UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.
Petitioner
v.

MAXELL, LTD.
Patent Owner

Case IPR2020-00202

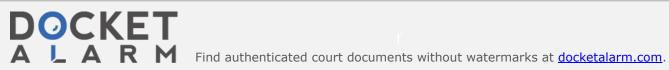
Patent 10,212,586

Declaration of Dr. Victor Shoup



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	a	a) Kirkup is Analogous art	
	b	b) De la Huerga Is Analogous Art	
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	a	a) Modifying Kirkup to Incorporate de la Huerga's Biometric	
		Authentication Teachings	22
	b	b) Modifying Kirkup to Incorporate de la Huerga's Teachings	•
		Unlocking Multiple Devices	25
	3.	Opinions Regarding the Claims	
	a	a) Opinions Regarding Independent Claim 1	
		(1) [1(pre)] A mobile terminal configured to switch between	
		unlocked state and a locked state in which a predetermin	
		operation is limited, comprising:	
		(2) [1(a)] a transceiver which performs short-range wireless	
		communications;	
		(3) [1(b)] a memory which previously stores information ab	
		an another mobile terminal	31
		(4) [1(c)] a controller which switches the mobile terminal	
		between an unlocked state and a locked state based on an	11
		authentication input to the mobile terminal, wherein the	
		locked state prevents unauthorized access to the mobile terminal	37
		₩1111111a1	ي∠



	(5)	[1(d)] wherein, when conditions are met, the controller controls the mobile terminal to transmit information to the another mobile terminal for switching a state of the another
	(6)	mobile terminal from a locked state to an unlocked state 33 [1(e)] wherein the conditions include: first, the mobile terminal is in a locked state, the another mobile terminal is in a locked state, and the another mobile terminal is within communication range of the short-range wireless communications of the transceiver while in the locked state
	(7)	[1(f)] second, after the mobile terminal is in the locked state, the another mobile terminal is in the locked state, and the another mobile terminal is within communication range of the short-range wireless communications of the transceiver while in the locked state, performing, via the transceiver, the short-range wireless communications with the another mobile terminal.
	(8)	[1(g)] third, after the performing, receiving, by the controller, the authentication input for switching the mobile terminal from the locked state to the unlocked state 40
<i>b</i>)	Ω_{r}	pinions regarding Independent Claim 945
U)	(1)	[9(b)] storing information about an another mobile terminal
	(1)	in a memory
	(2)	[9(c)] transmitting information from the mobile terminal to the another mobile terminal which is for switching a state of the another terminal from a locked state to an unlocked state
		when conditions are met, wherein the locked state prevents
		unauthorized access to the mobile terminal
c)	_	pinions regarding Independent Claim 1646
	(1)	[16(a)] a first mobile terminal and a second mobile terminal
		which are configured to switch between an unlocked state
		and a locked state in which a predetermined operation is limited
d)	Or	limited
uj	(1)	"wherein the operation includes a biometrics authentication"
	(-)	47
e)	Op	pinions Regarding Dependent Claims 6, 13, and 18 48
	(1)	[2] further configured to store information about two or more another mobile terminals; [13] storing information



	about two or more another mobile terminals; [18] further	
	comprising two or more second mobile terminals 4	.9
f)	Opinions Regarding Dependent Claims 7 and 145	2
	(1) [7] wherein the short-range wireless communication is via a	ì
	Bluetooth connection; [19] wherein the short-range wireles	SS
	communications are performed via a Bluetooth connection	
	5	2



DECLARATION OF DR. VICTOR SHOUP

I, Victor Shoup, Ph.D., hereby declare the following:

I. BACKGROUND AND QUALIFICATIONS

- 1. My name is Victor Shoup, and I am over 21 years of age and otherwise competent to make this Declaration. I make this Declaration based on facts and matters within my own knowledge and on information provided to me by others, and, if called as a witness, I could and would competently testify to the matters set forth herein.
- 2. I have been retained as a technical expert witness in this matter by Counsel for the Petitioner, Apple Inc. ("Petitioner") to provide my independent opinions on certain issues requested by Counsel for Petitioner relating to the accompanying Petition for *Inter Partes* Review of U.S. Patent No. 10,212,586 ("the '586 Patent"), claims 1-2, 6-7, 9-10, 13-14, and 16-18. I am being compensated at an hourly rate of \$500. My compensation in this matter is not based on the substance of my opinions or on the outcome of this matter. I have been informed that Maxell, Ltd. is the purported owner of the '586 Patent. I note that I have no financial interest in Maxell, Ltd. or Petitioner, and I have no other interest in the outcome of this matter.

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