

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

APPLE INC.,  
Petitioner

v.

COREPHOTONICS LTD.,  
Patent Owner

---

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

---

**PETITIONER'S NOTICE FOR FILING TWO PETITIONS**

Pursuant to the Consolidated Trial Practice Guide November 2019,

Petitioner submits this paper to aid the Board's understanding of why two petitions are needed to challenge validity of U.S. Patent No. 10,225,479 ("the '479 Patent").

### I. Petition's Preference for Consideration

Petitioner believes that both petitions should be instituted but ranks them in the following order for consideration:

Preference	Petition	Claims
1	Petition 1: IPR2020-00906	19-22
2	Petition 2: IPR2020-00905	1-16, 18, 23-38, 40

### II. Why Both Petitions Should be Instituted

Both Petitions should be instituted here because the **non-overlapping claims** recite different image processing techniques performed by different camera systems. While all of the claims are directed to a dual-lens camera with wide and telephoto lenses (1) having overlapping fields of view (FOV) and (2) an autofocus mechanism providing each lens with separate focusing control, the cameras perform different image processing steps.

The **first camera** in claim 19 performs a method that includes (1) controlling the autofocus mechanism, (2) calculating a depth map by finding corresponding points between the images to determine depth information, and (3) creating a fused image that mimics a portrait photo captured with a DSLR lens

suitable for creating a bokeh effect (i.e., principle subject in focus with a blurred background).

The **second camera** in claims 1 and 23 performs a different method that includes (1) controlling the autofocus mechanism and **(2)** outputting a fused image where just in-focus objects from the telephoto image are fused with the wide image by mapping pixels that correspond to the object to corresponding pixels in the wide image. The Parulski reference describes this as “broadening” the output image’s depth of field. The overlapping dependent claims recite additional image processing steps and camera specifications.

**Petition 1** challenges the **first camera** in **claims 19-22** as obvious over Parulski, Ogata, Kawamura, and Soga; relying on Parulski to show prior art disclosure of the camera and the first two method steps, Ogata for the wide lens, Kawamura for the telephoto lens, and primarily Soga for the third method step.

**Petition 2** challenges the **second camera** in **claims 1-16, 18, 23-38, and 40** as obvious over Parulski and Konno; relying on Parulski and Konno to show prior disclosure of the camera and Parulski for the method steps.

Consequently, the large number of claims and functional differences between them support instituting two petitions here. While Petition 1 only challenges four claims, it requires a different combination and application of the prior art than the 34 claims challenged in Petition 2.

Petitioner's Notice for Filing Two Petitions  
IPR2020-00905 & IPR2020-00906 / US Pat. No. 10,225,479

---

Petitioner therefore respectfully requests that the Board consider and  
institute both petitions under 35 U.S.C. § 314(a).

Respectfully submitted,

Dated: May 6, 2020  
HAYNES AND BOONE, LLP  
2323 Victory Avenue, Suite 700  
Dallas, Texas 75219

/Michael S. Parsons/  
Michael S. Parsons  
Lead Counsel for Petitioner  
Registration No. 58,767

**CERTIFICATE OF SERVICE**

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e) and 37 C.F.R. § 42.105, service was made on Patent Owner as detailed below. Patent Owner has authorized electronic service due to the United States Post Office suspending deliver to the address listed in accordance with 37 CFR § 42.105(a).  
*See APPL-1027.*

*Date of service* May 6, 2020

*Manner of service* Electronically: mafenster@raklaw.com,  
bwang@raklaw.com, jtsuei@raklaw.com,  
nrubin@raklaw.com

*Documents served* **Petitioner's Notice for Filing Two Petitions**

*Persons served* Marc A. Fenster, Benjamin T. Wang  
James S. Tsuei, Neil A. Rubin  
Russ August & Kabat  
12424 Wilshire Blvd., 12th Floor  
Los Angeles, CA 90025

/Michael S. Parsons/  
Michael S. Parsons  
Lead Counsel for Petitioner  
Registration No. 58,767