

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

NEONODE SMARTPHONE LLC
Patent Owner.

Case IPR2021-00145
U.S. Patent No. 8,812,993

**SUPPLEMENTAL DECLARATION OF DR. BENJAMIN B. BEDERSON
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,812,993**

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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 ("patent office").

3. I have been asked by Petitioners' counsel ("Counsel") to consider whether certain references teach or suggest the features recited in Claims 1-8 of U.S. Patent No. 8,812,993 ("the '993 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), Patent Owner's Response (Paper 29), and the Declaration of Dr. Craig Rosenberg (EX2013) 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.

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III. INFORMATION CONSIDERED

6. In preparing this declaration, I have considered the materials discussed in this declaration, including, for example, the '993 Patent, the references cited by the '993 Patent, the prosecution histories of the '993 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.

<u>Exhibit No.</u>	<u>Description</u>
1001	U.S. Patent No. 8,812,993 (“the '993 patent”)
1002	Declaration of Benjamin B. Bederson
1003	File History for U.S. Patent No. 8,812,993
1004	Benjamin B. Bederson CV
1005	Certified translation of JP Published Patent Application No. 2002-55750 (“Hisatomi”), published February 20, 2002
1006	Xiangshi Ren & Shinji Moriyama, “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”)
1007	U.S. Patent No. 5,422,656 to Allard et al. (“Allard-656”)
1008	U.S. Patent No. 5,249,296 to Tanaka (“Tanaka”)
1009	U.S. Patent No. 5,615,384 to Allard et al. (“Allard-384”)
1010	U.S. Patent No. 5,537,608 to Beatty et al. (“Beatty”)
1011	U.S. Patent No. 5,903,268 to Hirayama (“Hirayama”)

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