

TABLE OF CONTENTS

1. INTRODUCTION	1
2. QUALIFICATIONS	1
3. MATERIALS REVIEWED AND RELIED UPON	4
4. LEGAL STANDARDS	4
4.1 Claim Interpretation.....	4
4.2 Presumption of Validity And Burden of Proving Invalidity.....	5
4.3 Anticipation.....	5
4.4 Obviousness.....	8
4.5 Inherency.....	10
4.6 Written Description.....	10
4.7 Patentable Subject Matter	11
4.8 Person of Ordinary Skill in the Art.....	11
5. OVERVIEW OF THE PATENTS-IN-SUIT	12
6. TECHNOLOGY BACKGROUND	13
6.1 Modulation.....	13
6.2 Master/Slave	23
6.3 Dr. Mihran’s Purported “State of the Art”.....	26
7. THE ART REFERENCED IN THE MIHRAN REPORT DOES NOT INVALIDATE THE ASSERTED CLAIMS.	27
7.1 Briancon Does Not Anticipate Or Render Obvious The Asserted Claims	27
7.1.1 Overview of References.....	28
7.1.2 Missing Limitations	40
7.1.3 No Motivation to Combine	55
7.2 Siwiak Does Not Render Obvious The Asserted Claims.....	58
7.2.1 Overview of References.....	58
7.2.2 Missing Limitations	65
7.2.3 No Motivation to Combine	76
7.3 Yamano Does Not Render Obvious The Asserted Claims	81
7.3.1 Overview of References.....	82
7.3.2 Missing Limitations	87

7.3.3	No Motivation to Combine	111
7.4	Boer Does Not Render Obvious The Asserted Claims.....	116
7.4.1	Overview of References.....	117
7.4.2	Rembrandt Is Not Collaterally Estopped Based On The Prior IPRs	125
7.4.3	Missing Limitations	127
7.4.4	No Motivation to Combine	137
7.5	Snell Does Not Render Obvious The Asserted Claims	139
7.5.1	Overview of References.....	139
7.5.2	Missing Limitations	149
7.5.3	No Motivation to Combine	165
7.6	Reunamaki Does Not Anticipate Or Render Obvious The Asserted Claims.....	179
7.6.1	Overview of Reference	179
7.6.2	Reunamaki Is Not Prior Art.....	181
7.6.3	Missing Limitations	181
7.7	Medium Rate Does Not Anticipate Or Render Obvious The Asserted Claims.....	182
7.7.1	Overview of References.....	182
7.7.2	Medium Rate Is Not Prior Art	184
7.7.3	Missing Limitations	185
8.	THE ASSERTED CLAIMS HAVE PROPER WRITTEN DESCRIPTION	186
8.1	Factual Background	187
8.1.1	The Provisional Application (12/5/1997)	187
8.1.2	The First Non-Provisional Application (12/4/1998).....	190
8.1.3	The Continuation-in-Part Application (4/14/2003)	193
8.1.4	The ‘580 Patent Application (8/19/2009)	194
8.1.5	The ‘228 Patent Application (8/4/2011)	196
8.1.6	The Prior Litigation.....	197
8.2	Bilingual Slaves	198
8.3	All Recited Information Being Addressed To The Same Slave	199
9.	THE ASSERTED CLAIMS CONTAIN PATENTABLE SUBJECT MATTER.....	200
10.	THE “SECONDARY CONSIDERATIONS” SHOW NON-OBVIOUSNESS OF THE PATENTS-IN-SUIT	202
10.1	Commercial Success	203

10.2 Copying.....	209
10.3 Praise of the Invention	209
10.4 Long Felt, But Unresolved Need	211
11. MARKING ISSUES	212
12. CONCLUSION.....	213
13. LIST OF EXHIBITS.....	213
EXHIBIT A – CURRICULUM VITAE.....	215
EXHIBIT B – LIST OF MATERIALS CONSIDERED	222

REBUTTAL EXPERT REPORT OF DR. ROBERT MORROW
REGARDING VALIDITY OF U.S. PATENT NOS. 8,023,580 & 8,457,228

1. INTRODUCTION

1. I have been retained by Heim, Payne & Chorush, LLP and Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing P.C., counsel for Plaintiff Rembrandt Wireless Technologies, LP (hereinafter “Rembrandt”), as an independent technical expert in this litigation. Among other things, I have been asked by counsel to opine on the validity of certain claims from U.S. Patent No. 8,023,580 (“the ‘580 Patent”) and U.S. Patent No. 8,457,228 (“the ‘228 Patent) (collectively, the “Asserted Patents” or the “Patents-in-Suit”). Specifically, I have been asked by counsel to review the Opening Expert Report of Richard T. Mihran, Ph.D. on invalidity issues (“Mihran Report”) and to offer rebuttal opinions when I disagree with the opinions expressed in the Mihran Report.
2. The statements made in this expert report are made on my own personal knowledge and opinion, and I can and will testify competently to the content of this expert report if called on to do so at trial. In forming my opinions, I reviewed many documents, including many documents previously submitted by Rembrandt and its experts. Where appropriate, I copied relevant excerpts from those prior documents that reflect my opinions into this report (rather than “reinvent the wheel,” so to speak). I reserve the right to supplement or modify my opinions as the lawsuit develops or as new facts or other relevant information are uncovered and to testify in that regard, including testimony in rebuttal to opinions offered by experts representing Apple either prior to or during trial. I also intend to prepare demonstrative exhibits that are consistent with my opinions in this report for use at trial.
3. I am being compensated at my standard consulting rate of \$550 per hour. My compensation is not dependent on the outcome of this case.

2. QUALIFICATIONS

4. My education and expertise qualify me to do the below analysis. I have summarized in this section my educational background, career history, and other relevant qualifications. More details are set forth in my *curriculum vitae*, attached as Exhibit A to this report.

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