

UNITED STATES PATENT AND TRADEMARK OFFICE

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
IPR2016-01842
U.S. Pat. 9,189,437

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	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 -
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	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. - 62 -
- c) The combination of Pucci, Kepley, and Schmidt teaches the automatic recognition data element requirements. - 67 -
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 - a) The combination of Pucci, Kepley, and Schmidt teaches the recited automatic file transfer process. - 71 -
 - b) The combination of Pucci, Kepley, and Schmidt discloses the emulation and user requirement component of the file transfer limitation. - 77 -
- B. The combination of Pucci, Kepley, and Schmidt renders claim 4 obvious. - 78 -
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- J. The combination of Pucci, Kepley, and Schmidt renders claim 15 obvious. - 90 -
- K. The combination of Pucci, Kepley, and Schmidt renders claim 30 obvious. - 91 -
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	1. The combination of Pucci, Kepley, and Schmidt teaches the acquisition and processing limitations [43B].	- 109 -
	a) Pucci teaches the acquisition limitation of independent claim 43.....	- 109 -
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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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