

EXHIBIT C-8

U.S. Patent No. 8,749,251 (“’251 Patent”) in light of Mese

Complainant denies that U.S. Patent No 5,396,443 (“Mese”) anticipates any claim of U.S. Patent No. 8,749,251 (“’251 Patent”) and denies that Mese, alone or in combination with any other reference, renders obvious any claim of the ’251 Patent. In light of the obviousness, Respondents have failed to identify any limitation of any claim that is not disclosed by Mese, and have failed to show any basis for combining Mese with any other reference or with the alleged knowledge of one of ordinary skill in the art.

There is a list of purported prior art references identified at the top of Respondents’ claim chart for Mese. Respondents do not admit that any reference in that list qualifies as prior art to the ’251 Patent. Complainant expressly denies that Respondents have adequately disclosed any obviousness theory based on a combination of references for which Respondents’ claim chart fails to disclose the specific references to be combined and the purported motivation to combine these specific references.

Claims	Mese
1[pre] An apparatus comprising:	To the extent the preamble is construed as a limitation, Respondents have shown that Mese discloses the claimed apparatus.
1[a] a sensing element of a touch screen; and	Respondents have not shown that Mese discloses the claimed “sensing element of a touch screen.” Respondents identify additional references allegedly disclosing this limitation. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art would have combined any of the identified references with Mese. Respondents’ argument regarding alleged motivation to combine fails to specify which references are combined in the proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.
1[b] one or more computer-readable non-transitory storage media coupled to the sensing element and embodying logic that is operable when executed to: determine an amount of time that has elapsed since the sensing element last detected a change of capacitance	Respondents have not shown that Mese discloses the claimed “one or more computer-readable non-transitory storage media coupled to the sensing element and embodying logic that is operable when executed to: determine an amount of time that has elapsed since the sensing element last detected a change of capacitance on the touch screen; and if the amount of time that has elapsed exceeds a predetermined time duration, then initiate a particular function of the apparatus.”

EXHIBIT C-8

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<p>indicative of a key touch on the touch screen; and if the amount of time that has elapsed exceeds a predetermined time duration, then initiate a particular function of the apparatus.</p>	<p>Respondents identify additional references allegedly disclosing this. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art would have combined any of the identified references with Mese. Respondents' arguments regarding alleged motivation to combine fails to specify which references were combined in the proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.</p>
<p>2[a] The apparatus of claim 1, wherein the particular function comprises deactivation of measurement of changes in capacitance by the sensing element.</p>	<p>Neodron and the Staff contend that "deactivation of measurement of changes in capacitance" should be construed as: Plain and ordinary meaning: "deactivation of measurement of changes in capacitance." Respondents contend that "deactivation of measurement of changes in capacitance" should be construed as "scheduled measurements of changes in capacitance."</p> <p>Respondents have not shown that Mese discloses the apparatus of claim 1.</p> <p>Respondents have not shown that Mese discloses the claimed apparatus of claim 1 wherein the particular function comprises deactivation of measurement of changes in capacitance by the sensing element."</p> <p>Respondents identify additional references allegedly disclosing this. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art would have combined any of the identified references with Mese. Respondents' arguments regarding alleged motivation to combine fails to specify which references were combined in the proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.</p>
<p>3[a] The apparatus of claim 1, wherein the particular function comprises recalibration of measurement of changes in capacitance by the sensing element.</p>	<p>Respondents have not shown that Mese discloses the apparatus of claim 1.</p> <p>Respondents have not shown that Mese discloses the claimed apparatus of claim 1 wherein the particular function comprises recalibration of measurement of changes in capacitance by the sensing element."</p>

EXHIBIT C-8

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	<p>Respondents identify additional references allegedly disclosing this Complainant addresses in its corresponding claim charts for those re Respondents have failed to show that one of ordinary skill in the art combined any of the identified references with Mese. Respondents regarding alleged motivation to combine fails to specify which refer proposed combination and fails to identify specific reasons that one the art would have combined the teachings of these references.</p>
<p>4[a] The apparatus of claim 1, wherein the logic is further operable to calculate the predetermined time duration based on one of a plurality of power supply voltages or an output voltage of the sensing element.</p>	<p>Respondents have not shown that Mese discloses the apparatus of c Respondents have not shown that Mese discloses the claimed appar logic is further operable to calculate the predetermined time duratio plurality of power supply voltages or an output voltage of the sensin Respondents identify additional references allegedly disclosing this Complainant addresses in its corresponding claim charts for those re Respondents have failed to show that one of ordinary skill in the art combined any of the identified references with Mese. Respondents regarding alleged motivation to combine fails to specify which refer proposed combination and fails to identify specific reasons that one the art would have combined the teachings of these references.</p>
<p>5[a] The apparatus of claim 1, wherein the logic is further operable to calculate the predetermined time duration based on one of a plurality of delay multipliers determined by a polarity of a voltage pulse.</p>	<p>Respondents have not shown that Mese discloses the apparatus of c Respondents have not shown that Mese discloses the claimed appar logic is further operable to calculate the predetermined time duratio plurality of delay multipliers determined by a polarity of a voltage p Respondents identify additional references allegedly disclosing this Complainant addresses in its corresponding claim charts for those re Respondents have failed to show that one of ordinary skill in the art combined any of the identified references with Mese. Respondents regarding alleged motivation to combine fails to specify which refer</p>

EXHIBIT C-8

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	proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.
6[a] The apparatus of claim 1, wherein the particular function comprises turning off the apparatus.	<p>Respondents have not shown that Mese discloses the apparatus of claim 1, wherein the particular function comprises turning off the apparatus.</p> <p>Respondents have not shown that Mese discloses the claimed apparatus of claim 1, wherein the particular function comprises turning off the apparatus.”</p>
7[a] The apparatus of claim 1, wherein the sensing element comprises a control circuit.	<p>Respondents have not shown that Mese discloses the apparatus of claim 1, wherein the sensing element comprises a control circuit.</p> <p>Respondents have not shown that Mese discloses the claimed apparatus of claim 1, wherein the sensing element comprises a control circuit.”</p> <p>Respondents identify additional references allegedly disclosing this combination. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art would have combined any of the identified references with Mese. Respondents’ argument regarding alleged motivation to combine fails to specify which references are combined in the proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.</p>
8[a] The apparatus of claim 7, wherein the sensing element further comprises a pattern of electrodes within the touch screen, the electrodes being coupled to the control circuit.	<p>Respondents have not shown that Mese discloses the apparatus of claim 7, wherein the sensing element further comprises a pattern of electrodes within the touch screen, the electrodes being coupled to the control circuit.</p> <p>Respondents have not shown that Mese discloses the claimed apparatus of claim 7, wherein the sensing element further comprises a pattern of electrodes within the touch screen, the electrodes being coupled to the control circuit.”</p> <p>Respondents identify additional references allegedly disclosing this combination. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art would have combined any of the identified references with Mese. Respondents’ argument regarding alleged motivation to combine fails to specify which references are combined in the proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.</p>

EXHIBIT C-8

Claims	Mese
9[a] The apparatus of claim 8, wherein the electrodes comprise indium tin oxide (ITO).	<p>Respondents have not shown that Mese discloses the apparatus of c</p> <p>Respondents have not shown that Mese discloses the claimed apparatus wherein the electrodes comprise indium tin oxide (ITO).”</p> <p>Respondents identify additional references allegedly disclosing this. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art would have combined any of the identified references with Mese. Respondents’ arguments regarding alleged motivation to combine fails to specify which references were combined in the proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.</p>
16[pre] A computer- readable non-transitory storage media embodying logic that is operable when executed to:	<p>Respondents have not shown that Mese discloses a “computer- readable storage media embodying logic that is operable when executed to” perform the following steps.</p>
16[a] monitor detection by a sensing element of a key touch on a touch screen, the sensing element being of a touch screen;	<p>Respondents have not shown that Mese discloses the claimed step “monitoring detection by a sensing element of a key touch on a touch screen, the sensing element being of a touch screen.”</p> <p><i>See supra</i> element 1[a].</p> <p>Respondents identify additional references allegedly disclosing this. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art would have combined any of the identified references with Mese. Respondents’ arguments regarding alleged motivation to combine fails to specify which references were combined in the proposed combination and fails to identify specific reasons that one of ordinary skill in the art would have combined the teachings of these references.</p>
16[b] determine an amount of time that has elapsed since the sensing element last detected a change of capacitance	<p>Respondents have not shown that Mese discloses the claimed step “determining an amount of time that has elapsed since the sensing element last detected a change of capacitance indicative of a key touch on the touch screen.”</p>

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