Exhibit 16

These arguments are explained in further detail below. In support of these arguments, Patent Owner Apple files herewith the following 35 U.S.C. § 1.132 declarations:

- The declaration of James B. Nichols ("Nichols Declaration"), an inventor of the '074 patent. Mr. Nichols' declaration describes the development of the claimed subject matter, and thus offers a description of the process behind the development of the claimed subject matter from a technical point of view.

- The declaration of Ronald D. Williams, Ph.D. ("Williams Declaration"), an independent technical expert with extensive experience in computer engineering and architecture. Dr. Williams' declaration provides his technical opinions on the technical teachings of Riikonen.

II. Status of the Claims Under 37 C.F.R. § 1.530(e)

Claims 1-19 are currently subject to reexamination. No amendments to these claims are sought, and therefore no explanation for support under 37 C.F.R. § 1.530(e) is required.

The Patent Office has confirmed the patentability of claims 2-19 of the '074 Patent and has rejected claim 1 under 35 U.S.C. § 102(b) as allegedly being anticipated by Riikonen. Based on the following remarks, Patent Owner Apple respectfully requests that the Examiner reconsider and withdraw this rejection and issue a Notice of Intent to Issue a Reexamination Certificate ("NIRC").

III. Statement of Substance of the Personal Interview Held on January 5, 2011 Under 37 C.F.R. § 1.560(b)

Patent Owner Apple thanks Examiner Leung and her Conferees, Supervisory Patent Examiner Keasel and Examiner Hughes, for the interview held on January 5, 2011 at the USPTO. In attendance at the interview on behalf of Patent Owner Apple were inventor James B. Nichols, technical expert Ronald D. Williams, Ph.D., and patent attorney representatives Robert G. Sterne (Reg. No. 28,912), Glenn J. Perry (Reg. No. 28,458), Richard D. Coller III (Reg. No. 60,390), and William P. Ladd (Reg. No. 64,646).

During the interview, differences between the plug-and-play invention of claim 1 and Riikonen were discussed. A presentation summarizing the arguments set forth herein was given by Apple and discussed by the interview attendees. A copy of presentation slides projected during the interview was given to Examiner Leung for entry into the USPTO official record. The remainder of this Response reiterates and expands upon arguments presented at the interview.

The Examiner is invited to contact the undersigned with any questions.

IV. Independent Claim 1 is Patentable Over Riikonen

The Examiner has rejected claim 1 under 35 U.S.C. § 102(b) as allegedly being anticipated by Riikonen. Patent Owner Apple respectfully traverses.

Riikonen does not teach each and every element of claim 1. For example, Riikonen does not teach "sending from the I/O device to the computer a beacon signal," as claimed, or a "serial cable," as claimed. (Williams Declaration: ¶¶ 23 and 42.) Additionally, Riikonen does not teach "sending from the I/O device to the computer a beacon signal" over the "serial cable," as claimed by the broadest reasonable interpretation of claim 1 in light of the specification. (Williams Declaration: ¶ 52.) Finally, given that the CPU 14 of Riikonen is interpreted by the Office Action to teach the "computer" as claimed, Riikonen does not teach "determining within the computer a manner of interaction of the computer with the I/O device," as claimed. (Williams Declaration: ¶ 57.)

Each of these claim elements is not taught by Riikonen, as discussed in further detail below. Further, an explanation is provided as to why no possible interpretation of Riikonen could teach each and every feature of independent claim 1.

A. Riikonen does not teach "sending from the I/O device to the computer a beacon signal comprising a sequence of bytes identifying the I/O device," as recited by claim 1.

Claim 1 recites, inter alia, "sending from the I/O device to the computer a beacon signal comprising a sequence of bytes identifying the I/O device." The Office Action appears to allege at page 3 that the "device ID code," as discussed in column 18, lines 8-24 and column 27, lines 2-18 of Riikonen, is analogous to the claimed "beacon signal." The Patent Office's position appears to be that Riikonen's "devices" send device I.D. codes to CPU 14. Patent Owner Apple respectfully disagrees. Riikonen indicates that the device I.D. is not sent by the "devices" in Riikonen, but rather that the device I.D. is fetched from the "adapters" by the "controller" of Riikonen. (Williams Declaration: ¶¶ 23-41.)

In contrast with the claimed plug-and-play technology of the '074 Patent, Riikonen describes the use of additional special purpose hardware (the "controller" of Riikonen) to identify the type of a connected device. (Williams Declaration: ¶¶ 21 and 22.) FIG. 1 of