

Patent Owner e-Vision Optics, LLC

U.S. Patent No. 8,801,174
IPR2024-01070

October 6, 2025

King & Spalding LLP

IPR2024-01070
e-Vision Optics, LLC EX-2020

Table of Issues

ISSUE	CLAIM(S)	SLIDES
1. Does prior art anticipate or render obvious conductors to constrain the module?	Cls. 1-14	3-12
2. Does Delorenzo anticipate or render obvious an electronics module within the temple?	Cls. 1-14	13-15
3. Does Petitioner satisfy its burden as to method claims?	Cls. 15-19	16-17
4. Would a POSA have implemented Eichelberger's capacitive touch switch within Howell-596?	Cls. 15-19	18-20
5. Is Howell-596 analogous to the '174 patent?	Cl. 16	21
6. Would a POSA have applied Sikoniwiz's conformal coating to a capacitive touch switch?	Cl. 18	22-23

Issue 1: Conductors to constrain the module (Claims 1-14)

Grounds 1, 2, 4-7

'174 Patent, Claim 1

1. A first device, comprising:

a lens housing adapted to support a first lens and a second lens;

a first [and second] temple movably coupled to the lens housing; . . .

an electronics module disposed at least partially within the first temple;

a first [and second] electrical conductor coupled to the first temple,

wherein a first [and second] conductive path is provided...at least in part by the first [and second] electrical conductor; and . . .

wherein the first and second electrical conductors are configured to couple the electronics module to the first temple to constrain the electronics module.

Claim Construction: “constrain”

constrain:

- “As used in this context, ‘constrain’ may refer to when the first electrical conductor is configured to provide support (i.e., a restraining force) for the electronics module to retain the module in a fixed position within the temple.”

EX-1001, 11:52-55.

Claim Construction: “constrain”

constrain:

- “As used in this context, ‘constrain’ may refer to when the first electrical conductor is configured to provide support (i.e., a restraining force) for the electronics module to retain the module in a fixed position within the temple.”

EX-1001, 11:52-55.

substantially constrain:

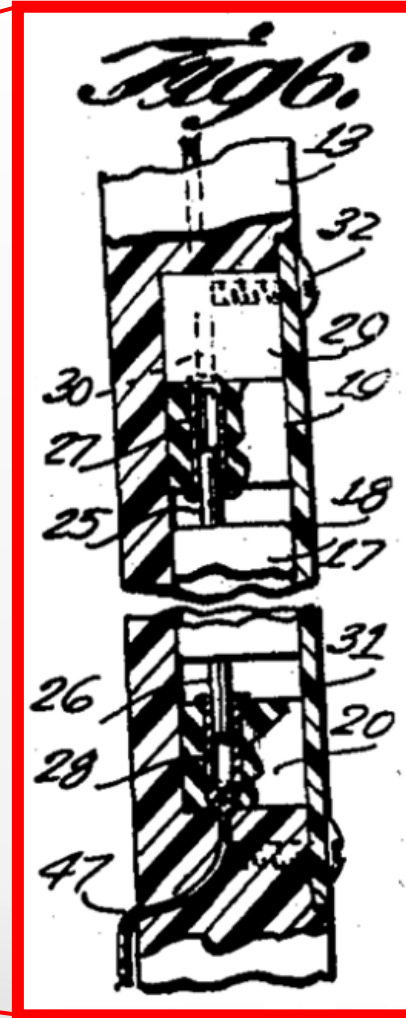
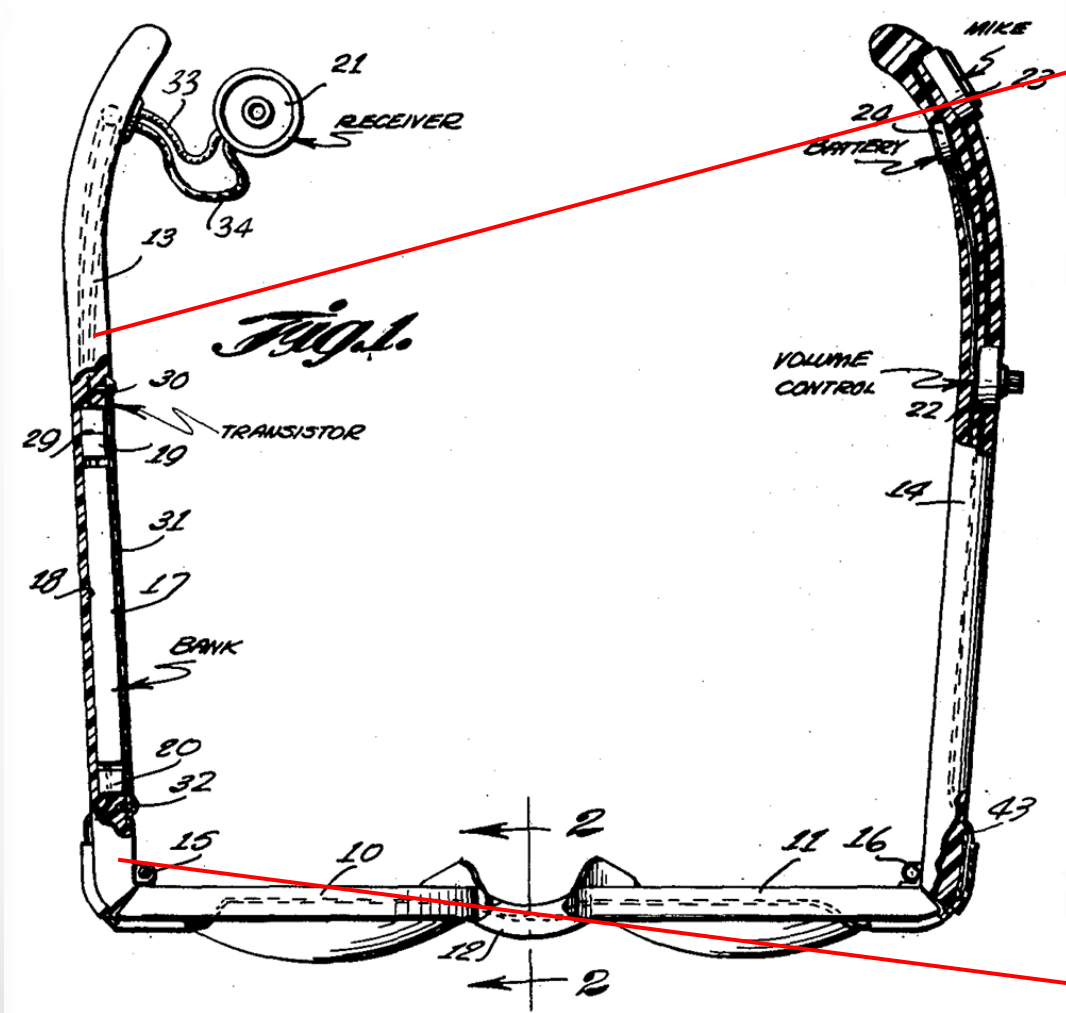
- “The term ‘substantially constrain’ is used in this context to account for some minor movement of the electronics module within the temple....”

EX-1001, 11:65-12:3.

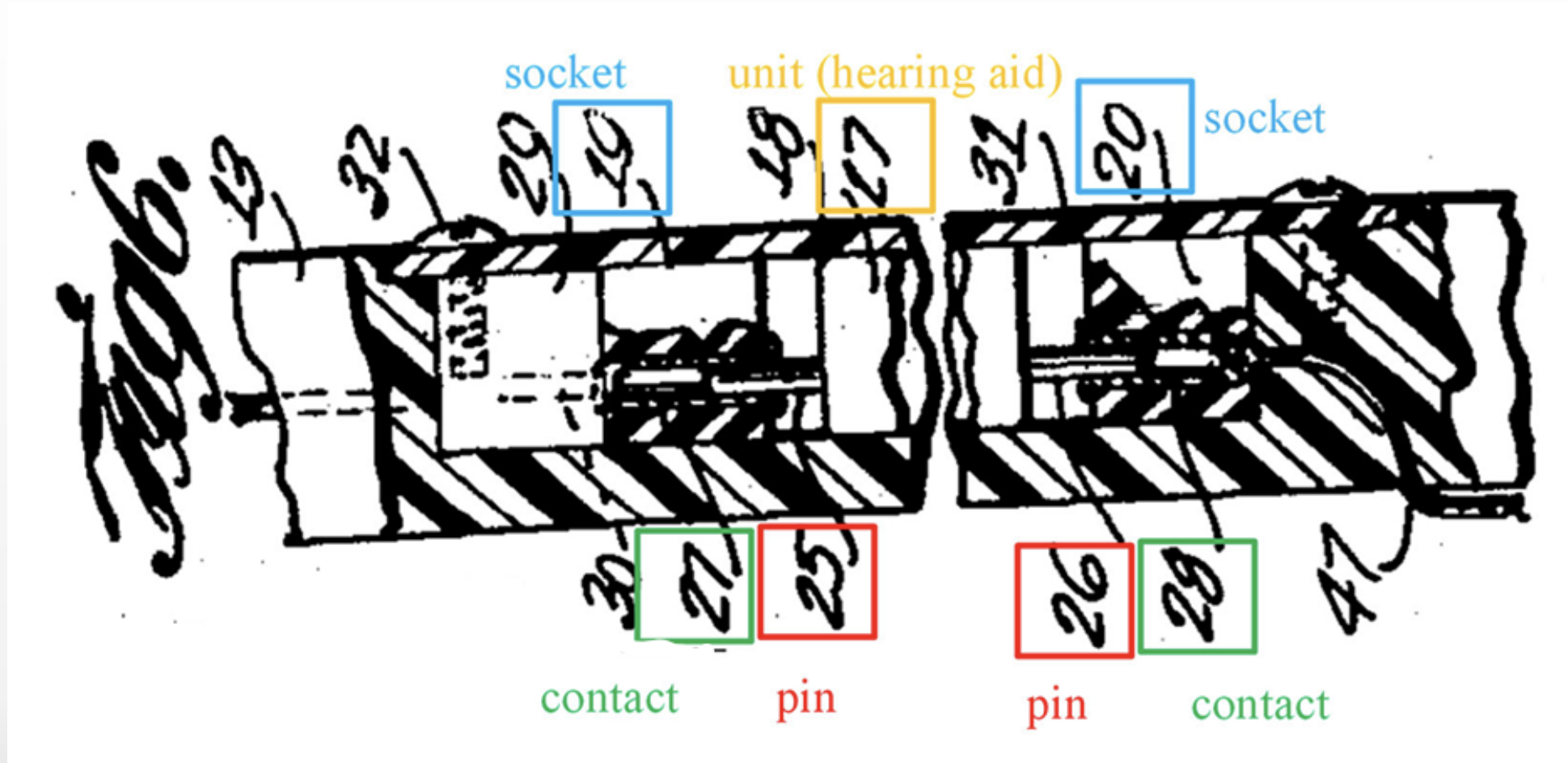
Conductors to constrain the module

Ground(s)	Prior Art
1-2, 4	Brunton (alone or in modifying Kokonaski-999)
5	Hattori-913 (alone)
6-7	Delorenzo (alone)

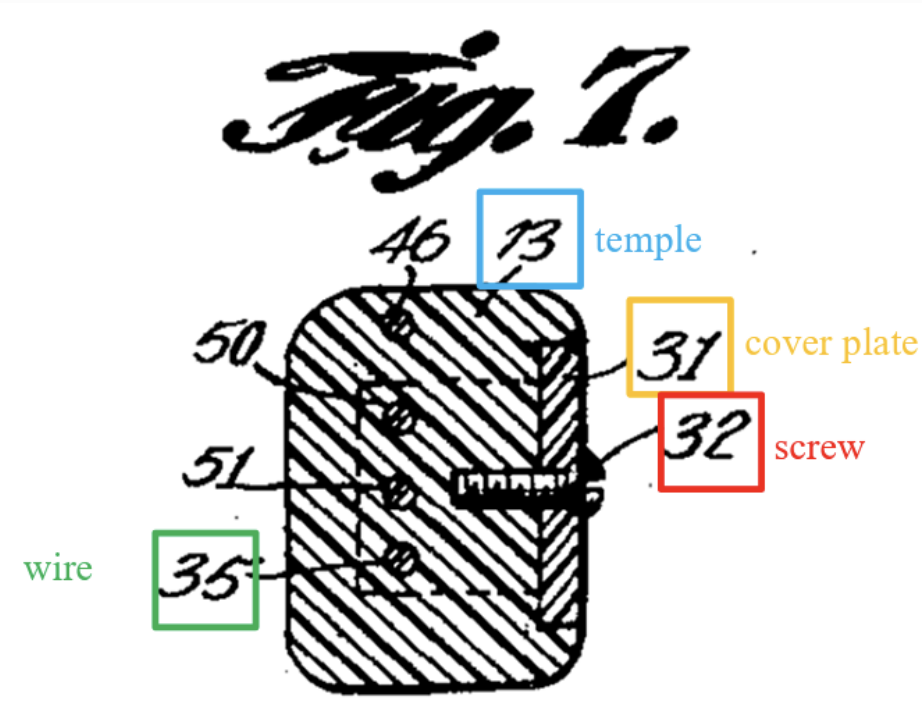
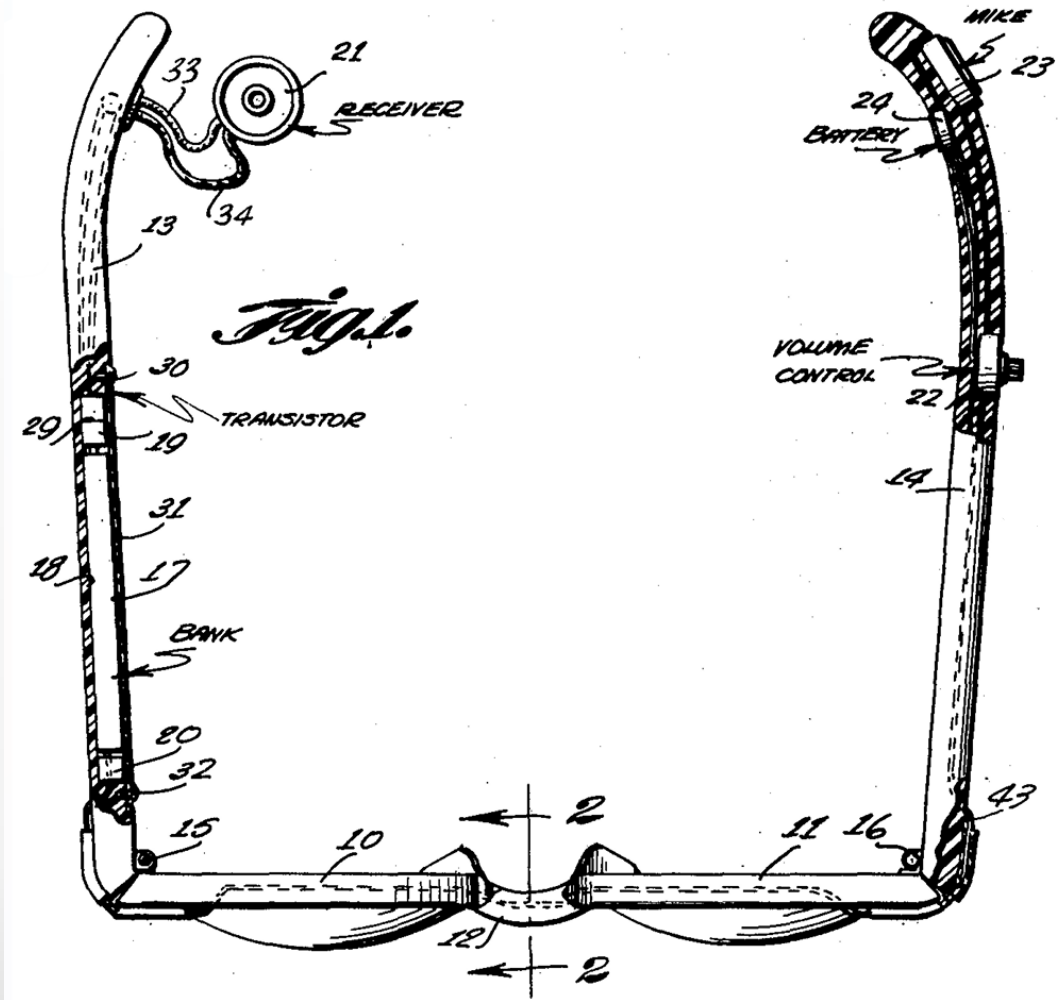
Brunton (Grounds 1-2, 4)



Brunton (Grounds 1-2, 4)



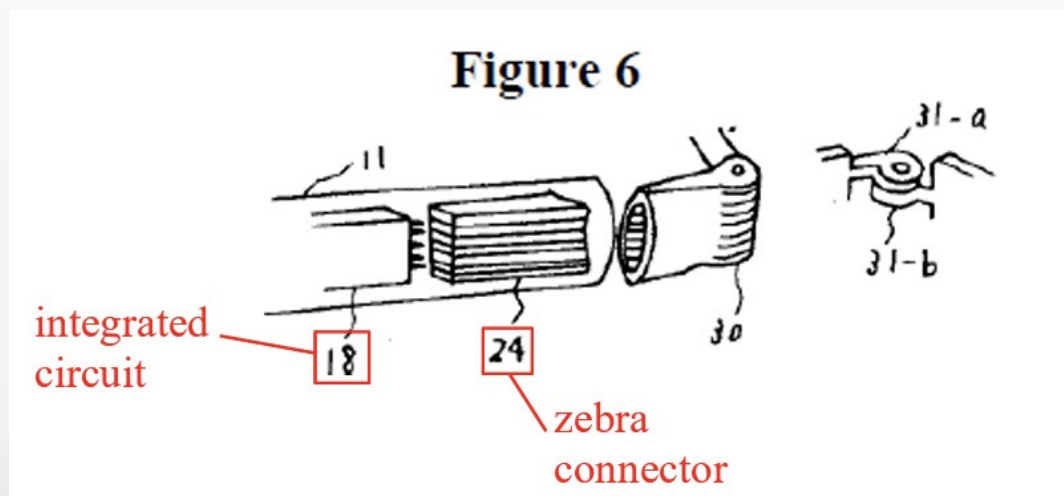
Brunton (Grounds 1-2, 4)



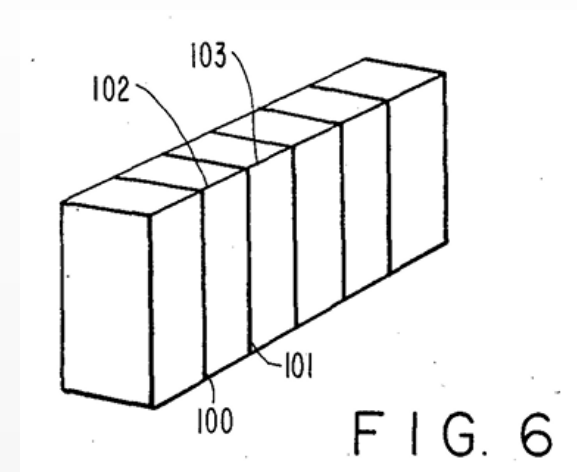
Hattori-913 (Ground 5)

“Zebra connectors ‘make reliable connections by exerting pressure between contacting surfaces.’”

Petition, 51 (quoting EX-1021, 6:50-53).



EX-1006 (Hattori-913), Fig. 6.

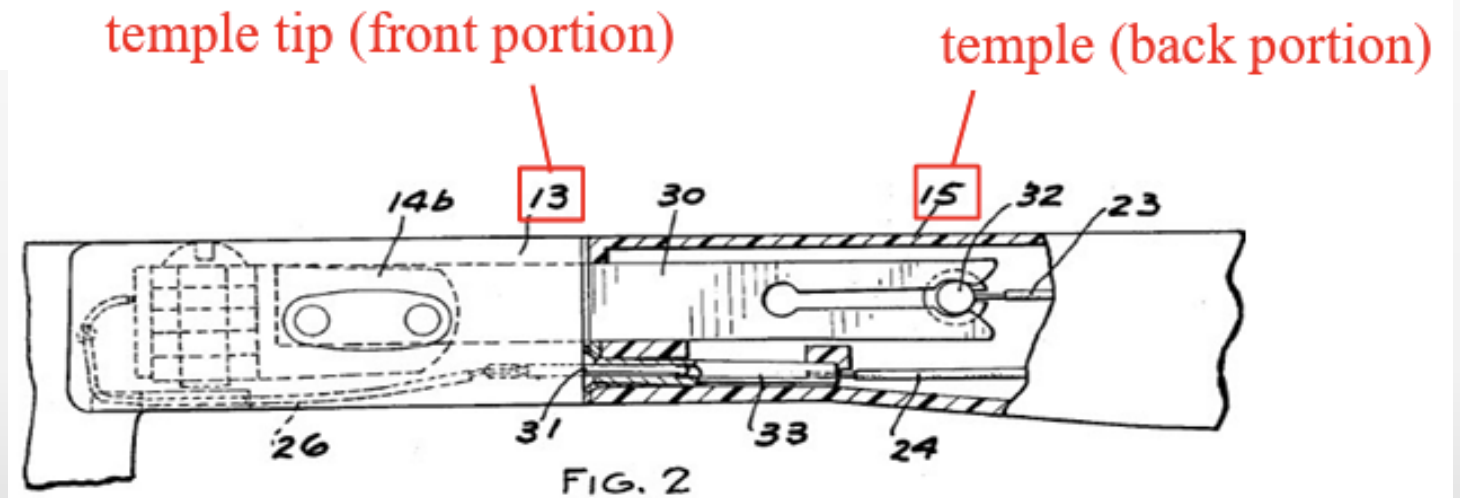
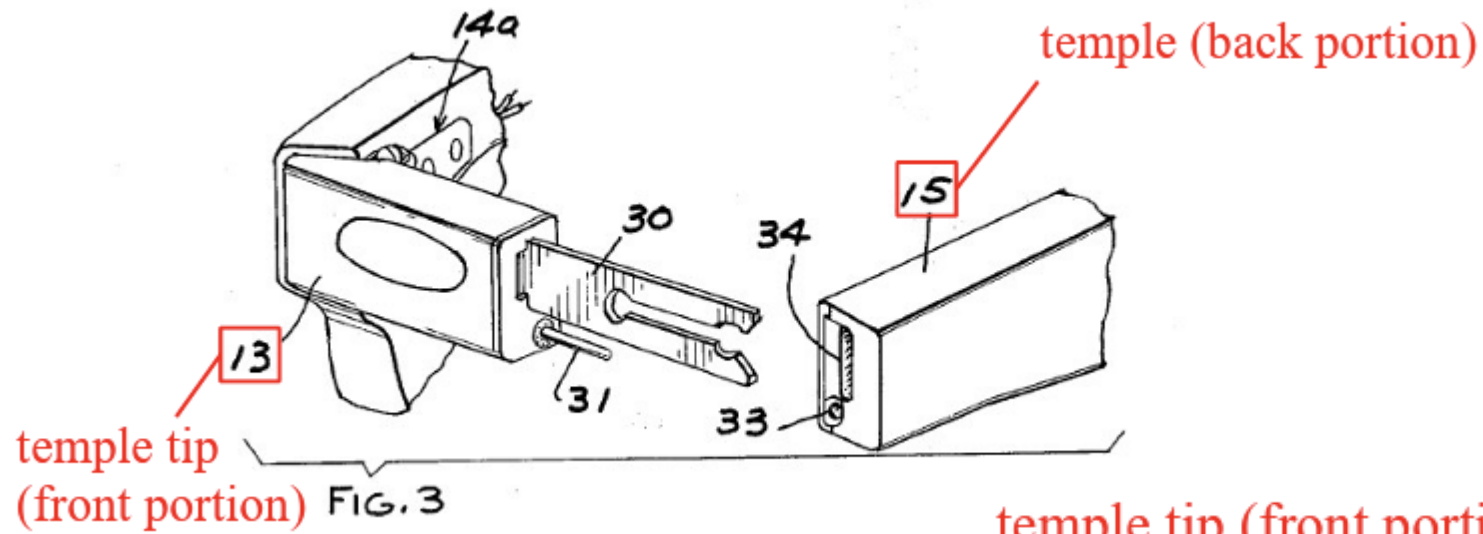


EX-1021, Fig. 6.

“Placed within the aperture is a conductive coupling material sold by many companies and referred to in general as a Zebra strip.”

EX-1002, ¶134 (quoting EX-1021, 6:41-62).

Delorenzo (Grounds 6-7)



Issue 2: Electronics module within the temple (Claims 1-14)

Grounds 6 & 7

'174 Patent, Claim 1

1. A first device, comprising:

a lens housing adapted to support a first lens and a second lens;

a first [and second] temple movably coupled to the lens housing; . . .

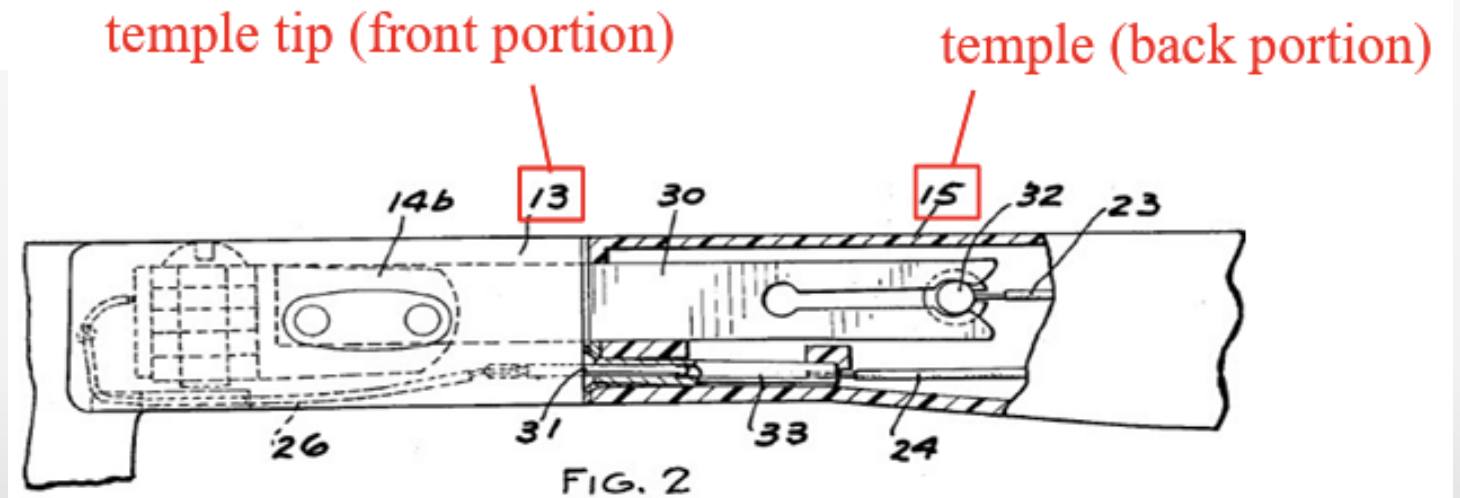
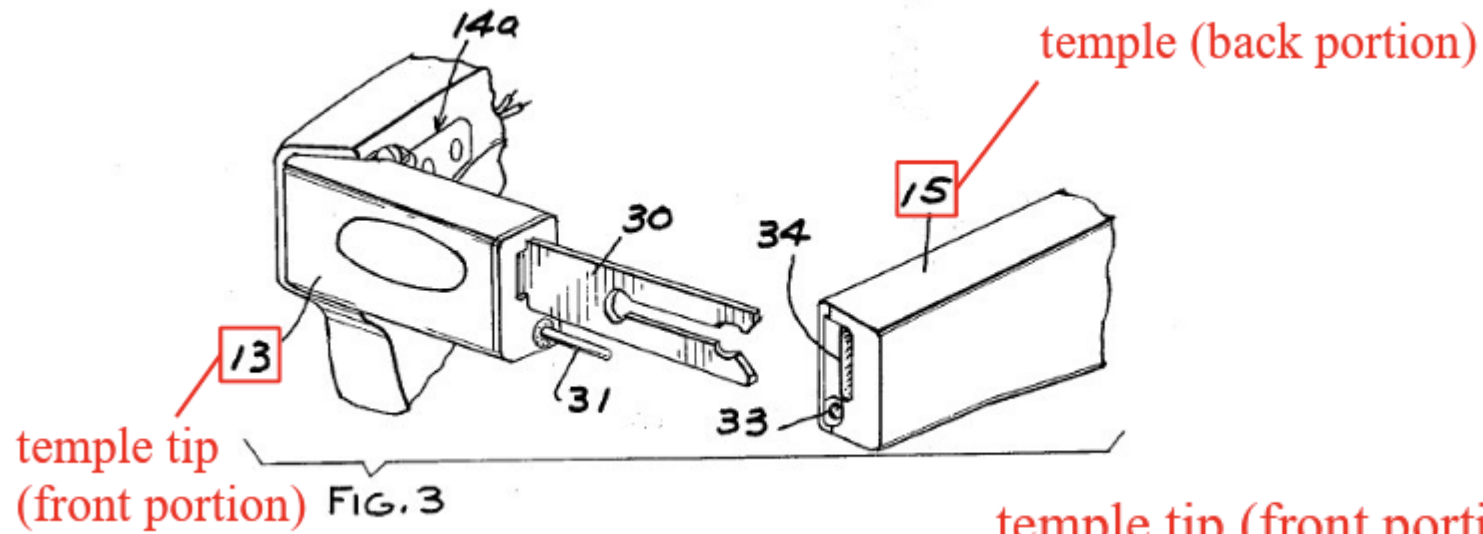
an electronics module disposed at least partially within the first temple;

a first [and second] electrical conductor coupled to the first temple,

wherein a first [and second] conductive path is provided...at least in part by the first [and second] electrical conductor; and . . .

wherein the first and second electrical conductors are configured to couple the electronics module to the first temple to constrain the electronics module.

Delorenzo (Grounds 6-7)



Issue 3: Method Claims (Claims 15-19)

Grounds 8 & 9

***Note overlap with IPR2024-01069 ('355 Patent)**

'174 Patent, Claim 15

15. A first method, comprising:
providing a capacitive touch switch;
disposing a plurality of electronic components on the capacitive switch;
and
coupling the capacitive touch switch to a partial enclosure to constrain the capacitive touch switch.

Issue 4: Capacitive Touch Switch (Claims 15-19)

Ground 9

***Note overlap with IPR2024-01069 ('355 Patent)**

'174 Patent, Claim 15

15. A first method, comprising:

providing a capacitive touch switch;

disposing a plurality of electronic components on the capacitive switch;
and

coupling the capacitive touch switch to a partial enclosure to constrain the capacitive touch switch.

Howell-596's switch 1664

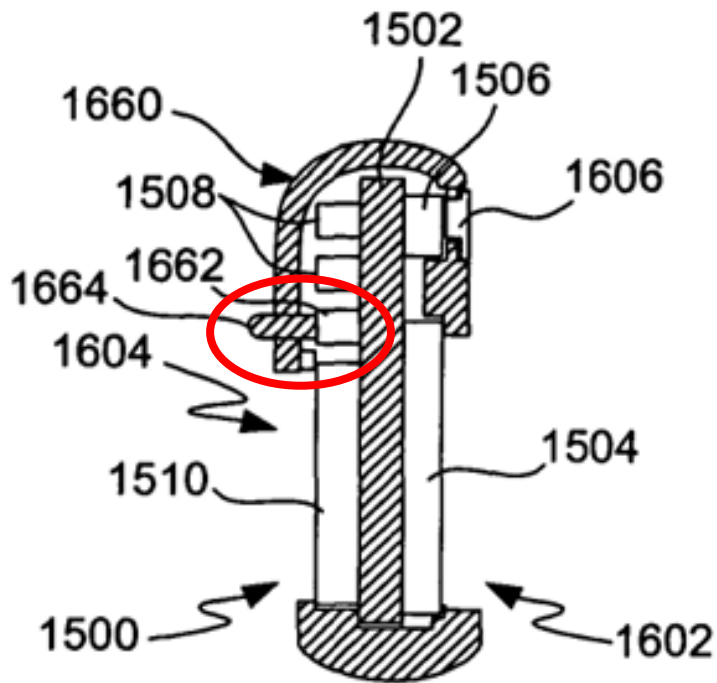


FIG. 16D

“One type of switch is a button switch, such as a push-button switch.”

Howell-596, ¶193.

Issue 5: Non-Analogous Howell-596 (Claim 16)

Ground 9

Issue 6: Conformal Coating (Claim 18)

Ground 9

***Note overlap with IPR2024-01069 ('355 Patent)**

'174 Patent, Claim 18

15. A first method, comprising:

providing a capacitive touch switch;

disposing a plurality of electronic components on the capacitive switch;
and

coupling the capacitive touch switch to a partial enclosure to constrain the capacitive touch switch.

18. The first method of claim 15, further comprising the step of applying a conformal coating to the plurality of electronic components.