

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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HTC CORPORATION and HTC AMERICA, INC.  
Petitioners,

v.

UNILOC LUXEMBOURG S.A.,  
Patent Owner

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**Declaration of Joseph A. Paradiso, PhD**  
**under 37 C.F.R. § 1.68**

**TABLE OF CONTENTS**

I.	INTRODUCTION .....	4
II.	QUALIFICATIONS AND PROFESSIONAL EXPERIENCE .....	5
III.	LEVEL OF ORDINARY SKILL IN THE ART .....	10
IV.	RELEVANT LEGAL STANDARDS .....	12
	A. Anticipation .....	12
	B. Obviousness.....	13
V.	OVERVIEW OF THE '508 PATENT .....	14
	A. Summary of the Patent .....	14
	B. Prosecution History .....	16
VI.	BROADEST REASONABLE INTERPRETATION .....	17
	A. “dominant axis” .....	17
	B. “cadence window”.....	18
	C. “a dominant axis logic to continuously determine an orientation of a device, to assign a dominant axis, and to update the dominant axis as the orientation of the device changes” .....	18
	D. “a counting logic to count periodic human motions by monitoring accelerations relative to the dominant axis” .....	20
	E. “a counting logic to identify and count periodic human motions” .....	21
	F. “a cadence logic to continuously update a dynamic cadence window” .....	22
	G. “a mode logic, to switch the device from a non-active mode to an active mode after a number of periodic human motions are detected within appropriate cadence windows by the counting logic” .....	23

VII. IDENTIFICATION OF HOW THE CLAIMS ARE UNPATENTABLE.....24

A. State of the Art at the Time of the '508 Patent .....24

B. Summary of Pasolini .....26

C. Summary of Fabio.....28

D. Challenge #1: Claims 1-2 and 11-12 are obvious under 35 U.S.C. § 103(a) over Pasolini.....32

E. Challenge #2: Claims 6-8, 15-16, and 19 are obvious under 35 U.S.C. § 103(a) over Fabio. ....47

F. Challenge #3: Claims 3-4, 13-14, and 20 are unpatentable under 35 U.S.C. § 103 over Pasolini in view of Fabio. ....79

    1. Reasons to Combine Pasolini and Fabio.....79

    2. Detailed Analysis .....82

VIII. CONCLUSION.....95

## I. INTRODUCTION

1. I am making this declaration at the request of HTC Corporation and HTC America, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 7,653,508 (“the ’508 Patent”) to Kahn et al.

2. I am being compensated for my work in this matter at the rate of \$600/hour. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony.

3. I have been asked to provide my opinions regarding whether claims 1-4, 6-8, 11-16, 19, and 20 of the ’508 Patent are unpatentable, either because they are anticipated or would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the limitations of claims 1-4, 6-8, 11-16, 19, and 20 would have been either anticipated or obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

- a) The ’508 Patent, Ex. 1001;
- b) The prosecution history of the ’508 Patent, Ex. 1002;
- c) U.S. Patent No. 7,463,997 to Fabio Pasolini et al. (“Pasolini”), Ex. 1005; and

d) U.S. Patent No. 7,698,097 to Fabio Pasolini et al. (“Fabio”), Ex. 1006.

5. In forming the opinions expressed below, I have considered:

- a) The documents listed above, and
- b) My own knowledge and experience based upon my work in the field of wireless communications, as described below.

## **II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE**

6. My complete qualifications and professional experience are described in my *Curriculum Vitae*, a copy of which can be found in Ex. 1004. The following is a brief summary of my relevant qualifications and professional experience.

7. As shown in my curriculum vitae, I have devoted my career to various fields of physical, electrical, and computer science with more than two decades focused on embedding sensing, including wearable and wireless sensors. I have 20 years of experience in wearable devices and computing, during which I invented and fielded many types of wearable activity tracking devices that utilized a variety of power management and wakeup protocols.

8. I am the Alexander W. Dreyfoos (1954) Professor in Media Arts and Sciences at the Massachusetts Institute of Technology (MIT), where I direct the Responsive Environments Group, which explores how sensor networks augment and mediate human experience, interaction and perception. I also have served as co-

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