# 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 ALMEROTH IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 6,895,449: CLAIMS 1-10, 12, 13, 15-18



### TABLE OF CONTENTS

I.	Back	ackground and Qualifications 4				
II.	Legal Standards and Background 13					
	<b>A.</b>	Perso	n of Ordinary Skill in the Art	14 -		
	В.	Claim	n Construction	14 -		
	C.	Valid	ity	14 -		
	D.	Writte	en Description	18 -		
III.	Priori	ty Dat	e of the Claims of the '449 Patent	21 -		
IV.	Overv	rview of the '449 Patent				
V.	Level	el of Ordinary Skill				
VI.	Clain	m Construction 27 -				
VII.	Analysis OF Claims 1-10, 12, 13, 15-18 29 -					
	<b>A.</b>	Claims 1-3, 6-10, 12, 13, and 15-18 over Murata, Ard and MS- DOS Encyclopedia29 -				
		1.	Rationale for Combining Murata, Ard and Encyclopedia			
		2.	Claim 1 [preamble] - "An interface device for common between a host device, which comprises drivers for indevices customary in a host device and a multinterface, and a data transmit/receive device comprollowing features:"	put/output lti-purpose orising the		
		3.	Claim 1 [1a] - "a processor;"	39 -		
		4.	Claim 1 [1b] - "a memory;"	39 -		
		5.	Claim 1 [1c] - "a first connecting device for interfacing device with the interface device via the multi-purpos of the host device; and"	e interface		



- 6. Claim 1 [1d] "a second connecting device for interfacing the interface device with the data transmit/receive device," ..... 40 -

- 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." ...... 48 -
- 10. Claim 3 "An interface device in accordance with claim 2 wherein the configuration file is a text file." ...... 49 -
- 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."

   51 -



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 " - 52 -

- 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." ........... 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."......-59 -
- **18.** Claim 15 "An interface device in accordance with claim 1 wherein the storage device is a hard disk.".... 62 -
- 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	om the host
device attachable to the first connecting device."	62 -

- 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:"- 64
- **21.** Claim 17 [17a] "a processor;" ..... 65 -
- **22.** Claim 17 [17b] "a memory;" ..... 65 -
- 24. Claim 17 [17d] "a second connecting device for interfacing the interface device with the data transmit/receive device," 66 -
- 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"............ 66 -



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

### **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

#### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

### **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

