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

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		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		

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B.	Ground 2: Claims 1-3, 5-12, and 14-19 are rendered obviou Trent in view of Engholm, and further in light of the knowle 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	
	2.	Independent claims 1, 10, and 19 are unpatentable over Trent in view of Engholm	
	3.	Claims 2, 11: "wherein the sensing path comprises a closed loop"	
	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 pre- determined 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"	
	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"	
	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"	
	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"	

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	8.	Claims 8, 17: "wherein the parameter is selected from the group consisting of temperature, volume, contrast, brightness, and frequency"
	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"
C.	Bryaı	nd 3: Claims 1-3, 5-12, and 14-19 are rendered obvious by n in view of Trent and Engholm, and further in light of the redge of a POSITA
	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
	2.	Independent claims 1, 10, and 19 are unpatentable over Bryan in view of Trent and Engholm
	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 pre- determined 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"
	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"

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