IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of:	Billhartz et al.	
U.S. Patent No.:	7,321,777	Attorney Docket No. 50095-0107IP1
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Appl. Serial No.:	11/531,487	
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Title:	WIRELESS COMMUNICATIONS SYSTEM INCLUDING A WIRELESS DEVICE LOCATOR AND RELATED METHODS	

DECLARATION OF DR. ZHI DING

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Table of Contents

I. Introduction 5

II. Background and Qualifications 6

III. Level of Ordinary Skill in the Art 12

IV. Summary of Opinions and Materials Considered/Relied Upon 13

V. Legal Standards 16
- A. Legal Standards for Claim Construction 16
- B. Legal Standard for Obviousness 17

VI. Overview of the '777 Patent 20
- A. Subject Matter Overview 20
- B. File History of the '777 Patent 24

VII. Interpretation of the '777 Patent Claims at Issue 25

VIII. Overview of the Cited References 26
- A. McCrady (APPLE-1005) 26
- B. Raphaeli (APPLE-1006) 32
- C. Kuwahara (APPLE-1007) 38
- D. Rofheart (APPLE-1009) 41

IX. McCrady in view of Raphaeli renders obvious claims 1-2, 5-7, 9-10, 12-13, 15-17, 19-21, 23, 25 (GROUND 1) 45
- A. McCrady-Raphaeli Combination 45
- B. Claims 1, 10, 12, 20 59
  - 1. Claim 1 59
  - 2. Claim 10 79
  - 3. Claim 12 82
  - 4. Claim 20 83
- C. Claims 2, 13, 21 85
- D. Claims 5, 15 85
- E. Claims 6, 16 88
- F. Claims 7, 17, 23 89
- G. Claims 9, 19, 25 92

X. Claims 3-4, 11, 14, and 22 are Rendered Obvious by McCrady, Raphaeli, and Kuwahara (GROUND 2) 94
- A. McCrady-Raphaeli-Kuwahara Combination 94
- B. Claims 3, 11, 14 100
  - 1. Claim 3 100
  - 2. Claim 11 110

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3. Claim 14 110
C. Claim 4 111
D. Claim 22 112
XI. Claims 7-8, 10-11, 17-18, 23-24 are Rendered Obvious by McCrady, Raphaeli, and Rofheart (GROUND 3) 112
A. McCrady-Raphaeli-Rofheart Combination 112
B. Claims 7, 17, 23 114
C. Claims 8, 18, 24 115
D. Claim 10 117
E. Claim 11 119
XII. Claims 1-3, 5-25 are Rendered Obvious by Rofheart and Raphaeli (GROUND 4) 121
A. Rofheart-Raphaeli Combination 121
B. Claims 1, 10, 12, 20 128
1. Claim 1 128
2. Claim 10 146
3. Claim 12 148
4. Claim 20 150
C. Claims 2, 13, 21 151
D. Claims 3, 11, 14 152
1. Claim 3 152
2. Claim 11 154
3. Claim 14 155
E. Claims 5, 15 155
F. Claims 6, 16 157
G. Claims 7, 17, 23 159
H. Claims 8, 18, 24 160
I. Claims 9, 19, 25 162
J. Claim 22 163
XIII. Claims 3-4, 11, 14, and 22 are Rendered Obvious by Rofheart, Raphaeli, and Kuwahara (GROUND 5) 163
A. Rofheart-Raphaeli-Kuwahara Combination 163
B. Claims 3, 11, 14 167
1. Claim 3 168
2. Claim 11 168
3. Claim 14 169
C. Claim 4 170
D. Claim 22 170

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XIV. Additional Remarks 170

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I, Zhi Ding, Ph.D., declare that:

I. Introduction

1. My name is Zhi Ding, and I have been retained by counsel for Petitioner Apple, Inc. ("Apple" or "Petitioner") as an expert witness to provide assistance regarding U.S. Patent 7,321,777 ("the '777 Patent"). Specifically, I have been asked to consider the validity of claims 1-25 of the '777 Patent (the "Challenged Claims") in view of prior art, anticipation and obviousness considerations, and understanding of a person of ordinary skill in the art ("POSITA") at the time of the invention, i.e., as of the effective filing date of the patent application as it relates to the '777 Patent. I have personal knowledge of the facts and opinions set forth in this declaration and believe them to be true. If called upon to do so, I would testify competently thereto.

2. I am being compensated for my time at my standard consulting rate. I am also being reimbursed for expenses that I incur during the course of this work. My compensation is not contingent upon the results of my study, the substance of my opinions, or the outcome of any proceeding involving the challenged claims. I have no financial interest in the outcome of this matter or on the pending litigation between Petitioner and Patent Owner.

3. My analysis here is based on my years of education, research and experience, as well as my investigation and study of relevant materials, including those cited herein.

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