PUBLIC, REDACTED VERSION

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

COREPHOTONICS LTD.

Patent Owner

IPR2020-00861

U.S. Patent 10,230,898

DECLARATION OF FRÉDO DURAND, PH.D. UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITIONER'S REPLY

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I. INTRODUCTION

1. I, Frédo Durand, who previously submitted a declaration as APPL-1003 in this proceeding. The terms of my engagement, my background, qualifications and prior testimony, and the legal standards and claim constructions I am applying are set forth in my previous CV and declaration. See APPL-1003; APPL-1004. I offer this declaration in reply to the Response the Patent Owner filed in this proceeding. In forming my opinion, I have considered the materials noted in my previous declaration, as well as the following additional materials:

(1) Dr. Hart's Declaration, Ex.2001;

(2) the Declaration of Eran Kali (Ex.2013);

(3) Patent Owner's Response, Paper No. 13 (POR);

(4) U.S. Patent No. 8,896,697 to Golan et al. ("Golan 697 Patent) (APPL-1022);

(5) NextVision Product Specs (APPL-1025);

(6) NextVision MicroCam-D (APPL-1028);

(7) Kodak EasyShare V610 dual lens digital camera ("Kodak Easy Share"), APPL-1029;

(8) UAS VISION, "Lightweight UAS Demand Accelerates Development of Lightweight Payloads," February 13, 2013 ("UAS VISION"), APPL-1030;

(9) U.S. Patent No. 8,462,209 to Sun ("Sun"), APPL-1031;

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(10) U.S. Patent No. 7,974,460 to Elgersma ("Elgersma"), APPL-1032;

(11) U.S. Patent No. 5,880,892 to Ohtake ("Ohtake"), APPL-1033;

(12) NextVision-Sys.com 2012 Website Video Capture, September 2, 2012 ("NextVision 2012 Website Video Capture"), APPL-1034;

(13) NextVision Stabilized Systems Ltd. Company Profile, September 02, 2012 ("NextVision Company Profile"), APPL-1035;

(14) John D. Hart deposition transcript, May 21, 2021 ("Hart Deposition"), APPL-1041;

(15) U.S. Patent App. 20060023083 to Yoo ("Yoo"), (APPL-1042);

(16) U.S. Patent No. 4,303,316 to McElveen ("McElveen"), APPL-1044;

(17) U.S. Patent No. 4,429,328 to Jones et al. ("Jones"), APPL-1045;

(18) Christopher A. Mayhew, Texture and Depth Enhancement for Motion Pictures and Television, 1990 ("Mayhew"), APPL-1046;

(19) Corephotonics, "iPhone 7 Plus switches between cameras when zooming in and out," August 2, 2017, ("Corephotonics iPhone 7 Plus Video"), APPL-1047[1];

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[1] I captured the video from https://www.youtube.com/watch?v=8iJorjnz0JM ("iPhone 7 Plus switches between cameras when zooming in and out") on April 20, 2021.

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