IPR2020-00896
Apple Inc. v. Corephotonics, Ltd.

U.S. Patent No. 10,317,647

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Instituted Grounds

- **Ground 2: Claims 1 and 4**
  Obviousness over Ogino and Chen II

- **Ground 3: Claims 2, 3, 5, and 8-11**
  Obviousness over Ogino, Chen II, and Bareau

- **Ground 4: Claim 6**
  Obviousness over Ogino, Chen II, Bareau, and Kingslake

- **Ground 5: Claim 7**
  Obviousness over Hsieh and Beich

- **Ground 6: Claim 12**
  Obviousness over Chen, Iwasaki, and Beich

Overview of Argument

- **All Instituted Grounds: Petition Uses Improper Hindsight**
    - **Petition ignores standard industry design practices**
    - **No motivation to vary only some parameters**
    - **Stops design when claims are achieved**
    - **Inconsistent arguments re motivation to combine**
        - **Reduce vignetting in some grounds, allow vignetting in others**
    - **All evidence improper hindsight**

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DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Overview of Argument

- **Grounds 2-4: No motivation to modify Ogino with Chen to m
  L2 meniscus**

  - **Stated motivation – to reduce vignetting – fails**

    - **Only change was to make L2 image side surface convex, BUT**
    - **Whether lens is convex or concave does not affect vignetting**
    - **Vignetting is due to aspherics at edge of lens, not meniscus or biconcave shape**
    - **No evidence POSITA would associate vignetting with meniscus shape**

Overview of Argument (cont.)

- **Grounds 3-4: No motivation to further modify Ogino with Bareau**
  - Overlapping lens elements ignore manufacturability
  - Design process contradicts original motivation
- **Ground 4: No motivation to combine**
  - Ignores Bareau teaching and decreases relative illumination
- **Ground 6 (Claim 12)**
  - Fails to demonstrate that all elements are found

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