DEMONSTRATIVE EXHIBIT

Apple Inc., Petitioner

v.

Koss Corporation, Patent O

IPR2021-00255
Patent 10,298,451

March 3, 2022

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Patentability Challenges

Ground	Claims	35 U.S.C. § 103 Basis
1A	1, 6, 11-13 & 15-20*	Brown (APPLE-1004) & Scherzer (AP
1B	2, 7-10 & 21	Brown, Scherzer & Baxter (APPLE
1C	3 & 4	Brown, Scherzer & Drader (APPLE
1D	5	Brown, Scherzer & Ramey (APPLE
1E	15	Brown, Scherzer & Gupta (APPLE

*Claims 1 and 18 are the only Independent Claims in the '451 Patent

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Claim 1 of the '451 Patent (APPLE-1003, 8:30-53)

1. A system comprising:
a wireless access point;
an electronic device;
a mobile computer device that is in communication with the electronic device via an ad hoc wireless communication link; and
one or more host servers that are in communication with the mobile computer device via the Internet, wherein the one or more host servers receive and store credential data for an infrastructure wireless network provided by the wireless access point,
wherein:
the mobile computer device is for transmitting to the electronic device, wirelessly via the ad hoc wireless communication link between the electronic device and the mobile computer device, the credential data for the infrastructure wireless network stored by the one or more host servers; and
the electronic device is for, upon receiving the credential data for the infrastructure wireless network from the mobile computing device, connecting to the wireless access point via the infrastructure wireless
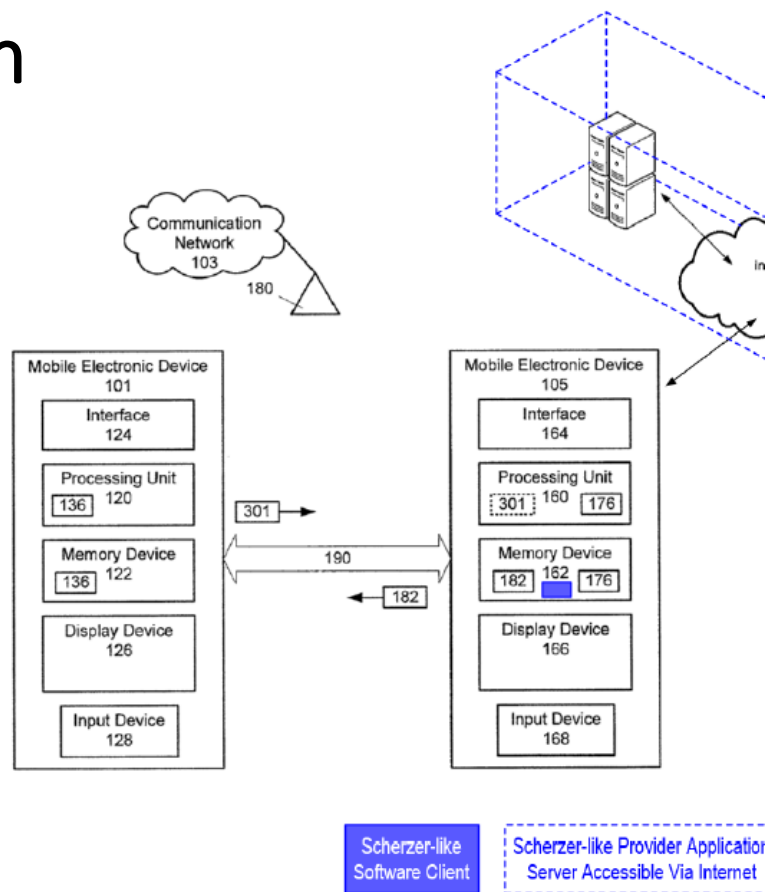
Credential data receiv[ed]
stored by one or more
servers is:
➤ Transmitted from t[he]
computer device to
electronic device w[ireless]
via an ad hoc
communication lin[k]
➤ Used by the electr[onic]
device to connect t[o]
wireless access poi[nt]

Petitioner's Brown-Scherzer Combination (Pet. 25-26)

Figure from Pet., 27

- Modifies Brown's system to include:
  - Scherzer-like software client on Brown's mobile electronic device 105.
  - Scherzer-like provider application server accessible via internet.

- Configuration data 182 stored on Scherzer-like provider application server is transmitted from device 105 to device 101 to enable device 101 to connect to the Internet

- Device 101 does not include a Scherzer-like software client

Communication Network 103
180

Mobile Electronic Device 101
Interface 124
Processing Unit 136 120
Memory Device 136 122
Display Device 126
Input Device 128

301
190
182

Mobile Electronic Device 105
Interface 164
Processing Unit 301 160 176
Memory Device 182 162 176
Display Device 166
Input Device 168

Scherzer-like Software Client

Scherzer-like Provider Application Server Accessible Via Internet

Brown-Scherzer Combination

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Problems with Petitioner's 35 U.S.C. § 103 Challenges

- Petitioner's Brown-Scherzer combination results i widespread, unfettered dissemination of access credentials and network access being provided to unrecognized devices and unregistered users

- Petitioner's Brown-Scherzer combination ignores teachings in Scherzer, as a whole, and POSITA's common understandings of network security

- Petitioner and Dr. Cooperstock have assumed inconsistent and unclear positions throughout thi proceeding

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