

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

COREPHOTONICS, LTD.

Patent Owner

IPR2020-00905

U.S. Patent No. 10,225,479

**DECLARATION OF FREDO DURAND, PH.D.
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION
FOR INTER PARTES REVIEW**

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I. INTRODUCTION

1. I, Fredo Durand, have been retained by counsel for Apple Inc. (“Apple” or “Petitioner”) as a technical expert in connection with the proceeding identified above. I submit this declaration in support of Apple’s Petition for *Inter Partes* Review of U.S. Patent No. 10,225,479 (“the ’479 Patent”).

2. Compensation for my work in this matter is based on an hourly rate. In addition, reasonable and customary expenses associated with my work and testimony in this matter are reimbursed. This compensation is not contingent on the outcome of this matter, nor is it contingent on the specifics of my testimony. I have no personal or financial stake, nor any interest in the outcome of the present proceeding.

3. In the preparation of this declaration, I have studied:

- (1) APPL-1001: The ’479 Patent;
- (2) APPL-1002: The prosecution history of the ’479 Patent (’242 App);
- (3) APPL-1005: U.S. Patent No. 7,859,588 to Parulski et al. (“Parulski”);
- (4) APPL-1013: Richard Szeliski, Computer Vision – Algorithms and Applications (2011) (“Szeliski”);
- (5) APPL-1015: JP Pub. No. 2013-106289 to Konno et al. (“Konno”),
Certified English translation and Original;

- (6) APPL-1018: U.S. Patent No. 7,206,136 to Labaziewicz et al.
("Labaziewicz");
 - (7) APPL-1020: Warren J. Smith, MODERN LENS DESIGN (1992)
("Smith");
 - (8) APPL-1021: Declaration of Dr. Jose Sasián, Ph.D.;
 - (9) APPL-1023: U.S. Patent No. 8,908,041 to Stein et al. ("Stein");
 - (10) APPL-1024: U.S. Patent No. 8,406,569 to Segall et al. ("Segall");
 - (11) APPL-1025: U.S. Patent No. 8,824,833 to Dagher et al. ("Dagher");
 - (12) APPL-1027: File History for Provisional No. 61/752,515 to Stein
("Stein provisional");
 - (13) APPL-1031: Product announcement for Sony ICX612 12 MP image
sensor;
 - (14) APPL-1032: Product announcement for Sony ICX652 13.5 MP image
sensor;
 - (15) APPL-1034: U.S. Patent No. 7,112,774 to Baer.
- 4.** In forming the opinions expressed below, I have considered:
- (1) The documents listed above;
 - (2) Any additional documents discussed below; and

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