

asserted claim is found.

Invalidity charts for each of these items of prior art are attached to these Invalidation Contentions with an Exhibit number as indicated in the column titled "Reference Identifier/Invalidity Chart ". The identifiers beginning with "A" refer to references and associated charts for an individual prior art reference. The identifiers beginning with "B" refer to charts that combine references in combinations that establish obviousness.

The charts provide exemplary portions of each patent or printed publication where each element of each asserted claim may be found. The Camera Manufacturers, however, maintain that a person of ordinary skill in the art of the asserted patents would determine what is described, disclosed, and taught by these publications based on the entire patent or printed publication. The Camera Manufacturers, therefore, reserve their right to rely on any and all portions of each patent or printed publication to establish invalidity under 35 U.S.C. §§ 102 and 103 in the present action.

As shown in the invalidity charts attached as Exhibits A, A1–A19, A21–A74, A76–A104, and B1–B13, the Camera Manufacturers contend that the items of prior art listed in the preceding section anticipate, expressly or inherently, and/or render obvious one or more claims of the '399 and/or '449 Patents. Alternatively, the Camera Manufacturers contend that each of the items of prior art listed in the preceding section renders the asserted claims of the '399 and/or '449 Patents obvious, either alone or in combination with what was known to those of ordinary skill in the art at the time of the alleged invention of the subject matter claimed in the asserted patents.³

In addition, the Camera Manufacturers contend that each of the asserted claims are obvious in light of the combined disclosures of any one or more of the references, as discussed in more detail below with respect to each of the asserted claims and as shown in the invalidity charts for each individual reference.

³ The Camera Manufacturers' contentions that the prior art identified in these Invalidation Contentions renders the asserted claims obvious under 35 U.S.C. § 103 are in no way an admission or suggestion that each reference does not independently anticipate the asserted claims under 35 U.S.C. § 102.

As a preliminary matter, the Camera Manufacturers note that the U.S. Supreme Court recently addressed the test for obviousness under 35 U.S.C. § 103 in *KSR Int'l Co. v. Teleflex Inc.*, 127 S.Ct. 1727 (2007), rejecting the Federal Circuit's rigid "teaching, suggestion, or motivation" requirement in favor of a flexible, functional approach in which an explicit finding of a "motivation" to combine prior art references is not required to establish obviousness. The Supreme Court held that it is sufficient that a combination of elements was "obvious to try" holding that, "[w]hen there is a design need or market pressure to solve a problem and there are a finite number of identified, predictable solutions, a person of ordinary skill has good reason to pursue the known options within his or her technical grasp." *Id.* at 1742.⁴

The Camera Manufacturers have provided numerous combinations of charts for combinations rendering obvious of references that include discussions about motivations to combine the appertaining references. However, the Camera Manufacturers provide the following comments of a general nature that supplement the discussions in the individual charts themselves.

The Camera Manufacturers contend as a general matter that, given the anticipated design requirements and state of the art for multi-purpose interface devices, as well as the predictable nature of the art of SCSI and USB interface standards, analog peripheral devices and various data transmission protocols and drivers, it would have been (and indeed was) obvious for one of skill in the art to make multipurpose interfaces as required by the asserted claims.

The Camera Manufacturers also contend that one of skill in the art, at the time the alleged inventions were made, would have been motivated to combine the references disclosed herein in such a way as to reach the alleged inventions. The teaching, suggestion, or motivation to combine these references, although not required, is found, explicitly or implicitly and as

⁴ See also *DyStar Textilfarben GmbH & Co Deutschland KG v. C.H. Patrick Co.*, 464 F.3d 1356, 1368 (Fed. Cir. 2006) ("we have repeatedly held that an implicit motivation to combine exists not only when a suggestion may be gleaned from the prior art as a whole, but when the 'improvement' is technology-independent and the combination of references results in a product or process that is more desirable, for example because it is stronger, cheaper, cleaner, faster, lighter, smaller, more durable, or more efficient...").

discussed in more detail in the charts and below, in one or more of the following: his or her own knowledge or common sense; the prior art references themselves and/or the prior art as a whole, including the interrelated teachings of multiple prior art references; the subject matter acknowledged as prior art in the '399 and '449 Patents; the nature of the problem to be solved and the existence of similar improvements in similar applications; design incentives and other market forces, including the advantages of creating a superior and more desirable product and the effects of demands known to the design community or present in the marketplace; the ability to implement the alleged invention as a predictable variation of the prior art; improvements in similar devices; the interrelated teachings of multiple prior art references; any needs or problems known in the field and addressed by the '399 and '449 Patents; and the number of identified, predictable solutions to the problem addressed by the '399 and '449 Patents.

A motivation to combine the teachings of the references also existed when a given combination would result in a product that is more desirable because, for example, it would be stronger, harder, cheaper, or more durable. In addition, the subject matter and disclosures in several of the prior art references cited herein are evidence that a motivation to combine various concepts described herein did, in fact, exist, and they were, in fact, combined.

Specific combinations of references that render the asserted claims obvious are identified in the charts and below, together with exemplary descriptions of specified combinations. However, Papst's continued insistence of disregarding the Court's claim construction has necessitated an inclusive approach to the analysis and identification of prior art where a particular element may not be present in the prior art under the Court's construction, but nonetheless present under Papst's rejected construction. The following charts are based on Papst's rejected construction of one or more claim elements relating to the "interface device", the "second connecting device", and the "virtual file system": A7, A9, A10, A12, A13, A19, A21, A23, A25, A26, A28, A31/A65, A33, A35-A37, A46, A52-58, A62-64, A67, A69-72, A78-80, A85, A86, A88, A94, A96, A100, A103, A104. Inclusion in this list does not mean that Papst's construction was used exclusively for the analysis. Again, the identification of the prior art in

these charts based in part on Papst's rejected construction responds to Papst's insistence on relying on those same rejected constructions in its Final Infringement Contentions.

In addition to the invalidity charts, attached as Exhibit A is an index identifying in spreadsheet format the individual limitations from Papst's asserted claims which the Camera Manufacturers believe are disclosed by each reference. This index, in conjunction with the individual invalidity charts, demonstrates the various possible combinations of disclosures from one or more of the above references that the Camera Manufacturers believe anticipate and/or render obvious each asserted claim of the '399 and '449 Patents.

Anticipation/Obviousness in Light of the Intrinsic Record and the Prior Art

As the intrinsic record of the Patents-in-Suit and the references cited by the Camera Manufacturers herein demonstrate, the problems identified by the inventor of the Patents-in-Suit and his alleged solutions to those problems were already well known to persons of ordinary skill in the art of multi-purpose interfaces at the time of the alleged invention. These well-known problems and their solutions included widespread efforts in the computer and consumer electronics industries to make digital products, including digital cameras, seamlessly compatible with computers. For example, the patent specification acknowledges as admitted prior art (APA) the state of the art at the time as follows:

In a preferred embodiment of the present invention in which the interface device **10** simulates a hard disk to the host device, the interface device is automatically detected and readied for operation when the host system is powered up or booted. This corresponds to the plug-and-play standard which is currently finding increasingly widespread use. The user is no longer responsible for installing the interface device **10** on the host device by means of specific drivers which must also be loaded; instead the interface device **10** is automatically readied for operation when the host system is booted.

'399 Patent, col. 8, ll. 1-11 (emphasis added).

Further, the "Description of Prior Art" section of the patent specification explains that it was well known in the art for a host device to communicate with an interface device by means of

an interface-specific driver installed in the host device. '399 Patent, col. 2, l. 15 – col. 3, l. 21. Specifically, this section of the specification refers to an IBM Technical Disclosure Bulletin which discloses “an interface which connects a host device to a peripheral device via a floppy disk drive interface.” '399 Patent, col. 3, ll. 8-10. Further, this “interface makes it possible to attach not only a floppy disk drive but also a further peripheral device to the FDD host controller of a host device. The host device assumes that a floppy disk drive is always attached to its floppy disk drive controller and communication is initiated if the address is correct.” '399 Patent, col. 3, ll. 13-18.

Indeed, both the inventor and the Examiner of the '399 Patent acknowledged this state of the art during prosecution of the '399 Patent application. In the first office action during prosecution of the '399 Patent application, the Examiner stated as follows:

Claims 1-16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant's admission of prior art [AAPA] and **McNeill, Jr. et al. (U.S. Patent No. 5,499,378)**.

...AAPA teaches an interface for communication between a host device and a transmit/receive device comprising:

- a processor [Applicant's specification, p. 3, line 8];
- a memory [Applicant's specification, p. 3, line 9];
- a first connecting device for interfacing the host device with the interface device via a multipurpose interface of the host device [Applicant's specification, p. 3, lines 1-3];
- a second connecting device for interfacing the interface device with the data transmit/receive device [Applicant's specification, p. 3, lines 9-12];

AAPA teaches the host device communicates with the interface device by means of an interface-specific driver installed in the host device...

It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the teachings of AAPA and **McNeill, Jr. et al.** because it would enhance the system by allowing the host device communicates [sic] with a transmit/receive device, through an interface device, by means of the standard driver in the host device instead of installing a device-

specific driver into the host device.

See '399 Patent Application, Office Action of 12/18/01.

Importantly, the applicant did not dispute these findings, nor was it disputed that the McNeill, Jr. reference constituted prior art. *See* '399 Patent Applicant's Response to Office Action of 12/18/01. Instead, the applicant amended the claims to include analog limitations, and stated: "this rejection is respectfully traversed with respect to the claims as amended.... In particular, the data transmit/receive device is arranged for providing analog data.... Since the second connecting device includes sample and hold circuits 1515 and A/D converter 1503, it is clear that the data transmit/receive device ... provides analog data." *Id.* (emphasis added). Then, with regard to **McNeill, Jr.**, the applicant admitted that the reference discloses (1) "provid[ing] access to a non-SCSI device via a SCSI bus," (2) requests are sent "in accordance with the SCSI protocol," and (3) the host can "access the [non-SCSI device] via SCSI commands." *Id.* The applicant distinguished over **McNeill, Jr.** by arguing that it did not disclose the analog limitations added by the claim amendments, nor did it disclose that the interface device "lies to the host computer as to the real nature of the data transmit/receive device." *Id.*

Accordingly, both the inventor and Examiner confirmed important details about the state of the art at the time of the alleged invention in the '399 and '449 Patents. Specifically, it was well known in the art for a host device to communicate with a peripheral device or interface device by means of standard drivers and command protocols which were already installed on the host device.⁵ The applicant's statements distinguishing over the prior art, as discussed above, made it clear that the inventor considered other limitations in his patent claims the point of novelty over the state of the art, specifically: (1) that the data transmit/receive device provides analog data to the interface device, and (2) that the interface device lies to the host computer as to the real nature of the data transmit/receive device.

⁵ Further, as demonstrated by the Murata reference (U.S. Patent No. 5,506,692), which was before the '399 Patent Examiner, it was also well known in the art for an interface device to use virtual file systems to make the host computer think there were actual files on the data transmit/receive device. *See* Exhibit A9.

As demonstrated by the prior art disclosures herein, it would have been (and indeed was) obvious to one skilled in the art to include such “analog” and “lying” characteristics in interface devices at the time of the alleged invention of the ’399 and ’449 Patents. Accordingly, under a proper understanding of the state of the art and of the intrinsic record of the ’399 and ’449 Patents, allowance of the asserted claims in this action is plainly refuted, and each of the asserted claims is demonstrably anticipated and/or rendered obvious as set forth herein, including within the invalidity charts attached to these Invalidity Contentions.

The Camera Manufacturers have further provided separate references disclosing certain aspects of the dependent claims and incorporated these into the accompanying charts—however, in some instances, such reference are supplemental inasmuch as the applicants admitted to various aspects as known in the prior art.

For example, the prior art reference SCSI Bus and IDE Interface Book (A47) has been used, in part, to address the transmission of the INQUIRY instruction. However, in the ’449 Patent, at 5:2–18, the patentee clearly admits that the INQUIRY instruction is known by those skilled in the art. Furthermore, the notion that one would *not* consider the SCSI specification when designing a device that is intended to appear to the host as a SCSI device is extremely untenable by any standard.

Claim by Claim Analysis

Below is an exemplary and representative invalidity analysis for each claim in the ’399 and ’449 Patents that Papst has asserted in this action. The Camera Manufacturers assert that the prior art references cited in these contentions may be combined in a variety of ways (*see, e.g.*, Exhibits A, A1–A19, A21–A74, A76–A104, and B1–13), and that one of ordinary skill in the art would have known how to incorporate or substitute other references disclosing similar subject matter:

'399 Patent, Claim 1

Claim 1 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 1 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 1 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 1 of the '399 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 1 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 1 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 1 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 1 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 1 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 1 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 1 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'399 Patent, Claim 2

Claim 2 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 2 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 2 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidation Chart claim 2 of the '399 Patent would have been

obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 2 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 2 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 2 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 2 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 2 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 2 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 2 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'399 Patent, Claim 3

Claim 3 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 3 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 3 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidation Chart claim 3 of the '399 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 3 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 3 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 3 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 3 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 3 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 3 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 3 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 3 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 3 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 3 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 3 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 3 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'399 Patent, Claim 5

Claim 5 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 5 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 5 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 5 of the '399 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 5 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 5 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 5 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 5 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 5 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 5 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 5 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 5 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 5 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 5 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 5 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'399 Patent, Claim 7

Claim 7 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 7 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 7 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidation Chart claim 7 of the '399 Patent would have been

obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 7 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 7 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 7 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 7 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 7 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 7 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 7 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'399 Patent, Claim 11

Claim 11 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 11 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 11 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 11 of the '399 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 11 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 11 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 11 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 11 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 11 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 11 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 11 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 11 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 11 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 11 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 11 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 11 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'399 Patent, Claim 14

Claim 14 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 14 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 14 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 14 of the '399 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 14 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 14 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 14 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 14 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 14 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 14 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 14 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 14 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 14 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 14 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 14 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 14 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'399 Patent, Claim 15

Claim 15 of the '399 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 15 of the '399 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 15 of the '399 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those

skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 15 of the '399 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 15 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 15 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 15 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 15 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 15 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 15 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 15 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 1

Claim 1 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 1 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 1 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 1 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 1 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 1 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 1 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 1 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 1 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 1 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 1 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 1 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 2

Claim 2 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 2 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 2 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidation Chart claim 2 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 2 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 2 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 2 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 2 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 2 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 2 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 2 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 2 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 6

Claim 6 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 6 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 6 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 6 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 6 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 6 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 6 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 6 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 6 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 6 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 6 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 6 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 6 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 6 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 6 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 7

Claim 7 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 7 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 7 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidation Chart claim 7 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 7 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 7 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 7 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 7 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 7 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 7 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 7 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 8

Claim 8 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 8 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 8 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidation Chart claim 8 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 8 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 8 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 8 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 8 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 8 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 8 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 8 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 8 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 8 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 8 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 8 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 9

Claim 9 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 9 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 9 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 9 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 9 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 9 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 9 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 9 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 9 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 9 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 9 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 9 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 9 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 9 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 9 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 12

Claim 12 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 12 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 12 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 12 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 12 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 12 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 12 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 12 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 12 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 12 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 12 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 12 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 12 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 12 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 12 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 13

Claim 13 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidation Chart as anticipating claim 13 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 13 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidation Chart claim 13 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 13 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 13 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 13 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 13 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 13 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 13 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 13 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 13 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 13 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 13 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 13 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 15

Claim 15 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 15 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 15 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 15 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 15 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 15 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 15 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 15 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 15 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 15 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 15 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 15 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 16

Claim 16 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 16 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 16 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 16 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 16 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 16 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 16 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 16 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 16 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 16 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 16 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 16 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 16 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 16 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 16 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 16 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 17

Claim 17 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 17 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 17 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 17 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 17 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 17 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 17 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 17 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 17 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 17 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 17 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 17 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 17 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 17 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 17 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 17 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

'449 Patent, Claim 18

Claim 18 of the '449 Patent is anticipated by at least the references identified in Table V: Summary Invalidity Chart as anticipating claim 18 of the '449 Patent, as indicated in Exhibit A and the attached claim charts A1–A19, A21–A74, A76–A104.

Claim 18 of the '449 Patent would also have been obvious with respect to each of the references above, whether alone, in combination with other references disclosing similar subject matter as shown in the attached invalidity charts, or in light of the common knowledge of those skilled in the art at the time of alleged invention. Although not limited to these combinations, as identified in Table V: Summary Invalidity Chart claim 18 of the '449 Patent would have been obvious (*see* Exhibit B1) over DeskLab 216 (*see* Exhibit A101) in combination with U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 18 would also have been obvious (*see* Exhibit B2) over the SCSI Bus Book (*see* Exhibit A47) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 18 would also have been obvious (*see* Exhibit B3) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of United States Patent No. 5,508,821 (*see* Exhibit A10), United States Patent No. 5,371,885 (*see* Exhibit A86) and the SCSI Bus Book (*see* Exhibit A47).

Claim 18 would also have been obvious (*see* Exhibit B4) over United States Patent No. 5,463,772 (*see* Exhibit A5/A68) in view of the MS-DOS Book (*see* Exhibit A97) and the SCSI Bus Book (*see* Exhibit A47).

Claim 18 would also have been obvious (*see* Exhibit B5) over United States Patent No. 5,231,501 (*see* Exhibit A88) in view of the SCSI Bus Book (*see* Exhibit A47), and U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 18 would also have been obvious (*see* Exhibit B6) over the Tasler Thesis (*see* Exhibit A48) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 18 would also have been obvious (*see* Exhibit B7) over the Universal Laboratory Interface User's Manual (ULI) (*see* Exhibit A102) in view of Francis (B7).

Claim 18 would also have been obvious (*see* Exhibit B8) over European Patent Number 0705037 (*see* Exhibit A89) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9).

Claim 18 would also have been obvious (*see* Exhibit B9) over United States Patent No. 5,129,036 (*see* Exhibit A87) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), the SCSI Bus Book (*see* Exhibit A47), and the CS5326 Datasheet (*see* Exhibit A98).

Claim 18 would also have been obvious (*see* Exhibit B10) over the Kodak DCS200 User's Manual (A56) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 18 would also have been obvious (*see* Exhibit B11) over the Kodak DCS1, DCS3, DCS5 User's Manual (A58) in view of U.S. Patent No. 5,506,692 (*see* Exhibit A9), and the SCSI Bus Book (A47).

Claim 18 would also have been obvious (*see* Exhibit B12) over the Universal Laboratory Interface User's Manual (ULI) (A102) in view of United States Patent No. 5,802,325 (A17).

Claim 18 would also have been obvious (*see* Exhibit B13) over United States Patent No. 5,815,205 (A21) in view of any of United States Patent Nos. 6,111,604; 6,344,875; 7,046,276 (A37), and United States Patent No. 5,742,934 (A104).

The reasons for obviousness and motivations to combine these references in the manner indicated above can be found in Exhibits B1–13.

INVALIDITY UNDER 35 U.S.C. § 112

The Court's Procedure Order (p. 3, 3(d)) requires the Camera Manufacturers to provide any grounds of invalidity based on 35 U.S.C. § 101, indefiniteness under 35 U.S.C. § 112(2) or enablement or written description under 35 U.S.C. § 112(1) of any asserted claims.

I. U.S.C. § 112, ¶2: INDEFINITENESS

Claims 3, 7, 8, and 14 of the '399 Patent and claims 9, 12–14, and 18 of the '449 Patent are invalid for failure to comply with the definiteness requirements of 35 U.S.C. § 112, ¶ 2, including the requirement that the claims particularly point out and distinctly claim the subject

matter which the patentee regards as its alleged invention such that one skilled in the relevant art would be reasonably apprised of the bounds of the asserted claims when read in light of the specification. The Camera Manufacturers provide the following reasons that certain asserted claims are invalid for indefiniteness:

Claim 7 of the '399 Patent is invalid for indefiniteness because the phrase "the signaled hard disk drive" recited in the claim lacks an antecedent basis.

Claim 12 of the '449 Patent is invalid for indefiniteness because the phrases "the file allocation table" and "the data file" recited in the claims lack an antecedent basis. Claim 12 is recited to depend from claim 1. However, claim 1 provides neither a recitation of "a file allocation table" nor "a data file." This is an error in the claim drafting that results in claim 12 being invalid for indefiniteness. Further, to the extent Papst may argue that the Court should "fix" claim 12 to depend from another claim in an attempt to cure its indefiniteness, there is no such way to fix the claim. In particular, the only possible antecedent bases for "a file allocation table" are recited in independent claims 17 and 18, while the only possible antecedent basis for "the data file" is recited in claim 2, which depends from independent claim 1. Thus, because there is no single claim from which claim 12 could properly depend in order to provide the necessary antecedent bases, claim 12 is invalid for indefiniteness. Since claim 13 of the '449 Patent depends from claim 12, it too is invalid for indefiniteness.

Similarly, claim 9 of the '449 Patent is invalid for indefiniteness because the phrase "the file allocation table" recited in the claims lacks an antecedent basis. Claim 9 is recited to depend from claim 1. However, claim 1 does not provide any antecedent recitation of "a file allocation table." For reasons similar to those discussed above with respect to claim 12 of the '449 Patent, claim 9 of the '449 Patent is invalid for indefiniteness.

Claims 3 and 8 of the '399 Patent are invalid for indefiniteness because the phrase "the memory means" recited in the claims lacks an antecedent basis. These claims both depend from independent claim 1, which does not provide any antecedent recitation of "a memory means."

Claim 14 of the '399 Patent is invalid for indefiniteness because the phrase "the usual driver" recited in the claim lacks an antecedent basis. This independent claim does not provide any antecedent recitation of "a usual driver."

Claim 18 of the '449 Patent is invalid for indefiniteness because the phrase "the usual driver" recited in the claim lacks an antecedent basis. This independent claim does not provide any antecedent recitation of "a usual driver."

Claim 13 of the '449 Patent is invalid for indefiniteness because it depends from claim 12 of the '449 patent, which itself is invalid for indefiniteness as set forth above.

II. 35 U.S.C. § 112, ¶1: INSUFFICIENT WRITTEN DESCRIPTION / ENABLEMENT

Claims 1-3, 5, 7, 11, 14-15 of the '399 Patent and claims 1, 2, 6-9, 12, 13, 15-18 of the '449 Patent are invalid for failure to comply with the written description and enablement requirements of 35 U.S.C. § 112, ¶ 1, including the requirement that the specification describe and enable the full scope of the claimed invention. The Camera Manufacturers provide the following reasons that certain asserted claims are invalid for lack of written description and/or enablement:

Claims 1-3, 5, 7 and 11 of the '399 Patent are invalid for failure to comply with the enablement and written description requirements of 35 U.S.C. § 112, ¶ 1. In particular, these claims lack enablement because they claim "a first command interpreter" and "and a second command interpreter," yet the patent does not describe or teach those skilled in the art how to implement or make such command interpreters. With regard to the command interpreters, independent claims 1 and 11 recite the following:

...wherein the interface device is configured by the processor and the memory to include a first command interpreter and a second command interpreter

... wherein the first command interpreter is configured in such a way that the command interpreter, when receiving an inquiry from the host device as to a type of a device attached to the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is an input/output device customary in a host device...

... wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.

'399 Patent, claims 1 and 11, col. 12, l. 60 – col. 13, l. 13; col. 14, ll. 1-20.

The specification of the '399 Patent, however, fails to provide descriptions sufficient to teach those skilled in the art how to implement the claimed first and second command interpreters without undue experimentation. The only disclosure in the '399 Patent specification pertaining to the command interpreters is as follows:

In a preferred embodiment of the present invention, the digital signal processor **13**, which need not necessarily be implemented as a digital signal processor but may be any other kind of microprocessor, comprises a first and a second command interpreter. The first command interpreter carries out the steps described above whilst the second command interpreter carries out the read/write assignment to specific functions. If the user now wishes to read data from the data transmit/receive device via the line **16**, the host device sends a command, for example "read file xy", to the interface device. As described above, the interface device appears to the host device as a hard disk. The second command interpreter of the digital signal processor now interprets the read command of the host processor as a data transfer command, by decoding whether "xy" denotes, for example, a "real-time input" file, a "configuration" file or an executable file, whereby the same begins to transfer data from the data transmit/receive device via the second connecting device to the first connecting device and via the line **11** to the host device.

'399 Patent, col. 14, ll. 48-67. This disclosure is woefully insufficient to teach those skilled in the art how to implement software capable of performing the steps described for the first and second command interpreters. For example, there is no teaching as to how the second command interpreter "interprets" or "decodes" a read command of the host processor, or how the second command interpreter subsequently translates these commands into device-specific commands that can be used to initiate data transfer from a variety of data transmit/receive devices, especially for data transmit/receive devices providing a "real-time input" file consisting of a stream of analog data.

One skilled in the art would not be able to write software capable of performing the claimed scope of the command interpreters based on the disclosure above. *See, e.g., White Consol. Indus., Inc. v. Vega Servo-Control, Inc.*, 713 F.2d 788 (Fed. Cir. 1983) (disclosure of

“language translator” and characteristics inadequate where as development of equivalent translator would require undue experimentation). Since the ‘399 Patent specification fails to teach those skilled in the art how to make and use the claimed “command interpreters” without undue experimentation, claims 1 and 11 of the ‘399 Patent are invalid for failure to comply with the enablement and written description requirements of 35 U.S.C. § 112, ¶ 1.

Further, claims 1-3, 5, 7, 11, 14-15 of the ‘399 Patent and claims 1, 2, 6-9, 12, 13, 15-18 of the ‘449 Patent are invalid for failure to comply with the written description and enablement requirements of 35 U.S.C. § 112, ¶ 1, including the requirement that the specification describe and enable the full scope of the claimed invention, in that the disclosure lacks a sufficient disclosure to teach one of ordinary skill in the art without undue experimentation how to implement any means in the “host device” which would allow or cause:

the host device [to] communicate[] with the interface device by means of the driver for the input/output device customary in a host device,

’399 Patent, claim 1;

the host device [to] communicate[] with the interface device by means of the specific driver for the multi-purpose interface,

’399 Patent, claim 11;

the host device [to] communicate[] with the interface device by means of the driver for the storage device customary in a host device, or

’449 Patent, claim 1;

the host device [to] communicate[] with the interface device by means of the usual driver for the storage device.

’449 Patent, claim 18.

Papst is expected to argue that these claims should be interpreted in such a manner as to describe an interface device and host device wherein it is not necessary for the user to load a specific driver onto the host to allow the host device to communicate with the interface device connected to the multi-purpose interface of the host device. However, the disclosures of the ’399 and ‘449 Patents contain no description of any means, either hardware or software, for a “driver

for the input/output device customary in a host device,” *etc.*, to communicate through the multi-purpose interface to the interface device without the user having to load a specific driver onto the host. Accordingly, claims 1-3, 5, 7, 11, 14-15 of the ‘399 Patent and claims 1, 2, 6-9, 12, 13, 15-18 of the ‘449 Patent are invalid for failure to comply with the enablement and written description requirements of 35 U.S.C. § 112, ¶ 1.

Claim 7 of the ‘399 Patent and claims 1, 2, 6-9, 12, 13, 15-18 of the ‘449 Patent are also invalid for failure to comply with the enablement and written description requirements of 35 U.S.C. § 112, ¶ 1 because the specification fails to describe or enable “virtual files,” “virtual boot sequence[s]” and/or “simulating a virtual file system.” There is no adequate description explaining the structure of a virtual file, virtual boot sequence or virtual file system, explaining how a “virtual” file, boot sequence or file system is different than an actual file, boot sequence or file system or explaining how a virtual file in a virtual file system can be used to access data on the data transmit/receive device. Accordingly, claim 7 of the ‘399 Patent and claims 1, 2, 6-9, 12, 13, 15-18 of the ‘449 Patent are invalid under 35 U.S.C. § 112, ¶ 1.

Claims 1, 2, 6-9, 12, 13, 15-18 of the ‘449 Patent are also invalid for failure to comply with the enablement and written description requirements of 35 U.S.C. § 112, ¶ 1 because the specification fails to describe or enable “simulating a virtual file system.” There is no description of “simulating” a virtual file system in the specification and, as drafted, these claims are inoperable. Accordingly, claims 1, 2, 6-9, 12, 13, 15-18 of the ‘449 Patent are invalid under 35 U.S.C. § 112, ¶ 1.

Claims 1-3, 5, 7, 11, 14-15 of the ‘399 Patent and claims 1, 2, 6-9, 12, 13, 15-18 of the ‘449 Patent are also invalid for failure to comply with the enablement and written description requirements of 35 U.S.C. § 112, ¶ 1 because the specification fails to describe or enable the full scope of the claims, at least as construed by Papst. For example, Papst is seeking to construe the claims of the ‘399 and ‘449 Patents to cover digital camera and audio devices that directly connect to a host computer without needing to use any separate “interface device” and to cover devices where there is no actual communication between the alleged data transmit/receive device

and the alleged host system. The specifications of the '399 and '449 Patents, however, do not describe or enable such systems. See *LizardTech, Inc. v. Earth Res. Mapping, Inc.*, 424 F.3d 1336 (Fed. Cir. 2005); *Sitrick v. Dreamworks, LLC*, 516 F.3d 993 (Fed. Cir. 2008) (claims invalid under 35 U.S.C. § 112 where they covered integrating a user's audio signal or visual image into a preexisting video game or movie, but specification only described video game embodiment). Accordingly, the asserted claims are invalid under 35 U.S.C. § 112, ¶ 1.

Dated: December 30, 2010

Respectfully submitted,

By: /s/ Patrick J. Kelleher

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CERTIFICATE OF SERVICE

I, Patrick J. Kelleher, hereby certify that on this 30th day of December, 2010, a true and correct copy of the foregoing **FIRST WAVE CAMERA MANUFACTURERS' FINAL INVALIDITY CONTENTIONS (CORRECTED)** was served on counsel of record by email as follows:

Respectfully submitted,

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Exhibit A8

PRIOR ART CLAIM CHART

Code	USP 6,470,399's Claim Language	U.S. Patent No.5,499,378
A	Independent Claim 1: 1. An interface device for communication between	A target system 14
B1	a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and	An initiator system 10; which would include or render obvious, input./output device customary in a host, such as storage devices , and associated drivers; SCSI is a multi-purpose interface (Abstract; Fig. 1)
C	a data transmit/receive device,	Magnetic disk 16; to the extent this does not meet the Court's limitations, this would be obvious.
C1	the data transmit/receive device being arranged for providing analog data, comprising:	Inherent with disk storage, otherwise limitation is obvious in light of prior art reference.
D	a processor;	Inherent to the extent that a PC comprise a processor. The target system 14 can be a PC which has a processor.
E	a memory;	Inherent to the extent that a PC comprises memory.. The target system 14 can be a PC which has a memory.
F	a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	The target system 14 is connected with the initiator system via its SCSI bus, which would incorporate, or render obvious, use of connectors. To the extent this does not meet the Court's limitations, this would be obvious.
G	a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including	The target system 10 is connected to the magnetic disk 16 via SCSI adapter; which would incorporate, or render obvious, use of connectors. To the extent this does not meet the Court's limitations, this would be obvious.

PRIOR ART CLAIM CHART

Code	USP 6,470,399's Claim Language	U.S. Patent No.5,499,378
G1	a sampling circuit for sampling the analog data provided by the data transmit/receive device and	Inherent with disk storage which requires sampling signals read from a rotating disk at a given time, otherwise limitation is obvious-
G2	an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,	Inherent with disk storage, otherwise limitation is obvious in light of prior art reference.
H	wherein the interface device is configured by the processor and the memory	The target system 14 is configured by its processor and memory.
H1	to include a first command interpreter and a second command interpreter,	Inherent as SCSI commands are received and interpreted (Fig. 3, 4; col. 4, lines 11-29).
I	wherein the first command interpreter is configured in such a way that the command interpreter, when receiving an inquiry from the host device as to a type of a device attached to the multi-purpose interface of the host device	Inherent in SCSI interface; initiator system sends Inquiry command to target system 5:10-31.
J	sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device	Inherent in SCSI interface; initiator system sends Inquiry command to target system 5:10-31.
K1	which signals to the host device that it is an input/output device customary in a host device	The initiator system deems the target system as a local hard disk. Col. 5, generally.
L1	whereupon the host device communicates with the interface device by means of the driver for the input/output device customary in a host device, and	Initiator system uses SCSI I/O device driver commands to communicate with target 3:15-30, 41-46; col. 5 generally, Fig. 3, 4.
M	wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.	Target system can response to read command to provide data. Col. 5 generally; Fig. 3, 4.
A	Independent claim 11: 11. An interface device for communication between	See '399 claim 1, row A.
B2	a host device, which comprises a multi-purpose interface and a specific driver for this interface, and	Initiator uses SCSI interface with appropriate driver. Col. 43, lines 16-45.
C	a data transmit/receive device	See '399 claim 1, row C.

PRIOR ART CLAIM CHART

Code	USP 6,470,399's Claim Language	U.S. Patent No.5,499,378
C1	the data transmit/receive device being arranged for providing analog data, comprising:	See '399 claim 1, row C1.
D	a processor;	See '399 claim 1, row D.
E	a memory;	See '399 claim 1, row E.
F	a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	See '399 claim 1, row F.
G	a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including	See '399 claim 1, row G.
G1	a sampling circuit for sampling the analog data provided by the data transmit/receive device and	See '399 claim 1, row G1.
G2	an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,	See '399 claim 1, row G2.
H	where the interface device is configured using the processor and the memory	See '399 claim 1, row H.
H1	to include a first command interpreter and a second command interpreter,	See '399 claim 1, row H1.
I	wherein the first command interpreter is configured in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached at the multi-purpose interface of the host device	See '399 claim 1, row I.
J	sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device,	See '399 claim 1, row J.
K1	which signals to the host device that it is an input/output device customary in a host device,	See '399 claim 1, row K1.
L3	whereupon the host device communicates with the interface device by means of the specific driver for the multi-purpose interface, and	Initiator uses SCSI interface with appropriate driver. Col. 43, lines 16-45.
M	wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.	See '399 claim 1, row M.
A	Independent Claim 14: 14. A method of communication between	See '399 claim 1, row A.

PRIOR ART CLAIM CHART

Code	USP 6,470,399's Claim Language	U.S. Patent No.5,499,378
B1	a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and	See '399 claim 1, row B1
C	a data transmit/receive device	See '399 claim 1, row C.
C1	the data transmit/receive device being arranged for providing analog data, via an interface device, comprising:	See '399 claim 1, row C1.
F	interfacing of the host device with a first connecting device of the interface device via the multi-purpose interface of the host device;	See '399 claim 1, row F.
G	interfacing of the data transmit/receive device with a second connecting device of the interface device, the second connecting device including	See '399 claim 1, row G.
G1	a sampling circuit for sampling the analog data provided by the data/transmit/receive device and	See '399 claim 1, row G1.
G2	an analog-to-digital converter for converting data sampled by the sampling circuit into digital data;	See '399 claim 1, row G2.
I	inquiring by the host device at the interface device as to the type of device to which the multi-purpose interface of the host device is attached;	See '399 claim 1, row I.
J	regardless of the type of the data transmit/receive data attached to the second connecting device of the interface device, responding to the inquiry from the host device by the interface device	See '399 claim 1, row J.
K1	in such a way that it is an input/output device customary in a host device,	See '399 claim 1, row K1.
L1	whereupon the host device communicates with the interface device by means of the usual driver for the input/output device, and	See '399 claim 1, row L1.
M	interpreting a data request command from the host device to the type of input/output device customary in the host device as a data transfer command for initiating a transfer of the digital data to the host device.	See '399 claim 1, row M.
B*1	Dependent Claim 2: 2. An interface device according to claim 1, wherein the drivers for input/output drivers customary in a host device comprise a hard disk driver, and the signal indicates to the host device that the host device is communicating with a hard disk.	SCSI driver with appropriate driver is used. Col. 3, lines 16-30.

PRIOR ART CLAIM CHART

Code	USP 6,470,399's Claim Language	U.S. Patent No.5,499,378
E*	<p>Dependent Claim 3:</p> <p>3. An interface device according to claim 1, wherein the memory means comprises a buffer to buffer data to be transferred between the data transmit/receive device and the host device.</p>	<p>Target system has a buffer (cache) memory. Col. 4, line 26.</p>
D*	<p>Dependent Claim 5:</p> <p>5. An interface device according to claim 1, wherein the processor is a digital signal processor.</p>	<p>To the extent this is not disclosed, this limitation would have been obvious.</p>
N*1	<p>Dependent Claim 7:</p> <p>7. An interface device according to claim 2, which further comprises a root directory and virtual files which are present on the signaled hard disk drive and which can be accessed from the host device.</p>	<p>Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.</p>
B*1	<p>Dependent Claim 15:</p> <p>15. A method according to claim 14, wherein the drivers for input/output devices customary in a host device comprise a driver for a storage device and in particular for a hard disk drive.</p>	<p>SCSI drivers with appropriate drivers are used. Co. 3, lines 15-30; col. 5 generally.</p>

PRIOR ART CLAIM CHART

Code	USP 6,895,449's Claim Language	U.S. Patent No.5,499,378
A	Independent Claim 1: 1. An interface device for communication between	See '399 claim 1, row A.
B1	a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and	See '399 claim 1, row B1.
C	a data transmit/receive device comprising the following features:	See '399 claim 1, row C.
D	a processor;	See '399 claim 1, row D.
E	a memory;	See '399 claim 1, row E.
F	a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	See '399 claim 1, row F.
G	a second connecting device for interfacing the interface device with the data transmit/receive device,	See '399 claim 1, row G.
H	wherein the interface device is configured by the processor and the memory	See '399 claim 1, row H.
I	in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached to the multi-purpose interface of the host device,	See '399 claim 1, row I.
J	sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device	See '399 claim 1, row J.
K2	which signals to the host device that it is a storage device customary in a host device,	The target system responds as a hard disk. Col. 5 generally; Fig. 3, 4.
L2	whereupon the host device communicates with the interface device by means of the driver for the storage device customary in a host device, and	SCSI drivers with appropriate drivers are used. Co. 3, lines 15-30; col. 5 generally.
N1	wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a directory structure.	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.
A	Independent claim 17: 17. An interface device for communication between	See '399 claim 1, row A.
B2	a host device, which comprises a multi-purpose interface and a specific driver for this interface,	See '399 claim 11, row B2.

PRIOR ART CLAIM CHART

Code	USP 6,895,449's Claim Language	U.S. Patent No.5,499,378
C	and a data transmit/receive device comprising the following features:	See '399 claim 1, row C.
D	a processor;	See '399 claim 1, row D.
E	a memory;	See '399 claim 1, row E.
F	a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	See '399 claim 1, row F.
G	a second connecting device for interfacing the interface device with the data transmit/receive device,	See '399 claim 1, row G.
H	where the interface device is configured using the processor and the memory	See '399 claim 1, row H.
I	in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached at the multi-purpose interface of the host device,	See '399 claim 1, row I.
J	sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device	See '399 claim 1, row J.
K2	which signals to the host device that it is a storage device customary in a host device,	See '449 claim 1, row K2.
L3	whereupon the host device communicates with the interface device by means of the specific driver for the multi-purpose interface, and	See '399 claim 11, row L3.
N2	wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a file allocation table and a directory structure.	Inherent; otherwise this limitation would have been obvious in light of other references.
A	Independent Claim 18: 18. A method of communication between	See '399 claim 1, row A.
B1	a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface,	See '399 claim 1, row B1.
C	and a data transmit/receive device via an interface device comprising the following steps:	See '399 claim 1, row C.
F	interfacing of the host device with a first connecting device of the interface device via the multi-purpose interface of the host device;	See '399 claim 1, row F.
G	interfacing of the data transmit/receive device with a second connecting device of the interface device;	See '399 claim 1, row G.

PRIOR ART CLAIM CHART

Code	USP 6,895,449's Claim Language	U.S. Patent No.5,499,378
I	inquiring by the host device at the interface device as to the type of device to which the multi-purpose interface of the host device is attached;	See '399 claim 1, row I.
J	regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, responding to the inquiry from the host device by the interface device	See '399 claim 1, row J.
K2	in such a way that it is a storage device customary in a host device,	See '449 claim 1, row K2.
L2	whereupon the host device communicates with the interface device by means of the usual driver for the storage device, and	See '449 claim 1, row L2.
N2	wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a file allocation table and a directory structure.	See '449 claim 17, row N2.
N*5	Dependent Claim 2: 2. An interface device in accordance with claim 1, in which the directory structure has a configuration file for setting and controlling functions of the interface device or an executable or a batch file for conducting a routine stored in the memory or a data file used for transferring data from the data transmit/receive device to the host device or a help file for giving help on handling the interface device.	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.
N*8	Dependent Claim 6: 6. An interface device in accordance with claim 1 wherein, in response to a request from the host to read a boot sequence, the processor is arranged to send a virtual boot sequence to the host.	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.
N*9	Dependent Claim 7: 7. An interface device in accordance with claim 6 wherein the virtual boot sequence includes a starting position and a length of a file allocation table, an indication of a type of the storage device or a number of sectors of the storage device.	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.
N*10	Dependent Claim 8: 8. An interface device in accordance with claim 7 wherein, in response to a request from the host to display a directory of the storage device, a processor is arranged for transferring the file allocation table and the directory structure to the host.	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.

PRIOR ART CLAIM CHART

Code	USP 6,895,449's Claim Language	U.S. Patent No.5,499,378
N*11	<p>Dependent Claim 9:</p> <p>9. An interface device in accordance with claim 1 wherein the file allocation table and the directory structure is transferred to the host in response to a request from the host to read data from or store data to the storage device.</p>	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.
N*14	<p>Dependent Claim 12:</p> <p>12. An interface device in accordance with claim 1 wherein the file allocation table includes information on numbers of blocks occupied by the data file wherein the interface device is arranged for receiving block numbers or a block number range from the host when the host wants to read the data file, and wherein the interface device is arranged to start a data transfer to the host, when the block numbers or the block number range is received from the host.</p>	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.
N*15	<p>Dependent Claim 13:</p> <p>13. An interface device in accordance with claim 12 wherein the processor is arranged for formatting the data acquired by the second connecting device into blocks having a predetermined size, the predetermined size being suited for the storage device.</p>	Inherent; otherwise this limitation would have been obvious in light of other SCSI related references.
K2*	<p>Dependent Claim 15:</p> <p>15. An interface device in accordance with claim 1 wherein the storage device is a hard disk.</p>	The initiator system considers the target system as a hard disk.
E*	<p>Dependent Claim 16:</p> <p>6. An interface device in accordance with claim 1 wherein the memory has a data buffer for permitting independence in terms of time of the data transmit/receive device attachable to the second connecting device from the host device attachable to the first connecting device.</p>	See '399 claim 3, row E*.