

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 No. IPR2020-00878  
U.S. Patent No. 10,330,897

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PATENT OWNER'S SUR-REPLY

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TABLE OF AUTHORITIES

**Cases**

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PATENT OWNER'S EXHIBIT LIST

<i>Exhibit No</i>	<i>Description</i>
2001	Declaration of Tom D. Milster, Ph.D.
2002	Curriculum Vitae of Tom D. Milster, Ph.D.
2003	Deposition transcript of José Sasián, January 22, 2021
2004	José Sasián, Introduction to Lens Design (2019)
2005	Peter Clark, "Mobile platform optical design," Proc. SPIE 9293, International Optical Design Conference 2017, 92931M (17 December 2014)
2006	Symmons and Schaub, <i>Field Guide to Molded Optics</i> (2016)
2007	G. Beall, "By Design: Part design 106 – Corner radiuses," <i>Plastics Today</i> (199)
2008	<i>Handbook of Optics</i> , 2 <sup>nd</sup> ed., vol. 2 (1995)
2009	Declaration of José Sasián in IPR2019-00030
2010	Declaration of Marc A. Fenster in Support of Motion to Appear Pro Hac Vice
2011	Declaration of James S. Tsuei in Support of Motion to Appear Pro Hac Vice
2012	Deposition transcript of José Sasián, May 28, 2021

## I. INTRODUCTION

As set forth below, Apple’s reply fails to rebut the core arguments made in Corephotonics’ response. Moreover, the reply is rife with technical misunderstandings, with unreliable or conclusory analysis, and with untimely new arguments. Grounds 2–4 of this IPR should be rejected.

## II. GROUND 2 – OGINO IN VIEW OF BAREAU

### A. Apple Fails to Demonstrate that the Proposed Design Is Manufacturable Using *Any* Technique

As explained in Corephotonics’ response, Apple’s combination of Ogino with Bateau rests on a lens design that cannot be manufactured. A lens that cannot be made cannot satisfy the limitations of the ’897 patent claims to a “lens assembly” comprising “a plurality of lens elements.” (Ex. 1001 at 8:22, 9:26–27.) And even if it could, no POSITA would be motivated to design such an impossible lens. Apple’s reply suggests this argument “seems to rely on an implicit requirement of large-scale injection plastic molding.” (Paper 14 at 9.) Apple’s own expert has opined that Ogino’s lens would “preferably be made of plastic via injection molding.” (IPR2019-00030, Ex. 2009, Sasián Decl. at 69.)

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