UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

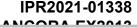
SONY MOBILE COMMUNICATIONS AB, SONY MOBILE COMMUNICATIONS, INC., SONY ELECTRONICS INC., and SONY CORPORATION,
Petitioners

v.

ANCORA TECHNOLOGIES, INC., Patent Owner

Case IPR2021-00663 Patent No. 6,411,941

DECLARATION OF DR. DAVID MARTIN ON *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,411,941





Case No.: IPR2021-00663 Atty. Dkt. No.: ANCC0121IPR Patent No.: 6,411,941

TABLE OF CONTENTS

		a. Claim 2b. Claim 3c. Claim 6	57			
	A.	Hellman, Chou, and/or Schneck Does Not Invalidate the Asserted Claims of the '941 Patent	51 57 57			
IX.	Rebuttal to Dr. Wolfe's Opinions Regarding the '941 Patent44					
	B.	Frequent Use of Impermissible Hindsight Inadequacy of Addressing the Expectation of Success	43			
VIII.	General Comments on the Wolfe Declaration42					
VII.	The R	eferences Addressed in the Wolfe Declaration	42			
VI.	Techn	ology Background	35			
	I. J.	Skill in the Art	33			
	Н.	The Level of Ordinary Skill in the Art and Person of Ordinary				
	F. G.	Abstract Ideas				
	E.	Claim Construction				
	D.	Prior Art Considered by the Examiner, and Prior Art that Is Cumulative to the Prior Art Considered by the Examiner	19			
	B. C.	Presumption of Validity Anticipation Obviousness	11			
V.		ant Legal Principles				
IV.	High-Level Description of Materials Studied					
III.		Summary of Opinions Regarding the Validity of the '941 Patent				
II.	Backg	Background of this Matter 8				
I.	Qualif	Qualifications and Professional Experience				
List o	f Exhib	oits	4			



Case No.: IPR2021-00663 Atty. Dkt. No.: ANCC0121IPR Patent No.: 6,411,941

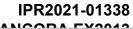
d.	Claim 7	59
e.	Claim 9	59
f.	Claim 10	59
h.	Claim 11 Claim 12	60
	Claim 13	
	Claim 14	
k.	Claim 16	62



Case No.: IPR2021-00663 Atty. Dkt. No.: ANCC0121IPR Patent No.: 6,411,941

List of Exhibits

Exhibit		
No.	Description	Date
2001	Scheduling Order, <i>Ancora Technologies, Inc. v. Sony Mobile Communications AB et al.</i> , Case No. 19-1703-CFC (Dkt. #24)	Sept. 16, 2020
2002	Sony's Invalidity Contentions, <i>Ancora Technologies, Inc. v. Sony Mobile Communications AB et al.</i> , Case No. 19-1703- CFC	Dec. 18, 2020
2003	Sony's Appendices A-E to Invalidity Contentions, <i>Ancora Technologies, Inc. v. Sony</i> <i>Mobile Communications AB et al.</i> , Case No. 19- 1703-CFC	Dec. 18, 2020
2004	Apple Patent L.R. 3-3 Disclosures, <i>Ancora Technologies, Inc. v. Apple, Inc.</i> , Case No. 4:11-cv-06357 (Dkt. #171-3)	Aug. 25, 2015
2005	Order Setting Patent Case Schedule, <i>Ancora Technologies, Inc. v. HTC America, Inc.</i> , Case No. 2:16-cv-01919 (Dkt. #56)	Mar. 11, 2019
2006	E-mail from Canavera to trials@uspto.gov	Feb. 19, 2021
2007	Complaint, Ancora Technologies, Inc. v. Sony Mobile Communications AB et al., Case No. 19- 1703-CFC (Dkt. #1)	Sept. 11, 2019
2008	Judge Connolly Docket Navigator Statistic	Apr. 15, 2021
2009	Scheduling Order, <i>Ancora Technologies, Inc. v. LG Electronics, Inc. et al.</i> , Case No. 1:20-cv- 00034 (WDTX) (Dkt. #129)	Jan. 28, 2021
2010	Expert Report of Suzanne Barber, <i>Ancora Technologies, Inc. v. LG Electronics, Inc. et al.</i> , Case No. 1:20-cv-00034 (WDTX)	Jan. 22, 2021
2011	Declaration of Erez Zadok, <i>Ancora Technologies, Inc. v. LG Electronics, Inc. et al.</i> , Case No. 1:20-cv-00034 (WDTX) (Dkt. #45-1)	Mar. 20, 2020

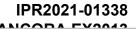




Case No.: IPR2021-00663 Atty. Dkt. No.: ANCC0121IPR

Patent No.: 6,411,941

Exhibit		
No.	Description	Date
2012	Joint Claim Construction Chart, Ancora	April 6, 2021
	Technologies, Inc. v. Sony Mobile	
	Communications AB et al., Case No. 19-1703-	
	CFC (Dkt. #34, 34-1, 34-2)	
2013 NEW	Ancora's Preliminary Response to Petition,	Dec. 17, 2020
	Case No. IPR2020-01609 (Dkt. 6)	
2014 NEW	Decision Granting Institution, Case No.	Feb. 16, 2021
	IPR2020-01609 (Dkt. 7)	
2015 NEW	Declaration of Dr. David Martin, Ph.D.	
2016 NEW	Ancora Techs., Inc. v. Apple, Inc., 744 F.3d 732	
	(Fed. Cir. 2014)	
2017 NEW	Phil Croucher, "The BIOS Companion," Tri-	
	Tam Enterprises Inc. 1997	
2018 NEW	Telephonic Markman Hearing Tentative Ruling,	Oct. 15, 2020
	Ancora Technologies, Inc. v. TCT Mobile (US),	
	Inc. et al., Case No. 8:19-cv-02192 (CDCA)	
	(Dkt. #60)	
2019	RESERVED	
2020	RESERVED	
2021	RESERVED	
2022 NEW	US Patent 6,189,146 B1 ("Misra")	Feb. 13, 2001
2023 NEW	US Patent 5,479,639 ("Ewertz")	Dec. 26, 1995
2024 NEW	Microsoft Corporation's Request for Ex Parte	
	Reexamination Image File Wrapper, Control	
	No. 90010560	
2025 NEW	Final Rulings on Claim Construction, Ancora	Nov. 12, 2020;
	Technologies, Inc. v. TCT Mobile (US), Inc. et	Nov. 19, 2020
	al., Case No. 8:19-cv-02192 (CDCA) (Dkt. #66,	
	#69)	





DOCKET

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.

