UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner,

v.

COREPHOTONICS, LTD., Patent Owner.

Case No. IPR2020-00896 U.S. Patent No. 10,317,647

PATENT OWNER'S RESPONSE

A L A R M Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

DOCKET

TABLE OF CONTENTS

I.	INTRODUCTION 1	
II.	OVERVIEW OF THE '647 PATENT1	
A.	Multiple Element Lens Design7	
III.	LEVEL OF ORDINARY SKILL 11	
IV.	CLAIM CONSTRUCTION 11	
V.	OVERVIEW OF THE ASSERTED PRIOR ART 12	
A.	Ogino (Ex. 1005) 12	
B.	Chen II (Ex. 1008)17	
C.	Bareau (Ex. 1012)	
D.	Kingslake (Ex. 1013)	
E.	Hsieh (Ex. 1025)	
F.	Beich (Ex. 1007)	
VI.	PATENTABILITY OF CHALLENGED CLAIMS	
A.	GROUND 2 - The Petition Fails to Demonstrate that Ogino in view of Chen II renders claims 1 and 4 unpatentable	
	1. Claim 1 and 4	
	2. Dependent claims 2-6	
B.	GROUND 3 - The Petition Fails to Demonstrate that Ogino in view of Chen II and Bareau renders claims 2, 3, 5 and 8-11 unpatentable	

	1.	A POSITA would not have modified Ogino in view of Chen II and Bareau to render claims 2, 3 and 5 unpatentable	2
	2.	A POSITA would not have modified Ogino in view of Chen II and Bareau to render claims 8-11 unpatentable	8
C.		GROUND 4 - The Petition Fails to Demonstrate that Ogino in view of Chen II, Bareau and Kingslake renders claim 6 unpatentable	3
D.		GROUND 5 - The Petition Fails to Demonstrate that Hsieh in view of Beich renders claim 7 unpatentable	
E.		GROUND 6 - The Petition Fails to Demonstrate that Chen in view of Iwasaki and Beich renders claim 12 unpatentable7	
VII.		ETITIONER FAILS TO MEET ITS BURDEN FOR HALLENGED CLAIM	4
VIII.	CC	ONCLUSION	5

TABLE OF AUTHORITIES

Cases

Wasica Finance GMBH v. Continental Auto. Systems,	In re Magnum Oil Tools Int'l, Ltd., 829 F.3d 1364 (Fed. Cir. 2016)	73
853 F.3d 1272 (Fed. Cir. 2017)		74

Case No. IPR2020-00896 U.S. Patent No. 10,317,647

PATENT OWNER'S EXHIBIT LIST

Exhibit No	Description
2001	Declaration of Tom D. Milster, Ph.D.
2002	Curriculum Vitae of Tom D. Milster, Ph.D.
2003	Deposition transcript of José Sasián, February 19, 2021
2004	José Sasián, Introduction to Lens Design (2019)
2005	Declaration of José Sasián in IPR2020-00897
2006	McGuire Jr, J. P., & Kuper, T. G. (2012, October). Approaching di-
	rect optimization of as-built lens performance. In Novel Optical Sys-
	tems Design and Optimization XV (Vol. 8487, p. 84870D).
	International Society for Optics and Photonics
2007	Sturlesi, D., & O'Shea, D. C. (1991). Global view of optical design
	space. Optical engineering, 30(2), 207-218
2008	Symmons and Schaub, Field Guide to Molded Optics (2016)
2009	Declaration of Tom Milster in IPR2020-00878

DOCKET A L A R M



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.