US. Patent No. 9,024,790 ("'790 Patent")

U.S. Patent No. 5,525,980 ("Jahier")

U.S. Patent No. 5,525,980 ("Jahier") qualifies as prior art to U.S. Patent No. 9,024,790 ("'790 Patent") at least under pre-AIA 35 U.S.C. § 102(b) and anticipates, and alone or with other references, renders obvious one or more of claims 1, 4-8, 10-14, 16-24. To the extent Jahier does not disclose one or more limitations of the claims, it would have been obvious to combine the teachings of Jahier with the knowledge of one of ordinary skill in the art and with one or more of the references below to render the claims at issue in the '790 patent invalid. The cited references listed in the following charts disclose or render obvious the respective limitations under those constructions agreed to by the parties and, where constructions are in dispute, under either party's construction as set forth in the updated Joint Proposed Claim Construction Chart dated October 31, 2019 unless noted otherwise.

- U.S. Patent No. 7,545,366 ("Sugimoto")
- U.S. Patent No. 5,618,232 ("Martin")
- U.S. Patent No. 7,844,914 ("Andre")
- Japanese Patent Publication JP2000-214989 ("Amano")
- Quantum 16 Key QMatrix™ Keypanel Sensor IC ("QT60161")
- Quantum QProx QT160 / QT161 Manual ("QT160")
- U.S. Patent No. 6,696,985 ("Houston")
- U.S. Patent No. 5,760,715 ("Senk")
- Prior art references as set forth in Exhibit C-13
- Prior art references as described in the cover pleading to these contentions

Asserted Claims	***Prior Art Disclosures***
Claim 1	
1[pre] An apparatus comprising:	Jahier, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses the apparatus recited in claim 1. Jahier discloses: "A method and apparatus for determining a valid selection of a capacitance tactile keyboard as a function of a selection state and validation state