

**UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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GOOGLE INC.  
Petitioner

v.

KONINKLIJKE PHILIPS ELECTRONICS N.V.  
Patent Owner

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U.S. PATENT NO. RE44,913  
Case Nos. IPR2017-00386, IPR2017-00387

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**DECLARATION OF DR. ANDREW COCKBURN**

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I, Dr. Andrew Cockburn, hereby state the following:

## **I. INTRODUCTION**

1. I have been retained by Google Inc. (“Google”) in connection with the filing of a Petition for *inter partes* review of U.S. Patent No. RE44,913 (“the ’913 patent”) (Ex. 1001). The opinions presented here are my own.

2. The claims of the ’913 patent generally relate to a method of improved character input that employs a keypad that is capable of selecting both “primary” and “secondary” characters associated with particular keys. The method involves the use of a “short press” to select “primary” characters and the use of a “long press” to facilitate selections of secondary characters.

3. I have been asked to explain the bases for my opinions that claims 1-16 of the ’913 patent are unpatentable because they are anticipated and/or would have been obvious to the person of ordinary skill in view of the prior art.

4. In reaching my opinions regarding the invalidity of these patent claims, I have relied on the documents cited herein, and I have relied as well on my decades of knowledge and experience in the field of Human-Computer Interaction (“HCI”).

5. This declaration is based on information currently available to me. I reserve the right to supplement my opinions in response to arguments raised by Philips or in response to any additional information that becomes available to me.

## II. BACKGROUND AND QUALIFICATIONS

6. I am a Professor at the Department of Computer Science and Software Engineering at the University of Canterbury, New Zealand. I also currently head the HCI (which stands for “Human-Computer Interaction”) and Multi-Media research group at the University of Canterbury.

7. In 1988, I was awarded a Bachelor of Science with Honors in Computer Science from the University of York, England.

8. In 1993, I was awarded a Ph.D. from the University of Stirling, Scotland. My thesis was on “Computer Supported Cooperative Work” which relates to forms of group interaction supported on computer.

9. In 1993, I joined the University of Canterbury as a Lecturer in the Department of Computer Science (now the Department of Computer Science and Software Engineering). I was subsequently promoted to a Senior Lecturer, and then an Associate Professor, before my appointment as a Professor in 2010. I currently hold this title of Professor.

10. I have over 23 years’ experience in the area of HCI. The field of HCI generally is concerned with ways of understanding and improving the interaction between humans and computers, with a view to understanding, evaluating, designing and building new styles of interactions that improve on one or more of

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