

# Petitioner Apple Inc.

IPR2018-00289 (U.S. Pat. No. 8,872,646)<sup>1</sup>

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<sup>1</sup> Samsung Electronics America, Inc., which filed a petition in IPR2018-01383, has been joined party to this proceeding.

## Argument

- 1 The prior art renders each and every element of the challenged claims obvious.
- 2 The term glitch, properly construed, is taught by the McMahan reference.
- 3 A POSITA would have combined the teachings of McMahan with those of Pasolini and Goldman.

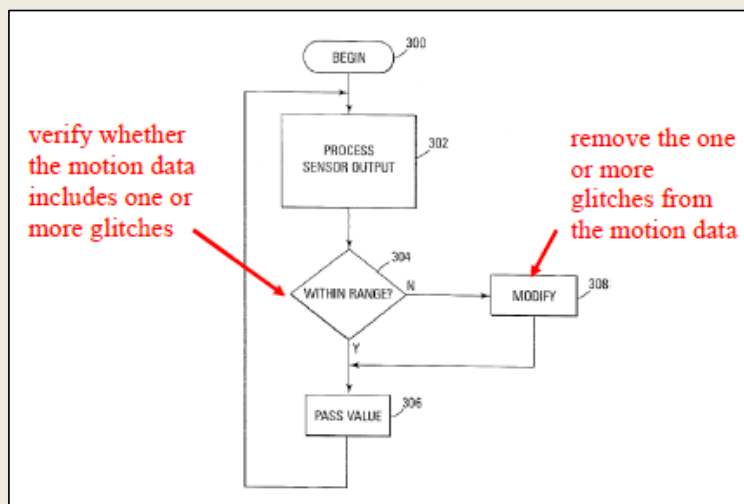
**Issue #1:**  
**The prior art renders each and every element of the  
challenged claims obvious.**



## McMahan teaches removing glitches

### Claim 1[b]:

***verifying whether the motion data includes one or more glitches and removing the one or more glitches from the motion data***



APPL-1005, Fig. 3 (annotated); Petition at 31.

In operation, enhancement circuit 104 receives the output of sensor 102, and, selectively modifies the output of sensor 102 when an anomalous output is detected. When the output of sensor 102 is not within the expected range of its normal operation, it is presumed that the output is in error. This means that the output of the sensor is not an accurate reflection of the stimulus that the sensor is designed to monitor. If the error is allowed to propagate to the electronic

APPL-1005, 4:26-30; Petition at 30.

relied on in further operations by electronic circuit 106. In one embodiment, enhancement circuit 104 advantageously overcomes this problem during an anomalous event by providing a value to electronic circuit 106 that is within the normal range of the output of sensor 102 as discussed above.

APPL-1005, 4:35-38; Petition at 31.

without correction at block 306. If, however, the output is not within the range, the output is modified at block 308.

APPL-1005, 5:46-48; Petition at 31.

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