

EXHIBIT I

Exhibit I

Apple’s Contingent Rebuttal to Samsung’s “DiamondTouch” Invalidity Chart for US Patent No. 7,469,381 (the “’381 Patent”)

This chart is a contingent rebuttal to Samsung’s argumentative “DiamondTouch” (aka “DTFlash”) invalidity chart for the ’381 Patent (Samsung’s Exhibit G-7), and the unauthenticated video that Samsung proposes to submit. Apple objects to Samsung’s chart and video because (1) Samsung failed to submit them in a timely manner; and (2) they are not admissible evidence of the features of the DiamondTouch or that it constitutes prior art. Apple submits this rebuttal chart on a contingent basis if the Court decides to consider Samsung’s chart. Apple has had no opportunity to examine the DiamondTouch system or the DTFlash software. Apple reserves the right to update its chart based on new information to include additional and/or revised arguments. This chart focuses on the three independent claims; DiamondTouch does not anticipate the dependent claims for the same and additional reasons.

U.S. Patent No. 7,469,381	DiamondTouch
Independent Claim 1	
[1-A] A computer-implemented method, comprising:	Samsung has presented no evidence of implementation of any method relevant to the claims of the ’381 Patent before the effective filing date of the ’381 Patent.
[1-B] at a device with a touch screen display	DiamondTouch does not appear to involve a “touch screen display.” Rather, it involves a touch-sensitive surface that may be used with a <i>separate</i> projector mounted over the table, which projects images onto the table. This is clear from Samsung’s Presentation (“SP”), which shows that images are projected onto the user’s hand and casts a shadow onto the table. (SP 173-76.)
[1-C] displaying a first portion of an electronic document;	Samsung defines the first “portion” displayed by DiamondTouch as the lower two-thirds of the screen (the sky), ignoring the image display in the upper one third (the grassy hill). (SP 174.) This is an unsupported attempt to misconstrue the claim language so as to support Samsung’s invalidity theory. “Displaying a first portion of the electronic document” refers to whatever image of the document is displayed in the display area: in this case the sky and the grassy hill. Samsung cannot properly interpret this as referring to only a fraction of the image displayed.
[1-D] detecting a movement of an object on or near the touch screen display; in response	Samsung inconsistently interprets “second portion” as the entire image that is displayed (SP 175), contrary to its use of “first portion” to refer to part of the image

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<p>to detecting the movement, translating the electronic document displayed on the touch screen display in a first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion</p>	<p>only. (SP 174.) If “portion” refers consistently to a part of the image, the DiamondTouch does not translate the electronic document to display a second portion that is different from the first, because the same sky and hill are displayed in both SP 174 and 175. Conversely, if “portion” refers consistently to the entire image, the entire image is continuously displayed in a “wrap-around” manner, so the DiamondTouch does not translate the electronic document to display a second portion that is different from the first.</p>
<p>[1-E] in response to an edge of the electronic document being reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen display: displaying an area beyond the edge of the document, and displaying a third portion of the electronic document, wherein the third portion is smaller than the first portion; and</p>	<p>Samsung inconsistently interprets “third portion” as a part of the entire image that is displayed (SP 176), contrary to its use of “second portion” to refer to the entire image. (SP 175.) If these terms are consistently interpreted as the entire image that is displayed, DiamondTouch fails to display a third portion that is “smaller than the first portion,” as the entire document is always displayed, in the same size.</p> <p>Moreover, the DiamondTouch system does not display an “area beyond the edge of the document” as the area indicated in Samsung’s chart is merely a section of the electronic document. As depicted in the video, the clouds at the top of the image wrap around and reappear at the bottom of the image. These clouds are part of the electronic document, and not “beyond the edge.”</p> <p>In addition, Samsung has presented no evidence the area beyond the edge is displayed “in response to an edge of the electronic document being reached.”</p>
<p>[1-F] in response to detecting that the object is no longer on or near the touch screen display, translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion.</p>	<p>Samsung inconsistently interprets “fourth portion” as the entire image that is displayed (SP 177), contrary to its use of “first portion” and “third portion” to refer to part of the image only. (SP 174, 176.) If these terms are used consistently to refer to the entire image that is displayed, DiamondTouch fails to display a fourth portion that is “different from the first portion,” as the entire document is always displayed, in full.</p>

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Independent Claim 19	
[19-A] A device, comprising:	<i>See</i> [1-A].
[19-B] a touch screen display;	<i>See</i> [1-B].
[19-C] one or more processors;	<i>See</i> [1-A].
[19-D] memory; and	<i>See</i> [1-A].
[19-E] one or more programs, wherein the one or more programs are stored in the memory and configured to be executed by the one or more processors, the programs including:	<i>See</i> [1-A].
[19-F] instructions for displaying a first portion of an electronic document;	<i>See</i> [1-C].
[19-G] instructions for detecting a movement of an object on or near the touch screen display; instructions for translating the electronic document displayed on the touch screen display in a first direction to display a second portion of the electronic document, wherein the second portion is different from the first portion, in response to detecting the movement;	<i>See</i> [1-D].
[19-H] instructions for displaying an area beyond an edge of the electronic document and displaying a third portion of the	<i>See</i> [1-E].

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<p>electronic document, wherein the third portion is smaller than the first portion, in response to the edge of the electronic document being reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen display; and</p>	
<p>[19-I] instructions for translating the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion, in response to detecting that the object is no longer on or near the touch screen display.</p>	<p><i>See</i> [1-F].</p>
<p>Independent Claim 20</p>	
<p>[20-A] A computer readable storage medium having stored therein instructions, which when executed by a device with a touch screen display, cause the device to:</p>	<p><i>See</i> [1-A] and [1-B].</p>
<p>[20-B] display a first portion of an electronic document;</p>	<p><i>See</i> [1-C].</p>
<p>[20-C] detect a movement of an object on or near the touch screen display; translate the electronic document displayed on the touch screen display in a first direction to display a</p>	<p><i>See</i> [1-D].</p>

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second portion of the electronic document, wherein the second portion is different from the first portion, in response to detecting the movement	
[20-D] display an area beyond an edge of the electronic document and display a third portion of the electronic document, wherein the third portion is smaller than the first portion, if the edge of the electronic document is reached while translating the electronic document in the first direction while the object is still detected on or near the touch screen display; and	<i>See</i> [1-E].
[20-E] translate the electronic document in a second direction until the area beyond the edge of the electronic document is no longer displayed to display a fourth portion of the electronic document, wherein the fourth portion is different from the first portion, in response to detecting that the object is no longer on or near the touch screen display.	<i>See</i> [1-F].