSI, LLC v. Samsung Electronics Co., Ltd.
	UUSI, LLC (d/b/a Nartron)

Instructions: Complete each section of the form. In answering items 2 and 3, be specific as to which represented entities the answers apply; lack of specificity may result in non-compliance. **Please enter only one item per box; attach additional pages as needed and check the relevant box.** Counsel must immediately file an amended Certificate of Interest if information changes. Fed. Cir. R. 47.4(b).

I certify the following information and any attached sheets are accurate and complete to the best of my knowledge.

Date: <u>11/15/2020</u>	Signature:	/s/ Stephen Underwood
	Name:	Stephen Underwood



FORM 9. Certificate of Interest

Form 9 (p. 2) July 2020

1. Represented Entities. Fed. Cir. R. 47.4(a)(1).	2. Real Party in Interest. Fed. Cir. R. 47.4(a)(2).	3. Parent Corporations and Stockholders. Fed. Cir. R. 47.4(a)(3).	
Provide the full names of all entities represented by undersigned counsel in this case.	Provide the full names of all real parties in interest for the entities. Do not list the real parties if they are the same as the entities.	Provide the full names of all parent corporations for the entities and all publicly held companies that own 10% or more stock in the entities.	
	✓ None/Not Applicable	✓ None/Not Applicable	
UUSI, LLC (d/b/a Nartron)			

☐ Additional pages attached



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Form 9 (p. 3) July 2020

4. Legal Representatives. List all law firms, partners, and associates that (a) appeared for the entities in the originating court or agency or (b) are expected to appear in this court for the entities. Do not include those who have already entered an appearance in this court. Fed. Cir. R. 47.4(a)(4).					
□ None/Not Applicable	None/Not Applicable Additional pages attached				
Jay P. Kesan (DiMuro Ginsberg PC)	Teresa M. Summers (DiMuro Ginsberg PC)	Jan Weir (Glaser Weil LLP)			
5. Related Cases. Provide the case titles and numbers of any case known to be pending in this court or any other court or agency that will directly affect or be directly affected by this court's decision in the pending appeal. Do not include the originating case number(s) for this case. Fed. Cir. R. 47.4(a)(5). See also Fed. Cir. R. 47.5(b).					
□ None/Not Applicable		ll pages attached			
Apple Inc. v. UUSI, LLC CAFC Case No. 21-1035	UUSI, LLC v. Apple Inc. N.D. Cal. Case No. 18-cv-04637	UUSI, LLC v. Samsung Elecs. Co. W.D. Mich. Case No. 15-cv-00146			
6. Organizational Victims and Bankruptcy Cases . Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6).					
✓ None/Not Applicable	☐ Additiona	al pages attached			



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