

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

COREPHOTONICS, LTD.,
Patent Owner.

Case No. IPR2020-00905
Case No. IPR2020-00906
U.S. Patent No. 10,225,479

DECLARATION OF JOHN C. HART, Ph.D.
PURSUANT TO 37 C.F.R. § 1.68

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I. BACKGROUND

1. I have been retained as a technical expert by Patent Owner Corephotonics Ltd. (“Patent Owner” or “Corephotonics”) in this proceeding. Corephotonics has asked me to provide my expert opinions concerning certain technical aspects of imaging system design as they relate to the Petitioner Apple Inc.’s petition for inter partes review of U.S. Patent 10,225,479 (“479 patent”) in Case Nos. IPR2020-00905 (“-00905 IPR”) IPR2020-00906 (“-00906 IPR”) and the accompanying Declarations of Fredo Durand. In particular, I have been asked to respond to Dr. Durand’s opinions set forth in his declarations, Ex. 1003 in each IPR.

2. The statements in this declaration summarize my opinions on these matters based on my over 30 years of study and research of imaging systems, my education, knowledge, skills, and my review and analysis of the materials referenced herein.

3. I am being compensated for my work in this matter at the rate of \$575 per hour. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the substance of my testimony

II. SUMMARY OF OPINIONS

4. In the preparation of this declaration, I have reviewed:
- The '479 patent (Ex. 1001)¹
 - Prosecution history of the '479 patent (Ex. 1002)
 - The declarations of Dr. Fredo Durand (Ex. 1003 in each IPR)
 - The curriculum vitae of Dr. Fredo Durand (Ex. 1004)
 - U.S. Patent No. 7,859,588 (“Parulski”) (Ex. 1005)
 - English translation of Japanese Patent Application Publication No. 2007-259108 (“Soga”) (Ex. 1006)
 - Jacobs et al., “Focal Stack Compositing for Depth of Field Control,” Stanford Computer Graphics Laboratory Technical Report 2012-1 (Ex. 1007)
 - Prosecution history of the Morgan-Mar patent (Ex. 1008)
 - U.S. Patent No. 8,989,517 (“Morgan-Mar) (Ex. 1009, Ex. 2037)
 - PCT Publication No. WO2013140359 (“Shalon”) (Ex. 1010)
 - U.S. Patent Application Publication No. 2008/0030592 (“Border”) (Ex. 1011)

¹ Where a given Apple exhibit appears with the same exhibit number in both IPRs on the '479 patent, or a given exhibit number is used in only one of the IPRs, I refer to the exhibit by that number. Where the same exhibit number is used for different exhibits in the two IPRs, e.g., for Dr. Durand’s declarations, I will attempt to always clarify which IPR’s exhibit I am referring to.

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