

EXHIBIT C-6

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

Complainant denies that U.S. Patent Application Publication No. 2008/0162996 (“Krah”) anticipates any No. 8,749,251 (“’251 Patent”) and denies that Krah, alone or in combination with any other reference, renders the ’251 Patent. As to obviousness, Respondents have failed to identify any limitation of any claim that is not disclosed by Krah. Respondents have failed to identify any basis for combining Krah 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 Krah. Complainant does 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 does not disclose the specific references to be combined and the purported motivation to combine these specific references.

| Claims | Krah |
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| 1[pre] An apparatus comprising: | To the extent the preamble is construed as a limitation, Respondents contend that Krah discloses the claimed apparatus. |
| 1[a] a sensing element of a touch screen; and | Respondents have not shown that Krah discloses the claimed “sensing element of a touch screen.” |
| 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. | Respondents have not shown that Krah 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.” Furthermore, Respondents have not identified the particular portions of Krah that Respondents contend correspond to the claimed “amount of time,” the claimed “sensing element of a touch screen,” the claimed “predetermined time duration,” or the claimed “particular function of the apparatus.” Respondents identify additional references allegedly disclosing this claimed logic. Complainant addresses in its corresponding claim charts for those references. |

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| Claims | Krah |
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| | <p>Respondents have failed to show that one of ordinary skill in the art combined any of the identified references with Krah. Respondents' regarding alleged motivation to combine fails to specify which reference 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 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 Krah discloses the apparatus of claim 1 wherein the particular function comprises deactivation of measurement of changes in capacitance by the sensing element.</p> <p>Respondents have not shown that Krah discloses the claimed apparatus 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 particular function. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art combined any of the identified references with Krah. Respondents' regarding alleged motivation to combine fails to specify which reference 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 Krah discloses 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 Krah discloses the claimed apparatus wherein the particular function comprises recalibration of measurement of changes in capacitance by the sensing element.</p> <p>Respondents identify an additional reference allegedly disclosing this particular function which Complainant addresses in its corresponding claim charts for those references.</p> |

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| Claims | Krah |
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| | <p>Respondents have failed to show that one of ordinary skill in the art combined the identified reference with Krah. Respondents' boilerplate regarding alleged motivation to combine fails to identify specific reasons that one of ordinary skill in 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 Krah discloses the apparatus of claim 1.</p> <p>Respondents have not shown that Krah discloses the claimed apparatus 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 identify additional references allegedly disclosing this apparatus. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art combined any of the identified references with Krah. Respondents' boilerplate regarding alleged motivation to combine fails to specify which reference is 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>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 Krah discloses the apparatus of claim 1.</p> <p>Respondents have not shown that Krah discloses the claimed apparatus 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 identify additional references allegedly disclosing this apparatus. Complainant addresses in its corresponding claim charts for those references. Respondents have failed to show that one of ordinary skill in the art combined any of the identified references with Krah. Respondents' boilerplate regarding alleged motivation to combine fails to specify which reference is 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> |

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| Claims | Krah |
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| <p>6[a] The apparatus of claim 1, wherein the particular function comprises turning off the apparatus.</p> | <p>Respondents have not shown that Krah discloses the apparatus of claim 1, wherein the particular function comprises turning off the apparatus.</p> <p>Respondents have not shown that Krah discloses the claimed apparatus of claim 1, wherein the particular function comprises turning off the apparatus.”</p> <p>Respondents identify additional references allegedly disclosing this claim. 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 Krah. Respondents’ argument 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>7[a] The apparatus of claim 1, wherein the sensing element comprises a control circuit.</p> | <p>Respondents have not shown that Krah discloses the apparatus of claim 1, wherein the sensing element comprises a control circuit.</p> <p>Respondents have not shown that Krah discloses the claimed apparatus of claim 1, wherein the sensing element comprises a control circuit.”</p> <p>Respondents identify additional references allegedly disclosing this claim. 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 Krah. Respondents’ argument 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>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> | <p>Respondents have not shown that Krah 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 identify additional references allegedly disclosing this claim. 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 Krah. Respondents’ argument 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> |

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| Claims | Krah |
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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. |
| 9[a] The apparatus of claim 8, wherein the electrodes comprise indium tin oxide (ITO). | Respondents have not shown that Krah discloses the apparatus of claim 8. Respondents identify additional references allegedly disclosing this apparatus. 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 Krah. Respondents' arguments 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. |
| 16[pre] A computer- readable non-transitory storage media embodying logic that is operable when executed to: | Respondents have not shown that Krah discloses a "computer- readable storage media embodying logic that is operable when executed to" perform the 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; | Respondents have not shown that Krah discloses the claimed step "monitoring a sensing element of a key touch on a touch screen, the sensing element being of a touch screen." <i>See supra</i> element 1[a]. Respondents identify additional references allegedly disclosing this step. 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 Krah. Respondents' arguments 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. |
| 16[b] determine an amount of time that has elapsed since the sensing element last detected a change of capacitance | Respondents have not shown that Krah 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." |

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