Paper No. 16
Filed: November 4, 2019

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.
Petitioner

v.

UUSI, LLC d/b/a NARTRON,
Patent Owner.

Case IPR2019-00358
Patent No. 5,796,183

PATENT OWNER RESPONSE

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EXHIBITS

UUSI-2001	Declaration of Lawrence M. Hadley in support of patent owner's motion for pro hac vice admission
UUSI-2002	Declaration of Dr. Darran Cairns in support of patent owner preliminary response
UUSI-2003	Deposition of Phillip D. Wright, Ph.D.
UUSI-2004	Declaration of Dr. Darran Cairns in support of patent owner response

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I. INTRODUCTION

The '183 Patent provided an important improvement over the prior art: *i.e.,* the ability to bring capacitive touch terminals very close together, while rejecting contamination-induced crosstalk between adjacent terminals. This improvement supplied a key foundation for the modern proliferation of capacitive touchscreens in mobile phones, tablets, and other devices. The inventors of the '183 Patent—Byron Hourmand, John Washeleski, and Stephen Cooper—conducted extensive empirical research to develop the theoretical and practical framework for rejection of contamination-induced crosstalk in closely-spaced capacitive touch terminals. *See* Ex. 1001 at 8:9-11:60. The inventors incorporated that research into a novel, highly effective, capacitive-responsive electronic switching circuit. Without the inventors' contributions, the modern "boom" in high-density capacitive touchscreens would not have been possible.

In response to Apple's Petition, the Board instituted review, because it found a "reasonable likelihood" that Apple would prevail in showing obviousness of "at least one" of, but not all of, challenged claims 37-39, 94, 96-99, 101-109, and 115-116[1] of Nartron's U.S. Patent No. 5,796,183 ("the '183 Patent"). *See* Paper 12 at 1.

[1] Page 1 of Apple's Petition identifies the "challenged claims" as "claims 37-39, 94, 96-99, 101-109, and 115-**117**." Paper 2 at 1 (emphasis added). However, Apple presented no argument as to why claim 117 is obvious over the cited references.

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