

Exhibit 1

U.S. Patent No. 8,526,767 (“767 Patent”)

Invalidity Chart Based On Primary Reference U.S. Patent Application Publication No. 2009/0284478

BALTIERRA qualifies as prior art to U.S. Patent No. 8,526,767 (“767 Patent”) at least under 35 U.S.C. § 102(e) alone or with other references, renders obvious one or more of claims 1-3, 6, and 11-14. To the extent BALTIERRA renders obvious one or more limitations of the claims, it would have been obvious to combine the teachings of BALTIERRA with one of ordinary skill in the art and with one or more of the references below to render the claims at-issue in the ‘

- U.S. Patent Application Publication No. 2007/0247435 (“BENKO”)
- U.S. Patent No. 8,519,965 (“CADY”)
- U.S. Patent Application Publication No. 2009/0325643 (“HAMADENE”)
- Japanese Laid-Open Patent Application Gazette H09-231004 (“KATOU”)
- U.S. Patent Application Publication No. 2009/0213084 (“KRAMER”)
- U.S. Patent Application Publication No. 2010/0020025 (“LEMORT”)
- U.S. Patent Application Publication No. 2008/0046425 (“PERSKI”)
- International Patent Publication No. WO 00/63874 (“STRINGER”)
- U.S. Patent Application Publication No. 2007/0176906 (“WARREN”)
- U.S. Patent Application Publication No. 2008/0036743 (“WESTERMAN”)
- U.S. Patent Application Publication No. 2009/0225039 (“WILLIAMSON”)
- U.S. Patent Application Publication No. 2007/0046643 (“HILLIS”) (prior art under at least 35 U.S.C. § 102(e))
- U.S. Patent Application Publication No. 2006/0066582 (“LYON”) (prior art under at least 35 U.S.C. § 102(e))
- U.S. Patent Application Publication No. 2007/0152984 (“ORDING”) (prior art under at least 35 U.S.C. § 102(e))
- U.S. Patent Application Publication No. 2007/0291009 (“WRIGHT”) (prior art under at least 35 U.S.C. § 102(e))
- Admitted Prior Art

The excerpts cited herein are exemplary. For any claim limitation, Samsung may rely on excerpts cited for any claim limitation and on additional excerpts not set forth fully herein to the extent necessary to provide a more comprehensive explanation of the claim limitation. Where an excerpt refers to or discusses a figure or figure items, that figure and any additional figures of that figure should be understood to be incorporated by reference as if set forth fully herein. Similarly, where a particular text referring to a figure, the citation should be understood to include the figure and related figures as if set forth fully herein.

These invalidity contentions are not an admission by Samsung that the accused products or components, including any version of these products or components, are covered by, or infringe the asserted claims, particularly when these claims are construed and applied. These invalidity assertions are also not an admission that Samsung concedes or acquiesces to the claim construction(s) implied or suggested by Plaintiff in its Complaint or the associated infringement claim charts. Samsung is not asserting any claim construction positions through these charts, including whether the preamble is a limitation. Samsung does not concede or acquiesce that any asserted claim satisfies the requirements of 35 U.S.C. §§ 112 or 101 and submits these contentions only to the extent Plaintiff's assertions may be understood.

<u>Asserted Claims</u>	<u>Exemplary Disclosures</u>
Claim 1	
[1.pre] A touch sensor device comprising:	<p>BALTIERRA, alone or in combination with the knowledge of a person of ordinary skill in the art, discloses and/or renders obvious the touch sensor device recited in claim 1.</p> <p>BALTIERRA at Abstract: “ This document describes tools capable of initiating a function based on one or more contacts received through a contact detection device, such as a touch pad. In some embodiments, the tools identify tactile contacts in accordance with the tool's input mode. The tools use the input mode to determine what gestures may be identified for the tactile contacts. In some embodiments, these tools switch input modes based on a number or characteristic of the contacts electronically represented in contact data. By so doing, the tools may determine appropriate gestures or provide a broader range of functions based on the contacts received through a contact detection device.”</p> <p>BALTIERRA at [0003]: “ This document describes tools capable of initiating a function based on one or more contacts received through a contact detection device, such as a touch pad. In some embodiments, the tools identify tactile contacts in accordance with the tool's input mode. The tools use the input mode to determine what gestures may be identified for the tactile contacts. In some embodiments, these tools switch input modes based on a number or characteristic of the contacts electronically represented in contact data. By so doing, the tools may determine appropriate gestures or provide a broader range of functions based on the contacts received through a contact detection device.”</p> <p>BALTIERRA at [0011]: “ More and more, computing systems are sold with contact input devices, such as a touch screen. These devices accept user input based on physical contact, such as a stylus or for one or more stylus or finger contacts, with one or more contact detectors on the touch pad. Current touch pads, however, are not well suited to many computing systems.”</p>

<u>Asserted Claims</u>	<u>Exemplary Disclosures</u>
	<p>applications because they often cannot differentiate between enough different contacts or require users to perform awkward gestures.”</p> <p>BALTIERRA at [0012]-[0013]: “‘This document describes an identifier module included with a contact detector to identify or recognize an electronic version of one or more tactile contacts represented by data obtained from contact detectors in the contact detection device. One or more state machines and a monitoring state machine are included with the identifier module. The identifier module's input mode, which controls which gestures that the identifier module may identify. The contact state machines and/or monitoring state machine may receive contact data for a change in a number of tactile contacts and characteristics of the contacts represented in the contact data. In response to a change represented in contact data, the state machine may determine to change state. The monitoring state machine may monitor the contact state machine to determine when the contact state machine changes state. The monitoring state machine changes the identifier module's input mode in response to the contact state machine changing state.</p> <p>In at least this way, the monitoring state machine determines what gestures that the identifier module may identify. If a person contacts the contact detection device with two fingers, the identifier module may identify which gesture is appropriate or intended by a user that contacts the contact detection device based on the input mode. Thus, when a user performs gestures, the identifier module may analyze individual tactile contacts based on the identifier module's input mode or sub-mode. By treating individual tactile contacts differently based on the input mode or sub-mode, the identifier module can distinguish combinations of gestures. This feature permits the identifier module to identify gestures from multiple contacts simultaneously without interfering with the identifier module's ability to identify gestures from a single contact.”</p> <p>BALTIERRA at [0016]: “‘FIG. 1 references a computing system 100 with a multi-input system 102 including an identifier module 104 that identifies gestures input by a user and detected by one or more sensors 106 (shown integrated with a display 107) included in a contact detection device.”</p>

<u>Asserted Claims</u>	<u>Exemplary Disclosures</u>
	<p>identifying the gestures, the identifier module 104 initiates an application 110 that performs a function (e.g., zooming) that is mapped to the gestures. Functions include input gestures for manipulating data, changing a display (e.g., pan, zoom, and rotate), providing a user interface like.”</p> <p>BALTIERRA at [0019]-[0020]: “In the example environment of FIG. 1, the multi-input system 102 is included in the user device 100. The multi-input system 102 includes a contact detection device 108. As illustrated, the contact detectors 106 are included in the contact detection device 108 and are integrated with the display 107 (e.g., a liquid crystal display or touch screen). The individual contact detectors may be configured to detect multiple contacts, such as a first tactile contact 112 and a second tactile contact 114. The contact detectors may identify a tactile contact (e.g., a first contact detector 106 detects a first contact while a second contact detector detects a second tactile contact). The contact detectors 106 may be aligned with the pixels in a column/row configuration or otherwise. The contact detectors 106 may be configured to detect an x-y position, i.e., a location or position, of the tactile contact. The contact detectors may also detect, for example, a duration of contact (whether static or moving), contact pressure, contact height, contact area, contact force, for multiple contacts, rate of positional change, angular orientation, contact velocity, direction of the contact, and other information set forth herein.”</p> <p>BALTIERRA at [0021]: “In some embodiments, an input controller 116 is included in the multi-input system 102 to convert the contact detector output (e.g., the electrical signals from the contact detectors 106) into contact data. For instance, the input controller 116 includes appropriate hardware or software for converting the contact detector output into contact data that is usable by the multi-input system 102. In other embodiments, the input controller 116 can be included in the user device 100, contained in a separate module, or performed by a general purpose processor. The input controller 116 may include firmware or software for converting contact detector output into contact data.”</p> <p>BALTIERRA at [0023]: “For example, the identifier module 104 may combine contact data that indi</p>

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.