Paper 19

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

COREPHOTONICS, LTD.

Patent Owner

Case No. IPR2018-01133
U.S. Patent No. 9,538,152

PETITIONER'S REPLY

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PETITIONER'S EXHIBIT LIST

Updated: June 3, 2019

APPL-1001	U.S. Patent No. 9,538,152 to Shabtay et al. (the "'152 Patent")
APPL-1002	Prosecution File History of the '152 Patent (the "'823 App")
APPL-1003	Prosecution File History of U.S. Provisional App. No. 61/730,570 (the "'570 App")
APPL-1004	Declaration of Dr. Oliver Cossairt ("Cossairt")
APPL-1005	Curriculum Vitae of Dr. Oliver Cossairt
APPL-1006	U.S. Patent Application Publication No. 2008/0030592 to Border et. al ("Border")
APPL-1007	U.S. Patent No. 7,859,588 ("Parulski")
APPL-1008	Ralph E. Jacobson et al., The Manual of Photography: photographic and digital imaging, 9th Edition, 2000 ("Jacobson")
APPL-1009	Michael Langford et al., Langford's Advanced Photography, 7th Edition, 2008 ("Langford")
APPL-1010	Richard Szeliski, Computer Vision: Algorithms and Applications, 2011 ("Szeliski")
APPL-1011 (**New**)	Transcript of Deposition of Dr. James Kosmach
APPL-1012 (**New**)	Additional Excerpt from Richard Szeliski, Computer Vision: Algorithms and Applications, 2011 ("Szeliski II")
APPL-1013 (**New**)	Supporting Declaration of Dr. Oliver Cossairt, under 37 C.F.R. § 1.68 ("Cossairt Supp.")

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I. Introduction

The Petition and record as a whole provide detailed reasons why the cited art renders the challenged claims of the '152 patent obvious. None of the arguments in the Response adequately refute the evidence of record.

Patent Owner's arguments fail because they import unclaimed limitations into the claims, mischaracterize Border's teachings regarding image stitching and image registration, and disregard Parulski's teachings for modifying a primary image using a secondary image to generate an enhanced primary image. In fact, Patent Owner attempts to recast Petitioner's Border and Parulski obviousness ground as Border-only anticipation (Response, 26n2 and 27) for the claim limitations in dispute. As discussed below, Patent Owner's arguments are incorrect, unsupported, and should be rejected.

II. Claim Construction

A. No construction is necessary for the term "*point of view*."

Patent Owner "believes that the term 'point of view' requires no construction," but proposes that "[s]hould the Board conclude that it is necessary to construe 'point of view,' that term should be construed as 'camera angle.'" Response, 13. Because Patent Owner fails to explain why construing the term "*point of view*" is necessary and states that it believes that the term 'point of view' requires no construction, no construction is necessary for the term "point of view." APPL-1013, ¶¶2-3.

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