UNITED STATES P	ATENT AND TRAI	DEMARK OFFICE
BEFORE THE PAT	TENT TRIAL AND A	- APPEAL BOARD -

DECLARATION OF EREZ ZADOK, PH.D. IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S. PATENT 8,504,746



Apple 1003 IPR 2016-01863

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			b)	"Computer architecture/operation component" [1P.2].	
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		1.	The combination of Pucci, Kepley, and Schmidt discloses "[a] method for analog data acquisition and interfacing to a host device wherein the host device includes a device driver" as recited in the preamble of claim 34 [34P]	87	
		2.	The combination of Pucci, Kepley, and Schmidt discloses the "interfacing" step of claim 34 [34A].	87	
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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. 8,504,746 ("the '746 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 '746 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 '746 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." ('746 patent, 4:14–17.) I am familiar with the technology described in the '746 patent as of its September 27, 2010 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 '746 patent and the references that form the basis for the three grounds of rejection set forth in the Petition for *Inter Partes* Review of the '746 patent.



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