

EXHIBIT C-22

U.S. Patent No. 8,749,251 (“’251 Patent”) in light of any of the purported “Secondary References,” alone

Complainant denies that any of the purported “Secondary References,” alone or in combination with any other reference, renders obvious any claim of U.S. Patent No. 8,749,251 (“’251 Patent”). As to obviousness, Respondents have failed to disclose any limitation of any claim that is not disclosed by any of the purported “Secondary References” and have failed to identify any combination of any of the purported “Secondary References” with any other reference or with the alleged knowledge, common sense, or skill in the art. Complainant does not admit that any of the “Secondary References” qualifies as prior art to the ’251 Patent. Complainant expressly denies that Respondents have adequately disclosed any obviousness theory based on a combination of any of the references for which Respondents’ claim chart does not disclose the specific references to be combined and the steps to combine these specific references.

- U.S. Patent No. 3,277,381 (“Sullivan”)
- U.S. Patent No. 3,483,401 (“Michalski”)
- U.S. Patent No. 6,452,494 (“Harrison”)
- U.S. Patent No. 5,333,119 (“Raatz”)
- U.S. Patent No. 5,669,004 (“Sellers”)
- U.S. Patent No. 8,654,083 (“Hotelling 083”)
- KR2005-0045541 (“Oh”)
- KR10-0674480 (“Lee 480”)
- KR20-0266980 (“Yoon”)
- “QT110: QTouch™ Sensor IC” (the “QT 110 Data Sheet”)

To the extent that Respondents’ Exhibit C-22 cites or incorporates by reference any other exhibit, Complainant incorporates by reference its corresponding responsive exhibit.

Claims	“Secondary References”
1[pre] An apparatus comprising:	To the extent the preamble is construed as a limitation, Respondents have not shown that any of the purported “Secondary References,” alone or in combination, discloses the claimed apparatus.
1[a] a sensing element of a touch screen; and	Respondents have not shown that any of the purported “Secondary References,” alone or in combination, discloses the claimed “sensing element of a touch screen.”

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Claims	“Secondary References”
<p>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 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 have not shown that any of the purported “Secondary References” in combination, 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 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>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 “stop or suspend scheduled measurements of changes in capacitance.”</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the apparatus of claim 1.</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed apparatus “wherein the particular function comprises deactivation of measurement of changes in capacitance by the sensing element.”</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 any of the purported “Secondary References” in combination, discloses the apparatus of claim 1.</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed apparatus “wherein the particular function comprises recalibration of measurement of changes in capacitance by the sensing element.”</p>

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Claims	“Secondary References”
	comprises recalibration of measurement of changes in capacitance b element.”
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>Respondents have not shown that any of the purported “Secondary I in combination, discloses the apparatus of claim 1.</p> <p>Respondents have not shown that any of the purported “Secondary I in combination, discloses the claimed apparatus “wherein the logic calculate the predetermined time duration based on one of a pluralit voltages or an output voltage of the sensing element.”</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>Respondents have not shown that any of the purported “Secondary I in combination, discloses the apparatus of claim 1.</p> <p>Respondents have not shown that any of the purported “Secondary I in combination, discloses the claimed apparatus “wherein the logic calculate the predetermined time duration based on one of a pluralit determined by a polarity of a voltage pulse.”</p>
6[a] The apparatus of claim 1, wherein the particular function comprises turning off the apparatus.	<p>Respondents have not shown that any of the purported “Secondary I in combination, discloses the apparatus of claim 1.</p> <p>Respondents have not shown that any of the purported “Secondary I in combination, discloses the claimed apparatus “wherein the partic comprises turning off the apparatus.”</p>
7[a] The apparatus of claim 1, wherein sensing element comprises a control circuit.	<p>Respondents have not shown that any of the purported “Secondary I in combination, discloses the apparatus of claim 1.</p> <p>Respondents have not shown that any of the purported “Secondary I in combination, discloses the claimed apparatus “wherein sensing e control circuit.”</p>

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Claims	“Secondary References”
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 any of the purported “Secondary References” in combination, discloses the apparatus of claim 7.</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed apparatus “wherein the sensing element further comprises a pattern of electrodes within the touch screen, the electrodes being coupled to the control circuit.”</p>
9[a] The apparatus of claim 8, wherein the electrodes comprise indium tin oxide (ITO).	<p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the apparatus of claim 8.</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed apparatus “wherein the electrodes comprise indium tin oxide (ITO).”</p>
16[pre] A computer- readable non-transitory storage media embodying logic that is operable when executed to:	Respondents have not shown that any of the purported “Secondary References” in combination, discloses a “computer- readable non-transitory storage media embodying logic that is operable when executed to” perform the claimed steps.
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 any of the purported “Secondary References” in combination, discloses the claimed step “monitor 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>
16[b] determine 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; and	<p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed step “determine 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> <p><i>See supra</i> element 1[b].</p>
16[c] if the amount of time that has elapsed exceeds a predetermined time	Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed step “if the amount of time that has elapsed exceeds a predetermined time.”

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Claims	“Secondary References”
duration, then initiate a particular function of an apparatus.	<p>exceeds a predetermined time duration, then initiate a particular function of an apparatus.”</p> <p><i>See supra</i> element 1[b].</p>
17[a] The media of claim 16, wherein the particular function comprises deactivation of measurement of changes in capacitance by the sensing element.	<p>Neodron and the Staff contend that “deactivation of measurement of changes in capacitance” should be construed as: Plain and ordinary meaning: “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 any of the purported “Secondary References” in combination, discloses a media of claim 16.</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed media “wherein the particular function comprises deactivation of measurement of changes in capacitance by the sensing element.”</p> <p><i>See supra</i> element 2[a].</p>
18[a] The media of claim 16, wherein the particular function comprises recalibration of measurement of changes in capacitance by the sensing element.	<p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses a media of claim 16.</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed media “wherein the particular function comprises recalibration of measurement of changes in capacitance by the sensing element.”</p> <p><i>See supra</i> element 3[a].</p>
19[a] The media of claim 16, 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>Respondents have not shown that any of the purported “Secondary References” in combination, discloses a media of claim 16.</p> <p>Respondents have not shown that any of the purported “Secondary References” in combination, discloses the claimed media “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>

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