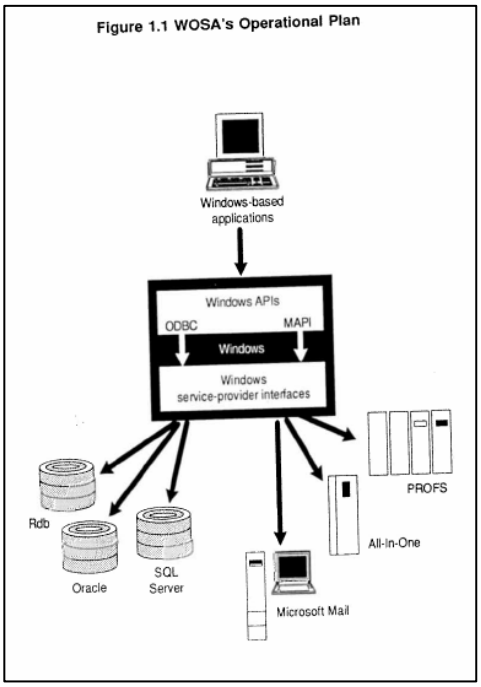
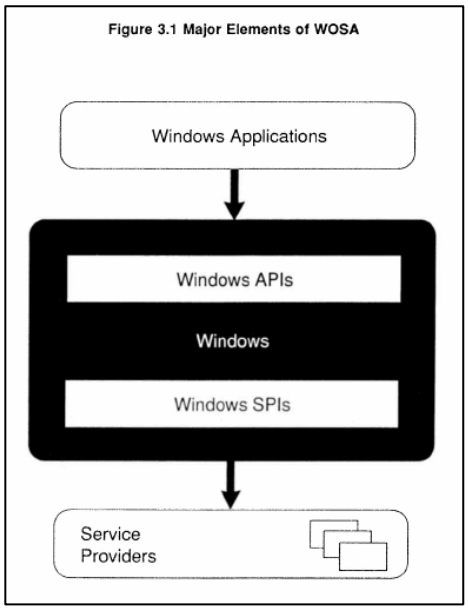
Prior Art: Windows Open System Architecture, Computer Technology Research Corp., Jerry Cashin ("Cashin" Programmer's Reference and SDK Guide ("ODBC Programmer's Guide"); Inside OLE 2, Kraig Brockschmidt (Compumotor Motion Toolbox User Guide, A Library of LabView Virtual Instruments for Motion Control ("Mot

Defendants assert that, based on the scope of the claims as asserted by AMS in its infringement contentions, disc ODBC, Brockschmidt, and Motion Toolbox in the documents described above are invalidating prior art under pr 102(a), (b) and/or (e), and that the underlying systems described in the Cashin reference, the Motion Toolbox ref Brockschmidt, and the ODBC reference are invalidating prior art by prior public use and/or on sale under pre-AI or (b). Accordingly, as used herein, "Cashin" is used to refer to both the disclosures of the Cashin disclosure and disclosed therein, ODBC is used to refer to both the disclosures of the ODBC reference and the systems disclose Brockschmidt is used to refer to both the disclosures of the Brockschmidt reference and the systems disclosed th Toolbox" is used to refer to both the disclosures of the Motion Toolbox reference and the systems disclosed there

Claim 1	***Cashin, Motion Toolbox, and ODBC***
A system for generating a sequence of control commands for controlling a selected motion control device selected from a group of supported motion control devices, comprising:	Cashin discloses and describes the Windows Open Services Architecture ("WO provides a software system that applications use to interact with local and remot and services. WOSA can include a Driver Manager that connects the applicatio server driver. WOSA provides a single interface for implementing a particular s applications can invoke specified APIs as appropriate to the functional service b including functional services for interacting with devices. "Applications call protocols known as Application Programming Interfaces (AP that have been standardized in the Windows environment. The specific nature, the called service is of no concern to the calling API, at least from the viewpoin procedures." Cashin at 2. "WOSA's operational plan (see Figure 1.1) includes an abstraction layer that pr with heterogeneous computing devices via a set of APIs. Windows-based appli APIs, can operate from a variety of end-user devices. New end-user devices ca enter the marketplace. Meanwhile, applications remain unchanged as long as th APIs." Cashin at 6. "Instead of having to learn a different set of APIs for each implementation of a s

Claim 1	*Cashin, Motion Toolbox, and ODBC*
	creating WOSA applications need only learn a single set of APIs for all implem particular service. In addition, applications remain stable no matter what chang functional services as long as these services communicate through the WOSA i "Figure 3.1 depicts the major elements of this model where user applications inv appropriate to the functional service being sought." Cashin at 49. *See, e.g.*, Cashin at Figure 1.1, 7:  "Figure 3.1 depicts the major elements of this model where user applications inv appropriate to the functional service being sought, e.g. messaging service. The provider, in this case MAPI, is accessed through SPIs developed for specific me Cashin at 49.

Claim 1	*Cashin, Motion Toolbox, and ODBC*
	See, e.g., Cashin at Figure 3.1, p. 50:  *See also* Cashin at 8, 46, Figure 1.2 at 17, Figure 2.3 at 47. Cashin also describes many specific examples of software systems that applicati based on WOSA including, for example, Open Database Connectivity ("ODBC ("MAPI"), and Windows Extensions for Financial Services ("WOSA/XFS"). *See also* Cashin at 18-19, 21-22, 30, Figure 1.8 at 32, Figure 4.2 at 61, 85-87, 12 Cashin also describes examples of communication between an application progr hardware devices, including printers and financial devices. "In 1992, Microsoft formed a consortium of firms interested in financial service standardize the end-user interface. … Their basic goal was to allow any applicat employ standard interfaces for access to financial data and devices." Cashin at

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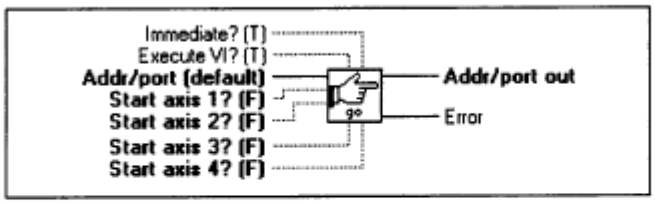
	can include printers, magnetic stripe readers/writers, PIN pads, cash dispensers, image scanners. *See* Cashin at 126.

Claim 1	*Cashin, Motion Toolbox, and ODBC*
[1A] a set of motion control operations, where each motion control operation is either a primitive operation the implementation of which is required to operate other motion control devices and cannot be simulated using other motion control operations or	Motion Toolbox was a library of motion control software instruments ("virtual i "VIs") for LabVIEW, developed by Snider Consultants, Inc. for Computmotor's motion controllers. Motion Toolbox allows LabVIEW programmers to develop systems for a wide range of applciations incluing automated test and manufactu and laboratory automation. Motion Toolbox provided developers with motion c including velocity, acceleration, deceleration, go, stop, kill, etc. *See* Motion To Motion Toolbox contains a library of VIs that programmers could use to develo systems and programs. The Cashin architecture as applied to the VIs of Motion in an API with functions that could be called from application programs to defi sequence. Motion Toolbox defines VIs including Initiate Motion, Stop Motion, Set Distan Acceleration, Set Deceleration, Set Direction, Set Position, and Set Path Velocit *See* Motion Toolbox at 85-93. *See, e.g.*, Motion Toolbox at 85 (Initiate Motion VI): **Initiate Motion**  Initiates motion on the specified axes. If motion does not occur after executing this command, verify the drive fault level, pulse cutoff and limits are configured properly. TF **Start axis 1-4.** A true initiates motion on the respective axis. **6000 command reference:** GO *See, e.g.*, Motion Toolbox at 86 (Stop Motion VI):

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