Joint Submission of Marked-Up Protective Order IPR2021-00145 (U.S. Patent No. 8,812,993)

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

JOINT SUBMISSION OF PROPOSED PROTECTIVE ORDER



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Motion for Protective Order IPR2020-00995 (U.S. Patent 9,553,880)

LIST OF EXHIBITS	LIST	OF	EXH	IBITS
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Exhibit No.	Description
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")
1012	U.S. Patent No. 5,305,435 to Bronson ("Bronson")
1013	U.S. Patent No. 6,133,898 to Ludolph et al. ("Ludolph")
1014	Tammara T. A. Combs and Benjamin B. Bederson "Does zooming improve image browsing?" Proceedings of the Fourth ACM Conference on Digital Libraries (DL '99), ACM, New York, NY, USA, (August 1999) 130-137
1015	Dean Harris Rubine, "The Automatic Recognition of Gestures," CMU-CS- 91-202, December, 1991.
1016	U.S. Patent No. 6,710,791 to Kodama et al. ("Kodama")
1017	IBM Corp., User's Manual, "Simon Says 'Here's How!"" Part. No. 82G2557 (1994) ("IBM")
1018	Benjamin B. Bederson & James D. Hollan, <i>Pad++: A Zooming Graphical</i> <i>Interface for Exploring Alternate Interface Physics</i> , UIST '94 Proceedings of the 7th Annual ACM Symposium on User Interface Software and Technology 17 (1994), DOI: http://dx.doi.org/10.1145/192426.192435
1019	David Rogers et al., <i>Tossing Objects in a Desktop Environment</i> , submitted to Conference on Human Factors in Computing Systems (1996)

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1020	David Rogers et al., Exemplar Figure of Tossing from <i>Tossing Objects in a Desktop Environment</i> , submitted to Conference on Human Factors in Computing Systems (1996)
1021	Benjamin B. Bederson, <i>Fisheye Menus</i> , UIST '00 Proceedings of ACM Conference on User Interface Software and Technology 217 (2000), DOI: <u>10.1145/354401.317382</u>
1022	Leslie E Chipman et al., <i>SlideBar: Analysis of a Linear Input Device</i> , 23 Behaviour & Info. Tech. 1 (2004), DOI: 10.1080/01449290310001638487
1023	Hilary Browne et al., <i>Designing a Collaborative Finger Painting</i> <i>Application for Children</i> , HCIL-2000-17, CS-TR-4184, UMIACS-TR- 2000-66 (Sept. 2000), available at <u>https://hcil.umd.edu/pub-perm- link/?id=2000-17</u>
1024	 Pekka Parhi, Amy K. Karlson, and Benjamin B. Bederson. 2006. Target size study for one-handed thumb use on small touchscreen devices. In Proceedings of the 8th Conference on Human-Computer Interaction with Mobile Devices and Services (MobileHCI '06). Association for Computing Machinery, New York, NY, USA, 203–210. DOI:<u>https://doi.org/10.1145/1152215.1152260</u>
1025	Karlson, Amy & Bederson, Benjamin & Contreras-Vidal, José. (2008). Understanding One-Handed Use of Mobile Devices. Handbook of Research on User Interface Design and Evaluation for Mobile Technology. 86-101. DOI:10.4018/978-1-59904-871-0.ch006
1026	Apple Newton Message Pad Handbook (1993)
1027	Handbook for Palm m500 Series Handhelds (1998)
1028	HP Jornada 520 Series Pocket PC User Guide (2001)
1029	U.S. Patent No. 5,821,930 to Hansen ("Hansen")
1030	U.S. Patent Application Publication No. 2005/0024341 ("Gillespie")
1031	Declaration of Mr. Jacob Munford
1032	Norman, D. A. (1988). <i>The psychology of everyday things</i> . BasicBooks. IBSN: 0-465-06709-3.
1033	U.S. Publication No. 2001/0043189 to Brisebois ("Brisebois")
1034	Trial Delay Statistics
1035	Order Governing Proceedings - Patent Case, Neonode Smartphone LLC v. Apple Inc., 6:20-cv-00505 (W.D.Tex. Oct. 5, 2020)
1036	Order Governing Proceedings - Patent Case, Neonode Smartphone LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc., 6:20- cv-00507 (W.D.Tex. Oct. 5, 2020)

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1037	Order Granting Motion Continue Case Management Conference (CMC), Neonode Smartphone LLC v. Apple Inc., 6:20-cv-00505 (W.D.Tex.) (W.D.Tex. Oct. 7, 2020)
1038	Order Granting Motion Continue Case Management Conference (CMC), Neonode Smartphone LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc., 6:20-cv-00507 (W.D.Tex. Oct. 7, 2020)
1039	Order Setting Markman Hearing, <i>Neonode Smartphone LLC v. Apple Inc.</i> , 6:20-cv-00505 (W.D. Tex. Oct. 26, 2020)
1040	Order Setting Markman Hearing, Neonode Smartphone LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc., 6:20-cv-00507 (W.D. Tex. Oct. 26, 2020)
1041	November 5, 2020 Letter from Apple Counsel to Neonode Counsel
1042	November 5, 2020 Letter from Samsung Counsel to Neonode Counsel
1043	"Order Staying Case Pending Completion of Venue Discovery" filed 12/08/20 in <i>Neonode Smartphone LLC v. Apple Inc.</i> , 6:20-cv-00505 (W.D. Tex.)
1044	"Text Order GRANTING [36] Motion to Stay Case" filed 12/11/20 in Neonode Smartphone LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc., 6:20-cv-00507 (W.D. Tex.)
1045	"Plaintiff Neonode Smartphone LLC's Unopposed Motion to Extend Venue Discovery Deadlines" filed 02/16/21 in <i>Neonode Smartphone LLC v. Apple</i> <i>Inc.</i> , 6:20-cv-00505 (W.D. Tex.)
1046	"Amended Agreed Scheduling Order" filed 11/13/20 in Neonode Smartphone LLC v. Apple Inc., 6:20-cv-00505 (W.D. Tex.)
1047	Proposed Redacted Version of Patent Owners Response
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1049	Marked-Up Version of Samsung and Neonode Joint Proposed Protective Order
1050	Declaration of Zachary Loney
1051	Supplemental Declaration of Benjamin B. Bederson
1052	Craig Rosenberg Deposition Transcript, Nov. 17, 2021
1053	Joseph Shain Deposition Transcript, Dec. 1, 2021
1054	Ulf Martensson Deposition Transcript, Dec. 3, 2021
1055	Per Bystedt Deposition Transcript, Dec. 1, 2021
1056	Marcus Bäcklund Deposition Transcript, Nov. 30, 2021
1057	Microsoft Computer Dictionary, 5 th Ed. (2002)

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1058	Pen Lab Review: IBM ThinkPad 730TE (Nov./Dec. 1995)
1059	Redline of Default Protective Order

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