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6	APPLE INC.	SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA,	
7		INC., AND SAMSUNG TELECOMMUNICATIONS AMERICA,	
8		LLC	
9	UNITED STATES DI		
10	NORTHERN DISTRICT OF CALIFORNIA		
11	SAN JOSE DIVISION		
12	APPLE INC., a California corporation,	Case No. 11-cv-01846-LHK	
13	•	Case No. 11-cv-01640-LIIK	
14	Plaintiff,		
15	V.		
16	SAMSUNG ELECTRONICS CO., LTD., a Korean corporation; SAMSUNG	JOINT STATEMENT ON PERSON OF ORDINARY SKILL IN THE	
17	ELECTRONICS AMERICA, INC., a New York corporation; and SAMSUNG	ART AND REPORT REGARDING MEET AND CONFER ON	
18	TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	DISPUTED CLAIM TERMS	
19	Defendants.		
20			
21	In accordance with the Court's request on Ja	anuary 17, 2012, the parties have conferred on	
22	the proposed person of ordinary skill in the art for each of the patents at issue in the <i>Markman</i>		
23	hearing, but have been unable to reach agreement on all of the definitions. The parties have		
24	agreed on the definition with respect to the '002 patent, and have set forth their proposals in Table		
25	1 below. The parties will continue to meet and confer prior to the hearing in order to attempt to		
26	reach agreement on some of the proposals, and to reduce the scope of their disagreements on the		
27	remainder.		
28			

1	The parties have also met and confer	red regarding the nine disputed claim terms. The		
2	parties reached agreement on the construction for the term "starting a timer" from the '891 patent			
3	The parties agree that the term "starting a tir	mer" means "initiating a time keeping process." The		
4	parties also met and conferred regarding the	parties also met and conferred regarding the construction of the term "pixel" from the '828 patent		
5	but were unable to reach an agreement.			
6				
7	Dated: Jan. 19, 2012			
8	MORRISON & FOERSTER LLP	QUINN EMANUEL URQUHART &		
9		SULLIVAN, LLP		
10		D // E 11D:		
11	By: /s/ Michael A. Jacobs HAROLD J. MCELHINNY	By: /s/ Todd Briggs CHARLES K. VERHOEVEN		
12	JENNII EK EEE IIII EGK	KEVIN P.B. JOHNSON VICTORIA F. MAROULIS		
13	ALISON M. TUCHER RICHARD S.J. HUNG	EDWARD DEFRANCO MICHAEL T. ZELLER		
14	JASON R. BARTLETT	A., C. CAMCUNG ELECTRONICO		
15	Attorneys for Plaintiff APPLE INC.	Attorneys for SAMSUNG ELECTRONICS CO. LTD, SAMSUNG ELECTRONICS		
16		AMERICA, INC., AND SAMSUNG TELECOMMUNICATIONS AMERICA,		
17		LLC.		
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TABLE 1

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3	Patent	Apple's Proposals	Samsung's Proposals
4	'002 Patent	A person of ordinary skill in the	A person of ordinary skill in the art
5		relevant art of the '002 patent at the	would have a Bachelor's Degree in
6		time of the invention would have a	computer science (or equivalent
7		Bachelor's degree in computer science	industry experience) and at least two
8		(or equivalent industry experience), and	years of experience in the area of
9		at least two years of experience in the	computer programming and/or
10		area of computer programming and/or	operating systems.
11		operating systems.	
12	'891 Patent	A person of ordinary skill in the	A person of ordinary skill in the art
13		relevant art of the '891 patent at the	would have a Bachelor's Degree in
14		time of the invention would have a	computer science (or equivalent
15		Bachelor's degree in computer science	industry experience) and at least two
16		or electrical engineering or an	years of experience in the area of
17		equivalent, and one or more years	computer programming and/or
18		experience working on designing	operating systems.
19		and/or implementing user interfaces.	
20	'381 Patent	A person of ordinary skill in the	A person of ordinary skill in the art
21		relevant art of the '381 patent at the	would have a Bachelor's Degree in
22		time of the invention would have a	computer science, and 3-5 years of
23		Bachelor's degree in computer science	software design and implementation
24		or electrical engineering or an	experience, including experience with
25		equivalent, and one or more years	graphical user interface design, or
26		experience working on designing	would have equivalent educational and
27		and/or implementing user interfaces.	work experience.
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Joint Statement on Person of Ordinary Skill in the Art Case No. 11-cv-01846-LHK $\,$

1	'915 Patent	A person of ordinary skill in the	A person of ordinary skill in the art
2		relevant art of the '915 patent at the	would have a Bachelor's Degree in
3		time of the invention would have a	computer science (or equivalent
4		Bachelor's degree in computer science	industry experience) and at least two
5		or electrical engineering or an	years of experience in the area of
6		equivalent, and one or more years	computer programming and/or
7		experience working with electronic	operating systems.
8		devices with touch screen displays.	
9	'607 Patent	A person of ordinary skill in the	A person of ordinary skill in the art
10		relevant art of the '607 patent at the	would have a Bachelor's Degree in
11		time of the invention would have a	electrical engineering, physics,
12		Bachelor's degree in electrical	computer engineering, or a related field
13 14		engineering, physics, computer	and 2-3 years of work experience with
15		engineering, or an equivalent, and two	input devices.
16		or more years experience working with	
17		input devices.	
18	'828 Patent:	A person of ordinary skill in the	A person of ordinary skill in the art
19		relevant art of the '828 patent at the	would have a Bachelor's Degree in
20		time of the invention would have a	computer science, electrical
21		Bachelor's degree in computer science,	engineering or Mathematics and several
22		electrical engineering, physics,	years of experience in the area of signal
23		mathematics, or an equivalent, and	processing, human-computer
24		several years experience working in the	interaction or the design, use, and/or
25		area of signal processing, human-	evaluation of touch-sensitive input
26		computer interaction, or the design, use,	devices.
27		or evaluation of touch-sensitive input	
28		devices.	

skill in the art in 2005 would have at least a bachelor's degree in computer computer science/engineering and science/engineering or similar discipline and several years' relevant tasking systems and computer	1514.5	T 1 1744	
least a bachelor's degree in computer science/engineering or similar discipline and several years' relevant industry or academic research experience in the areas of multitasking systems, embedded systems or programming for handheld devices. Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering and several years of experience in multitasking systems and computer programming, or a Master's Degree with less relevant experience, or a person with equivalent industry experience.	'711 Patent	For the '711 patent, a person of ordinary	A person of ordinary skill in the art
science/engineering or similar discipline and several years' relevant industry or academic research experience in the areas of multitasking systems, embedded systems or programming for handheld devices. Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering or a similar field with somewhat less		skill in the art in 2005 would have at	would have a Bachelor's Degree in
discipline and several years' relevant industry or academic research experience in the areas of multitasking systems, embedded systems or programming for handheld devices. Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering or a similar field with somewhat less		least a bachelor's degree in computer	computer science/engineering and
industry or academic research experience in the areas of multitasking systems, embedded systems or programming for handheld devices. Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering or a similar field with somewhat less programming, or a Master's Degree with less relevant experience, or a person with equivalent industry experience.		science/engineering or similar	several years of experience in multi-
experience in the areas of multitasking systems, embedded systems or programming for handheld devices. Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering or a similar field with somewhat less with less relevant experience, or a person with equivalent industry experience.		discipline and several years' relevant	tasking systems and computer
systems, embedded systems or person with equivalent industry programming for handheld devices. Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering or a similar field with somewhat less		industry or academic research	programming, or a Master's Degree
programming for handheld devices. Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering or a similar field with somewhat less		experience in the areas of multitasking	with less relevant experience, or a
Alternatively, the ordinary artisan would have had a more advanced degree in computer science/engineering or a similar field with somewhat less		systems, embedded systems or	person with equivalent industry
would have had a more advanced degree in computer science/engineering or a similar field with somewhat less		programming for handheld devices.	experience.
degree in computer science/engineering or a similar field with somewhat less		Alternatively, the ordinary artisan	
or a similar field with somewhat less		would have had a more advanced	
		degree in computer science/engineering	
additional work or research experience.		or a similar field with somewhat less	
		additional work or research experience.	
		•	

1	ECF ATTESTATION	
2	I, MICHAEL A. JACOBS, am the ECF User whose ID and password are being used to	
3	file the following document: JOINT STATEMENT ON PERSON OF ORDINARY SKILL IN	
4	THE ART AND REPORT REGARDING MEET AND CONFER ON DISPUTED CLAIM	
5	TERMS. In compliance with General Order 45, X.B., I hereby attest that Todd Briggs has	
6	concurred in this filing.	
7		
8	Dated: January 19, 2012 MICHAEL A. JACOBS MORRISON & FOERSTER LLP	
9	By: /s/ Michael Jacobs	
10	MICHAEL A. JACOBS	
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