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                                                  SAMSUNG ELECTRONICS AMERICA,
7   INC., AND SAMSUNG
                                                  TELECOMMUNICATIONS AMERICA,
8   LLC

9   UNITED STATES DISTRICT COURT

10   NORTHERN DISTRICT OF CALIFORNIA

11   SAN JOSE DIVISION

12
     APPLE INC., a California corporation,   Case No. 11-cv-01846-LHK
13
                     Plaintiff,
14
            v.
15
     SAMSUNG ELECTRONICS CO., LTD., a   **JOINT STATEMENT ON PERSON**
16   Korean corporation; SAMSUNG   **OF ORDINARY SKILL IN THE**
     ELECTRONICS AMERICA, INC., a New York   **ART AND REPORT REGARDING**
17   corporation; and SAMSUNG   **MEET AND CONFER ON**
     TELECOMMUNICATIONS AMERICA, LLC, a   **DISPUTED CLAIM TERMS**
18   Delaware limited liability company,

19   Defendants.

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21   In accordance with the Court's request on January 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 *Markman*

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.

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JOINT STATEMENT ON PERSON OF ORDINARY SKILL IN THE ART
CASE NO. 11-CV-01846-LHK

1   The parties have also met and conferred 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 timer" means "initiating a time keeping process." The

4 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 &**
                                        SULLIVAN, LLP
9

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11 By:___/s/ Michael A. Jacobs_____   By:___/s/_Todd Briggs_____
       HAROLD J. MCELHINNY   CHARLES K. VERHOEVEN
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15   Attorneys for Plaintiff   Attorneys for SAMSUNG ELECTRONICS
       APPLE INC.   CO. LTD, SAMSUNG ELECTRONICS
                                               AMERICA, INC., AND SAMSUNG
16   TELECOMMUNICATIONS AMERICA,
                                               LLC.
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TABLE 1

Patent	Apple's Proposals	Samsung's Proposals
'002 Patent	A person of ordinary skill in the relevant art of the '002 patent at the time of the invention would have a Bachelor's degree in computer science (or equivalent industry experience), and at least two years of experience in the area of computer programming and/or operating systems.	A person of ordinary skill in the art would have a Bachelor's Degree in computer science (or equivalent industry experience) and at least two years of experience in the area of computer programming and/or operating systems.
'891 Patent	A person of ordinary skill in the relevant art of the '891 patent at the time of the invention would have a Bachelor's degree in computer science or electrical engineering or an equivalent, and one or more years experience working on designing and/or implementing user interfaces.	A person of ordinary skill in the art would have a Bachelor's Degree in computer science (or equivalent industry experience) and at least two years of experience in the area of computer programming and/or operating systems.
'381 Patent	A person of ordinary skill in the relevant art of the '381 patent at the time of the invention would have a Bachelor's degree in computer science or electrical engineering or an equivalent, and one or more years experience working on designing and/or implementing user interfaces.	A person of ordinary skill in the art would have a Bachelor's Degree in computer science, and 3-5 years of software design and implementation experience, including experience with graphical user interface design, or would have equivalent educational and work experience.

'915 Patent	A person of ordinary skill in the relevant art of the '915 patent at the time of the invention would have a Bachelor's degree in computer science or electrical engineering or an equivalent, and one or more years experience working with electronic devices with touch screen displays.	A person of ordinary skill in the art would have a Bachelor's Degree in computer science (or equivalent industry experience) and at least two years of experience in the area of computer programming and/or operating systems.
'607 Patent	A person of ordinary skill in the relevant art of the '607 patent at the time of the invention would have a Bachelor's degree in electrical engineering, physics, computer engineering, or an equivalent, and two or more years experience working with input devices.	A person of ordinary skill in the art would have a Bachelor's Degree in electrical engineering, physics, computer engineering, or a related field and 2-3 years of work experience with input devices.
'828 Patent:	A person of ordinary skill in the relevant art of the '828 patent at the time of the invention would have a Bachelor's degree in computer science, electrical engineering, physics, mathematics, or an equivalent, and several years experience working in the area of signal processing, human-computer interaction, or the design, use, or evaluation of touch-sensitive input devices.	A person of ordinary skill in the art would have a Bachelor's Degree in computer science, electrical engineering or Mathematics and several years of experience in the area of signal processing, human-computer interaction or the design, use, and/or evaluation of touch-sensitive input devices.

'711 Patent	For the '711 patent, a person of ordinary skill in the art in 2005 would have at 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 or a similar field with somewhat less additional work or research experience.	A person of ordinary skill in the art would have a Bachelor's Degree in computer science/engineering and several years of experience in multi-tasking systems and computer programming, or a Master's Degree with less relevant experience, or a person with equivalent industry experience.

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ECF ATTESTATION

I, MICHAEL A. JACOBS, am the ECF User whose ID and password are being used to file the following document: JOINT STATEMENT ON PERSON OF ORDINARY SKILL IN THE ART AND REPORT REGARDING MEET AND CONFER ON DISPUTED CLAIM TERMS. In compliance with General Order 45, X.B., I hereby attest that Todd Briggs has concurred in this filing.

Dated: January 19, 2012

MICHAEL A. JACOBS
MORRISON & FOERSTER LLP

By: /s/ Michael Jacobs
        MICHAEL A. JACOBS