UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.; AND SAMSUNG ELECTRONICS AMERICA, INC., Petitioner

v.

NEODRON LTD. Patent Owner.

DECLARATION OF DR. BENJAMIN B. BEDERSON IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,432,173



TABLE OF CONTENTS

Contents

1.	INTRODUCTION				
II.	BACKGROUND AND QUALIFICATIONS				
III.	INFORMATION CONSIDERED				
IV.	RELEVANT LEGAL STANDARDS1				
	A.	Claim Interpretation	14		
	B.	Perspective of One of Ordinary Skill in the Art	14		
	C.	Obviousness	15		
V.	LEVEL OF ORDINARY SKILL IN THE ART				
VI.	SUMMARY OF MY OPINIONS				
VII.	TECHNOLOGICAL BACKGROUND				
	A.	Capacitive Touch Sensors Were Well-Known And Widely Used In Electronic Devices At The Time Of The Alleged Invention	20		
	В.	Software Engineering Practices And The Irrelevance Of Particular Sensing Technology	22		
	C.	User Input Disambiguation	24		
	D.	Adjusting User Interface Parameters Based On Duration Of Touch Was Well-Known At The Time Of The Alleged Invention	30		
VIII.	THE	CHALLENGED PATENT	32		
IX.	PATENT PROSECUTION HISTORY				
X.	PRIORITY DATE				
XI.	CLAIM CONSTRUCTION				



Declaration of Dr. Benjamin B. Bederson U.S. Patent No. 8,432,173

	A.		nsing element that comprises a sensing path that comprises gth"	35		
	B.	"obje	ct"	36		
	C.	"disp	lacement"	36		
	D.		range of parameter values being associated with the length e sensing path" (Claims 1, 10, 19)	37		
	Ε.	"the s	sensing path comprises a closed loop" (Claims 2, 11)	37		
XII.	BRIEF DESCRIPTION OF THE PRIOR ART					
	A.	Trent		37		
	B.	Engh	olm	39		
	C.	Bryaı	1	43		
XIII.			EXPLANATION OF THE UNPATENTABILITY	45		
	A.		nd 1: Claims 1-2, 8-11, and 17-19 are rendered obvious by in light of the knowledge of a POSITA	45		
		1.	Independent claims 1, 10, and 19 are unpatentable over Trent.	45		
		2.	Claims 2, 11: "wherein the sensing path comprises a closed loop"	61		
		3.	Claims 8, 17: "wherein the parameter is selected from the group consisting of temperature, volume, contrast, brightness, and frequency"	62		
		4.	Claims 9, 18: "wherein [the media and] the sensing element [is/are] part of an electronic appliance selected from the group consisting of a cooking oven, microwave oven, television, washing machine, MP3 player, mobile phone, and multimedia device"	63		



B.	Ground 2: Claims 1-3, 5-12, and 14-19 are rendered obvious by Trent in view of Engholm, and further in light of the knowledge of a POSITA			
	1.	One of skill in the art would be motivated to combine the teachings of Trent and Engholm, and would have a reasonable expectation of success in doing so	54	
	2.	Independent claims 1, 10, and 19 are unpatentable over Trent in view of Engholm	56	
	3.	Claims 2, 11: "wherein the sensing path comprises a closed loop"	'2	
	4.	Claims 3, 12: "[switching/operable to switch] from a first mode of operation to a second mode of operation in response to one or more of the second signals if the displacement corresponding to the second capacitive coupling indicated by the second signals exceeds a predetermined threshold, the second mode of operation being for adjusting the parameter within the range of parameter values based on the displacement of the object along the sensing path, the first mode of operation being for setting the parameter to the initial value"	73	
	5.	Claims 5, 14: "wherein adjusting the parameter comprises effecting an incremental change in the parameter from the initial value based on an amount of the displacement exceeding a pre-determined displacement threshold"	77	
	6.	Claims 6, 15: "wherein adjusting the parameter comprises changing the parameter from the initial value by a number of units based on a number of times an amount of the displacement exceeds a pre-determined displacement threshold"	79	
	7.	Claims 7, 16: "[mapping/operable to map] all or a portion of the range of parameter values onto the sensing path around the initial value"	30	



	8.	Claims 8, 17: "wherein the parameter is selected from the group consisting of temperature, volume, contrast, brightness, and frequency"	82
	9.	Claims 9, 18: "wherein [the media and] the sensing element [is/are] part of an electronic appliance selected from the group consisting of a cooking oven, microwave oven, television, washing machine, MP3 player, mobile phone, and multimedia device"	83
C.	Bryar	nd 3: Claims 1-3, 5-12, and 14-19 are rendered obvious by in view of Trent and Engholm, and further in light of the ledge of a POSITA.	83
	1.	One of skill in the art would be motivated to combine the teachings of Bryan, Trent, and Engholm, and would have a reasonable expectation of success in doing so	83
	2.	Independent claims 1, 10, and 19 are unpatentable over Bryan in view of Trent and Engholm.	85
	3.	Claims 2, 11: "wherein the sensing path comprises a closed loop"	.101
	4.	Claims 3, 12: "switch[ing/operable to switch] from a first mode of operation to a second mode of operation in response to one or more of the second signals if the displacement corresponding to the second capacitive coupling indicated by the second signals exceeds a predetermined threshold, the second mode of operation being for adjusting the parameter within the range of parameter values based on the displacement of the object along the sensing path, the first mode of operation being for setting the parameter to the initial value"	.101
	5.	Claims 5, 14: "wherein adjusting the parameter comprises effecting an incremental change in the parameter from the initial value based on an amount of the displacement exceeding a pre-determined displacement threshold"	.102



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