IPR2020-00897
Apple Inc. v. Corephotonics, Ltd.

U.S. Patent No. 10,324,277

core photonics

Instituted Grounds

- **Ground 1: Claims 1-3 and 5-8 Obviousness over Ogino Example 4 and Bareau**

- **Ground 2: Claims 1-24 Obviousness over Ogino Example 5 and Bareau**

Overview of Argument

- **All Instituted Grounds:**
    - **Improperly uses '277 patent as a guide to obviousness**
    - **No motivation to modify Ogino Examples**
    - **Ignores standard industry design practices**
- **Ground 1:**
    - **Effectively Overlapping Lenses and Manufacturability Issues**
    - **Ignores Bareau Teaching of Relative Illumination**
- **Ground 2:**
    - **Manufacturability Issues**
    - **Inconsistent Characterization of Ogino Example 5**

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DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner Improperly Uses the ‘277 Patent as a Guide

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Dr. Sasian Designed Based on '277 Patent Claims

> Q: So once you found a spacing between L3 and L4 that met the claim limitations, you just stopped; right?
>
> MS. SIVINSKI: Objection. Misstates testimony.
>
> A: I wouldn't characterize like that. I apply the teaching of Ogino and change the spacing and have probably -- probably three different solutions, and one of them was within the range of -- of -- in thickness as specified in the -- in the '277 Patent. The others, maybe they weren't within the range of the '277 Patent.

Ex. 2003, February 19, 2021, Sasian Dep. Tr., 171:2-13 (objection omitted).

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