

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC, SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG
ELECTRONICS AMERICA, INC.,
Petitioners,

v.

SMART MOBILE TECHNOLOGIES LLC,
Patent Owner.

IPR2022-00807
U.S. Patent No. 9,756,168

**DECLARATION OF MICHAEL KOTZIN, PH.D.,
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW**

TABLE OF CONTENTS

I.	Introduction.....	5
II.	Qualifications and Professional Experience.....	8
III.	Level of Ordinary Skill in the Art	12
IV.	Relevant Legal Standards	13
V.	Overview of the '168 Patent.....	15
VI.	Claim Construction.....	18
VII.	Identification of how the Claims are Unpatentable.....	18
A.	Ground 1: Claims 2-5, 23, and 28 are obvious under 35 U.S.C. § 103(a) over Sainton in view of Baker and Mueller.....	19
1.	Summary of Sainton	19
2.	Summary of Baker	21
3.	Summary of Mueller.....	24
4.	Reasons to Combine Sainton, Baker, and Mueller.....	24
a)	<i>Sainton and Baker</i>	24
b)	<i>Sainton and Mueller</i>	29
5.	Claim 2.....	33
6.	Claim 3.....	75
7.	Claim 4.....	77
8.	Claim 5.....	94
9.	Claim 23.....	96
10.	Claim 28.....	98

B.	Ground 2: Claims 25 and 34 are obvious under 35 U.S.C. § 103(a) over Sainton in view of Baker, Mueller, and Humpleman.	100
1.	Summary of Humpleman.....	100
2.	Reasons to Combine Sainton, Baker, Mueller, and Humpleman 101	
3.	Claim 25.....	107
4.	Claim 34.....	110
C.	Ground 3: Claim 22 is obvious under 35 U.S.C. § 103(a) over Sainton in view of Baker, Mueller, and Grube.	115
5.	Summary of Grube	115
6.	Reasons to Combine Sainton, Baker, Mueller, and Grube....	115
7.	Claim 22.....	118
D.	Ground 4: Claims 19-20 are obvious under 35 U.S.C. § 103(a) over Sainton in view of Baker, Mueller, and Hsu.....	120
8.	Summary of Hsu	120
9.	Reasons to Combine Sainton, Baker, Mueller, and Hsu	121
10.	Claim 19.....	126
11.	Claim 20.....	129
E.	Ground 5: Claim 21 is obvious under 35 U.S.C. § 103(a) over Sainton in view of Baker, Mueller, and Camp.....	129
1.	Summary of Camp	129
2.	Reasons to Combine Sainton, Baker, Mueller, and Camp	130
3.	Claim 21	132
F.	Ground 6: Claim 29 is obvious under 35 U.S.C. § 103(a) over Sainton in view of Baker, Mueller, and Petty.	135

1.	Summary of Petty	135
2.	Reasons to Combine Sainton, Baker, Mueller, and Petty.....	136
3.	Claim 29.....	140
VIII.	Conclusion	144

I, Michael Kotzin, Ph.D., do hereby declare as follows:

I. INTRODUCTION

1. I am making this declaration at the request of Apple Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 9,756,168 (“the ’168 Patent”) to Rao *et al.*

2. I am being compensated for my work in this matter at my standard hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony.

3. I have been asked to provide my opinions regarding whether claims 2-5, 19-23, 25, 28-29, and 34 (“the Challenged Claims”) of the ’168 Patent are unpatentable as they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the limitations of the challenged claims would have been obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

- a. the ’168 Patent, Ex.1001;
- b. the prosecution history of the ’168 Patent (“’168 File History”),

Ex.1002;

- c. U.S. Patent No. 5,854,985 to Sinton *et al.* (“Sinton”), Ex.1005;

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