

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

Huawei Device Co., Ltd., LG Electronics, Inc., and ZTE (USA) Inc.

Petitioner,

v.

Papst Licensing GmbH & Co. KG
Patent Owner.

Case No. To Be Assigned
Patent No. 6,895,449

**DECLARATION OF KEVIN ALMEROOTH IN SUPPORT OF PETITION
FOR INTER PARTES REVIEW OF U.S. PATENT NO. 6,895,449: CLAIMS
1–10, 12, 13, AND 15–18**

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5.	Claim 1 [1c] - “a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and”	- 35 -
6.	Claim 1 [1d] - “a second connecting device for interfacing the interface device with the data transmit/receive device,”	- 35 -

7. Claim 1 [1e] - “wherein the interface device is configured by the processor and the memory in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached to the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is a storage device customary in a host device, whereupon the host device communicates with the interface device by means of the driver for the storage device customary in a host device, and”- 35 -
8. Claim 1 [1f] - “wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a directory structure.”- 42 -
9. Claim 2 - “An interface device in accordance with claim 1, in which the directory structure has a configuration file for setting and controlling functions of the interface device or an executable or a batch file for conducting a routine stored in the memory or a data file used for transferring data from the data transmit/receive device to the host device or a help file for giving help on handling the interface device.”- 45 -
10. Claim 3 - “An interface device in accordance with claim 2 wherein the configuration file is a text file.”- 45 -
11. Claim 6 - “An interface device in accordance with claim 1 wherein, in response to a request from the host to read a boot sequence, the processor is arranged to send a virtual boot sequence to the host.”- 46 -
12. Claim 7 - “An interface device in accordance with claim 6 wherein the virtual boot sequence includes a starting position and a length of a file allocation table, an indication of a type of the storage device or a number of sectors of the storage device.”- 47 -
13. Claim 8 - “An interface device in accordance with claim 7 wherein, in response to a request from the host to display a directory of the storage device, a processor is arranged for

transferring the file allocation table and the directory structure to the host.”- 49 -

14. Claim 9 - “An interface device in accordance with claim 1 wherein the file allocation table and the directory structure is transferred to the host in response to a request from the host to read data from or store data to the storage device.”- 51 -
15. Claim 10 -“An interface device in accordance with claim 1 wherein the directory structure includes a data file for transferring data from the data transmit/receive device to the host device wherein the processor is arranged to interpret a request from the host to read the data file as a request for a data transfer from the data transmit/receive device to the host, so that data is transmitted from the second connecting device to the first connecting device and to the host.”- 54 -
16. Claim 12 - “An interface device in accordance with claim 1 wherein the file allocation table includes information on numbers of blocks occupied by the data file wherein the interface device is arranged for receiving block numbers or a block number range from the host when the host wants to read the data file, and wherein the interface device is arranged to start a data transfer to the host, when the block numbers or the block number range is received from the host.”- 56 -
17. Claim 13 - “An interface device in accordance with claim 12 wherein the processor is arranged for formatting the data acquired by the second connecting device into blocks having a predetermined size, the predetermined size being suited for the storage device.”- 58 -
18. Claim 15 - “An interface device in accordance with claim 1 wherein the storage device is a hard disk.”- 59 -
19. Claim 16 - “An interface device in accordance with claim 1 wherein the memory has a data buffer for permitting independence in terms of time of the data transmit/receive device attachable to the second connecting device from the host device attachable to the first connecting device.”- 59 -

- 20. Claim 17 [preamble] - “An interface device for communication between a host device, which comprises a multi-purpose interface and a specific driver for this interface, and a data transmit/receive device comprising the following features:”- 60 -
- 21. Claim 17 [17a] - “a processor;”- 61 -
- 22. Claim 17 [17b] - “a memory;”- 61 -
- 23. Claim 17 [17c] - “a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and”.....- 62 -
- 24. Claim 17 [17d] - “a second connecting device for interfacing the interface device with the data transmit/receive device,”- 62 -
- 25. Claim 17 [17e] - “where the interface device is configured using the processor and the memory in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached at the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is a storage device customary in a host device, whereupon the host device communicates with the interface device by means of the specific driver for the multi-purpose interface, and”- 62 -
- 26. Claim 17 [17f] - “wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a file allocation table and a directory structure.”- 63 -
- 27. Claim 18 [preamble] - “A method of communication between a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and a data transmit/receive device via an interface device comprising the following steps:”- 63 -

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