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 No. 10,230,898

_____

PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104

TABLE OF CONTENTS

I.   INTRODUCTION 1

II.   MANDATORY NOTICES 1

        A.   Real Party-in-Interest 1

        B.   Related Matters..2

        C.   Lead and Back-up Counsel and Service Information 2

III.   GROUNDS FOR STANDING..2

IV.   THE '898 PATENT..3

        A.   Summary of the '898 Patent...3

        B.   Prosecution History of the '898 Patent 5

V.   LEVEL OF ORDINARY SKILL IN THE ART..7

VI.   CLAIM CONSTRUCTION 8

VII.   REQUESTED RELIEF 8

VIII.   OVERVIEW OF CHALLENGES 8

        A.   Challenged Claims 8

        B.   Statutory Grounds for Challenges 9

        C.   Discretionary Denial is Not Warranted..9

                1.   Becton-Dickinson factors weigh in favor of institution. 9

                2.   Advanced Bionics weighs in favor of institution 13

                3.   None of the General Plastic factors apply. 13

IX.   IDENTIFICATION OF HOW THE CLAIMS ARE UNPATENTABLE..13

        A.   Ground 1: Claims 1, 4, 8, 12, and 15 are unpatentable under
                35 U.S.C. § 103 over Golan in view of Martin and Togo..................13

                1.   Summary of Golan..13

                2.   Summary of Martin...15

                3.   Reasons to Combine Golan and Martin.....................................18

                4.   Summary of Togo 22

                5.   Reasons to Combine Togo with Golan and Martin 29

PETITIONER'S EXHIBIT LIST

May 6, 2020

APPL-1001	U.S. Patent No. 10,230,898 to Cohen et al. (the "'898 Patent")
APPL-1002	Prosecution File History of the '898 Patent (the "'720 App")
APPL-1003	Declaration of Dr. Fredo Durand
APPL-1004	CV of Dr. Fredo Durand
APPL-1005	U.S. Patent Application Publication No. 2012/0026366 to Golan et al. ("Golan")
APPL-1006	U.S. Patent 8,081,206 to Martin et al. ("Martin")
APPL-1007	U.S. Patent 7,990,422 to Ahiska et al. ("Ahiska")
APPL-1008	U.S. Patent No. 7,859,588 to Parulski et al. ("Parulski")
APPL-1009	U.S. Patent Application Publication No. 2008/0030592 to Border et al. ("Border")
APPL-1010	J.P. Patent Application Publication No. JP 2011-55246 to Togo, Certified English Translation and Original ("Togo")
APPL-1011	RESERVED
APPL-1012	U.S. Patent No. 8,553,106 to Scarff ("Scarff")
APPL-1013	Richard Szeliski, Computer Vision: Algorithms and Applications, 2011 ("Szeliski")
APPL-1014	U.S. Patent No. 8,854,432 to Orimoto ("Orimoto")
APPL-1015	U.S. Patent Application Publication No. 2012/0019704 to Levey et al. ("Levey")
APPL-1016	Xiong, et al., "A critical review of image registration methods," International Journal of Image and Data Fusion, June 2010 ("Xiong")

APPL-1017	Ralph E. Jacobson et al., The Manual of Photography: photographic and digital imaging, 9th Edition, 2000 ("Jacobson")
APPL-1018	RESERVED
APPL-1019	Hansen, et al., "Online continuous stereo extrinsic parameter estimation," 2012 IEEE Conference on Computer Vision and Pattern Recognition, June 2012 ("Hansen")
APPL-1020	U.S. Patent No. 9,571,731 to Shabtay, et al. ("'731 Patent")
APPL-1021	U.S. Patent Application Publication No. 2014/0362274 to Christie, et al. ("Christie")
APPL-1022	RESERVED
APPL-1023	Warren J. Smith, MODERN LENS DESIGN (1992) ("Smith")
APPL-1024	U.S. Patent No. 7,777,972 to Chen et al. ("Chen")
APPL-1025	RESERVED
APPL-1026	Jacobs et al., "Focal Stack Compositing for Depth of Field Control," Stanford Computer Graphics Laboratory Technical Report 2012-1 ("Jacobs")
APPL-1027	Email authorizing electronic service

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

WHAT WILL YOU BUILD? | sales@docketalarm.com | 1-866-77-FASTCASE

fastcase
Smarter legal research.