UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

JDS UNIPHASE CORPORATION Petitioner

v.

CAPELLA PHOTONICS, INC.
Patent Owner

Case IPR2015-00731 Patent RE42,368

PATENT OWNER RESPONSE

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	I.	Petitioner does not explain how or why a POSA would have incorporated Sparks's alleged servo control into Bouevitch53
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EXHIBIT LIST

Exhibit	Reference
2001	Defendant's Motion to Transfer Venue, <i>Capella Photonics, Inc. v. Cisco Systems, Inc.</i> , Case Number: 1:14-cv-20529-PAS, Docket No. 19, April 4, 2014.
2002	Capella Photonics Launches Dynamically Reconfigurable Wavelength Routing Subsystems, Offering Unprecedented Operating Cost Savings and Flexibility for Telecom Service Providers, Business Wire (June 2, 2003, 8:16 AM), http://www.businesswire.com/news/home/20030602005554/en/Capell a-Photonics-Launches-Dynamically-Reconfigurable-Wavelength-Routing.
2003	WavePath 4500 Product Brief, Capella, http://www.capellainc.com/downloads/WavePath%204500%20Product%20Brief%20030206B.pdf.
2004	U.S. Provisional Patent Application No. 60/183,155
2005	Deposition Transcript of Dan M. Marom, Ph.D.
2006	Benjamin B. Dingel & Achyut Dutta, <i>Photonic Add-Drop Multiplexing Perspective for Next Generation Optical Networks</i> , 4532 SPIE 394 (2001).
2007	Tze-Wei Yeow, K. L. Eddie Law, & Andrew Goldenberg, <i>MEMS Optical Switches</i> , 39 IEEE Comm. I Mag. no. 11, 158 (2001).
2008	Clifford Holliday, Components for R-OADMs '05 (B & C Consulting Services & IGI Consulting Inc. 2005) (Excerpts).
2009	Patrick B. Chu et al., <i>MEMS: the Path to Large Optical Crossconnects</i> , 40 IEEE Comm. I Mag. no. 3, 80 (2002).
2010	Clifford Holliday, <i>Switching the Lightwave: OXC's – The Centerpiece of All Optical Network</i> (IGI Consulting Inc. & B & C Consulting Services 2001) (Excerpts).
2011	An Vu Tran et al., Reconfigurable Multichannel Optical Add-Drop Multiplexers Incorporating Eight-Port Optical Circulators and Fiber Bragg Gratings, 13 Photonics Tech. Letters, IEEE, no. 10, 1100 (2001).
2012	Jungho Kim & Byoungho Lee, <i>Bidirectional Wavelength Add-Drop Multiplexer Using Multiport Optical Circulators and Fiber Bragg Gratings</i> , 12 IEEE Photonics Tech. Letters no. 5, 561 (2000).



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