

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC.
Petitioner

v.

LITL LLC
Patent Owner

IPR Case No. IPR2021-00681
U.S. Patent No. 8,289,688

**DECLARATION OF JEAN RENARD WARD, IN SUPPORT OF
PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. § 311 *ET SEQ.* AND 37 C.F.R. § 42.100 *ET SEQ.*
(CLAIMS 1-9 AND 11-32 OF U.S. PATENT NO. 8,289,688)**

I. INTRODUCTION

1. My name is Jean Renard Ward. I have been retained as a technical expert on behalf of Lenovo (United States) Inc. to provide assistance in the above-captioned matter. I understand that Lenovo (United States) Inc. is the Petitioner in this proceeding. I have no financial interest in or affiliation with the Petitioner or the Patent Owner, which I understand is LiTL LLC. My compensation does not depend upon the outcome of, or the specifics of my testimony in, this *inter partes* review proceeding or any litigation proceedings.

2. I have reviewed each of the following documents: I understand that some are also identified in the Petition.

EXHIBIT	DESCRIPTION
1001	U.S. Pat. No. 8,289,688 ("the '688 Patent")
1002	Prosecution History of the '688 Patent
1003	JP 1994-242853 to Shimura
1004	Certified English translation of JP 1994-242853 ("Shimura")
1005	U.S. Pub. No. 2006/0034042 to Hisano et al. ("Hisano")
1006	U.S. Pub. No. 2005/0062715 to Tsuji et al. ("Tsuji")
1007	JP 1996-179851 to Shigeo
1008	Certified English translation of JP 1996-179851 ("Shigeo")
1009	U.S. Pat. No. 6,918,159 to Choi ("Choi")
1011	Curriculum Vitae of Jean Renard Ward

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1012	Claim Listing
1013	Family Diagram of Modified Shimura Computers
1014	Clifford & Gomez, Measuring Tilt with Low-g Accelerometers (2005) ("Freescale")
1015	U.S. Pub. No. 2005/0122318 to Tonouchi et al. ("Tonouchi")
1016	DE 1031455A1 to Schweizer
1017	Certified English translation of DE 1031455A1 ("Schweizer")
1018	Hardy, Lenovo ThinkPad X61 Table PC Review (2007) ("Lenovo")
1019	U.S. Pat. No. 6,882,335 to Saarinen ("Saarinen")
1020	U.S. Pat. No. 6,493,216 to Lin ("Lin")
1021	U.S. Pat. No. 8,151,105 to Park et al. ("Park")
1022	Ride, MIT's \$100 Laptop (2005) ("MIT")
1023	U.S. Pub. No. 2005/0134717 to Misawa ("Misawa")
1024	U.S. Pat. No. 6,243,258 to Paratore ("Paratore")
1025	Hinckley et al., Sensing Techniques for Mobile Interaction ("Hinckley")
1026	Bartlett, Rock 'n' Scroll is Here to Stay (2000) ("Bartlett")
1027	U.S. Pat. No. 6,704,007 to Clapper ("Clapper")
1028	Microsoft, Microsoft Computer Dictionary Fifth Edition (2002) ("Microsoft")
1029	U.S. Pat. No. 5,436,954 to Nishiyama ("Nishiyama")
1030	GB 2449632 to Hohl ("Hohl")

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1031	JP 2002-258982 to Kiyoyuki
1032	Certified English translation of JP 2002-258982 ("Kiyoyuki ")

3. I understand that the application leading to U.S. Patent No. 8,289,688 ("the '688 Patent") was filed as U.S. Application No. 12/170,939 on July 10, 2008. This application claims priority to U.S. Provisional Application No. 61/041,365, filed April 1, 2008, which I have been asked to treat as the effective filing or priority date of the '688 Patent (also referred to hereafter as the "Critical Date").

II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

4. EX-1011 is a copy of my current curriculum vitae ("CV").

5. I provide consulting services doing business as Rueters-Ward Services (<http://ruetersward.com/>). My place of business is located at 33 Forest Street, Watertown MA 02472.

6. I received an SBEE degree (combined program in Electrical Engineering and Computer Science) from the Massachusetts Institute of Technology as a member of the class of 1973.

7. I am a practicing engineer. For a number of years, I have primarily been doing consulting projects and contract development work under the business name of Rueters-Ward Services. I have worked professionally in the general field of software engineering and relevant hardware for approximately 45 years, primarily in pen/touch computing, applications of public-key cryptography, and web development. Many of my major projects have concerned pen/touch computing: also referred to simply as pen computing. Pen computing refers to computing that makes

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