

IN 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. 6,470,399

**DECLARATION OF KEVIN ALMEROOTH IN SUPPORT OF PETITION
FOR INTER PARTES REVIEW OF U.S. PATENT NO. 6,470,399: CLAIMS
1-8, 10-11, AND 13-15**

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2.	Claim 1 [preamble] - “An interface device for 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, the data transmit/receive device being arranged for providing analog data, comprising:”	- 27 -
3.	Claim 1[1a] - “a processor;”	- 35 -
4.	Claim 1 [1b] - “a memory;”	- 35 -
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”.....	- 36 -
6.	Claim 1 [1d] - “a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive	

- device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,”- 36 -
7. Claim 1 [1e] - “wherein the interface device is configured by the processor and the memory to include a first command interpreter and a second command interpreter”- 39 -
 8. Claim 1[1f] - “wherein the first command interpreter is configured in such a way that the command interpreter, when receiving an inquiry from the host device as to a 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 an input/output device customary in a host device, whereupon the host device communicates with the interface device by means of the driver for the input/output device customary in a host device, and”- 39 -
 9. Claim 1[1g] - “wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.”- 46 -
 10. Claim 2 - “An interface device according to claim 1, wherein the drivers for input/output drivers customary in a host device comprise a hard disk driver, and the signal indicates to the host device that the host device is communicating with a hard disk.”- 49 -
 11. Claim 3 - “An interface device according to claim 1, wherein the memory means comprises a buffer to buffer data to be transferred between the data transmit/receive device and the host device.”- 51 -
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13. Claim 6 - “An interface device according to claim 2, wherein the data to be transferred from the data transmit/receive device to the host device in the interface device is formatted in a suitable format for a hard disk present in the host device.”- 52 -
14. Claim 7 - “An interface device according to claim 2, which further comprises a root directory and virtual files which are present on the signaled hard disk drive and which can be accessed from the host device”- 54 -
15. Claim 8 -“An interface device according to claim 7, wherein the virtual files comprise a configuration file in text format which are stored in the memory means and using which the user can configure the interface device for a specific data transmit/receive device.”.....- 56 -
16. Claim 11 [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, the data transmit/receive device being arranged for providing analog data, comprising:”- 57 -
17. Claim 11[11a] - “a processor;”- 58 -
18. Claim 11[11b] - “a memory;”- 58 -
19. Claim 11 [11c] - “a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and”.....- 58 -
20. Claim 11 [11d] - “a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,”- 59 -
21. Claim 11 [11e] - “where the interface device is configured using the processor and the memory to include a first command interpreter and a second command interpreter,”- 59 -

22. Claim 11 [11f] - “wherein the first command interpreter is configured 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 an input/output 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”.....- 59 -
23. Claim 11 [11g] - “wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.”- 61 -
24. Claim 13 - “An interface device according to claim 11, wherein the multi-purpose interface is an SCSI interface, and wherein the specific driver for the multi-purpose interface is an ASPI manager.”- 61 -
25. Claim 14 [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, the data transmit/receive device being arranged for providing analog data, via an interface device, comprising:”- 63 -
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