UNITED STATES PATENT AND TRADEMARK OFFICE

_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC., AND APPLE INC.,

Petitioners

v.

NEONODE SMARTPHONE LLC
Patent Owner.

Case IPR2021-00144
U.S. Patent No. 8,095,879

**SUPPLEMENTAL DECLARATION OF DR. BENJAMIN B. BEDERSON
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,095,879**

EXHIBIT 1051
Samsung et al. v. Neonode
IPR2021-00144

TABLE OF CONTENTS

Contents

1.   I, Dr. Benjamin B. Bederson, declare as follows:

I.   INTRODUCTION

2.   I have been retained by Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Apple Inc. (collectively, "Petitioners") as an independent expert consultant in this *inter partes* review ("IPR") proceeding before the United States Patent and Trademark Office ("PTO").

3.   I have been asked by Petitioners' counsel ("Counsel") to consider whether certain references teach or suggest the features recited in Claims 1-6, and 12-17 of U.S. Patent No. 8,095,879 ("the '879 Patent") (EX1001).

4.   I previously submitted a Declaration in this proceeding that I signed on November 5, 2020, and I understand that Declaration was marked as Exhibit 1002. That Declaration contained my opinions and the bases for them. Since submitting my Declaration (EX1002) I have considered the Board's institution decision (Paper 24), Petitioners' Request for Rehearing (Paper 25), the Board's decision granting Petitioners' Request for Rehearing (Paper 26), Patent Owner's Response (Paper 37) and the exhibits identified therein, and the Second Declaration of Dr. Craig Rosenberg (EX2007) in support of Patent Owner's Response. My opinions from my previous declaration have not changed.

II.   BACKGROUND AND QUALIFICATIONS

5.   My background and qualifications are set forth in my November 5,

2020 declaration. I incorporate that section of my previous declaration here by reference.

III.   INFORMATION CONSIDERED

6.   In preparing this declaration, I have considered the materials discussed in this declaration, including, for example, the '879 Patent, the references cited by the '879 Patent, the prosecution histories of the '879 Patent and the application from which it derives (including the references cited therein), various background articles and materials referenced in this declaration, and the prior art references identified in this declaration. In addition, my opinions are further based on my education, training, experience, and knowledge in the relevant field.

Exhibit No.	Description
1001	U.S. Patent No. 8,095,879 ("the '879 patent")
1002	Declaration of Benjamin B. Bederson
1003	File History for U.S. Patent No. 8,095,879
1004	Xiangshi Ren & Shinji Moriya, "Improving Selection on Pen-Based Systems: A Study of Pen-Based Interaction for Selection Tasks," ACM Transactions on Computer-Human Interaction, Vol. 7, No. 3, September 2000, pp. 384-416 ("Ren")
1005	U.S. Patent No. 5,249,296 ("Tanaka")
1006	U.S. Patent No. 5,406,307 ("Hirayama307")
1007	U.S. Patent No. 5,949,418 ("Shields")
1008	CV of Benjamin B. Bederson
1009	U.S. Patent No. 6,100,878 ("Hirayama878")
1010	U.S. Patent No. 5,615,384 ("Rubine ")
1011	IBM Simon User's Manual (1994)
1012	Andrew Sears, et al., "A new era for touchscreen applications: High precision, dragging icons, and refined feedback,"

SAMSUNG EX1051

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

WHAT WILL YOU BUILD? | sales@docketalarm.com | 1-866-77-FASTCASE

fastcase
Smarter legal research.