UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.
Petitioner

v.

COREPHOTONICS, LTD.,
Patent Owner

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

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**PATENT OWNER'S SUR-REPLY
TO PETITION FOR *INTER PARTES* REVIEW**

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Patent Owner's Updated Exhibit List for IPR2018-01133

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Corephotonics Ltd., hereby submits its updated exhibit list associated with the above-captioned *inter partes* review of U.S. Patent No. 9,538,152.

Exhibit No.	Description
2003	Joint Claim Construction Statement filed in *Corephotonics, Ltd. v. Apple Inc.*, Case No. 5:17-cv-06457-LHK in the U.S. District Court for the Northern District of California.
2004	Transcript of Deposition of Oliver Cossairt (February 5, 2019)
2005	Declaration of James Kosmach, Ph.D.
2006	Curriculum Vitae of James Kosmach
2007	Corephotonics' Opening Claim Construction Brief
2008	Apple's Responsive Claim Construction Brief
2009	U.S. Patent No. 9,185,291, "Dual Aperture Zoom Digital Camera"
2010 (New)	Transcript of Deposition of Oliver Cossairt (July 12, 2019)

I. Introduction

Apple's Reply makes, for the first time, multiple arguments that were either absent from or never substantively discussed in its initial Petition. Not only did Apple submit a new 33-page declaration from its technical expert replete with new opinions, Apple uses a newly-filed, 211-page exhibit of excerpts from the Szeliski textbook[1] (other portions of which were discussed only as background prior art in the Petition) to make new arguments for obviousness and motivation to combine. The scope of the trial, however, is limited to the grounds in the Petition, in which Apple was required to identify "with particularity . . . the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim." 35 U.S.C. § 312(a)(3). Each of Apple's new arguments on Reply are improper and should be disregarded.

Even if the new Reply arguments are credited, Apple still failed to show that either of its asserted references, Border or Parulski, disclose an "output image," generated from multiple cameras, that has the "point of view" of only one of the multiple cameras. As explained below, the correct construction of "point of view" is "camera angle," and none of Apple's arguments based on Border or Parulski show

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[1] Richard Szeliski, COMPUTER VISION: ALGORITHMS AND APPLICATIONS (2011). Apple's Petition included APPL-1010 ("Szeliski I"), which comprised 16 pages of the Szeliski textbook. On Reply, Apple filed **211** pages of new material from the Szeliski textbook as APPL-1012 ("Szeliski II").

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