

# Exhibit 2

**EXHIBIT 18**  
**FILED UNDER SEAL**

Disparities Between the Descriptions of the Patented Features Used in Dr. Hauser's Surveys  
and Apple's Descriptions of the Patented Features

Patent	Description of the Patented Feature in the Hauser Surveys	Description of the Patented Feature by Apple's Technical Expert <sup>1</sup>	Disparity
'607	<p>“Whether the smartphone accurately carries out what you intend to do when you touch the screen.”<sup>2</sup></p> <p>“Whether the tablet is capable of reliably performing a full range of multi-touch operations.”<sup>3</sup></p> <p>For an example that did not include the patented feature, Dr. Hauser showed respondents an animation. The animation displayed the words “Intended contact not recognized,” multiple times. The narration accompanying the animation stated, “This touchscreen is a single touch screen with very limited multi-touch capability. It reliably tracks single-finger operations like scrolling. Some gestures involving two fingers, like pinch-to-zoom, will work, but with poor response. As a result, the touch screen will not always carry out the two-finger gestures you intend.”<sup>4</sup></p>	<p>“[T]he claimed inventions of the ‘607 Patent relate to a specific configuration of conductive lines and layers that make up the touch panel in a display arrangement. The ‘607 Patent claims recite an innovative combination of elements including the use of a mutual capacitance touch screen in a truly transparent display that can simultaneously detect and generate signals representing distinct multiple points of actual or near contact and the use of “dummy” visual features (that can be made of the same material as the conductive lines in the display) to enhance the display.”</p> <p>Maharbiz Opening Report at 8.</p>	<p>No connection between the touchscreen “reliably” doing what “you intend” and the ‘607 patent.</p>

<sup>1</sup> Samsung does not accept the descriptions provided by Apple's experts, but has used them here to show that Dr. Hauser's descriptions do not even comport with Apple's experts' descriptions of the patented features.

<sup>2</sup> Hauser Report, Exh. F at QATTR3.

<sup>3</sup> Hauser Report, Exh. G at QATTR3.

<sup>4</sup> [REDACTED]

[REDACTED]

Patent	Description of the Patented Feature in the Hauser Surveys	Description of the Patented Feature by Apple’s Technical Expert <sup>1</sup>	Disparity
‘163	<p>“Tap to re-center after zoom.”<sup>5</sup></p> <p>“After you double-tap to zoom and center, this touchscreen does not permit you to tap on other parts of the document to center their content. In this example, to center that content, the user zooms back out, finds the other content she wants, and zooms back in.”<sup>6</sup></p>	<p>“The invention of the ‘163 patent allows a user to navigate easily around a structured electronic document by tapping or double tapping on boxes of content in that document. The ‘163 patent describes enlarging or translating the electronic document, in response to a tap gesture, so that the tapped box of content is substantially centered on the touch screen display. Tapping on a previously enlarged box can result in zooming back out, including to the original scale. Other gestures, such as a finger swipe or a “depinch” gesture, can also result in translating or scaling of the electronic document.” Singh Opening Report at 7.</p>	<p>The animation presented to respondents talks about the ability to “re-center after zoom,” but says nothing about the requirement that a “box” of content be “substantially centered” upon the initial enlarging (<i>i.e.</i> “zoom” step). The animation also talks about “re-center[ing],” whereas the claim covers “translating a structured electronic document” in order to “substantially center” a “second box of content.”</p>
‘915	<p>“Whether you can automatically switch back and forth between using only one finger on the screen (“single touch”), and using two or more fingers on the screen (“multi-touch”).”<sup>7</sup></p>	<p>“The ‘915 patent is generally directed to methods and apparatus for responding to user inputs on a touch-sensitive display integrated with a device. The asserted claims of the ‘915 patent recite methods and apparatus that distinguish between a single-input point that is interpreted as a “scroll operation” and two or more input</p>	<p>Nothing in the patent talks about “automatically switching” between single- and multi-touch.</p>

<sup>5</sup> Hauser Report, Exh. F at QATTR3, Exh. G at QATTR3.

<sup>6</sup> [REDACTED]

<sup>7</sup> Hauser Report, Exhs F at QATTR3, G at QATTR3.

Patent	Description of the Patented Feature in the Hauser Surveys	Description of the Patented Feature by Apple’s Technical Expert <sup>1</sup>	Disparity
		points that are interpreted as a “gesture operation.” Singh Opening Report at 68.	
‘381	“Whether or not the touchscreen contains a ‘rubberband’ effect in which the screen ‘bounces’ when you reach the end of a webpage or image.” <sup>8</sup>	“The ‘381 patent generally claims an innovative method of informing the user of a touch screen mobile device that the edge of an electronic document has been reached by allowing the user to scroll beyond the edge of the document and to view an area beyond the edge of the document for as long as the user keeps his finger in contact with the screen. Once the user’s finger is removed, the ‘381 patent describes having the document or image scroll back into place so that the area beyond its edge is no longer shown, and the document or image can be viewed.” Balakrishnan Opening Report at 11.	Dr. Hauser’s surveys use the term “rubberband” to describe the ‘381 patent, but the ‘381 patent does not use that term. The animation presented to respondents shows motion only in the vertical direction, while Apple’s expert does not seem to limit the ‘381 patent in this way. <sup>9</sup>

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<sup>8</sup> *Id.*

<sup>9</sup> [REDACTED]

[REDACTED]

[REDACTED]