

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.
Petitioner

v.

CAPELLA PHOTONICS, INC.
Patent Owner

Case IPR2014-01276
Patent RE42,678

PATENT OWNER PRELIMINARY RESPONSE

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F. Bouevitch does not teach or suggest “an input port” and “output ports” as recited by the independent claims 1, 21, 44, and 6141

G. The Smith patent does not teach “channel micromirrors being pivotal about two axes” as recited in independent claims 1 and 44, and similar features recited in independent claim 6145

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