

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LUXOTTICA OF AMERICA INC.,

Petitioner,

v.

E-VISION OPTICS, LLC,

Patent Owner.

Case No. IPR2024-01070

Patent No. 8,801,174

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
DEMONSTRATIVE EXHIBIT 1031**

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office P.O.
Box 1450
Alexandria, VA 22313-1450

Pursuant to the Board’s Order Setting Oral Argument (Paper 32), Patent Owner submits the following objections to Petitioner’s demonstratives. The parties met and conferred on October 3, 2025, but did not resolve Patent Owner’s objections.

Slide 31

The call-out from Dr. Oliver’s declaration (Ex-2016, ¶100) in the upper-right quadrant of Slide 31 is misleading because it quotes a typographical error—the omission of the word “not” between “would” and “have” in the first line— which is obvious based on surrounding context from the same paragraph omitted from Petitioner’s slide. (*See* EX-1016, ¶100 (“As stated above, it is Petitioner’s position that a ZEBRA connector constrains an electronics module. I disagree. . . . All Petitioner’s evidence shows is that Hattori-913’s ZEBRA connector makes conductive parts touch and maintain contact for an electrical connection. This does not disclose or render obvious constraining Hattori-913’s integrated circuit by restraining it in place, as required by the ’174 patent claims.”).

Hattori's Zebra Connector Constrains The Electronics Module

▪ Petitioner's expert, Dr. Feland:

134. Due to its construction, a zebra connector can transmit multiple electrical signals while maintaining excellent electrical conductivity and providing mechanical stability. The DiSanto patent, issued in 1986, states:

145. The embedded zebra connector 24 is electrically and mechanically coupled to the integrated circuit 18 in the temple 3. The zebra connector is an elastomeric material that exerts pressure on the integrated circuit's output terminal group 23 by compressing against it, which creates a secure electrical connection and also physically couples the integrated circuit to the temple to retain it in a fixed position. See Ex. 1021, 6:50-53 (Zebra connectors "make reliable connections by

(Ex. 1002, ¶¶134, 145)

▪ PO's expert. Dr. Oliver:

constrains an electronics module. I disagree. In my opinion, a POSITA would have understood an elastomeric material applying pressure to keep conductive parts in contact to disclose or teach a mechanism for constraining an electronics module as required by the claims and intrinsic record. All Petitioner's evidence shows is that

(Ex. 2016, ¶100)

▪ Patent Owner's Response:

claims and Petitioner's own district court construction.⁴ All Petitioner's evidence shows is that Hattori-913's ZEBRA connector makes conductive parts touch and maintain contact. This does not disclose or render obvious constraining Hattori-

to restrain the integrated circuit. At best, Petitioner has merely shown that an elastomeric material (i.e., a flexible or rubber-like material) keeps conductors in contact.

(POR, 49-50, 52)

Reply, 12-14; Sur-Reply, 14-15

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Date: October 3, 2025

Respectfully submitted,

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BY: /Brian Eutermoser/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S OBJECTIONS TO PETITIONER'S DEMONSTRATIVE EXHIBIT 1031** were served by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS), as well as by delivering a copy via electronic mail on October 3, 2025, in their entirety on the following:

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Date: October 3, 2025