UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
APPLE INC., Petitioner, V.
COREPHOTONICS, LTD., Patent Owner
IPR2020-00896 Patent No. 10,317,647

Paper No.____

PETITIONER'S REPLY



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II.	Claims 1-3 and 5 are unpatentable over Iwasaki's Example 4.			
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	B.	Dr. Sasián used the same techniques that a POSITA would have used to generate the modified Ogino Example 55		
	C.	Manufacturing considerations are not required by claims 1 and 4 nor can they be imported to avoid unpatentability6		
		1. Patent Owner seeks to import manufacturing requirements into claims where there are none6		
		2. Patent Owner's arguments contradict statements made in a related case, and supported by a different expert, that lens design is separate from manufacturing.		
		3. Dr. Milster admits that a POSITA would have designed lenses for purposes other than mass production manufacturing		
		4. Manufacturing considerations are preferences, and do not show that lenses cannot be physically produced		
		5. Whether a prior art lens design is finished is not relevant to the claims		
	D. Patent Owner's arguments about differences in relative illumination plots for the Example 5 lens are irrelevant			
IV.		s 2, 3, 5, and 8-11 are obvious over Ogino's Example 5 in of Chen II and Bareau15		



	A.	A POSITA would have been motivated to modify Ogino's Example 5 as discussed in the Petition.	15
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Petitioner's Reply IPR2020-00896 (Patent No. 10,317,647)

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PETITIONER'S EXHIBIT LIST

Updated: June 21, 2021

APPL-1001	001 U.S. Patent No. 10,317,647	
APPL-1002	PPL-1002 Prosecution History of U.S. Patent No. 10,317,647	
APPL-1003	PPL-1003 Declaration of José Sasián, Ph.D., under 37 C.F.R. § 1.68	
APPL-1004	APPL-1004 Curriculum Vitae of José Sasián, Ph.D.	
APPL-1005 U.S. Patent No. 9,128,267 to Ogino et al. ("Ogino")		
APPL-1006	Warren J. Smith, Modern Lens Design (1992) ("Smith")	
APPL-1007 William S. Beich et al., "Polymer Optics: A manufacturer's perspective on the factors that contribute to successful programs SPIE Proceedings Volume 7788, Polymer Optics Design, Fabrication, and Materials (August 12, 2010), https://doi.org/10.1117/12.861364 ("Beich")		
APPL-1008 U.S. Patent No. 7,777,972 to Chen et al. ("Chen")		
APPL-1009	U.S. Patent No. 9,678,310 to Iwasaki et al. ("Iwasaki")	
APPL-1010 Max Born et al., PRINCIPLES OF OPTICS, 6th Ed. (1980) ("Ed. (1980))		
APPL-1011 Prosecution history of U.S. Patent No. 9,128,267 to Ogino		
APPL-1012	Jane Bareau et al., "The optics of miniature digital camera modules," SPIE Proceedings Volume 6342, <i>International Optical Design Conference 2006</i> ; 63421F (2006) https://doi.org/10.1117/12.692291 ("Bareau")	
APPL-1013 Rudolf Kingslake, OPTICS IN PHOTOGRAPHY (1992) ("Kingsla		
APPL-1014	U.S. Patent No. 7,859,588 to Parulski et al. ("Parulski")	
APPL-1015 Japanese Patent Pub. No. JP2013106289 to Konno et al. and certified English translation		
APPL-1016	Bruce J. Walker, OPTICAL ENGINEERING FUNDAMENTALS (1995) ("Walker")	



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