

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ANKER INNOVATIONS LTD.,
Petitioner

v.

MYPAQ HOLDINGS LTD.,
Patent Owner

Case IPR2022-01134
Patent 8,477,514

DECLARATION OF DR. SAYFE KIAEI

TABLE OF CONTENTS

I.	INTRODUCTION	5
II.	EXPERIENCE AND QUALIFICATIONS.....	5
III.	LEGAL STANDARDS.....	10
	A. Anticipation	10
	B. Obviousness.....	11
IV.	LEVEL OF ORDINARY SKILL IN THE ART	14
V.	OVERVIEW OF THE '514 PATENT.....	15
	A. Subject Matter of the '514 Patent	16
	B. Prosecution History of the '514 Patent	17
VI.	CLAIM CONSTRUCTION	18
VII.	SUMMARY OF PRIOR ART.....	19
	A. <i>Chagny</i> (EX1004).....	19
	B. <i>Hwang</i> (EX1006).....	20
VIII.	SUMMARY OF PRIOR ART GROUNDS.....	21
IX.	GROUND 1A: CHAGNY ANTICIPATES CLAIMS 1-12, 14-17, AND 19-20 OF THE '514 PATENT.....	22
	A. Claim 1	22
	B. Claim 2	31
	C. Claim 3	34
	D. Claim 4	36
	E. Claim 5	37
	F. Claim 6	37
	G. Claim 7	41
	H. Claim 8	42
	I. Claim 9	42

J.	Claim 10	43
K.	Claim 11	43
L.	Claim 12	52
M.	Claim 14	53
N.	Claim 15	53
O.	Claim 16	54
P.	Claim 17	55
Q.	Claim 19	56
R.	Claim 20	57
X.	GROUND 1B: CHAGNY IN VIEW OF THE KNOWLEDGE OF A POSITA RENDERS OBVIOUS CLAIMS 1-20.....	57
A.	Claims 1-5.....	57
B.	Claims 6-12 and 14-15	58
C.	Claims 11-12, 14-17, and 19-20	60
D.	Claims 13 and 18	61
XI.	GROUND 2A: HWANG ANTICIPATES CLAIMS 1-10, 16-17, AND 19- 20 OF THE '514 PATENT.....	63
A.	Claim 1	63
B.	Claim 2	69
C.	Claim 3	73
D.	Claim 4	75
E.	Claim 5	76
F.	Claim 6	76
G.	Claim 7	81
H.	Claim 8	81
I.	Claim 9	81
J.	Claim 10	82
K.	Claim 16	82

L.	Claim 17	88
M.	Claim 19	90
N.	Claim 20	90
XII.	GROUND 2B: HWANG IN VIEW OF CHAGNY RENDERS OBVIOUS CLAIMS 11-12, 14-17, AND 19-20.....	90
A.	Motivation to Combine	90
B.	Claim 11	93
C.	Claim 12	101
D.	Claim 14	102
E.	Claim 15	102
F.	Claims 16-17 and 19-20	103
XIII.	GROUND 2C: HWANG IN VIEW OF THE KNOWLEDGE OF A POSITA RENDERS OBVIOUS CLAIM 18	104
A.	Claim 18	104
XIV.	GROUND 2D: HWANG IN VIEW OF CHAGNY AND THE KNOWLEDGE OF A POSITA RENDERS OBVIOUS CLAIMS 13 AND 18.....	106
A.	Claims 13 and 18	106
XV.	CONCLUSION.....	107

I. INTRODUCTION

1. I have been retained by Anker Innovations Ltd. (“Anker” or “Petitioner”) as an independent expert consultant in this proceeding before the United States Patent and Trademark Office (“PTO”). I submitted a substantially identical declaration at the request of Samsung/Dell in IPR2022-00311.

2. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other interest in this proceeding.

3. I have been asked to consider whether certain references disclose or suggest the features recited in the claims of U.S. Patent No. EX1001 – US8477514B2 (“the ’514 patent”) (EX1001).¹ My opinions are set forth below.

II. EXPERIENCE AND QUALIFICATIONS

4. I am a professor at Arizona State university and am an independent consultant for this IPR. All of my opinions stated in this declaration are based on my own personal knowledge and professional judgment.

5. In forming my opinions, I have relied on my education, experience, and knowledge regarding electrical engineering, computer science, and consumer electronics product design. A copy of my current curriculum vitae, which details

¹ Where appropriate, I refer to exhibits I understand will be attached to the petition for *inter partes* review of the ’514 patent (the “Petition”).

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.