

EXHIBIT 11

Defendant's Invalidation Contentions
Exhibit H1

Invalidity of U.S. Patent No. 10,212,586
by
U.S. Patent No. 6,871,063 to Schiffer ("Schiffer '063")

The excerpts cited herein are exemplary. For any claim limitation, Defendant may rely on excerpts cited for any other limitation and/or additional excerpts not set forth fully herein to the extent necessary to provide a more comprehensive explanation for a reference's disclosure of a limitation. Where an excerpt refers to or discusses a figure or figure items, that figure and any additional descriptions of that figure should be understood to be incorporated by reference as if set forth fully therein.

Except where specifically noted otherwise, this chart applies the apparent constructions of claim terms as used by Plaintiff in its infringement contentions; such use, however, does not imply that Defendant adopts or agrees with Plaintiff's constructions in any way.

U.S. Patent No. 10,212,586 ("the '586 Patent") claims priority to Japanese Application No. 2012-117105, filed May 23, 2012. For purposes of these invalidity contentions, Defendant applies the May 23, 2012, priority date for the '586 Patent. However, Defendant reserves the right to contest Plaintiff's reliance on the May 23, 2012, priority date, should the priority date become an issue in this proceeding.

Schiffer '063 was filed on June 30, 2000 and issued on March 22, 2005. As such, Schiffer '063 qualifies as prior art with regard to the '586 patent under 35 U.S.C. § 102(a), 102(b), and 102(e). Alternatively, should the claims of the '586 patent be found to not be entitled to priority to the foreign filing date, Schiffer '063 qualifies as prior art under §§ 102(a)(1) and 102(a)(2) (post-AIA). Using Plaintiff's interpretation of the claims, Schiffer '063 anticipates claims 1-2, 6-7, 9-10, 13-14, and 16-18 under 35 U.S.C. § 102(a), (b) and (e).

Alternatively, Schiffer '063 renders obvious claims 1-2, 6-7, 9-10, 13-14, and 16-18 under 35 U.S.C. § 103(a).

Alternatively, Schiffer '063 in view of U.S. Patent No. 7,941,534 to de la Huerga ("de la Huerga '534") renders obvious claims 1-2, 6-7, 9-10, 13-14, and 16-18 under 35 U.S.C. § 103(a). De la Huerga '534 was filed on June 26, 2004 and was published on April 28, 2005. As such, de la Huerga '534 qualifies as prior art with regard to the '586 patent under 35 U.S.C. §§ 102(a), 102(b), and 102(e).

Alternatively, Schiffer '063 in view of U.S. Patent Application Publication No. 2006/0041746 to Kirkup, et al. ("Kirkup '746") renders obvious claims 1-2, 6-7, 9-10, 13-14, and 16-18 under 35 U.S.C. § 103(a). Kirkup '746 was filed on August 17, 2004 and published on Feb 23, 2006. As such, Kirkup '746 qualifies as prior art with regard to the '586 patent under 35 U.S.C. §§ 102(a), 102(b), and 102(e).

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Alternatively, Schiffer '063 in view of U.S. Patent No. 8,149,089 to Lin ("Lin '089") renders obvious claims 1-2, 6-7, 9-10, 13-14, and 16-18 under 35 U.S.C. § 103(a). Lin '089 was filed on November 21, 2008 and issued on April 3, 2012. As such, Lin '089 qualifies as prior art with regard to the '586 Patent under 35 U.S.C. § 102(a) and 102(e).

U.S. Patent No. 10,212,586	Schiffer '063
<i>Claim 1</i>	
<p>[1(pre)]A mobile terminal configured to switch between an unlocked state and a locked state in which a predetermined operation is limited, comprising:</p>	<p>To the extent the preamble is limiting, Schiffer '063 teaches "mobile phone 100" (mobile terminal):</p> <p><i>Mobile phone 100 of FIG. 1 may be any mobile phone capable of long-range communication. For example, for one embodiment, mobile phone 100 is a cellular phone, in which case long-range transceiver circuit 102 may communicate with a cell base.</i></p> <p>Schiffer '063 at 2:30-34.</p> <p>Schiffer '063's mobile phone 100 is configured to be unlocked or locked (in which case the ability of the phone to send and receive calls is limited):</p> <p><i>In accordance with one embodiment of the present invention, before step 200 of FIG. 2 a user may authenticate him or herself to their mobile phone. Authentication of a user to the mobile phone may be accomplished by, for example, the user entering a password onto keypad 105 of mobile phone 100 of FIG. 1. This password may then be compared to information stored in the protected memory region of SIM 101 to verify the password. If the password is verified, mobile phone 100 may then be unlocked. Unlocking the phone enables the phone to send and receive calls via long-range transceiver circuit 102, exchange information via short-range transceiver circuit 103, and allows the user to modify phone settings via keypad 105. Alternatively, authentication of the user by the mobile phone may include performing voice recognition of the user.</i></p> <p>Schiffer '063 at 3:23-37.</p>
<p>[1(a)] a transceiver which performs short-range wireless communications;</p>	<p>Schiffer '063 teaches that mobile phone 100 includes "short-range transceiver circuit 103." See FIG. 1, <i>infra</i>. This short-range transceiver circuit is characterized as establishing a short-range, wireless communication link:</p> <p><i>Consequently, a short-range, wireless communication link, 121, is established between computer system 110 and mobile phone 100, according to step 205. In accordance with one</i></p>

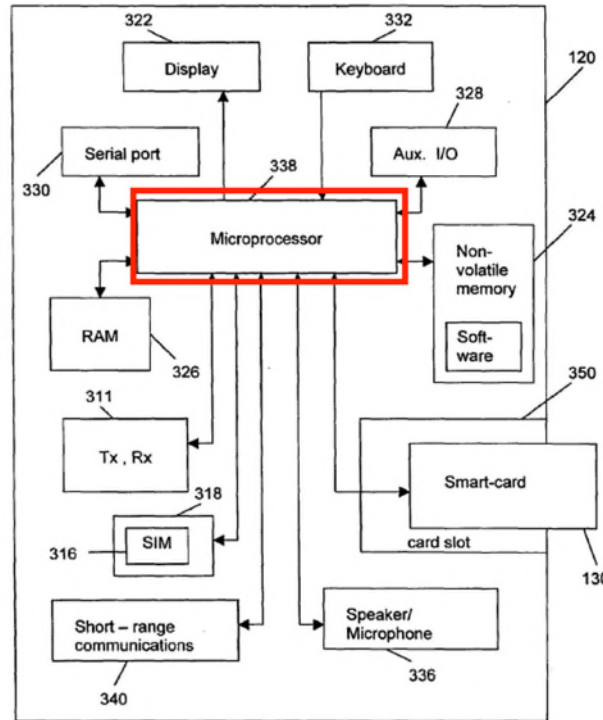
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The handheld electronic device 120 requires the user to authenticate himself/herself by providing a password or PIN code to unlock the user interface of the handheld electronic device 120 and enable use thereof.

Kirkup '746 at ¶ [0045]; *see also* FIG. 3:



The motivation to modify Schiffer '063 to incorporate Kirkup '746's microprocessor would be to provide a component to perform the various functions described by Schiffer '063's mobile device 100. Substituting whatever performs the functions in Schiffer '063 with Kirkup '746's microprocessor would be a simple substitution of one known element for another to obtain predictable results.

[1(d)] wherein, when conditions are met, the controller controls the mobile

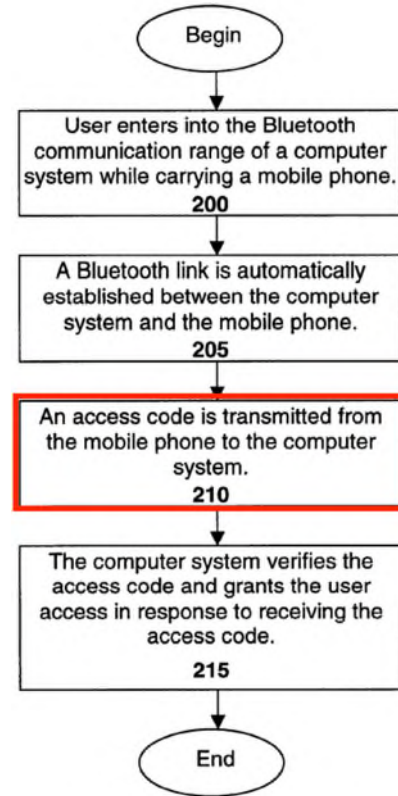
Schiffer '063 teaches that, when the conditions are met (as described below; *see* elements [1(e)], [1(f)], and [1(g)]), mobile phone 100 transmits the access code to computer system 110:

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terminal to transmit information to the another mobile terminal for switching a state of the another mobile terminal from a locked state to an unlocked state, wherein the conditions include:

At step 210 of FIG. 2, an access code is transmitted from short-range transceiver circuit 103 of mobile phone 100 to short-range transceiver circuit 111 of computer system 110 via link 121 of FIG. 1.

Schiffer '063 at 4:10-13; *see also* FIG. 2:



This access code causes computer system 110 to grant the user access (switch state from a locked state to an unlocked state):

Once the access code has been verified by computer system 110 of FIG. 1, the computer system grants the user access to the system at step 215 of FIG. 2. If the access code is not

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