

Exhibit C.14

U.S. Patent No. 8,102,286 (“’286 patent”)

U.S. Patent No. 5,525,980 (“Jahier”)

U.S. Patent No. 5,525,980 (“Jahier”) was filed on April 21, 1993, and issued on June 11, 1996. Jahier qualifies as prior art with regard to U.S. Patent No. 8,102,286 (“’286 patent”) at least under pre-AIA 35 U.S.C. § 102(b), and alone or with other references, one or more of claims 1-5, 7-17, and 19-24. To the extent Jahier does not disclose one or more limitations of the claims of the ’286 patent, it has been obvious to combine the teachings of Jahier with the knowledge of one of ordinary skill in the art and with other references below to render the claims at issue in the ’286 patent invalid.

- U.S. Patent No. 7,545,366 (“Sugimoto”) was filed on May 20, 2005, and issued June 9, 2009. Sugimoto qualifies as prior art with regard to the ’286 patent at least under 35 U.S.C. § 102(e) (pre-AIA).
- U.S. Patent No. 5,618,232 (“Martin”) was filed on March 23, 1995, and issued April 8, 1997. Martin qualifies as prior art with regard to the ’286 patent at least under 35 U.S.C. § 102(b) (pre-AIA).
- U.S. Patent No. 7,844,914 (“Andre”) was filed on September 16, 2005, and issued November 30, 2010. Andre qualifies as prior art with regard to the ’286 patent at least under 35 U.S.C. § 102(e) (pre-AIA).
- Japanese Patent Publication JP2000-214989 (“Amano”) was published on August 4, 2000. Amano qualifies as prior art with regard to the ’286 patent at least under 35 U.S.C. § 102(b) (pre-AIA).
- Quantum 16 Key QMatrix™ Keypanel Sensor IC (“QT60161”) was published in 2001. QT60161 qualifies as prior art with regard to the ’286 patent at least under 35 U.S.C. § 102(b) (pre-AIA).
- Quantum QProx QT160 / QT161 Manual (“QT160”) was published in 2002. QT160 qualifies as prior art with regard to the ’286 patent at least under 35 U.S.C. § 102(b) (pre-AIA).
- U.S. Patent No. 6,696,985 (“Houston”) was filed on April 24, 2001, and issued February 24, 2004. Houston qualifies as prior art with regard to the ’286 patent at least under 35 U.S.C. § 102(b) and (e) (pre-AIA).

- U.S. Patent No. 5,760,715 (“Senk”) was filed on April 15, 1997 and issued on June 2, 1998. Senk qualifies for prior art under 35 U.S.C. § 102(b) (pre-AIA) with regard to the ’286 patent at least under 35 U.S.C. § 102(b) (pre-AIA).
- U.S. Patent No. 5,012,124 (“Hollaway”) was filed on Jul. 24, 1989, and issued Apr. 30, 1991. Hollaway qualifies for prior art under 35 U.S.C. § 102(b) (pre-AIA) with regard to the ’286 patent at least under 35 U.S.C. § 102(b) (pre-AIA).

The excerpts cited herein are exemplary. For any claim limitation, Defendants may rely on excerpts cited for /and/or additional excerpts not set forth fully herein to the extent necessary to provide a more comprehensive explanation of a reference’s disclosure of a limitation. Where an excerpt refers to or discusses a figure or figure items, that figure’s descriptions of that figure should be understood to be incorporated by reference as if set forth fully herein.

To the extent this limitation is not disclosed by this reference, this limitation is rendered obvious in light of this reference combined with the knowledge of a person or ordinary skill in the art, and this reference combined with the prior art references charted for this patent or cited in these charts. These references all are in comparable fields and have similar disclosures that are readily combinable. For example, the prior art references charted for this patent all disclose user interfaces for controlling electronic devices, including determining whether there has been a touch and distinguishing between intended and unintended touches, as established in these charts. All of these disclosures also would have been within the knowledge of a person having ordinary skill in the art (“a POSITA”). A POSITA seeking to apply the teachings of, for example, any of these references would have been motivated to practice this limitation for the reasons set forth in these references and as a matter of course. Additional motivation arises from a desire to overcome known problems and determining intended touches using known methods. Additional motivation to do so arises from combining prior art elements according to known methods to yield predictable results to improve a similar device. Doing so would have been within the abilities of one of ordinary skill in the art, would not have required undue effort, and would have led to expected results. Practicing this limitation amounts to merely choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success.

These invalidity contentions are not an admission by Defendants that the accused products or components, including the prior art version of these products or components, are covered by, or infringe the asserted claims, particularly when the claims are properly construed and applied. These invalidity assertions are also not an admission that Defendants concede or acquiesce to the claim construction(s) implied or suggested by Plaintiff in its Complaint or the associated infringement claim charts. Defendants asserting any claim construction positions through these charts, including whether the preamble is a limitation, also do not concede or acquiesce that any asserted claim satisfies the requirements of 35 U.S.C. §§ 112 or 101 and that the invalidity contentions only to the extent Plaintiff’s assertions may be understood.