

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent of: Mayfield et al.  
U.S. Patent No.: 10,259,020 Attorney Docket No.: 50095-0028IP1  
Issue Date: April 16, 2019  
Appl. Serial No.: 15/851,952  
Filing Date: December 22, 2017  
Title: APPARATUS FOR CLEANING VIEW SCREENS AND LENSES  
AND METHOD FOR THE USE THEREOF

**SUPPLEMENTAL DECLARATION OF DR. JEREMY COOPERSTOCK**

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    A. In multiple ways, Bohbot renders obvious a “switching device”  
    “configured to activate, deactivate or send into hibernation the portable  
    electronic device” and “an electronic circuit [of the electronic device]  
    that is responsive to the switching device” (elements 1[a], 1[d], and 1[f]).  
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        1. Bohbot’s headset acts as a switching device to activate and  
        deactivate discharging of power from the primary module’s power  
        storage device. ....7

        2. Bohbot’s headset acts as a switching device to activate and  
        deactivate data transfer to, and storage at, the primary module’s  
        data storage unit. ....9

        3. Bohbot’s headset acts as a switching device to activate and  
        deactivate the primary module’s microphone circuitry. ....10

        4. Bohbot’s headset acts as a switching device to activate and  
        deactivate the primary module.....11

    B. A POSITA would have modified Bohbot’s FIG. 3 based on FIG. 2. ....12

    C. Bohbot-Gundlach renders obvious “the electronic device comprises...  
    recessed areas... configured to correspond to complimentary surface  
    elements on the switching device” and “when coupled, the second case  
    [of the electronic device] functions to protect the first case [of the  
    switching device]” (elements 1[e] and 1[g]).....13

    D. Bohbot-Gundlach-Diebel renders obvious the “switching device is  
    configured to activate, deactivate or send into hibernation the portable  
    electronic device” (element 1[f]). ....16

    E. Bohbot-Gundlach and Bohbot-Gundlach-Diebel renders obvious claim 6.  
    .....20

    F. Bohbot-Gundlach and Bohbot-Gundlach-Diebel renders obvious claim 7.  
    .....23

    G. Bohbot-Gundlach-Li and Bohbot-Gundlach-Diebel-Li render obvious  
    claims 4 and 18. ....24

H. Bohbot-Gundlach-Stevinson and Bohbot-Gundlach-Diebel-Stevinson  
render obvious claims 8 and 9. ....25

I. Bohbot-Gundlach-Stevinson-Iio and Bohbot-Gundlach-Diebel-  
Stevinson-Iio render obvious claim 17. ....27

IV. CONCLUSION .....30

I, Jeremy Cooperstock, of Montreal, Canada, declare that:

## I. INTRODUCTION

1. I have been retained by Fish & Richardson, P.C., on behalf of Apple Inc. (“Petitioner”), as an independent expert consultant in this *inter partes* review (“IPR”) proceeding before the United States Patent and Trademark Office (“PTO”).

2. I understand that this declaration will be submitted in support of Petitioner’s Reply to Patent Owner’s Response to the Petition for *inter partes* review of the ’020 Patent (U.S. Patent No. 10,259,020). This declaration supplements, and is intended to be read in conjunction with, my declaration in support of Apple’s Petition (APPLE-1003, “my First Declaration”). In my First Declaration, I address many topics, including (but not limited to) my background and qualifications, the level of skill in art, an overview of the ’020 Patent, claim construction, certain legal standards explained to me by Apple’s counsel, and a detailed analysis of the prior art against the ’020 Patent’s claims. The opinions and explanations expressed in my First Declaration apply equally here.

3. In writing this Supplemental Declaration, I have considered the following: my own knowledge and experience, including my teaching and work experience in the above fields; and my experience of working with others involved in those fields.

4. I have no financial interest in either party or in the outcome of this proceeding. I am being compensated for my work as an expert on an hourly basis, for all tasks involved. My compensation is not dependent on the outcome of these proceedings or on the content of my opinions.

## **II. PERSON OF ORDINARY SKILL IN THE ART**

5. Based on my knowledge and experience in the field and my review of the '020 patent and its file history, I believe that a POSITA would have had at least a Bachelor's degree in an academic area emphasizing electrical engineering, mechanical engineering, or a similar discipline, and at least two years of experience in the field working with electronic devices. Superior education could compensate for a deficiency in work experience, and vice-versa. I understand that Patent Owner and its expert, Dr. Toliyat, propose that the POSITA would have post-baccalaureate electronic device or system design experience. I agree.

## **III. TECHNICAL DISCUSSION**

6. The analysis and opinions expressed in my First Declaration fully explain why each and every feature of the '020 Patent's Challenged Claims is provided in the prior art. I understand that Patent Owner and Dr. Toliyat have considered my opinions and offered their own, some of which are inconsistent with my view. I will address some of those points below. The fact that I have not

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