UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LENOVO (UNITED STATES) INC.
Petitioner

v.

LITL LLC
Patent Owner

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IPR Case No. IPR2021-00786
U.S. Patent No. 9,880,715

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**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 1-20 OF U.S. PATENT NO. 9,880,715)**

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, regarding which I am informed that some are also identified in the Petition.

EXHIBIT	DESCRIPTION
1001	U.S. Pat. No. 9,880,715 ("the '715 Patent")
1002	Prosecution History of the '715 Patent
1003	JP 1994-242856 to Shimura
1004	Certified English translation of JP 1994-242856 ("Shimura")
1005	U.S. Pub. No. 2005/0062715 to Tsuji et al. ("Tsuji")
1006	Windows XP Home Edition: The Missing Manual (2nd Edition)("Pogue")
1008	Curriculum Vitae of Jean Renard Ward
1009	Claim Listing
1010	U.S. Pub. No. 2008/0059888 to Dunko ("Dunko")

1011	U.S. Pub. No. 2006/0034042 to Hisano et al. ("Hisano")
1012	U.S. Pub. No. 2005/0122318 to Tonouchi et al. ("Tonouchi")
1013	JP 2002-258982 to Kiyoyuki
1014	Certified English translation of JP 2002-258982 ("Kiyoyuki")
1015	JP 1996-179851 to Shigeo
1016	Certified English translation of JP 1996-179851 ("Shigeo")
1017	DE 1031455A1 to Schweizer
1018	Certified English translation of DE 1031455A1 ("Schweizer")
1019	Clifford & Gomez, Measuring Tilt with Low-g Accelerometers (2005) ("Freescale")
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. Pat. No. 6,882,335 to Saarinen ("Saarinen")
1024	Panasonic CF-19 Operating Instructions ("CF-19")
1025	Panasonic CF-T8 Operating Instructions
1026	Hardy, Lenovo ThinkPad X61 Tablet PC Review (2007)
1027	Lenovo ThinkPad X61 Tablet Service and Troubleshooting Guide
1028	Dell Latitude XT Tablet
1029	Motion Computing M1400 Tablet PC User Guide
1030	Motion Computing M1400 Tablet PC Addendum

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1031	HP Compaq Tablet PC TC1100 QuickSpecs ("Compaq")
1032	Sony Vaio VGN-UX280P (UX Series MicroPC) Spec Sheet
1033	Declaration of Michael J. Hopkins
1034	Declaration of Liliana Nunez
1035	WaybackMachine Archive of https://www.windows-help-central.com/show-desktop-icon-in-xp-missing.html.
1036	Excerpts of Windows XP Hacks & Mods: For Dummies
1037	Excerpts of Windows XP in a Nutshell (2nd Edition)
1038	U.S. Pat. No. 5,559,670 ("Flint")

3. I understand that the application leading to U.S. Patent No. 9,880,715

("the '715 Patent") was filed as U.S. Application No. 14/680,422 on April 7, 2015. I

also understand that 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 '715 Patent (also referred hereafter as the

"Critical Date").

II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

4. EX-1008 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

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