UNITED STATES PATENT AND TRADEMARK OFFIC	Έ
BEFORE THE PATENT TRIAL AND APPEAL BOARD)

DECLARATION OF EREZ ZADOK, PH.D. IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S. PATENT 9,189,437

> Apple 1003 IPR2016-01840



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		e combination of Kawasaki, Alon, and Schmidt renders claim 1 vious	29
	1.	The combination of Kawasaki, Alon, and Schmidt discloses "[a]n analog data generating and processing device (ADGPD)."	29
	2.	The combination of Kawasaki, Alon, and Schmidt discloses the ADGPD architecture elements	31
		a) The combination of Kawasaki, Alon, and Schmidt discloses "an input/output (i/o) port."	32
		b) a program memory;	32
		c) The combination of Kawasaki, Alon, and Schmidt discloses "a data storage memory."	33
		d) The combination of Kawasaki, Alon, and Schmidt discloses "a processor operatively interfaced with the I/O port, the program memory and the data storage memory."	33
	3.	The combination of Kawasaki, Alon, and Schmidt teaches the acquisition and processing limitations of independent claim 1	36
		a) The combination of Kawasaki, Alon, and Schmidt teaches the analog data acquisition limitation	36



	b) The combination of Kawasaki, Alon, and Schmidt discloses the data processing including digitization, processing and file storage limitation	
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The	combination of Kawasaki, Alon, and Schmidt renders claim 14	
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	The obv	data processing including digitization, processing and file storage limitation



		e combination of Kawasaki, Alon, and Schmidt renders claim 30 vious76
		e combination of Kawasaki, Alon, and Schmidt renders claim 34 vious
		e combination of Kawasaki, Alon, and Schmidt renders claim 43 vious
	1.	The combination of Kawasaki, Alon, and Schmidt discloses "[a]n analog data generating and processing method for acquiring analog data and for communicating with a host computer."
	2.	The combination of Kawasaki, Alon, and Schmidt discloses the architecture elements of claim 4380
	3.	The combination of Kawasaki, Alon, and Schmidt teaches the acquisition and processing limitations of independent claim 4383
		a) Kawasaki in view of Alon teaches the acquisition limitation83
		b) Kawasaki teaches the processing limitation of independent claim 4386
	4.	The combination of Kawasaki, Alon, and Schmidt teaches the automatic recognition limitation of independent claim 4387
	5.	The combination of Kawasaki, Alon, and Schmidt teaches the transferring limitation of independent claim 4393
	6.	The combination of Kawasaki, Alon, and Schmidt teaches "wherein the identification parameter is consistent with the ADGPD being responsive to commands issued from a customary device driver."98
		e combination of Kawasaki, Alon, and Schmidt renders claim 45 vious
IX.		d 2: The combination of Kawasaki, Alon, Schmidt, and Van Sant s claim 4 obvious
X.		d 3: The combination of Kawasaki, Alon, Schmidt, and Ogami renders 6 obvious
XI.		d 4: The combination of Kawasaki, Alon, Schmidt, and eraphunsiri renders claim 9 and 10 obvious
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