

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OPTICIS CO., LTD

Petitioner,

v.

INNEOS LLC,

Patent Owner.

Case No. IPR2023-01256
U.S. Patent No. 7,198,416

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
DEMONSTRATIVES**

Pursuant to the Board's Order Setting Oral Argument, Paper 60 ("Order"), Patent Owner hereby timely objects to certain slides from Petitioner's Demonstratives (Paper 32). In accordance with the Order, Petitioners emailed the below objections, identifying with particularity the objected-to content:

Slide 25: Patent Owner objects to the green arrow associated with "stopped single optical fiber" that points to the end of the fiber 40 in the figure because it is unsupported by the Petition (Paper 1 p. 22, which circles element 40) and misleadingly suggests an argument by Petitioner that Kurita discloses a structure at the end of element 40 to meet this limitation.

Slide 32: Patent Owner objects to the third major bullet, "Lemoff does not discourage ..." as asserting an argument not supported by the citations to the record.

Slide 62: Patent Owner objects to this slide in its entirety, and in particular to its discussion of references EX1011 and EX1007, as advancing new arguments based on these references that were merely addressed in the technical background discussion of EX1003 and bulk-incorporated by reference in the background section of Paper 1, but were not included as part of any Grounds in the Petition or cited or discussed in any Grounds in the Petition.

During the exchange of multiple emails, the parties were able to resolve other concerns and objections, but were unable to resolve the objections to these slides.

IPR2023-01256

U.S. Patent No. 7,198,416

As such, Patent Owner hereby timely objects to the above identified demonstrative slides.

Dated: November 8, 2024

Respectfully submitted,

/s/ Barry J. Herman

Barry J. Herman (Reg. No. 51,254)
Christian E. Mammen (*pro hac vice*)
Carrie Richey (*pro hac vice*)

Counsel for Patent Owner Inneos LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on November 8, 2024, that a true and correct copy of the foregoing was served on Counsel for Petitioner via filing through the P-TACTS, as well as by delivering a copy via electronic mail to the following email address(es):

Petitioner's Lead Counsel

Michael H. Jones
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Ave NW Suite 900
Washington, DC 20001
Tel: (202) 783-6040
Fax: (202) 783-6031
Email: mjones@rfem.com
USPTO Customer No. 06449
USPTO Reg. No. 76,120

Petitioner's Back-Up Counsel

Martin M. Zoltick
USPTO Reg. No. 35,745
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Ave NW Suite 900
Washington, DC 20001
Tel: (202) 783-6040
Fax: (202) 783-6031
Email: mzoltick@rfem.com

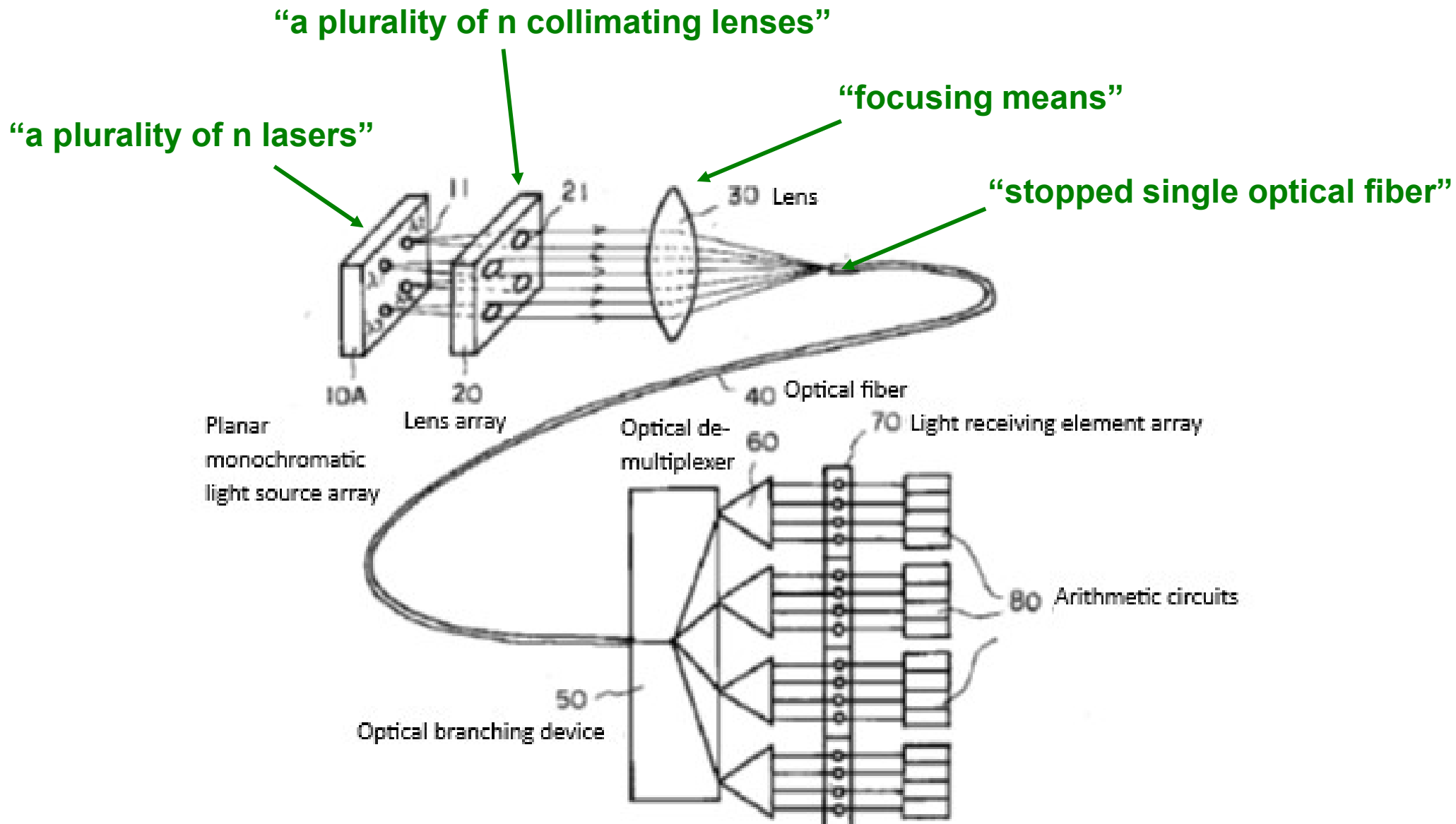
Mark T. Rawls
USPTO Reg. No. 76,376
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Ave NW Suite 900
Washington, DC 20001
Tel: (202) 783-6040
Fax: (202) 783-6031
Email: mrawls@rfem.com

/s/ Barry J. Herman

Barry J. Herman (Reg. No. 51,254)

Lead Counsel for Patent Owner

Kurita's Optical Combiner



Ex. 1004 (Kurita), FIG. 3; Paper 1, pp. 18-24

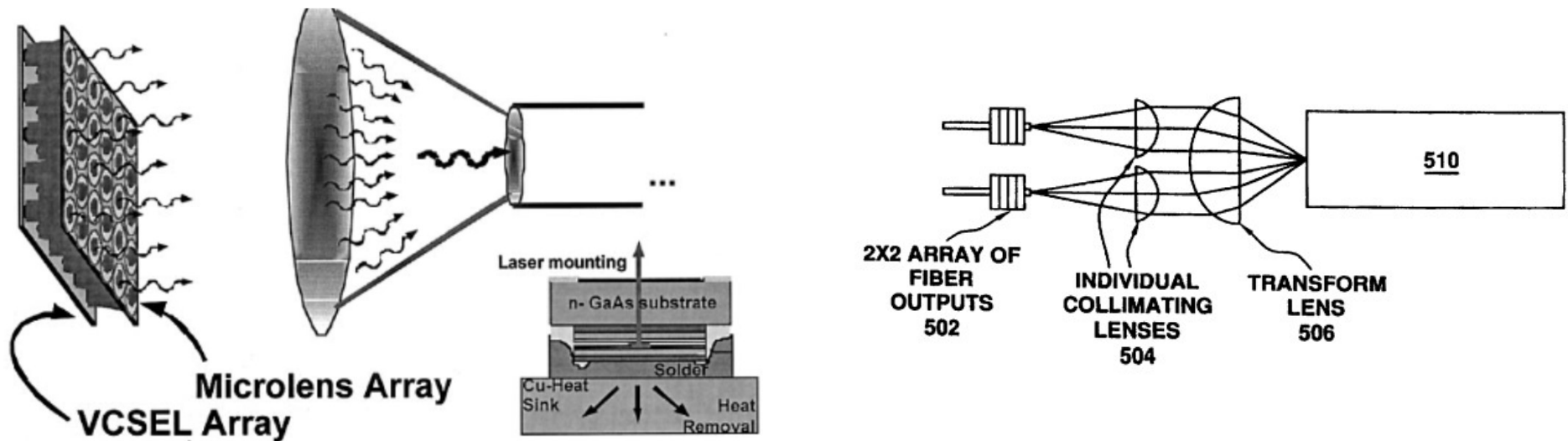
(DEMONSTRATIVE EXHIBIT - NOT EVIDENCE)

Kurita and Lemoff Would Have Been Combined

- Lemoff's teachings of a ***receptacle and ferrule arrangement for securing an optical fiber*** are combined with Kurita's light connection element (Ground 2)
 - Motivation = Securing the optical fiber would improve the coupling efficiency, as it would help ensure the light would be focused into the optical fiber. See Ex. 1003, §VIII(C)(iii).
 - Motivation = Lemoff teaches that the receptacle and ferrule arrangement form a connector that supports improved installation and maintenance of the optical device and allows optical fibers to be plugged into or out of the optical device based on changing circumstances. See Ex. 1006, 5:63-6:2.
- Purported size differences do not make references incompatible
 - Kurita is silent with respect to size – entire argument is premised on (incorrect) assumption that Kurita can only be implemented on a workbench.
- Lemoff **does not** discourage using optical wavelength multiplexers
 - Rather than using an *external* optical multiplexer, Lemoff instead teaches an optical multiplexer that is part of the emitter (e.g., optical signal emitter 200 of FIG. 2).

Collimating Lenses with a Focusing Lens

- The device described in Lee et al U.S. Pat. No. 5,377,287 “combines the outputs of, for example, 19 passive optical fibers arranged concentrically together with 19 collimating lenses and a Fresnel focusing lens.” Ex. 1001, :1:59-62 (Background).
- “[T]he article ‘Collimating Diode Laser Beams from a Large-Area VSCEL-Array Using Microlens Array,’ by Chen et al., had the same laser-collimating-focusing-fiber setup as that described in the ’416 Patent.” Ex. 1003, ¶ 58 (citing Ex. 1011)
- “U.S. Patent No. US 5,715,270 ... is another example of the same laser-collimating-focusing-fiber setup described in the ’416 Patent.” Ex. 1003, ¶ 59 (citing Ex. 1007)



Paper 1, pp. 7-8, 43; Paper 24, p. 19; Ex. 1016, ¶ 142

(DEMONSTRATIVE EXHIBIT - NOT EVIDENCE)