

From: [Bregman, Dion M.](#)
To: [Trials](#)
Cc: ["Stephen Murray"](#); [John D. Simmons](#); [Dennis Butler](#); [Keith Jones](#); [LGE-ImmerVision-IPRs](#)
Subject: IPR2020-00179 and -00195 / Request to Submit Supplemental Information
Date: Thursday, June 11, 2020 7:29:02 PM

Dear Board,

Petitioner writes to request permission to file a **motion to submit supplemental information** pursuant to 37 C.F.R. § 42.123(a) in the captioned cases. The supplemental information consists of:

- 1) Code V Designer's Manual: System of Optical Design Programs, 2nd ed., Optical Research Associates (1978) (Ex. 1014);
- 2) Excerpts of the Code V Reference Manual, Version 7.60, Optical Research Associates (Feb. 1994) (Ex. 1015);
- 3) "A Technical Overview of CODE V Version 7" by Bruce R. Irving of Optical Research Associates, Proceedings Volume 0766 of the Society of Photo-Optical Instrumentation Engineers (SPIE), Recent Trends in Optical Systems Design and Computer Lens Design Workshop (1987) (Ex. 1016); and
- 4) A supplemental declaration from Petitioner's expert (Ex. 1017) that authenticates the above three additional pieces of evidence and notes that they corroborate his opinion in his original declaration that the Code V lens design software would render the same results in 2001 as it did at the time of his declaration.

Petitioner has conferred with counsel for Patent Owner, who has indicated that they **do not oppose** Petitioner's motion to submit the above-referenced exhibits.

If authorized, Petitioner seeks guidance as to whether the above listed exhibits should be filed with the unopposed motion or whether the exhibits should only be filed if and when the motion is granted.

If the Board wishes to convene a call to discuss Petitioner's request, the parties are available next week as follows:

1. Monday (6/15) – 11:30am-1:30pm or after 4:30pm ET
2. Tuesday (6/16) – 11:30am-12:30pm or 3:00pm ET

Thank you.

Respectfully submitted,

-Dion Bregman

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