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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

E-VISION OPTICS, LLC AND E-
VISION SMART OPTICS, INC.,

Plaintiffs,

V.

LUXOTTICA GROUP S.P.A. AND
LUXOTTICA OF AMERICA, INC.,

Defendants.

Case No. 8:23-cv-02013-AB-(SHKx)

**PLAINTIFFS' DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

1 Plaintiffs e-Vision Optics, LLC and e-Vision Smart Optics, Inc. (collectively, “e-
2 Vision” or “Plaintiffs”), by and through their attorneys, hereby serve their Disclosure
3 of Asserted Claims and Infringement Contentions (the “Disclosure” or “Preliminary
4 Infringement Contentions”) in the above-captioned action as to U.S. Patent
5 No. 8,708,483 (“the ’483 Patent”); U.S. Patent No. 8,801,174 (“the ’174 Patent”); U.S.
6 Patent No. 8,905,541 (“the ’541 Patent”); U.S. Patent No. 10,598,960 (“the ’960
7 Patent”); U.S. Patent No. 10,613,355 (“the ’355 Patent”) (collectively the “Asserted
8 Patents”) as to Defendants Luxottica Group S.P.A. (“Luxottica Group”) and Luxottica
9 of America, Inc. (“Luxottica of America”) (collectively “Defendants” or “Luxottica”).
10 This Disclosure is made solely for the purpose of this action. Plaintiffs also incorporate
11 by reference all prior infringement allegations and infringement contentions, including
12 their initial Complaint (Dkt. 1) and First Amended Complaint (Dkt. 49).
13

14 Plaintiffs’ investigation regarding infringement and additional potential grounds
15 of infringement is ongoing. This Disclosure is therefore based upon information that
16 Plaintiffs have been able to obtain to date, together with their good-faith beliefs
17 regarding the Accused Products and their operation, and is given without prejudice to
18 Plaintiffs’ right to supplement or amend their Disclosure as additional facts are
19 ascertained, discovery is conducted, analysis is made, research is completed, and claim
20 language is construed. Plaintiffs reserve the right to amend and/or supplement their
21 infringement contentions as additional details are made available.
22

23 This Disclosure is based at least in part on Plaintiffs’ present understanding of
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1 the meaning and scope of the claims of the Asserted Patents. Plaintiffs reserve the right
2 to supplement or amend this Disclosure if their understanding of the claim scope
3 changes, including any constructions of terms by the Court.
4

5 For each Asserted Patent, Plaintiffs identify the following Accused Products of
6 which they are currently aware. The identification of Accused Products is based on
7 Plaintiffs' research and analysis to date, without the benefit of discovery. Plaintiffs
8 reserve the right to add, delete, substitute, or otherwise amend this list of Accused
9 Products based on discovery or other circumstances, in a manner consistent with the
10 Federal Rules of Civil Procedures, local rules, and the Standing Patent Rules of the
11 Honorable Andrew J. Guilford.
12

13
14 **Accused Products.** The Accused Products include, without limitation, the
15 following: Ray-Ban | Meta Wayfarer, Ray-Ban | Meta Skyler, Ray-Ban | Meta Low
16 Bridge Fit Headliner.
17

18 **Defendants' Infringement.** Based upon currently available information,
19 Plaintiffs identify the following asserted claims:
20

21 a) The '483 Patent. The named Defendants have infringed and are infringing
22 claims 1-2, 6-8, 10, 13, 17, 19-20, 24-26, 31, and 36, literally and/or under the Doctrine
23 of Equivalents. The named Defendants have infringed and are infringing these claims
24 both directly and indirectly (by inducing infringement pursuant to 35 U.S. Code §
25 271(b) and/or by contributing to infringement pursuant to 35 U.S. Code § 271(c)).
26

27
28 b) The '174 Patent. The named Defendants have infringed and are infringing

1 claims 1-2, 5-6, 12-13, 15-16, and 18, literally and/or under the Doctrine of Equivalents.
2 The named Defendants have infringed and are infringing these claims both directly and
3 indirectly (by inducing infringement pursuant to 35 U.S. Code § 271(b) and/or by
4 contributing to infringement pursuant to 35 U.S. Code § 271(c)).
5

6 c) The '541 Patent. The named Defendants have infringed and are infringing
7 claims 1-6, 12, and 16-17, literally and/or under the Doctrine of Equivalents. The named
8 Defendants have infringed and are infringing these claims both directly and indirectly
9 (by inducing infringement pursuant to 35 U.S. Code § 271(b) and/or by contributing to
10 infringement pursuant to 35 U.S. Code § 271(c)).
11

12 d) The '960 Patent. The named Defendants have infringed and are infringing
13 claims 1-2, 6-8, 10, literally and/or under the Doctrine of Equivalents. The named
14 Defendants have infringed and are infringing these claims both directly and indirectly
15 (by inducing infringement pursuant to 35 U.S. Code § 271(b) and/or by contributing to
16 infringement pursuant to 35 U.S. Code § 271(c)).
17

18 e) The '355 Patent. The named Defendants have infringed and are infringing
19 claims 1-3, 5-8, and 13, literally and/or under the Doctrine of Equivalents. The named
20 Defendants have infringed and are infringing these claims both directly and indirectly
21 (by inducing infringement pursuant to 35 U.S. Code § 271(b) and/or by contributing to
22 infringement pursuant to 35 U.S. Code § 271(c)).
23

24 Willful and Indirect Infringement. Luxottica Group and Luxottica of
25 America have been aware of the Asserted Patents since October 25, 2023 when they
26
27
28

1 received a letter identifying the patent and their infringement. At the very least,
2 Luxottica Group and Luxottica of America have been aware of the Asserted Patents
3 and their infringement based on the Accused Products since at least the filing of the
4 Complaint on October 26, 2023 and service of the original Complaint on October 31,
5 2023 (*See* Dkts. 1, 28-30).
6

7
8 Luxottica Group and Luxottica of America directly infringe at least the
9 asserted claims of the Asserted Patents, literally or under the doctrine of equivalents, by
10 making, using, offering to sell, and selling the Accused Products within the United
11 States, and importing the Accused Products into the United States during the term of
12 the Asserted Patents. Luxottica Group and Luxottica of America sell and/or offer for
13 sale the Accused Products through Luxottica Group's websites - [https://www.ray-](https://www.ray-ban.com/usa/ray-ban-meta-smart-glasses)
14 [ban.com/usa/ray-ban-meta-smart-glasses](https://www.ray-ban.com/usa/ray-ban-meta-smart-glasses), which may be accessed by customers within
15 this District, and through Ray-Ban stores in this District.
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17

18
19 Luxottica Group operates a website through which it markets and sells Ray-
20 Ban Smart Glasses, including the Accused Products. The website, <http://Ray-Ban.com>,
21 is registered to Luxottica Group. The website itself indicates that Luxottica Group
22 maintains copyright ownership of the Accused Products and the website through which
23 it sells the Accused Products. Through this website, Luxottica Group markets the
24 Accused Products and allows customers to purchase Accused Products via the website.
25
26 (*See* [https://www.ray-ban.com/usa/electronics/](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597982788)
27 [RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597982788](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597982788).) Similarly,
28

1 the website advises its customers that they “can buy Ray-Ban Meta smart glasses on
2 Ray-Ban.com, at official Ray-Ban stores and from certified Ray-Ban dealers (online &
3 in store). Currently they're available for purchase in the United States.” *Id.* Luxottica
4 Group also provides the warranty for the Accused Products. (See [https://media.ray-
5 ban.com/cms/resource/blob/846774/431e2f4d0d902104cf8fe4a53076a8fd/rbm-
6 safetywarranty-data.pdf](https://media.ray-ban.com/cms/resource/blob/846774/431e2f4d0d902104cf8fe4a53076a8fd/rbm-safetywarranty-data.pdf)).

9 Luxottica Group, through its subsidiary Luxottica of America, sells and offers
10 to sell the Accused Products by directing Luxottica of America to market and sell the
11 Accused Products through Luxottica Group’s website. Luxottica of America also sells
12 and offers to sell the Accused Products through retail stores owned and operated by
13 Luxottica of America. (See, e.g., [https://www.ray-
14 ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-
15 black/8056597982788](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597982788).) (advising customers that they “can buy Ray-Ban Meta smart
16 glasses on Ray-Ban.com, at official Ray-Ban stores and from certified Ray-Ban dealers
17 (online & in store). Currently they're available for purchase in the United States.”)

21 Luxottica of America also maintains retail stores in this District where the
22 Accused Products are available for purchase. For instance, Luxottica of America
23 maintains at least five (5) Ray-Ban, Pearle Vision, and SunglassHut brand retail stores
24 within a close proximity of the Southern Division Courthouse that market and sell Ray-
25 Ban Smart Glasses, including the Accused Products. One such Ray-Ban retail store is
26 located in this District at 1087 Newport Center Drive, Newport Beach, CA 92660.

1 Luxottica Group and Luxottica of America market and sell the Accused Products at this
2 location.

3
4 Luxottica of America cooperates with its parent Luxottica Group to market
5 and sell the Accused Products through its use of Luxottica Group's ray-ban.com
6 website. For instance, as stated the Terms of Use for the Accused Products (which is
7 available on the ray-ban.com website owned, registered, and controlled by Luxottica
8 Group), "[t]hese [Terms of Use] together with our Privacy Policy, terms of sale and
9 returns and exchange policy ("Additional Policies") are a legal agreement
10 ("Agreement") between you ("You", or "you") and Luxottica of America Inc., its
11 parents, subsidiaries, affiliates, representatives, officers, and directors (collectively,
12 "Luxottica", "us", "we", or "our"), as owner of Ray-Ban (the "Website"), and govern
13 your use of the Website." (See <https://www.ray-ban.com/usa/c/terms-of-use>; see also
14 <https://www.ray-ban.com/usa/c/terms-of-sale>.).
15
16
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18

19 Luxottica's retail partners (including Ray-Ban, Pearle Vision, SunglassHut,
20 LensCrafters, and independent vision and optometry stores), customers, and end users
21 of the Accused Products and corresponding systems and services directly infringe at
22 least the asserted claims of the Asserted Patents, literally or under the doctrine of
23 equivalents, at least by using the Accused Products and corresponding systems and
24 services, as described above.
25

26 Luxottica Group and Luxottica of America actively induced and are actively
27 inducing infringement of at least the asserted claims of the Asserted Patents with
28

1 specific intent to induce infringement, and/or willful blindness to the possibility that its
2 acts induce infringement, since at least the filing and service of this lawsuit, in violation
3 of 35 U.S.C. § 271(b). For example, Luxottica Group and Luxottica of America
4 encourage and induce customers to use the Accused Products in a manner that infringes
5 the asserted claims of the Asserted Patents by at least offering and providing the
6 Accused Products and corresponding systems and services that infringe the asserted
7 claims when operated by the customer, and by activities relating to selling, marketing,
8 advertising, promotion, installation, support, and distribution of its Accused Products
9 and corresponding systems and services in the United States. (See, e.g.,
10 <https://www.ray-ban.com/usa/ray-ban-stories>; [https://www.ray-ban.com/usa/discover-](https://www.ray-ban.com/usa/discover-ray-ban-meta-smart-glasses/clp)
11 [ray-ban-meta-smart-glasses/clp](https://www.ray-ban.com/usa/discover-ray-ban-meta-smart-glasses/clp); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377)
12 [ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377)
13 [black/8056597988377](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377); [https://www.ray-ban.com/usa/c/frequently-asked-questions-](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-stories)
14 [ray-ban-stories](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-stories); [https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-meta-smart-glasses)
15 [meta-smart-glasses](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-meta-smart-glasses); [https://media.ray-](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf)
16 [ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf)
17 [reference-guide-ps-rw-we-mp-v2-1--data.pdf](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146)
18 [ban.com/usa/electronics/RW4003%20UNISEX%20ray-](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146)
19 [ban%20stories%20%7C%20round-blue/8056597557146](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
20 [ban.com/usa/electronics/RW4004%20UNISEX%20ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
21 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
22 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
23 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
24 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
25 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
26 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
27 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
28 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)

1 ban.com/usa/electronics/RW4005%20UNISEX%20ray-
2 ban%20stories%20%7C%20meteor-olive/8056597557207.)
3

4 Luxottica Group and Luxottica of America encourage, instruct, direct, and/or
5 require third parties—including its retail partners and/or customers—to use the Accused
6 Products and corresponding systems and services in infringing ways, as described
7 above.
8

9 For example, Luxottica Group and Luxottica of America share instructions,
10 guides, and manuals, which advertise and instruct third parties on how to use the
11 Accused Products as described above, including at least customers and retail partners.
12

13 (See, e.g., <https://www.ray-ban.com/usa/ray-ban-stories>; [https://www.ray-](https://www.ray-ban.com/usa/discover-ray-ban-meta-smart-glasses/clp)
14 [ban.com/usa/discover-ray-ban-meta-smart-glasses/clp](https://www.ray-ban.com/usa/discover-ray-ban-meta-smart-glasses/clp);
15 [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377)
16 [ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377)
17 [black/8056597988377](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377); [https://www.ray-ban.com/usa/c/frequently-asked-questions-](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-stories)
18 [ray-ban-stories](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-stories); [https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-meta-smart-glasses)
19 [meta-smart-glasses](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-meta-smart-glasses);
20 [https://media.ray-](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf)
21 [ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf)
22 [reference-guide-ps-rw-we-mp-v2-1--data.pdf](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf);
23 [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146)
24 [ban.com/usa/electronics/RW4003%20UNISEX%20ray-](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146)
25 [ban%20stories%20%7C%20round-blue/8056597557146](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146);
26 [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
27 [ban.com/usa/electronics/RW4004%20UNISEX%20ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
28 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478);
[https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)

1 ban.com/usa/electronics/RW4005%20UNISEX%20ray-
2 ban%20stories%20%7C%20meteor-olive/8056597557207.) Luxottica Group and
3 Luxottica of America also provide customer service or technical support to purchasers
4 of the Accused Products and corresponding systems and services, which directs and
5 encourages customers to perform certain actions as a condition to use the Accused
6 Products in an infringing manner.
7

8
9 Luxottica Group and Luxottica of America and/or their retail partners
10 recommend and sell the Accused Products and provide technical support for ongoing
11 operation of the Accused Products for each individual customer. (See, e.g.,
12 <https://www.ray-ban.com/usa/ray-ban-stories>; [https://www.ray-ban.com/usa/discover-](https://www.ray-ban.com/usa/discover-ray-ban-meta-smart-glasses/clp)
13 [ray-ban-meta-smart-glasses/clp](https://www.ray-ban.com/usa/discover-ray-ban-meta-smart-glasses/clp); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377)
14 [ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377)
15 [black/8056597988377](https://www.ray-ban.com/usa/electronics/RW4006ray-ban%20%7C%20meta%20wayfarer-black/8056597988377); [https://www.ray-ban.com/usa/c/frequently-asked-questions-](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-stories)
16 [ray-ban-stories](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-stories); [https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-meta-smart-glasses)
17 [meta-smart-glasses](https://www.ray-ban.com/usa/c/frequently-asked-questions-ray-ban-meta-smart-glasses); [https://media.ray-](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf)
18 [ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf)
19 [reference-guide-ps-rw-we-mp-v2-1--data.pdf](https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146)
20 [ban.com/usa/electronics/RW4003%20UNISEX%20ray-](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146)
21 [ban%20stories%20%7C%20round-blue/8056597557146](https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20ray-ban%20stories%20%7C%20round-blue/8056597557146); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
22 [ban.com/usa/electronics/RW4004%20UNISEX%20ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
23 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
24 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
25 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
26 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
27 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)
28 [ban%20stories%20%7C%20wayfarer-black/8056597489478](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478); [https://www.ray-](https://www.ray-ban.com/usa/electronics/RW4004%20UNISEX%20ray-ban%20stories%20%7C%20wayfarer-black/8056597489478)

1 ban.com/usa/electronics/RW4005%20UNISEX%20ray-
2 ban%20stories%20%7C%20meteor-olive/8056597557207.) Each customer enters into
3 a contractual relationship with Luxottica Group, Luxottica of America, and/or their
4 retail partners that obligates each customer to perform certain actions as a condition to
5 use the Accused Products. (See <https://www.ray-ban.com/usa/c/terms-of-use>; *see also*
6 <https://www.ray-ban.com/usa/c/terms-of-sale>.) Further, in order to receive the benefit
7 of Luxottica Group's, Luxottica of America's and/or their retail partners' continued
8 technical support and their specialized knowledge and guidance with respect to
9 operation of the Accused Products, each customer must continue to use the Accused
10 Products in a way that infringes the Asserted Patents. Further, as the entity that ensures
11 that the Accused Products remain operational for each customer through ongoing
12 technical support, Luxottica Group, Luxottica of America, and/or their retail partners
13 affirmatively aid and abet each customer's use of the Accused Products in a manner that
14 infringes the Asserted Patents.
15

16 Luxottica Group and Luxottica of America also contribute to the infringement
17 of their retail partners, customers, and end-users of the Accused Products by providing
18 within the United States or importing into the United States the Accused Products, the
19 constituent parts of which are not staple articles or commodities of commerce suitable
20 for substantial non-infringing uses.
21

22 The infringing actions of each partner, customer, and/or end-user of the
23 Accused Products are attributable to Luxottica Group and Luxottica of America. For
24

1 example, Luxottica Group and Luxottica of America direct and control the activities or
2 actions of its retail partners in connection with the Accused Products by contractual
3 agreement or otherwise requiring retail partners to provide information and instructions
4 to customers who acquire the Accused Products which, when followed, results in
5 infringement.
6

7
8 e-Vision has suffered and continues to suffer damages as a result of
9 Defendants' infringement of the Asserted Patents. Defendants are therefore liable to e-
10 Vision under 35 U.S.C. § 284 for damages in an amount that adequately compensates
11 e-Vision for Defendants' infringement, but no less than a reasonable royalty.
12

13 e-Vision will continue to suffer irreparable harm unless this Court
14 preliminarily and permanently enjoins Defendants, their agents, employees,
15 representatives, and all others acting in concert with Defendant from infringing the
16 Asserted Patents. e-Vision has lost potential customers, business opportunities, and
17 goodwill in the community. e-Vision will continue to suffer these harms absent an
18 injunction.
19
20

21 Defendants' infringement of the Asserted Patents is knowing and willful.
22 Defendants acquired actual knowledge of the Asserted Patents at least when e-Vision
23 filed and served this lawsuit.
24

25 Despite Defendants' knowledge of the Asserted Patents and e-Vision's
26 patented technology, Defendants made and continue to make the deliberate decision to
27 sell products and services that they knew infringe these patents. Defendants' continued
28

1 infringement of the Asserted Patents with knowledge of the Asserted Patents constitutes
2 willful infringement.
3

4 **Priority Dates.** The '483 Patent is entitled at least to the earliest priority date
5 listed on the face of the Patent, May 4, 2007, corresponding to provisional application
6 No. 60/924,225.
7

8 The '174 Patent is entitled at least to the earliest priority date listed on the face
9 of the Patent, February 11, 2011, corresponding to provisional application No.
10 61/441,817.
11

12 The '541 Patent is entitled at least to the earliest priority date listed on the face
13 of the Patent, August 25, 2010, corresponding to provisional application Nos.
14 61/376,719.
15

16 The '960 Patent is entitled at least to the earliest priority date listed on the face
17 of the Patent, January 6, 2012, corresponding to provisional application No. 61/583,940.
18

19 The '174 Patent is entitled at least to the earliest priority date listed on the face
20 of the Patent, February 11, 2011, corresponding to provisional application No.
21 61/441,817.
22

23 The '355 Patent is entitled at least to the earliest priority date listed on the face
24 of the Patent, May 4, 2007, corresponding to provisional application No. 60/924,225.
25

26 **Production of Documents.** Simultaneously with this Disclosure, Plaintiffs are
27 producing documents herewith. Plaintiffs reserve the right to supplement this
28 production as additional investigation and discovery is conducted in the ordinary course

1 of these proceedings. Further, Plaintiffs reserve the right to supplement or revise their
2 infringement contentions and/or chart, including identification of additional asserted
3 claims, based on, for example, new versions or variations of one or more of the accused
4 products that are later discovered.
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10 DATED: May 17, 2024

Respectfully submitted:

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and E-VISION SMART OPTICS, INC.

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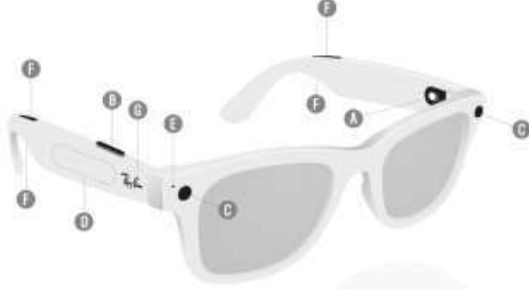
/s/ Christopher C. Campbell
Christopher C. Campbell

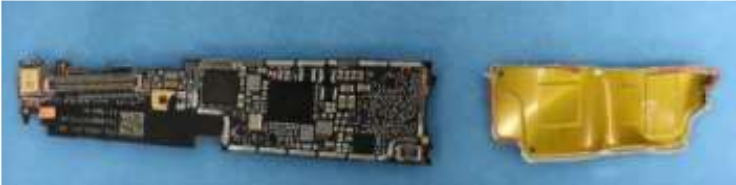
e-Vision, LLC et al. v. Lenovo Group, Ltd. et al., 8:23-cv-01860

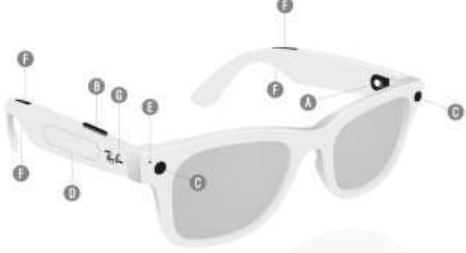
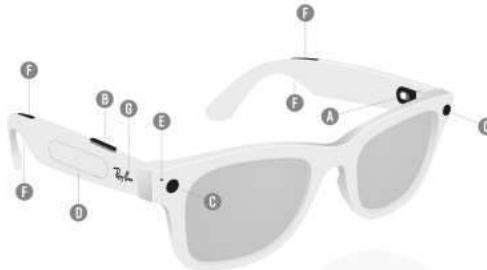
Claim Chart for U.S Patent No. 10,613,355 titled “*Eyewear Including a Docking Station.*”

Claim	Claim Language	Accused Products
[1P]	An eyewear system comprising:	To the extent the preamble is limiting, the Accused Products include an “<i>eyewear system.</i>” For example, the Accused Products are “smart glasses” having a frame that can be charged “on the go.” (See https://www.rayban.com/usa/electronics/RW4004%20UNISEX%20rayban%20stories%20%7C%20wayfarer-black/8056597489478.)  (See https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20rayban%20stories%20%7C%20round-blue/8056597557146.)

Claim	Claim Language	Accused Products
		 (See <i>id.</i>)
[1A]	an eyewear frame;	The Accused Products include an “<i>an eyewear frame.</i>” For example, as stated above, the Accused Products are “smart glasses” having a frame that can be charged “on the go.” (See https://www.rayban.com/usa/electronics/RW4004%20UNISEX%20rayban%20stories%20%7C%20wayfarer-black/8056597489478.)

Claim	Claim Language	Accused Products
		 Capture button Bouton de capture Pulsante di acquisizione Botón de captura Botão de captura Aufnahmetaste Touchpad Touchpad Touchpad Panel táctil Touchpad Touchpad (See https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)
[1B]	an electronics assembly comprising electronic components configured to control an electrical functional member;	The Accused Products include an “<i>an electronics assembly comprising electronic components configured to control an electrical functional member.</i>” For example, FCC Internal Photos shows an electronics assembly including a circuit board with a processor and a touch sensor disposed in a cavity in the right temple and connected to the speaker, which is also in the same cavity:  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22.)

Claim	Claim Language	Accused Products
		 (See <i>id.</i> at 23.)  (See <i>id.</i> at 26.)  (See <i>id.</i> at 33.) As another example shown in the image below, the electronics assembly controls several functional members including two cameras in the frame (reference letter C), the speakers (reference letter F), and the microphone (reference number G):

Claim	Claim Language	Accused Products
		 Cameras Caméras Fotocamere Cámaras Câmaras Kameras Speakers Haut-parleurs Altoparlanti Altavoces Alti-falantes Lautsprecher Microphones Microphones Microfoni Micrófonos Microfones Mikrofone (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)
[1C]	a capacitive touch switch coupled to at least one electronic component in the electronics assembly;	The Accused Products include an “a capacitive touch switch coupled to at least one electronic component in the electronics assembly.” For example, the Accused products include a capacitive touch pad (reference number D) for controlling various functionalities of the accused products, including audio playback, volume, managing calls, and accessing a virtual Facebook Assistant. 

Claim	Claim Language	Accused Products
		CONTROL PLAYBACK Contrôle de la lecture · Controlla la riproduzione  ▷⏸ Tap once to play or pause. Appuyez une fois pour lire ou mettre en pause. Tocca una volta per riprodurre o mettere in pausa. ▷▷ Double-tap to skip forward. Appuyez deux fois pour avancer. Tocca due volte per andare avanti. ◁◁ Triple-tap to skip back. Appuyez trois fois pour reculer. Tocca tre volte per tornare indietro. ADJUST VOLUME Réglage du volume · Regola il volume  🔊 Swipe back to turn down volume. Balayez vers l'arrière pour baisser le volume. Scorri indietro per abbassare il volume. 🔊 Swipe forward to turn up volume. Balayez vers l'avant pour monter le volume. Scorri in avanti per alzare il volume.

Claim	Claim Language	Accused Products
		MANAGE CALLS Gestion des appels · Gestisci le chiamate  Double-tap to answer. Appuyez deux fois pour répondre. Tocca due volte per rispondere. Double-tap to end. Appuyez deux fois pour mettre fin à l'appel. Tocca due volte per terminare la chiamata. Tap and hold to reject. Appuyez et maintenez pour refuser l'appel. Tieni premuto per rifiutare la chiamata. FACEBOOK ASSISTANT Only available in English · Disponible uniquement en anglais · Disponibile solo in inglese  ACCESS Activation · Accedi Tap and hold or say "Hey Facebook". Appuyez et maintenez ou dites "Hey Facebook". Tieni premuto o pronuncia "Hey Facebook". DISMISS Annulation · Annulla Tap again or say "Hey Facebook, Cancel". Appuyez de nouveau ou dites "Hey Facebook, Cancel". Tocca di nuovo o pronuncia "Hey Facebook, Cancel". (See https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)
[1D]	at least one electrical connective element electrically connected to the electronic assembly and the	The Accused Products include an “<i>at least one electrical connective element electrically connected to the electronic assembly and the electrical functional member.</i>” For example, FCC Internal Photos show a ribbon cable extending out of the right temple to electrically connect the electronics assembly in the right temple to the camera in the frame front:

Claim	Claim Language	Accused Products
	electrical functional member; and	 (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 16.) As another example, the FCC Internal Photos show an electrical connector on the speakers that appears to fit into a connection point on the electronics assembly:  (See <i>id.</i> at 22.)

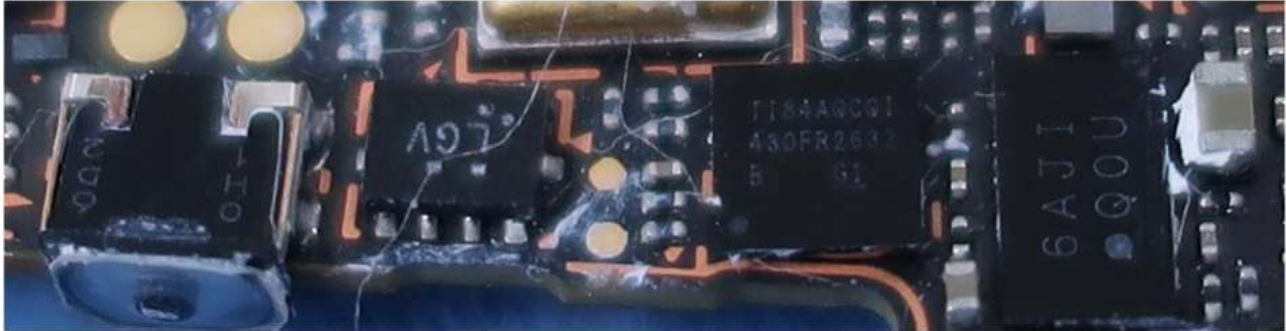
Claim	Claim Language	Accused Products
[1E]	a conformal layer over the electronic assembly to seal the electronic components;	The Accused Products include an “a conformal layer over the electronic assembly to seal the electronic components.” For example, FCC Internal Photos shows a metal layer placed over and sealing components on the printed circuit board on the side of the temple facing the wearer:  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 33.)  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 32.) As shown above, the metal layer conforms to the shapes of the chips below it, as shown by the square and rectangular dimples in the layer matching the shapes of the chips.

Claim	Claim Language	Accused Products
		As another example, there is a line of adhesive and/or conductive material on the printed circuit board tracing the shape of the gold-colored layer that helps seal the gold-colored layer against the board. This line of adhesive also conforms to the shape of the surface of the board. As another example, FCC Internal Photos shows a ribbon cable disposed in the right temple and connected to the printed circuit board that has an insulating layer formed around and sealing the conductive elements:  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22.) FCC Internal Photos also shows the printed circuit board has a transparent conformal coating over it: 

Claim	Claim Language	Accused Products
		(See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 28.)
[1F]	wherein the conformal layer is moisture proof and seals electrical connections of the electronic component;	The Accused Products include an “<i>wherein the conformal layer is moisture proof and seals electrical connections of the electronic component.</i>” The Accused Products include various layers, including insulating layers, in between electrical components. (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.). As another example, water cannot pass through the insulating layers around the ribbon cable. As another example, the Accused Products are “resistant to water splashes.” (See https://fcc.report/FCC-ID/2AYOA-4002/5271617.pdf at 3.)
[1G]	wherein the conformal layer is disposed in an enclosure of the eyewear frame;	The Accused Products include an “<i>wherein the conformal layer is disposed in an enclosure of the eyewear frame.</i>” For example, in the Accused Products, the metal layer, the ribbon cable, the printed circuit board and the layers therebetween are disposed inside of the right temple. The Accused Products further include a conformal layer that protects the internal electronic components from, for example, water damage. (See https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=5271529 at 3.)

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Exhibit A-05

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.)
[1H]	wherein the eyewear frame comprises a temple; and	The Accused Products include an “<i>wherein the eyewear frame comprises a temple.</i>” For example, as shown above, the Accused Products are “smart glasses” having a frame that can be charged “on the go.” (See https://www.rayban.com/usa/electronics/RW4004%20UNISEX%20rayban%20stories%20%7C%20wayfarer-black/8056597489478.) The Accused Products include at least two 150 mm temples (the Wayfarer and Round models). (See https://www.ray-

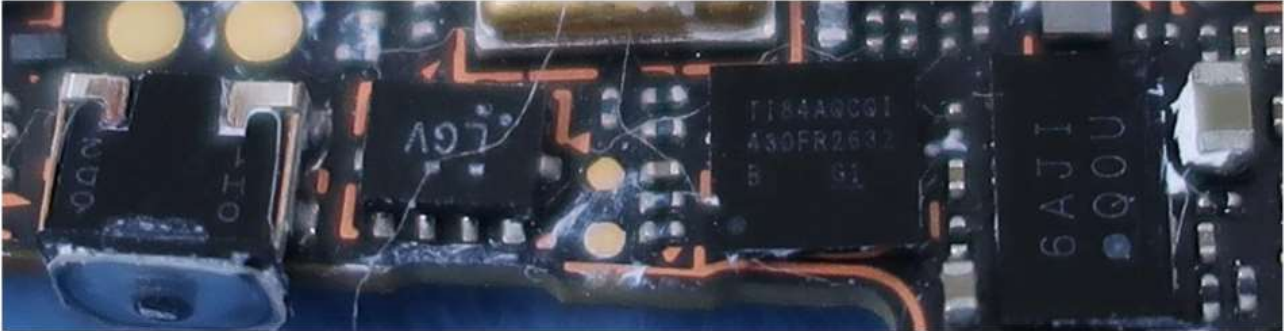
Claim	Claim Language	Accused Products
		ban.com/usa/electronics/RW4003%20UNISEX%20rayban%20stories%20%7C%20round-blue/8056597557146; <i>see also</i> https://www.rayban.com/usa/electronics/RW4004%20UNISEX%20rayban%20stories%20%7C%20wayfarer-black/8056597489478.) As another example, the Meteor models include two 155 mm temples. (See https://www.rayban.com/usa/electronics/RW4005%20UNISEX%20rayban%20stories%20%7C%20meteor-olive/8056597557207.) As another example, the Accused Products include at least two 150 mm temples (the Wayfarer and Round models). (See https://www.rayban.com/usa/electronics/RW4003%20UNISEX%20rayban%20stories%20%7C%20round-blue/8056597557146; <i>See also</i> https://www.rayban.com/usa/electronics/RW4004%20UNISEX%20rayban%20stories%20%7C%20wayfarer-black/8056597489478.) As another example, the Meteor models include two 155 mm temples. (See https://www.rayban.com/usa/electronics/RW4005%20UNISEX%20rayban%20stories%20%7C%20meteor-olive/8056597557207.) The temples may be moved in order to fold the Accused Products, allowing them to fit into a charging station and/or protective case, among other things. As another example, customers for the Accused Products are advised to “[t]ake care when folding the temples (earpieces or arms) in or out.” (See https://media.rayban.com/cms/resource/blob/173544/cce4b64454c7c4e31d3b9a01652b2972/1noinrw007-booklet-rw-ps-rb-web-mp-v2-data.pdf at 6; <i>See also</i> https://fcc.report/FCCID/2AYOA-4002/5271617.pdf at 3.)

Claim	Claim Language	Accused Products
		 (See https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20rayban%20stories%20%7C%20round-blue/8056597557146)  (See https://fcc.report/FCC-ID/2AYOA-4002/5264925.pdf at 1.)

Claim	Claim Language	Accused Products
		 (See id.)  (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)

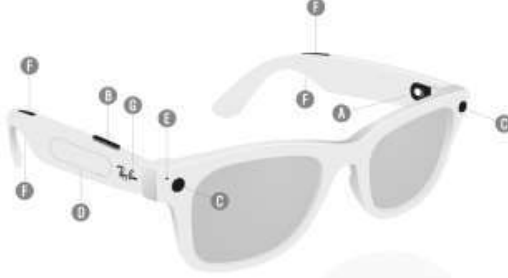
Claim	Claim Language	Accused Products
		 (See https://fcc.report/FCC-ID/2AYOA-4002/5264925.pdf at 4.)
[11]	wherein the electronic assembly is enclosed in the temple.	The Accused Products include an “<i>wherein the electronic assembly is enclosed in the temple.</i>” The metal layer, the ribbon cable, the printed circuit board and the layers therebetween are disposed inside of the right temple.

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

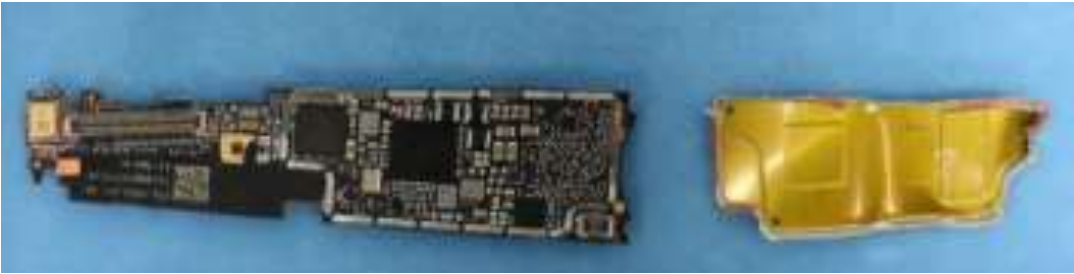
Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.). As another example shown in the images below, various electrical components are enclosed within the temple:

Claim	Claim Language	Accused Products
		 Cameras Caméras Fotocamere Cámaras Câmaras Kameras Speakers Haut-parleurs Altoparlanti Altavoces Alti-falantes Lautsprecher Microphones Microphones Microfoni Micrófonos Microfones Mikrofone (See https://media.ray-ban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)
[2]	The eyewear system of claim 1, wherein the electrical functional member comprises a lens.	The Accused Products include “[t]he eyewear system of claim 1, wherein the electrical functional member comprises a lens.” For example, the Accused Products include two lenses supported by a lens housing. The lenses may be prescription lenses, (See https://fcc.report/FCC-ID/2AYOA-4002/5271617.pdf at 1), photochromic lenses, (See <i>id.</i> at 5), and/or may include filters of various types. (See <i>id.</i> at 6-7.). As another example, the lenses are “[a]vailable in Shiny Black, Shiny Olive, Shiny Brown and Shiny Blue, with a choice of sun and clear lenses featuring the latest innovations in lens technology: Clear with Blue Light filter, Brown Gradient, G-15 Green, Blue Polarised and Transitions®.” (See https://www.rayban.com/usa/electronics/RW4003%20UNISEX%20rayban%20stories%20%7C%20round-blue/8056597557146.)

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4003, RW4002, RW4004, RW4006  (See https://fcc.report/FCC-ID/2AYOA-4002/5264925.pdf at 1.)  (See https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20rayban%20stories%20%7C%20round-blue/8056597557146.)

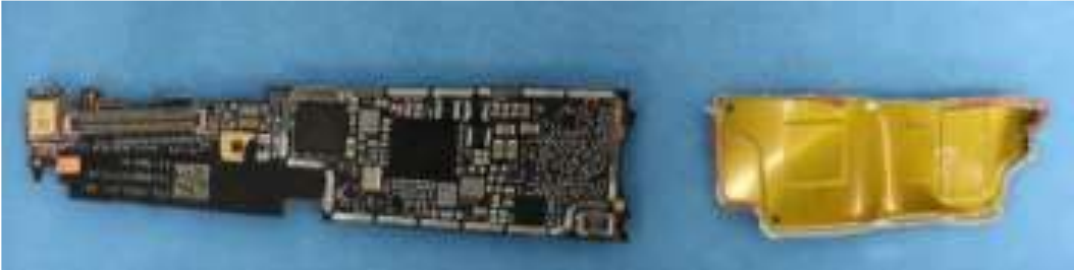
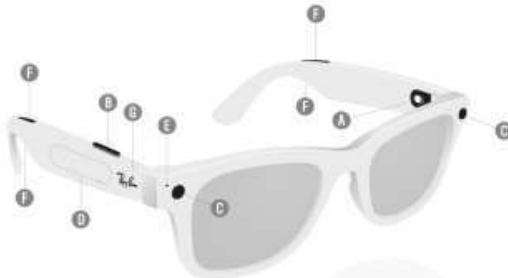
Claim	Claim Language	Accused Products
[3]	The eyewear system of claim 1, wherein the electrical functional member includes at least one of an electro-active lens, an electro-chromic lens, an electronic display, a sensor, an imager, a GPS, an alarm, a hearing aid, a virtual reality function, an augmented reality function, a gaming function, an audio output function, a microphone function, a recording function, a transmitter function, a pedometer, and an active 3D function.	The Accused Products include “[t]he eyewear system of claim 1, wherein the electrical functional member includes at least one of an electro-active lens, an electro-chromic lens, an electronic display, a sensor, an imager, a GPS, an alarm, a hearing aid, a virtual reality function, an augmented reality function, a gaming function, an audio output function, a microphone function, a recording function, a transmitter function, a pedometer, and an active 3D function.” For example, the Accused Products include a printed circuit board within the right temple.  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 23.) The printed circuit board includes a processor and a touch sensor, as shown in the images below:

Claim	Claim Language	Accused Products
		 (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 26.)  (See <i>id.</i> at 33.)

Claim	Claim Language	Accused Products
		Power switch Bouton d'alimentation Pulsante di accensione Botón de encendido Interruptor de alimentação Ein/Aus-Schalter Capture LED LED de capture LED di acquisizione LED de captura LED de captura Aufnahme-LED Cameras Caméras Fotocamere Cámaras Câmaras Kameras Microphones Microphones Microfoni Micrófonos Microfones Mikrofone Capture button Bouton de capture Pulsante di acquisizione Botón de captura Botão de captura Aufnahmetaste Speakers Haut-parleurs Altoparlanti Altavoces Alti-falantes Lautsprecher Touchpad Touchpad Touchpad Panel táctil Touchpad Touchpad Notification LED LED de notification LED di notifica LED de notificaciones LED de notificação Benachrichtigungs-LED (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf).
[5]	The eyewear system of claim 1, wherein the electronic assembly comprises a micro-processor.	The Accused Products include “[t]he eyewear system of claim 1, wherein the electronic assembly comprises a micro-processor.” For example, the Accused Products include various electronics in the housing module, which is located within a cavity of the structural member of the Accused Products, as shown in the images below:  (See https://fcc.report/FCC-ID/2AYOA-4002/5264927.pdf at 15.)

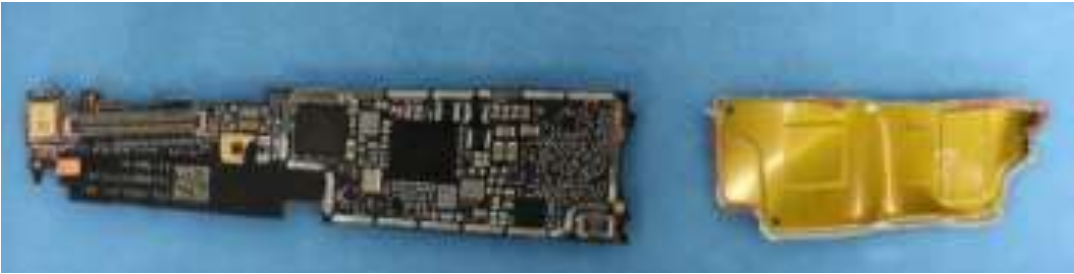
Claim	Claim Language	Accused Products
		 (See id. at 50.)  (See id. at 30.) As another example, the Accused Products include a printed circuit board within the right temple.

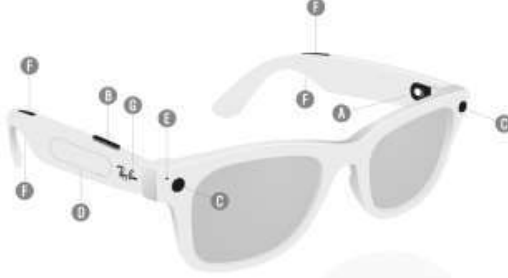
Claim	Claim Language	Accused Products
		 (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 23.) The printed circuit board includes a processor and a touch sensor, as shown in the images below:  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 26.)

Claim	Claim Language	Accused Products
		 (See <i>id.</i> at 33.)  Capture button Bouton de capture Pulsante di acquisizione Botón de captura Botão de captura Aufnahmetaste Touchpad Touchpad Touchpad Panel táctil Touchpad Touchpad (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)
[6]	The eyewear system of claim 1, wherein the enclosure comprises at least one of an outer casing of the electronic	The Accused Products include “[t]he eyewear system of claim 1, wherein the enclosure comprises at least one of an outer casing of the electronic assembly or a cavity of the eyewear frame.” For example, the Accused Products include various electronics in the housing module, which is located within a cavity of the structural member of the Accused Products, as shown in the images below:

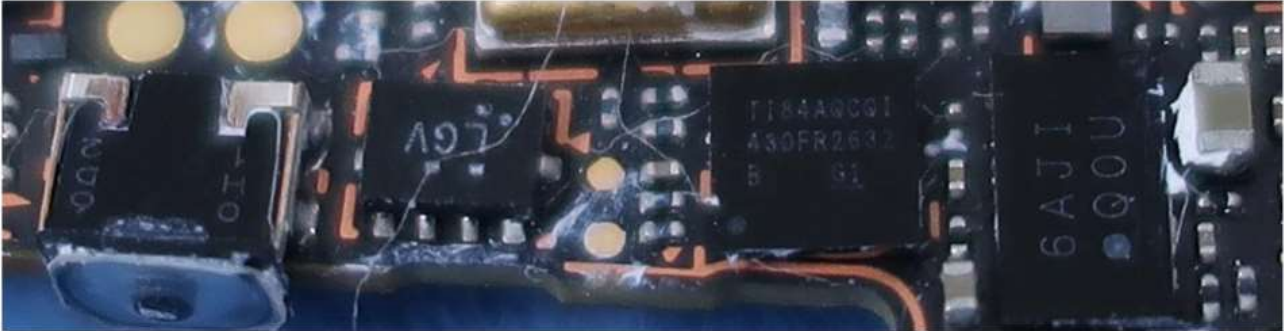
Claim	Claim Language	Accused Products
	assembly or a cavity of the eyewear frame.	 Brand Name: Ray Ban / Model Name: RB4002, RB4003, RB4004, RB4005 (See https://fcc.report/FCC-ID/2AYOA-4002/5264927.pdf at 15.)  Brand Name: Ray Ban / Model Name: RB4002, RB4003, RB4004, RB4005 (See id. at 50.)

Claim	Claim Language	Accused Products
		(See id. at 30.) As another example, the Accused Products include a printed circuit board within the right temple. (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 23.) The printed circuit board includes a processor and a touch sensor, as shown in the images below:

Claim	Claim Language	Accused Products
		 (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 26.)  (See <i>id.</i> at 33.)

Claim	Claim Language	Accused Products
		 B Capture button Bouton de capture Pulsante di acquisizione Botón de captura Botão de captura Aufnahmetaste D Touchpad Touchpad Touchpad Panel táctil Touchpad Touchpad (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)
[7]	The eyewear system of claim 1, wherein the conformal layer comprises at least one of an encasing layer or an encapsulating layer.	The Accused Products include “[t]he eyewear system of claim 1, wherein the conformal layer comprises at least one of an encasing layer or an encapsulating layer.” For example, in the Accused Products, the metal layer, the ribbon cable, the printed circuit board and the layers therebetween are disposed inside of the right temple. The Accused Products further include a conformal layer that protects the internal electronic components from, for example, water damage. (See https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=5271529 at 3.)

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

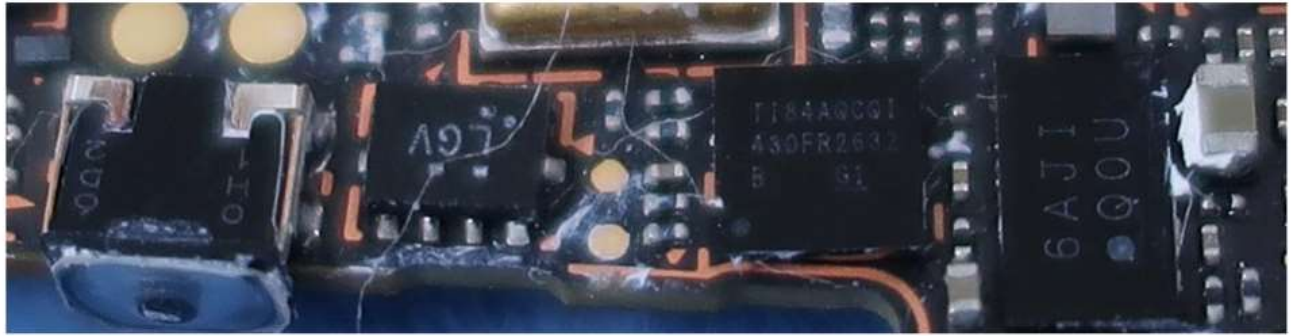
Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.)
[8]	The eyewear system of claim 1, wherein the conformal layer protects the electronic components from external	The Accused Products include “[t]he eyewear system of claim 1, wherein the conformal layer protects the electronic components from external environmental damage.” For example, in the Accused Products, the metal layer, the ribbon cable, the printed circuit board and the layers therebetween are disposed inside of the right temple. The Accused Products further include a conformal layer that protects the internal electronic components from, for example, water damage. (See https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=5271529 at 3.)

Claim	Claim Language	Accused Products
	environmental damage.	Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Exhibit A-05

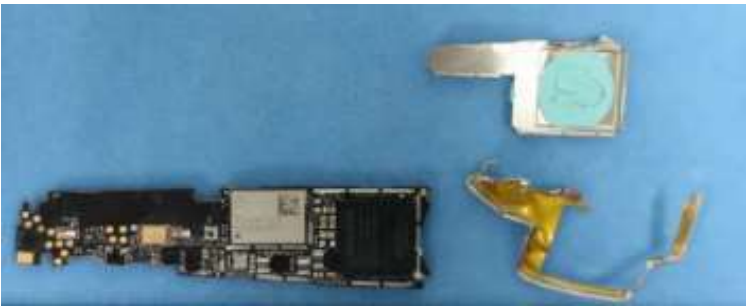
Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

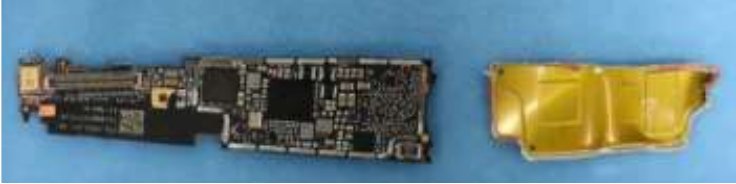
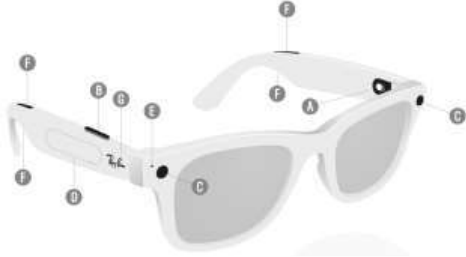
Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

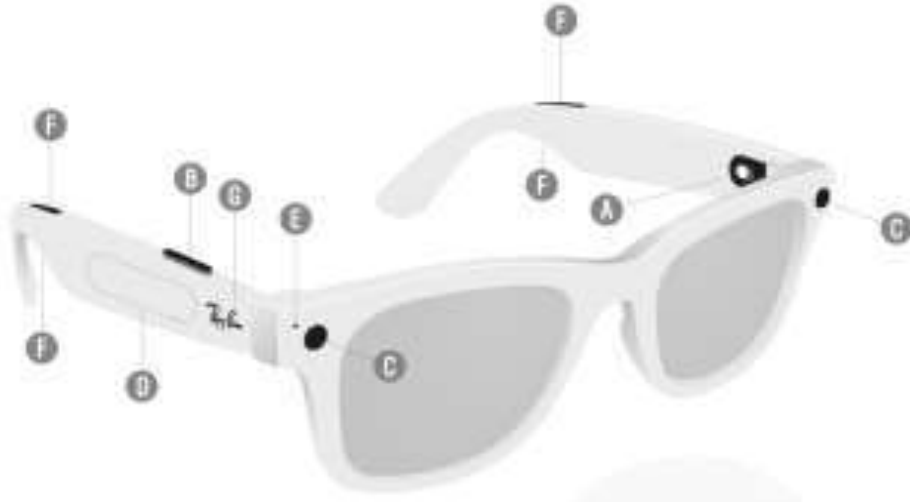
Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.)
[13P]	A method of manufacturing an eyewear system comprising:	To the extent the preamble is limiting, the Accused Products include “[a] method of manufacturing an eyewear system.” For example, the Accused Products are “smart glasses.”(See https://www.rayban.com/usa/electronics/RW4004%20UNISEX%20rayban%20stories%20%7C%20wayfarer-black/8056597489478.)

Claim	Claim Language	Accused Products
		 (See https://www.ray-ban.com/usa/electronics/RW4003%20UNISEX%20rayban%20stories%20%7C%20round-blue/8056597557146.)

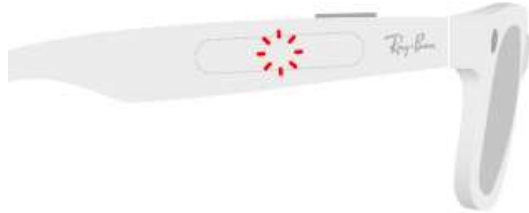
Claim	Claim Language	Accused Products
		 <i>(See id.)</i> As another example, FCC Internal Photos show that the Accused Products are products of manufacturing processes, including an electronics assembly including a circuit board with a processor, touch sensor, and speaker:

Claim	Claim Language	Accused Products
		 (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22.)  (See <i>id.</i> at 23.)  (See <i>id.</i> at 26.)

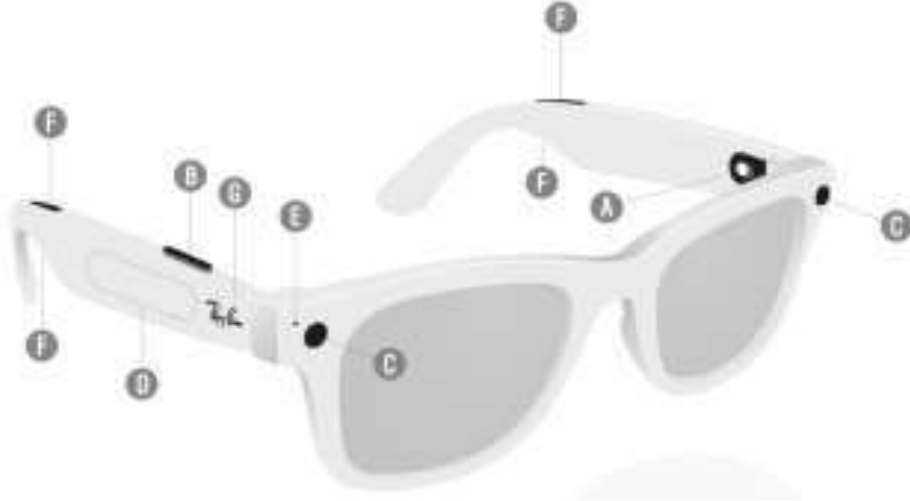
Claim	Claim Language	Accused Products																					
		 (See <i>id.</i> at 33.) As another example shown in the image below, the electronics assembly controls several functional members including two cameras in the frame (reference letter C), the speakers (reference letter F), and the microphone (reference number G):  <table border="0"> <tr> <td>C</td><td>Speakers</td><td>G</td></tr> <tr> <td>Cameras</td><td>Haut-parleurs</td><td>Microphones</td></tr> <tr> <td>Caméras</td><td>Altoparlanti</td><td>Microfoni</td></tr> <tr> <td>Fotocamere</td><td>Altavoces</td><td>Micrófonos</td></tr> <tr> <td>Cámaras</td><td>Alti-falantes</td><td>Microfones</td></tr> <tr> <td>Câmaras</td><td>Lautsprecher</td><td>Mikrofone</td></tr> <tr> <td>Kameras</td><td></td><td></td></tr> </table> (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf.)	C	Speakers	G	Cameras	Haut-parleurs	Microphones	Caméras	Altoparlanti	Microfoni	Fotocamere	Altavoces	Micrófonos	Cámaras	Alti-falantes	Microfones	Câmaras	Lautsprecher	Mikrofone	Kameras		
C	Speakers	G																					
Cameras	Haut-parleurs	Microphones																					
Caméras	Altoparlanti	Microfoni																					
Fotocamere	Altavoces	Micrófonos																					
Cámaras	Alti-falantes	Microfones																					
Câmaras	Lautsprecher	Mikrofone																					
Kameras																							
[13A]	disposing a plurality of electronic components on a capacitive touch switch;	The Accused Products include “<i>disposing a plurality of electronic components on a capacitive touch switch.</i>” For example, the Accused Products include a capacitive touchpad that includes electronic components disposed thereon. These electronic components, for instance, allow for the following: “Unlock a range of hands-free possibilities with voice command – call and message, capture content, and manage media																					

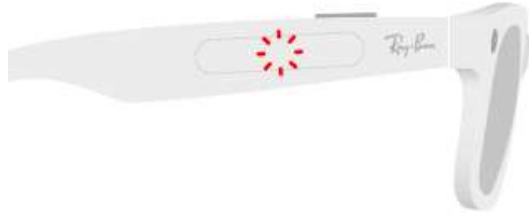
Claim	Claim Language	Accused Products
		settings with your phone in your pocket. Or activate the features in a single touch with the hyper-responsive touchpad and capture button.”  Touchpad Touchpad Touchpad Panel táctil Touchpad Touchpad (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf).

Claim	Claim Language	Accused Products	
		 DOUBLE-TAP TO ANSWER Appuyez deux fois pour répondre. Tocca due volte per rispondere. Toque el panel dos veces para responder. Duplo toque para atender. Doppeltippen, um zu antworten.	 DOUBLE-TAP TO END Appuyez deux fois pour mettre fin à l'appel. Tocca due volte per terminare la chiamata. Toque el panel dos veces para finalizar. Duplo toque para encerrar. Doppeltippen, um zu beenden.

Claim	Claim Language	Accused Products
		  ACCESS Activation · Accedi · Activación · Acesso · Zugang  TAP AND HOLD TO REJECT Appuyez et maintenez pour refuser l'appel. Tieni premuto per rifiutare la chiamata. Toque y mantenga presionado el panel para rechazar. Toque e segure para rejeitar. Zum Ablehnen antippen und halten. TAP AND HOLD OR SAY "HEY FACEBOOK". Appuyez et maintenez ou dites "Hey Facebook". Tieni premuto o pronuncia "Hey Facebook". Toque y mantenga presionado o diga "Hey Facebook". Toque e segure ou diga "Hey Facebook". Antippen oder "Hey Facebook" sagen.

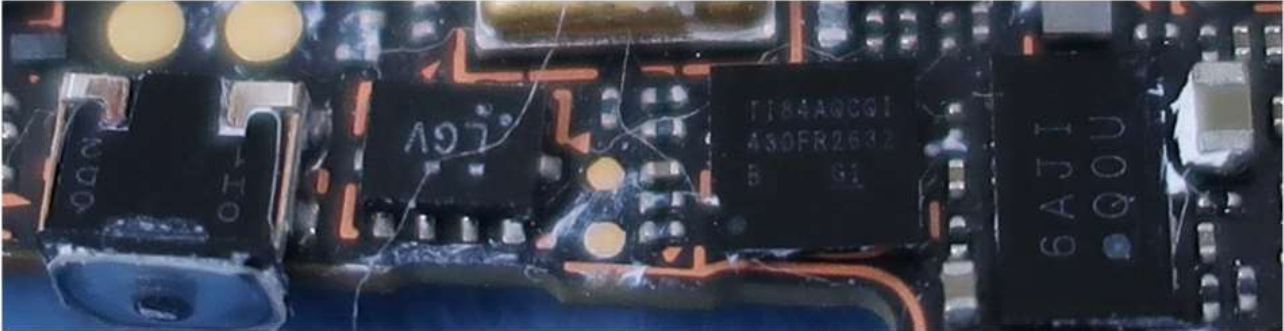
Claim	Claim Language	Accused Products
		 DISMISS Annulation · Annulla · Cancelación · Rejeitar · Ablehne TAP AGAIN OR SAY "HEY FACEBOOK, CANCEL". Appuyez de nouveau ou dites "Hey Facebook, Cancel". Tocca di nuovo o pronuncia "Hey Facebook, Cancel". Toque de nuevo o diga "Hey Facebook, Cancel". Toque novamente ou diga "Hey Facebook, Cancel". Erneut antippen oder "Hey Facebook, Cancel" sagen. (See id.)
[13B]	connecting the plurality of electronic components via electrical connections to form an electronic assembly;	The Accused Products include “<i>connecting the plurality of electronic components via electrical connections to form an electronic assembly.</i>” For example, the Accused Products include a capacitive touchpad that includes electronic components. These electronic components, for instance, allow for the following: “Unlock a range of hands-free possibilities with voice command – call and message, capture content, and manage media settings with your phone in your pocket. Or activate the features in a single touch with the hyper-responsive touchpad and capture button.”

Claim	Claim Language	Accused Products
		 Touchpad Touchpad Touchpad Panel táctil Touchpad Touchpad (See https://media.rayban.com/cms/resource/blob/365824/502ffc3b5fa2b9d54e8ae63aaab536cf/1etrw036-reference-guide-ps-rw-we-mp-v2-1--data.pdf).  DOUBLE-TAP TO ANSWER Appuyez deux fois pour répondre. Tocca due volte per rispondere. Toque el panel dos veces para responder. Duplo toque para atender. Doppeltippen, um zu antworten.  DOUBLE-TAP TO END Appuyez deux fois pour mettre fin à l'appel. Tocca due volte per terminare la chiamata. Toque el panel dos veces para finalizar. Duplo toque para encerrar. Doppeltippen, um zu beenden.

Claim	Claim Language	Accused Products
		  ACCESS Activation · Accedi · Activación · Acesso · Zugang  TAP AND HOLD TO REJECT Appuyez et maintenez pour refuser l'appel. Tieni premuto per rifiutare la chiamata. Toque y mantenga presionado el panel para rechazar. Toque e segure para rejeitar. Zum Ablehnen antippen und halten. TAP AND HOLD OR SAY "HEY FACEBOOK". Appuyez et maintenez ou dites "Hey Facebook". Tieni premuto o pronuncia "Hey Facebook". Toque y mantenga presionado o diga "Hey Facebook". Toque e segure ou diga "Hey Facebook". Antippen oder "Hey Facebook" sagen.

Claim	Claim Language	Accused Products
		 DISMISS Annulation · Annulla · Cancelación · Rejeitar · Ablehne TAP AGAIN OR SAY "HEY FACEBOOK, CANCEL". Appuyez de nouveau ou dites "Hey Facebook, Cancel". Tocca di nuovo o pronuncia "Hey Facebook, Cancel". Toque de nuevo o diga "Hey Facebook, Cancel". Toque novamente ou diga "Hey Facebook, Cancel". Erneut antippen oder "Hey Facebook, Cancel" sagen. <i>(See id.)</i> The electrical components are connected to form an electronic assembly:

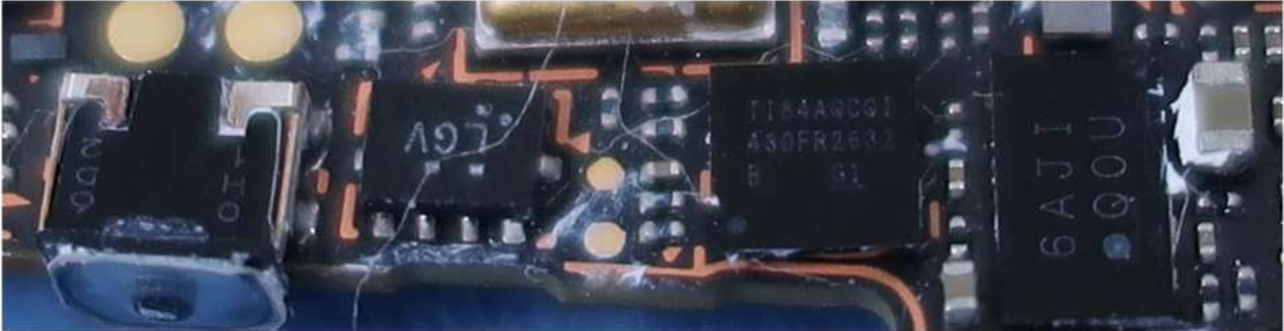
Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.)
[13C]	depositing a conformal layer over at least a portion of the electronic assembly and at least a portion of the capacitive touch switch; and	The Accused Products include “<i>depositing a conformal layer over at least a portion of the electronic assembly and at least a portion of the capacitive touch switch.</i>” For example, in the Accused Products, the metal layer, the ribbon cable, the printed circuit board and the layers therebetween are disposed inside of the right temple. The Accused Products further include a conformal layer that protects the internal electronic components from, for example, water damage. (See https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=5271529 at 3.)

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

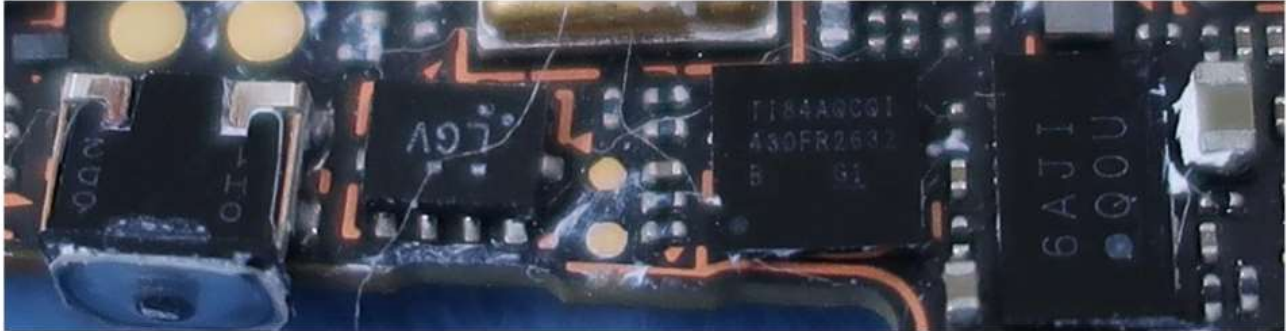
Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.)
[13D]	coupling the electronic assembly and the capacitive touch switch with the conformal layer to an enclosure of an eyewear frame.	The Accused Products include “<i>coupling the electronic assembly and the capacitive touch switch with the conformal layer to an enclosure of an eyewear frame.</i>” For example, in the Accused Products, the metal layer, the ribbon cable, the printed circuit board and the layers therebetween are disposed inside of the right temple. The Accused Products further include a conformal layer that protects the internal electronic components from, for example, water damage. (See https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=5271529 at 3.)

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Exhibit A-05

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005 

Claim	Claim Language	Accused Products
		Brand Name: Ray Ban / Model Name: RW4002, RW4003, RW4004, RW4005  (See https://fcc.report/FCC-ID/2AYOA-4002/5264926.pdf at 22, 28, 32-33.)