

Exhibit R

Summary of Expert Report and Patent Language Supporting Dr. Hauser’s Descriptions of Patented Features

Patent	Description of the Patented Feature in the Hauser Survey	Samsung’s Alleged “Disparity”¹	Dr. Hauser’s Descriptions Are Consistent with Apple’s Expert Reports	Dr. Hauser’s Descriptions Are Consistent with the Patent Language
‘607	<p>“Multi-touch capability. Whether the tablet is capable of reliably performing a full range of multi-touch operations – operations where two, three or more fingers are used on the screen at the same time.”²</p> <p>“Touchscreen reliability. Whether the smartphone accurately carries out what you intend to do when you touch the screen.”³</p>	No connection between the touchscreen “reliably” doing what “you intend” and the ‘607 patent.	<p>Maharbiz, Apple’s technical expert, says:</p> <ul style="list-style-type: none"> • The technology associated with the ‘607 patent “<i>can detect and locate multiple touches even when the touches are along a single-sense line, and can smoothly track the motion of multiple fingers.</i>”⁴ <p>Maharbiz also distinguishes the ‘607 technology from other touch screen technology. He says:</p> <ul style="list-style-type: none"> • “[I]t is not at all clear that resistive type touch screens or prior capacitive touch screens could have accurately reflected contacts with the touch screen to enable natural, <i>reliable</i> multi-touch gestures.”⁵ 	<p>The patent itself says:</p> <ul style="list-style-type: none"> • The technology results in a “more <i>accurate</i> output”⁶ and that with alternative technology “faulty results are generated.”⁷

¹ Dkt. No. 927-20.

² Hauser Decl. Ex. A [Hauser Report], Ex. E, p. 8, Ex. G at QATTR3; *see also* http://www.surveypius.com/survey1202asts/play_video.asp?vid=31.

³ Hauser Decl. Ex. A [Hauser Report], Ex. F at QATTR3; *see also* http://www.surveypius.com/survey1202asps/play_video.asp?vid=31.

⁴ Mazza Decl. Ex. P [Maharbiz Opening Report] ¶ 32.

⁵ Mazza Decl. Ex. P [Maharbiz Opening Report] ¶ 272.

⁶ “The sensing line **224** may contain a filter **236** for eliminating parasitic capacitance **237**, which may for example be created by the large surface area of the row and column lines relative to the other lines and the system enclosure at ground 40 potential. Generally speaking, the filter rejects stray capacitance effects so that a clean representation of the charge transferred across the node **226** is outputted (and not anything in addition to that). That is, the filter **236** produces an output that is not dependent on the parasitic capacitance, but rather on the capacitance at the node **226**. As a result, a more accurate output is produced.” Mazza Decl. Ex. T [US 7,663,607] at 17:36-47. (emphasis added.)

⁷ “One problem found in all of these technologies is that they are only capable of reporting a single point even when multiple objects are placed on the sensing surface. That is, they lack the ability to track multiple points of contact simultaneously. In resistive and capacitive technologies, an average of all simultaneously occurring touch points are determined and a single point which falls somewhere between the touch points is reported. In surface wave and

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‘163	<p>“Tap to re-center after zoom. Whether, after zooming in and centering, the touchscreen permits you to tap the screen to center other content on the screen.”⁹</p> <p>The video accompanying the description depicts the user tapping on the screen to substantially center other content after the initial zoom.¹⁰</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.e. “zoom” step).</p> <p>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>	<p>Samsung’s chart uses the wrong description of the feature covered by the ‘163 patent. The disparity it alleges is unintelligible. The video Hauser used clearly shows the substantial centering of content upon the initial zoom. Singh, Apple’s technical expert, described this feature in a way completely consistent with Hauser’s survey. He wrote:</p> <ul style="list-style-type: none"> • “The iPhone 4 detects a user’s double tap gesture (two taps on the touch screen in quick succession) on a box of content, and <i>it responds to that gesture by determining which box was tapped and then enlarging and substantially centering that box on the screen. If the user proceeds to double tap on a second box of content on the web page, the iPhone 4 responds by substantially centering that second box on the screen.</i>”¹¹ 	<p>The patent language says:</p> <ul style="list-style-type: none"> • “[W]hile the first box is enlarged, a second gesture is detected on a second box other than the first box; and in response to detecting the second gesture, the structured electronic document is translated so that the second box is <i>substantially centered</i> on the touch screen display.”¹²

infrared technologies, it is impossible to discern the exact position of multiple touch points that fall on the same horizontal or vertical lines due to masking. In either case, faulty results are generated.” Mazza Decl. Ex. T [US 7,663,607] at 1:63-2:6. (emphasis added.)

⁸ Dkt. No. 927-20.

⁹ Hauser Decl. Ex. A [Hauser Report], Ex. E, p. 8, Ex. F at QATTR3, Ex. G at QATTR3.

¹⁰ http://www.surveyplus.com/survey1202asts/play_video.asp?vid=31; http://www.surveyplus.com/survey1202asps/play_video.asp?vid=31.

¹¹ Mazza Decl. Ex. M [Singh Opening Report] ¶ 33.

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‘915	“Automatically switch between single- and multi-touch. 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”). ¹⁴	Nothing in the patent talks about “automatically switching” between single- and multi-touch.	Singh explained that: <ul style="list-style-type: none"> • “The ‘915 patent provides functionality that is central to all of the Accused Products: the ability to distinguish <i>automatically</i> between a one-finger scroll call and a two finger gesture such as a zoom or rotate gesture.”¹⁵ 	The patent language makes clear that: <ul style="list-style-type: none"> • In “determining whether the event object invokes a scroll or gesture operation” it can, without further user input, “distinguish[] between a single input point applied to the touch-sensitive display that is interpreted as the scroll operation and two or more input points applied to the touch-sensitive display that

¹² “A computer-implemented method, comprising: at a portable electronic device with a touch screen display; displaying at least a portion of a structured electronic document on the touch screen display, wherein the structured electronic document comprises a plurality of boxes of content; detecting a first gesture at a location on the displayed portion of the structured electronic document; determining a first box in the plurality of boxes at the location of the first gesture; enlarging and translating the structured electronic document so that the first box is substantially centered on the touch screen display; while the first box is enlarged, a second gesture is detected on a second box other than the first box; and in response to detecting the second gesture, the structured electronic document is translated so that the second box is substantially centered on the touch screen display.” Mazza Decl. Ex. S [US 7,864,163] at 25:30-43. (emphasis added.)

¹³ Dkt. No. 927-20.

¹⁴ Hauser Decl. Ex. A [Hauser Report], Ex. E, p. 8, Ex. F at QATTR3, Ex. G at QATTR3; *see also*

http://www.surveyplus.com/survey1202asts/play_video.asp?vid=31; http://www.surveyplus.com/survey1202asps/play_video.asp?vid=31.

¹⁵ Mazza Decl. Ex. M [Singh Opening Report] ¶ 457.

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‘381	“Rubberband effect. Whether or not the touchscreen contains a ‘rubberband’ effect in which the screen ‘bounces’ when you reach the end of a webpage or image. ¹⁸	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.	Dr. Hauser’s use of “rubberband” is consistent with the use of that term by Balakrishnan, Apple’s technical expert who writes: <ul style="list-style-type: none"> • “[O]nce the user lifts his finger, the photo will ‘bounce’ or <i>‘rubber band’</i> back to fill the screen.”¹⁹ Motion in the vertical direction is expressly covered by the patent and Samsung does not explain why showing motion in an additional direction would be required.	are interpreted as the gesture operation.” ¹⁶ Dr. Hauser’s Descriptions Are Consistent with the Patent Language Figures 8A-8D depict the “rubberbanding” effect. ²⁰ The patent language says: <ul style="list-style-type: none"> • The feature “makes the edge of the electronic document appear to be <i>elastically</i> attached to an edge of the touch screen display.”²¹ The patent language specifies that the effect works in “a vertical direction, a horizontal

¹⁶ “A machine implemented method for scrolling on a touch-sensitive display of a device comprising: receiving a user input, the user input is one or more input points applied to the touch-sensitive display that is integrated with the device; creating an event object in response to the user input; determining whether the event object invokes a scroll or gesture operation by distinguishing between a single input point applied to the touch-sensitive display that is interpreted as the scroll operation and two or more input points applied to the touch-sensitive display that are interpreted as the gesture operation.” Mazza Decl. Ex. U[US 7,844,915] at 23:65-24:11. (emphasis added.)

¹⁷ Dkt. No. 927-20.

¹⁸ Hauser Decl. Ex. A [Hauser Report], Ex. E, p. 8, Ex. F at QATTR3, Ex. G at QATTR3; *see also* http://www.surveyplus.com/survey1202asts/play_video.asp?vid=31; http://www.surveyplus.com/survey1202asps/play_video.asp?vid=31.

¹⁹ Mazza Decl. Ex O [Balakrishnan Rebuttal Report] ¶ 37; *see also Id.* ¶¶ 36, 44, 148, Ex. N [Balakrishnan Opening Report] ¶ 44.

²⁰ Mazza Decl. Ex. V [US 7,469,381] at Figures 8A-8D.

²¹ “The computer-implemented method of claim 1, wherein changing from translating in the first direction to translating in the second direction until the area beyond the edge of the document is no longer displayed makes the edge of the electronic document appear to be elastically attached to an edge of the touch screen display or to an edge displayed on the touch screen display.” Mazza Decl. Ex. V [US 7,469,381] at 36:31-37. (emphasis added.)

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				direction, <i>or</i> a diagonal direction. ²²
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²² "The computer-implemented method of claim 1, wherein the first direction is a vertical direction, a horizontal direction, or a diagonal direction." Mazza Decl. Ex. V [US 7,469,381] at 36:1-3. (emphasis added.)