UNITED STATES	PATENT AND TRA	ADEMARK OFFICE
BEFORE THE PA	TENT 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 IPR2016-01842

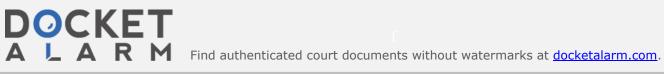


TABLE OF CONTENTS

I.	Introduction1 -				
II.	Qualifications2 -				
III.	My understanding of claim construction8 -				
IV.	My und	erstanding of obviousness 9 -			
V.	Level o	f ordinary skill in the art 10 -			
VI.	Background of the technologies disclosed in the '437 patent 11 -				
	A. De	vice emulation 11 -			
	B. Hard disk interface technologies17				
	C. Op	erating systems and file systems 22 -			
VII.	Claim c	construction 26 -			
VIII.		1: The combination of Pucci, Kepley, and Schmidt renders claims 1, 12, 14, 15, 30, and 34 obvious 27 -			
		e combination of Pucci, Kepley, and Schmidt renders claim 1 vious. ————————————————————————————————————			
	1.	An analog data generating and processing device (ADGPD), comprising [1P]:28 -			
	2.	The combination of Pucci, Kepley, and Schmidt discloses the ADGPD architecture elements. ————————————————————————————————————			
		a) an input/output (i/o) port; 31 -			
		b) a program memory [1B];32 -			
		c) a data storage memory [1C];32 -			
		d) a processor operatively interfaced with the I/O port, the program memory and the data storage memory [1D]; 33 -			
	3.	The combination of Pucci, Kepley, and Schmidt teaches the acquisition and processing limitations of independent claim 1 36 -			
		a) Pucci teaches the acquisition limitation [1E.1] 36 -			
		b) The combination of Pucci and Kepley teaches the data processing limitation [1E.2]47 -			
	4.	The combination of Pucci, Kepley, and Schmidt teaches the automatic recognition limitation of independent claim 1 51 -			



		a)	The combination of Pucci, Kepley, and Schmidt discloses the claimed automatic recognition operation [1F.1] 52 -			
		b)	The combination of Pucci, Kepley, and Schmidt teaches the end user requirements. ————————————————————————————————————			
		c)	The combination of Pucci, Kepley, and Schmidt teaches the automatic recognition data element requirements 67 -			
	5.	5. The combination of Pucci, Kepley, and Schmidt teaches the file transfer limitation of independent claim 1				
		a)	The combination of Pucci, Kepley, and Schmidt teaches the recited automatic file transfer process. ———————————————————————————————————			
		b)	The combination of Pucci, Kepley, and Schmidt discloses the emulation and user requirement component of the file transfer limitation. ————————————————————————————————————			
B.		The combination of Pucci, Kepley, and Schmidt renders claim 4 bbvious. ————————————————————————————————————				
C.						
D.						
E.						
F.						
G.						
H.	The combination of Pucci, Kepley, and Schmidt renders claim 12 obvious 87 -					
I.	The combination of Pucci, Kepley, and Schmidt renders claim 14 obvious.					
J.	The combination of Pucci, Kepley, and Schmidt renders claim 15 obvious.					
K.	The combination of Pucci, Kepley, and Schmidt renders claim 30 obvious. ————————————————————————————————————					
L.	Th	e co	mbination of Pucci, Kepley, and Schmidt renders claim 34 s			



IX.	Ground 2: The combination of Pucci, Kepley, Schmidt, and Shinosky renders claim 16 obvious. ————————————————————————————————————					
X.	Ground 3: The combination of Pucci, Kepley, Schmidt, and Campbell renders claims 13 and 18 obvious. ————————————————————————————————————					
	A.		combination of Pucci, Kepley, Schmidt and Campbell renders 13 obvious99 -			
	B.		combination of Pucci, Kepley, Schmidt, and Campbell renders n 18 obvious 103 -			
XI.		round 4: The combination of Pucci, Kepley, Schmidt, and Wilson renders aim 32 obvious 103 -				
XII.	Ground 5: The combination of Pucci and Schmidt renders claim 43 obvious 105 -					
	A.	An analog data generating and processing method for acquiring analog data and for communicating with a host computer comprising [43P]: 105 -				
	B.		combination of Pucci and Schmidt discloses the architecture ents of claim 43 106 -			
			The combination of Pucci, Kepley, and Schmidt teaches the acquisition and processing limitations [43B] 109 -			
		8	Pucci teaches the acquisition limitation of independent claim 43 109 -			
		ł	The combination of Pucci and Schmidt teaches the processing limitation of independent claim 43 109 -			
			The combination of Pucci and Schmidt teaches the automatic recognition limitation of independent claim 43 111 -			
			The combination of Pucci and Schmidt teaches the transferring imitation of independent claim 43 115 -			
		i r	The combination of Pucci and Schmidt teaches "wherein the dentification parameter is consistent with the ADGPD being esponsive to commands issued from a customary device driver." 17 -			
XIII.	Ground 6: The combination of Pucci, Schmidt, and Campbell renders claim 45 obvious 118 -					
XIV.	Adequacy of the German Priority Application 118 -					
XV.	Conclusion 122 -					



I. Introduction.

- I, Dr. Erez Zadok, declare as follows:
- 1. I have been retained on behalf of Apple Inc. for the above-captioned *inter partes* review proceeding. I understand that this proceeding involves U.S. Patent No. 9,189,437 ("the '437 patent") titled "Flexible Interface for Communication Between a Host and an Analog I/O Device Connected to the Interface Regardless the Type of the I/O Device" by Michael Tasler, and that the '437 patent is currently assigned to Papst Licensing GmbH & Co. KG.
- 2. In preparing this declaration, I have reviewed and am familiar with all the references cited herein.
- 3. The '437 patent describes an interface device that "simulates, both in terms of hardware and software, the way in which a conventional input/output device functions, preferably that of a hard disk drive." (Ex. 1001, '437 patent, 4:16–20.) I am familiar with the technology described in the '437 patent as of its August 24, 2006 filing date and its claimed March 4, 1997 priority date.
- 4. I have been asked to provide my independent technical review, analysis, insights, and opinions regarding the '437 patent and the references that form the basis for the six grounds of rejection set forth in the Petition for *Inter Partes* Review of the '437 patent.



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