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

OLYMPUS CORPORATION, OLYMPUS AMERICA INC. Petitioners,

V.

PAPST LICENSING GmbH & Co. KG Patent Owner.

Case No. IPR2017-01682 Patent No. 6,470,399

DECLARATION OF KEVIN ALMEROTH 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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VI.	Analysis of Claims 1-8, 10-11, and 13-15							
	<b>A.</b>	Claims 1-4, 6-8, 11, and 13-15 are Unpatentable Over the Combination of Murata, Schmidt and Lin 23 -						
		1.	Rationale for Combining Murata, Schmidt and Lin 23	-				
		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	it e a				
		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 hos device with the interface device via the multi-purpose interface of the host device; and"36	e				
		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/received	e r				



device	and	an	analog-to	-digital	converter	for	converting	data
sample	d by	the	sampling	circuit i	nto digital	data	ı,''	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 -
- 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 -



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"					
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."					



- 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 -

- 27. Claim 14 [14b] "interfacing of the data transmit/receive device with a second connecting device of the interface 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;"............. 64 -



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