UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ABILITY OPTO-ELECTRONICS TECHNOLOGY CO., LTD.,

Petitioner,

v.

LARGAN PRECISION CO., LTD.,

Patent Owner.

U.S. Patent No. 8,988,796

Filing Date: December 13, 2013 Issue Date: March 24, 2015

Title: Image Capturing Lens System, Imaging Device and Mobile Terminal

DECLARATION OF WILLIAM T. PLUMMER, Ph.D.



TABLE OF CONTENTS

_			
P	a	g	E

II.	Qual	ificatio		
	Qualifications			2
III.	Legal Standards			7
IV.	Bases of Opinions and Materials Considered			9
V.	Summary of My Opinions			10
VI.	U.S.	Patent	No. 8,988,796	10
	A.	Over	view	10
	B.	File H	History	17
VII.	Tech	nology	Background & The State of the Art	18
VIII.			29	
IX.	Clain	n Cons	truction	30
X.	Over	view o	f U.S. Patent No. 9,097,860 ("Yu")	30
	A.		an Application No. 102131525	
XI.	Overview of U.S. Patent Application Publication No. 2004/0012861 ("Yamaguchi")		44	
XII.	Grou	nd 1: Y	Yu Renders Claims 1-11, and 15-25 Obvious	48
	A.	Clain	ı 1	48
		1.	Preamble: "An image capturing lens system comprising, in order from an object side to an image side:"	48
		2.	Element 1a: "a first lens element having refractive power;"	50
		3.	Element 1b: "a second lens element with positive refractive power having a convex image-side surface in a paraxial region thereof;"	52
		4.	Element 1c: "a third lens element with negative refractive power having a concave object-side surface in a paraxial region thereof and a convex image-side surface in a paraxial region thereof; and"	56



	5.	Element 1d: "a fourth lens element with refractive power having a concave image-side surface in a paraxial region thereof, wherein both of an object-side surface and the image-side surface of the fourth lens element are aspheric, and the image-side surface of the fourth lens element has at least one convex shape in an off-axis region thereof;"	61
	6.	Element 1e: "wherein the image capturing lens system has a total of four lens elements with refractive power,"	69
	7.	Element 1f: "an axial distance between an object-side surface of the first lens element and the image-side surface of the fourth lens element is Td, half of a maximal field of view of the image capturing lens system is HFOV, a focal length of the image capturing lens system is f, a focal length of the fourth lens element is f4, a focal length of the second lens element is f2, a focal length of the third lens element is f3, and the following conditions are satisfied: 0.5 mm <td<3.2 1.0="" and="" f2="" f3<-0.65."<="" f4 <1.20;="" mm;="" mm<td="" tan(hfov)<3.75="" td="" f=""><td>71</td></td<3.2>	71
	8.	Conclusion for Claim 1	76
B.	the fo	n 2: "The image capturing lens system of claim 1, wherein burth lens element has the object-side surface being convex paraxial region thereof."	76
	1.	Conclusion for Claim 2	78
C.	Claim 3: "The image capturing lens system of claim 2, wherein the focal length of the image capturing lens system is f, a focal length of the first lens element is f1, and the following condition is satisfied: -0.25 <f f1<0.75."<="" td=""><td>78</td></f>		78
	1.	Conclusion for Claim 3	79



D.	Claim 4: "The image capturing lens system of claim 2, wherein the axial distance between the object-side surface of the first lens element and the image-side surface of the fourth lens element is Td, and the following condition is satisfied: 0.8 mm <td<2.5 mm."<="" th=""><th>79</th></td<2.5>	79	
	1. Conclusion for Claim 4	80	
E.	Claim 6: "The image capturing lens system of claim 2, wherein a curvature radius of the object-side surface of the second lens element is R3, a curvature radius of the image-side surface of the second lens element is R4, and the following condition is satisfied: 0.5<(R3+R4)/(R3-R4)<2.5."	80	
	1. Conclusion for Claim 6	81	
F.	Claim 7: "The image capturing lens system of claim 2, wherein the focal length of the image capturing lens system is f, and the following condition is satisfied: 0.5 mm <f<2.0 mm."<="" td=""><td>81</td></f<2.0>	81	
	1. Conclusion for Claim 7	82	
G.	Claim 8: "The image capturing lens system of claim 1, wherein the first lens element has a convex object-side surface in a paraxial region thereof."	82	
	1. Conclusion for Claim 8	85	
Н.	Claim 9: "The image capturing lens system of claim 8, wherein the axial distance between the object-side surface of the first lens element and the image-side surface of the fourth lens element is Td, half of the maximal field of view of the image capturing lens system is HFOV, and the following condition is satisfied: 1.2 mm <td mm."<="" tan(hfov)<2.75="" td=""><td>85</td></td>	<td>85</td>	85
	1 Conclusion for Claim 0	86	



I.	where elements the for object surfa	In 10: "The image capturing lens system of claim 8, ein a sum of the central thicknesses of the first lens ent, the second lens element, the third lens element, and burth lens element is \sum CT, the axial distance between the et-side surface of the first lens element and the image-side ce of the fourth lens element is Td, and the following ition is satisfied: $0.80 < \sum$ CT/Td< 0.95 ."	86
	1.	Conclusion for Claim 10	88
J.	wher	n 11: "The image capturing lens system of claim 8, ein an Abbe number of the first lens element is V1, and the wing condition is satisfied: 45 <v1."< td=""><td>88</td></v1."<>	88
	1.	Conclusion for Claim 11	89
K.	Clain	n 15	89
	1.	Preamble: "An image capturing lens system comprising, in order from an object side to an image side:"	89
	2.	Element 15a: "a first lens element having refractive power;"	90
	3.	Element 15b: "a second lens element with positive refractive power having a convex image-side surface in a paraxial region thereof;"	90
	4.	Element 15c: "a third lens element with negative refractive power having a concave object-side surface in a paraxial region thereof and a convex image-side surface in a paraxial region thereof; and"	90
	5.	Element 15d: "a fourth lens element with refractive power having a concave image-side surface in a paraxial region thereof, wherein both of an object-side surface and the image-side surface of the fourth lens element are aspheric, and the image-side surface of the fourth lens element has at least one convex shape in an off-axis region thereof;"	91



DOCKET A L A R M

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

