UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARASHI VISION (U.S.) LLC (D/B/A INSTA360)
Petitioner,

v.

GOPRO, INC.
Patent Owner.

Patent No. D789,435

Inter Partes Review No. IPR2024-01434

DECLARATION OF PETER BRESSLER

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Photo Review, *The Value of Lens Hoods*, https://www.photoreview.com.au/tips/lens-tips/the-value-of-lens-hoods/ (January 10, 2014)	1031
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J. Cornish, *Aspect Ratios – Part 1,* https://www.onlandscape.co.uk/2010/11/aspect-ratios/ (November 24, 2010)	1033
Digital Photography Review, *SELP 18200 Lens Hood Question*, https://www.dpreview.com/forums/thread/3892859 (August 22, 2015)	1034
Adorama, *Leica Replacement Lens Hood for Summilux-M 35mm 1.4 ASPH Wide Angle Lens*, https://www.adorama.com/lclh3514fm.html#main-product-tabs (October 11, 2014)	1035
GoPro, *GoPro Introduces HERO4 – The Most Powerful GoPro Lineup, Ever*, https://gopro.com/en/us/news/gopro-introduces-hero4-the-most-powerful-gopro-lineup-ever (September 29, 2014)	1036

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I, Peter Bressler, make this declaration in connection with the proceeding identified above.

I. INTRODUCTION

1. I have been retained as an expert witness on behalf of Arashi Vision (U.S.) LLC (d/b/a Insta360) ("Petitioner" or "Insta360") to provide expert opinions on the patentability of United States Patent No. D789,435 ("the D'435 patent").

2. I am being compensated at my normal rate for my analysis, plus reimbursement for expenses. My compensation does not depend on the content of my opinions or the outcome of this proceeding.

II. EXPERIENCE AND QUALIFICATIONS

3. In formulating my opinions, I have relied upon my knowledge, training, and experience in the relevant art. My qualifications are stated more fully in my curriculum vitae, which has been provided as Appendix A. Here, I provide a brief summary of my qualifications.

4. As set forth in my curriculum vitae, I have over 50 years of experience working on designing consumer electronic products. As part of that career, I have designed camera products including cameras and camera housings for RCA commercial and consumer products, Eastman Kodak, and Concord Camera.

III. MATERIALS CONSIDERED

5. In preparing this declaration, I have reviewed, among other things, the D'435 patent and file history. I have also considered each of the documents cited in this Declaration and the documents specifically identified below and in the Exhibit List. In formulating my opinions, I have further relied upon my extensive experience in the relevant fields.

IV. SUMMARY OF THE D'435 PATENT

A. Filing and Priority Dates

6. The D'435 patent was filed on October 26, 2016, and issued on June 13, 2017. The D'435 patent is a continuation of Application No. 29/554,818 (U.S. Design Patent No. D773,546), which was filed on February 16, 2016; and a continuation of Application No. 29/545,934 (U.S. Design Patent No. D769,346), which was filed on November 17, 2015.

B. Claimed Design

7. The D'435 patent is directed toward the ornamental design of a camera as shown in Figures 1-10 (discussed below). As stated in the D'435 patent, it claims "[t]he ornamental design for a camera, as shown and described." (EX1001, Claim.) The descriptions of the figures are: "FIG. 1 is a front, top, and left side perspective view of a camera showing our new design." (EX1001, 1.) "FIG. 2 is a rear, bottom, and right side perspective view thereof." (EX1001, 1.)

"FIG. 3 is a front, top, and right side perspective view thereof." (EX1001, 1.) "FIG. 4 is a rear, bottom, and left side perspective view thereof." (EX1001, 1.) "FIG. 5 is a front elevational view thereof." (EX1001, 1.) "FIG. 6 is a rear elevational view thereof." (EX1001, 1.) "FIG. 7 is a left side elevational view thereof." (EX1001, 1.) "FIG. 8 is a right side elevational view thereof." (EX1001, 1.) "FIG. 9 is a top plan view thereof." (EX1001, 1.) "FIG. 10 is a bottom plan view thereof." (EX1001, 1.) The figures include broken and solid lines, but as the D'435 patent explains, "[t]he broken lines depict portions of the camera in which the design is embodied that form no part of the claimed design." (EX1001, 1.)

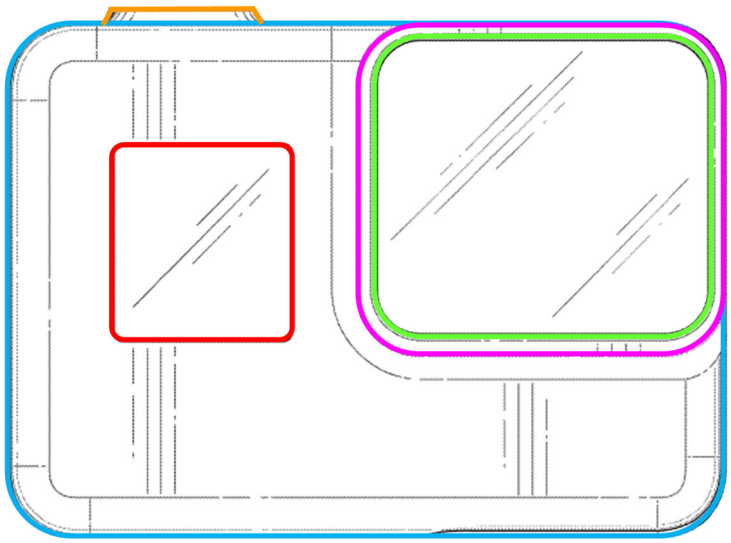


FIG. 5

8. Figure 5 (reproduced and annotated above) is a front elevational view of the D'435 patent claimed design. As shown, the claimed design shows a body that is ***rectangular in shape*** with flat faces. The upper left part of the figure shows a ***top button protrusion***, and on the left side is a ***small rectangle*** located at the front of the design. Additionally, the upper right part of the figure shows two (***pink*** and ***green***) rectangles for a rectangular lens cover. (EX1030, 1; EX1032, 1; EX1031, 3, 6.)

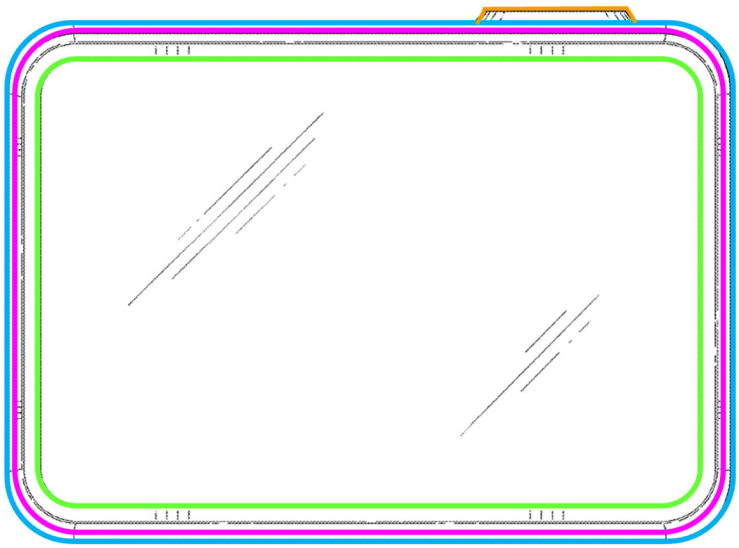


FIG. 6

9. Figure 6 (reproduced and annotated above) is a rear elevational view of the D'435 patent claimed design. As shown, the claimed design teaches a ***rectangular body*** that shows two inner rectangles (***pink*** and ***green***) that occupy a

large part of the back of the design. The upper right part of the figure shows the ***top button protrusion***.

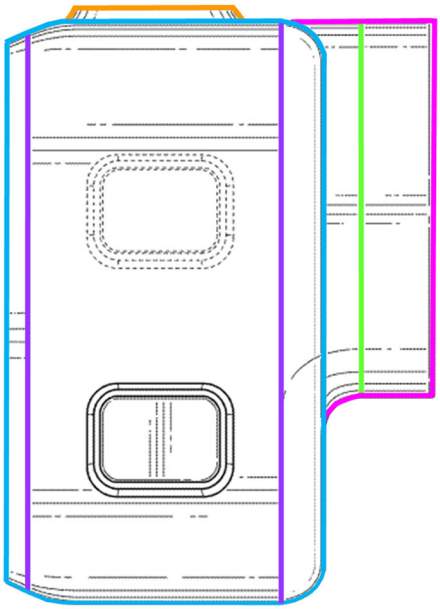


FIG. 7

10. Figure 7 (reproduced and annotated above) is the left side elevational view of the D'435 patent claimed design. As shown, the claimed design shows a ***rectangular body*** with flat faces and ***vertical lines***. The upper part of the figure also shows the ***top button protrusion,*** and the upper right part of the figure shows the ***rectangular lens cover*** protruding outward from the body (towards the right side of the figure). The rectangular lens cover shows a ***vertical line*** that visually divides the rectangular lens cover.

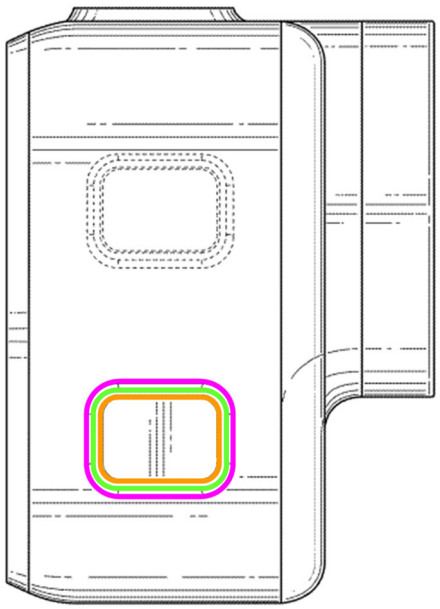


FIG. 7

11. The left side elevational view of Figure 7 (reproduced and annotated above) also shows a rectangular button and/or access element (***pink***, ***green***, and ***orange*** rectangles) located near the bottom of the design.

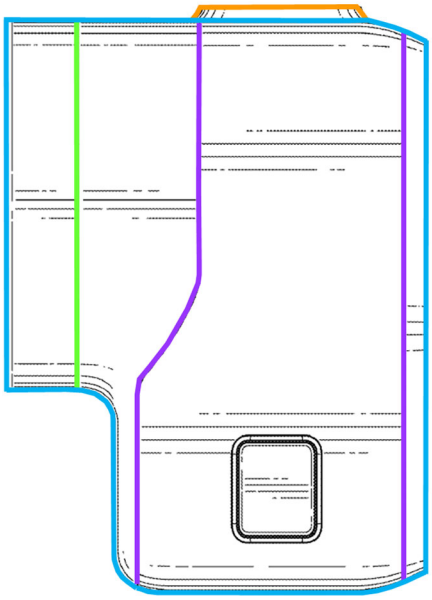


FIG. 8

12. Figure 8 (reproduced and annotated above) is the right side elevational view of the D'435 patent claimed design. As shown, the claimed design shows a ***rectangular body*** including ***vertical lines***. The top part of the figure shows the ***top button protrusion***. The figure also shows the ***rectangular lens cover*** protruding outward from the front of the body (towards left side of the figure) and shows a ***vertical line*** that visually divides the rectangular lens cover.

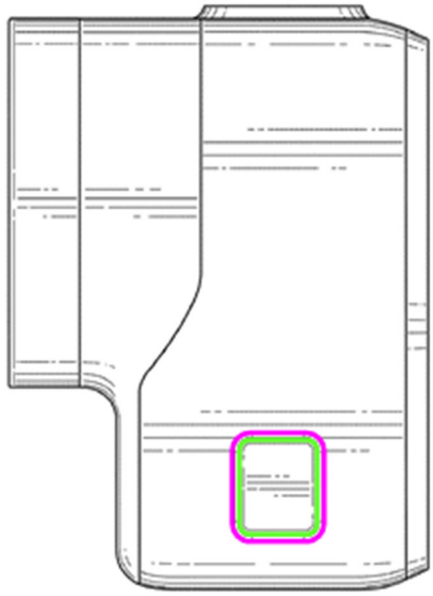


FIG. 8

13. The right side elevational view of Figure 8 (reproduced and annotated above) also shows a rectangular button and/or access element (***pink*** and ***green*** rectangles) located near the bottom of the design.

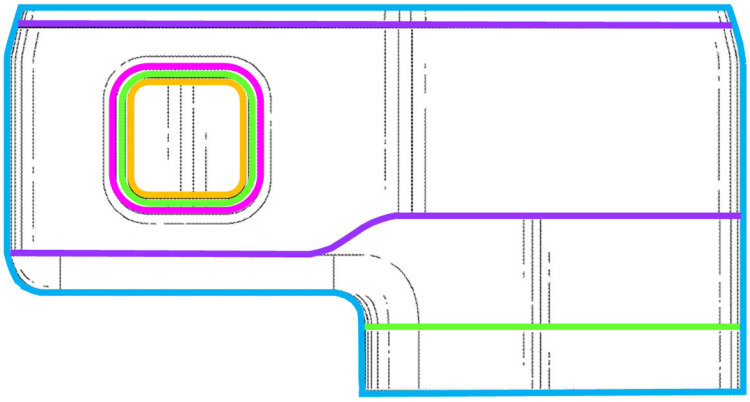


FIG. 9

14. Figure 9 (reproduced and annotated above) is the top plan view of the D'435 patent claimed design. As shown, the claimed design shows a ***rectangular body*** including ***horizontal lines***. The bottom right side of the figure also shows the ***rectangular lens cover*** protruding outward from the body (towards the bottom of the figure) and including a ***horizontal line*** that visually divides the rectangular lens cover. The top button is shown in the figure as three (***pink***, ***green***, and ***orange***) rectangles, shown in the left part of the figure.

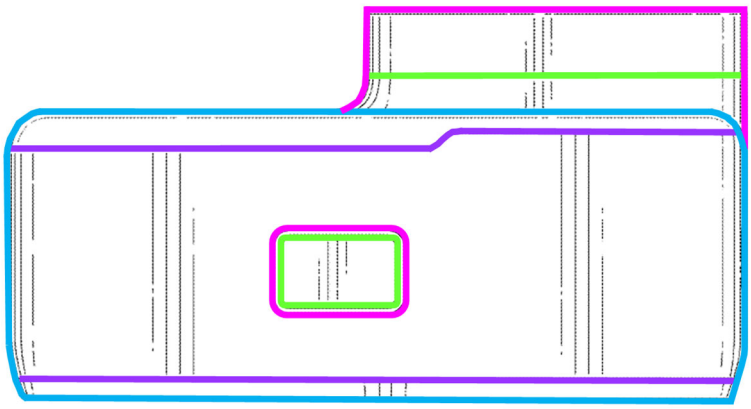


FIG. 10

15. Figure 10 (reproduced and annotated above) is the bottom plan view of the D'435 patent claimed design. As shown, the claimed design shows a ***rectangular body*** including ***horizontal lines***. The upper right part of the figure shows the ***rectangular lens cover*** protruding outward from the body (towards the upper part of the figure) and including a ***horizontal line*** that visually divides the

rectangular lens cover. In the middle of the figure are two small (***pink*** and ***green***) rectangles for a button and/or access element. (*Id.*)

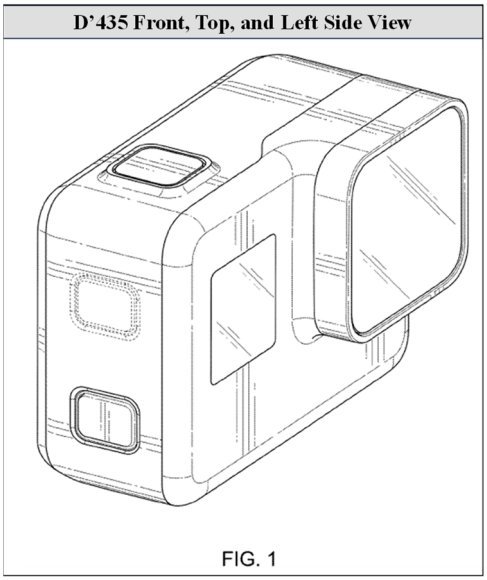


FIG. 1

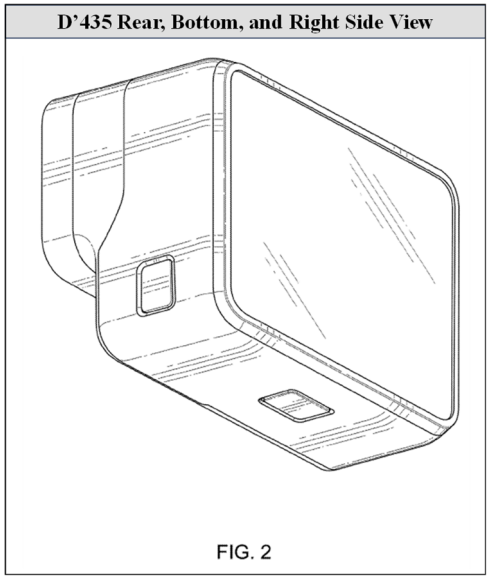


FIG. 2

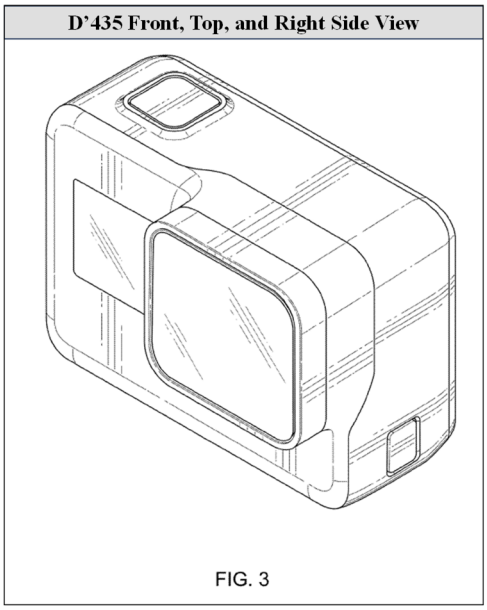


FIG. 3

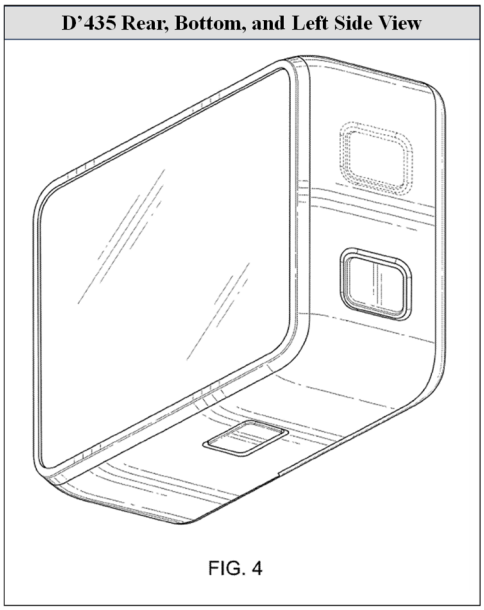


FIG. 4

16. Figures 1-4 (reproduced above) show the perspective views of the claimed design of the D'435 patent. The 10 figures of the D'435 patent together give an ordinary designer in the field an overall visual impression of a rectangular

"box-like" design for a camera or camera housing, including a rectangular body with flat faces, a rectangular enclosure for the lens (lens hood or lens cover) that protrudes from the front face of the body, rectangular buttons/access elements, rectangles for displays (front and rear), etc.

C. Prosecution History

17. I understand that during prosecution of the D'435 patent, the Examiner did not issue any Office Actions. (EX1003.)

18. On October 26, 2016, Applicant filed the application with the same specification and claim that became the D'435 patent. (EX1003, 41-71.) On March 16, 2017, the examiner issued a Notice of Allowance. (EX1003, 15-19.)

V. RELEVANT LEGAL STANDARDS AND DEFINITIONS

A. Obviousness

19. I have been informed by counsel and understand that a claim is unpatentable if the claimed design would have been obvious at the time of the invention to a designer of ordinary skill who designs articles of the type involved. I have also been informed that obviousness in a design patent starts with a primary reference that is something in existence and is visually similar to the claimed design. To assess obviousness, I have been informed that I am to consider the differences between the primary reference and the claimed design by comparing the visual appearance from the perspective of an ordinary designer in the field of

the article of manufacture. I have been informed that if the differences are *de minimus*, insubstantial, or insignificant, then the claimed design is obvious.

20. I have also been informed that a claimed design is obvious if an ordinary designer in the field would have been motivated to modify the primary prior art design with visual elements from additional prior art reference(s), to lead to the same overall visual appearance as the claimed design. The obviousness inquiry must focus on the visual impression of the claimed design as a whole and not on selected individual pieces.

B. Prior Art

21. I am informed by counsel and understand that prior art includes patents and printed publications that existed before the effective filing date of the claimed invention. The effective filing date is the earliest claimed priority date or the earliest filing date of the application that describes the subject matter. A patent or published patent application is prior art if it was filed before the earliest filing date of the claimed invention, absent a few exceptions. I have been informed that a patent or published patent application is entitled to have its effective filing date as the filing date of its provisional application if the disclosure of the provisional application provides support for the claim(s) of the patent or published patent application.

VI. LEVEL OF SKILL OF AN ORDINARY DESIGNER FOR THE D'435 PATENT

22. I am informed and understand that under the law various factors may be considered in determining an ordinary designer skilled in the art. I am informed and understand that in the law one or more factors may be considered including: (1) the education level of the inventors; (2) the type of problems encountered in the art; (3) prior art solutions to those problems; (4) the rapidity with which innovations are made; (5) sophistication of the technology; and (6) education level of active workers in the field.

23. I understand that Petitioner proposed that the level of skill of an ordinary designer in the field of the D'435 patent would have a bachelor's degree in industrial design or an equivalent field, or two years of experience designing cameras or camera housings.

24. I agree with this level of skill of an ordinary designer for the D'435 patent. Based on my experience, I understand and know of the capabilities of a designer of this skill level as of the time that the D'435 patent priority application was filed in 2015. I am familiar with how an ordinary designer would have understood and used the terminology found in the D'435 patent at the time of its filing, and with the state of the art at that time.

VII. CLAIM CONSTRUCTION

25. I have been informed and understand that the claim in a design patent is defined by the drawings. I have also been informed that for claim construction for a design patent, a detailed verbal description of the claimed design is not required but may be helpful.

26. I have been informed that, in the context of this proceeding, Petitioner considers the D'435 patent based on the solid lines along with verbal descriptions of certain features relevant to the prior art. Here, the solid lines show that the D'435 patent, as a whole, gives an ordinary designer an overall visual impression of a rectangular "box-like" design for a camera/camera housing. The design encompasses a rectangular body with flat faces, a rectangular lens cover that protrudes outward from the front of the body, rectangular buttons/access elements on the top, left, right, and bottom sides, and rectangles for displays at the front and rear of the design. I agree with Petitioner. For purposes of this declaration, I have also interpreted the challenged claims based on the breadth of GoPro infringement allegations in the related International Trade Commission (ITC) proceeding. (EX1037; EX1038.)

VIII. PRIOR ART

27. I understand that each of the below-listed references discussed herein qualifies as prior art against the D'435 patent. I note that the Examiner never

characterized, and Applicant never cited: DC Rainmaker, DP Review, Stoilov, Gigazine, Amazon, Gioscia, Wang, Woodman, Huang, Heo, Li, or McVicker. Chen680 and Chen686 were disclosed during prosecution, but never substantively discussed or applied against the clamed design of the D'435 patent.

28. DC Rainmaker, *GoPro Hero4 Silver & Hero4 Black In-Depth Review*, DC Rainmaker, published on November 13, 2014 ("Maker," EX1004);

29. Digital Photography Review, *GoPro announces Hero4 lineup*, Digital Photography Review, published on September 29, 2014 ("DP Review," EX1006);

30. Stoilov, *GoPro Hero4 Official Specs: 4K/30fps, Built-in Touch Screen, 1080/120fps*, 4K Shooters, published on September 26, 2014 ("Stoilov," EX1008);

31. Gigazine, *I tried 4K shooting with the new "GoPro HERO4" Black and Silver Review*, Gigazine, published on October 31, 2014 ("Gigazine," EX1010);

32. Amazon, *GoPro Hero4 Silver*, Amazon, published on October 3, 2014 ("Amazon," EX1011);

33. U.S. Design Patent No. D710,921 ("Gioscia," EX1013) was filed on July 18, 2013, and issued on August 12, 2014;

34. U.S. Design Patent No. D750,680 ("Chen680," EX1014) was filed on January 20, 2015, and issued on March 1, 2016;

35. Chinese Patent Pub. No. 204360078 ("Wang," EX1015, EX1016 (English Translation)) was filed on December 30, 2014, and published on May 27, 2015;

36. U.S. Design Patent No. D750,686 ("Chen686," EX1018) was filed on January 20, 2015, and issued on March 1, 2016;

37. U.S. Design Patent No. D702,747 ("Woodman," EX1019) was filed on September 11, 2012, and issued on April 15, 2014;

38. Chinese Design Pub. No. 30344022 (EX1020) ("Huang," EX1020, EX1021 (English Translation)) was filed on February 11, 2015, and published on November 11, 2015;

39. Korean Design Pub. No. 300792432 ("Heo," EX1023, EX1024 (English Translation)) was filed on April 30, 2014, published on April 16, 2015, and issued on April 9, 2015;

40. Chinese Design Pub. No. 303358967 ("Li," EX1026, EX1027 (English Translation)) was filed on February 17, 2015, and published on September 2, 2015; and

41. U.S. Utility Patent No. 9,864,258 ("McVicker," EX1029) was filed on August 22, 2015, and issued on January 9, 2018.

1. Overview of Hero4

42. The Hero4 design includes a transparent camera case that is designed to fit the camera like a glove and designed to show components (front display, right side button/access element, bottom button/access element) of the camera (via transparent portions in the camera case) as part of the overall appearance of the design. (EX1004, 11.) The Hero4 design is shown in several publications, such as Maker, Digital Photography (DP) Review, Stoilov, Gigazine, and Amazon.

43. Maker was posted on the DC Rainmaker website. (EX1004.) Digital Photography Review was posted on the Digital Photography website. (EX1006.) Stoilov was posted on the 4K Shooters website. (EX1008.) Gigazine was posted on the Gigazine website. (EX1010.) Amazon was posted on the Amazon website. (EX1011.) I refer to these publications collectively as the "Hero4 Publications." The Hero4 Publications are authentic and were publicly available to an ordinary designer before the earliest priority date for the D'435 patent. I am personally familiar with these websites. The DC Rainmaker website (https://www.dcrainmaker.com) is a blog from Ray Maker that started in 2007 to discuss technology, such as cameras and camera housings, used for runners, cyclists, and triathletes. An ordinary designer would have been familiar with Ray Maker, not only from his blog, but also from the information he disseminates using other public sources. For example, Mr. Maker has been posting videos on

YouTube, a well-known video sharing platform that is public and reaches a wide audience including members of the camera field, since 2007 and currently has over 512K subscribers[1]. The Digital Photography (DP) Review website (https://www.dpreview.com) is a website about digital cameras and digital photography that started in 1998 and is known by members in the camera field. DP Review is a well-known website viewed by members of the camera field. In 2007, it had an excess of 7 million unique viewers monthly[2]. The 4K Shooters website (https://www.4kshooters.net) is a website that delivers news, reviews, and insights regarding 4K cameras and is known by members in the camera field. The Gigazine website (https://www.gigazine.net) is blog site that started in 2000 and provides articles and reviews about new products to the public, including members of the camera field. The Amazon website (https://www.amazon.com) is well-known company and website that allows members of the camera field, to purchase and receive information about products including design views of products. An ordinary designer would have known about these websites, which

[1] DC Rainmaker, *DC Rainmaker*, YouTube, https://www.youtube.com/@Dcrainmaker/videos.

[2] Paul Sawers, *Amazon Acquires dpreview.com*, TechCrunch (May 14, 2007), https://techcrunch.com/2007/05/14/amazon-acquires-dpreviewcom/.

were readily accessible at that time through, *e.g.*, public search engines. To the best of my knowledge, DC Rainmaker, DP Review, 4K Shooters, Gigazine, and Amazon websites are public (*e.g.*, no access restrictions), searchable, and intended to reach a wide audience. These websites are freely accessible, so an ordinary designer would not have been restricted (*e.g.*, need a subscription or account) in accessing the Hero4 Publications. An ordinary designer interested in the technology would have known about these websites and would have readily located the information posted on these websites with reasonable diligence.

44. Maker indicates that it was posted on November 13, 2014, and archived on November 15, 2014. (EX1004, 1; EX1005.) DP Review indicates that it was posted on September 29, 2014, and archived on October 1, 2014. (EX1006, 1; EX1007.) Stoilov indicates that it was posted on September 26, 2014, and archived on October 1, 2014. (EX1008, 1; EX1009.) Gigazine indicates that it was posted on October 31, 2014. (EX1010, 1.) Amazon indicates that it was posted on October 3, 2014, and archived on October 3, 2014. (EX1011, 1; EX1012.) In my experience, an ordinary designer would have relied on the dates posted on the publications. Further, Patent Owner posted a public announcement of Hero4 on its website on September 29, 2014. (EX1036.) Thus, Hero4 and the Hero4 Publications were publicly available by at least November 15, 2014 (more than 1-year before the earliest priority date of the D'435 patent).

45. The Hero4 publications show different views of Hero4, such as the front, top, and left side view, the rear, bottom, and right side view, the front, top, and right side view, the front view, the rear view, the right side view, and the bottom view (without a case). The images are:

Hero4 Front, Top, and Left Side View



Hero4 Rear, Bottom, and Right Side View



D'435 Front, Top, and Right Side View



Hero4 Front View



Hero4 Rear View



Hero4 Right Side View



Hero4 (Without Case) Bottom View



(EX1004; EX1006; EX1008; EX1010; EX1011; EX1036.)

46. As shown in the images above and as discussed in further detail in paragraphs 66-83, Hero4's design, as published, shows a rectangular body with flat faces and radiused corners, a protruding rectangular lens cover including a visible line, and rectangles for displays (left side of the front of the design that is flush with the front face, and in back that occupies a large part of the back of the design).

(EX1006, 4.) The design also shows buttons and access elements, including buttons on the top and left side, and rectangular access elements located on the right side and bottom of the design. (EX1006, 3, 4; EX1010, 11.) The images give Hero4 an overall visual impression of a rectangular "box-like" design with a rectangular lens cover that protrudes from the upper right corner of the front of the body.

2. Overview of Gioscia

47. Gioscia discloses a "camera housing" design and uses 10 figures to show different views of its design. (EX1013, Title.) The figures are:

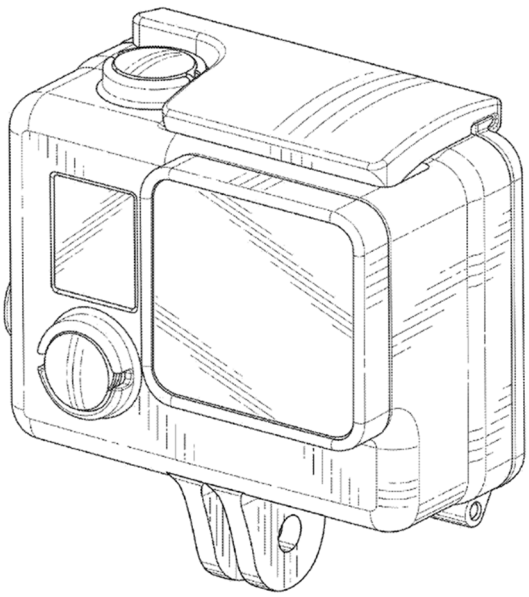
Figure 1 shows a front, top, and right side perspective view.	**Gioscia Front, Top, and Right Side View**  FIG. 1

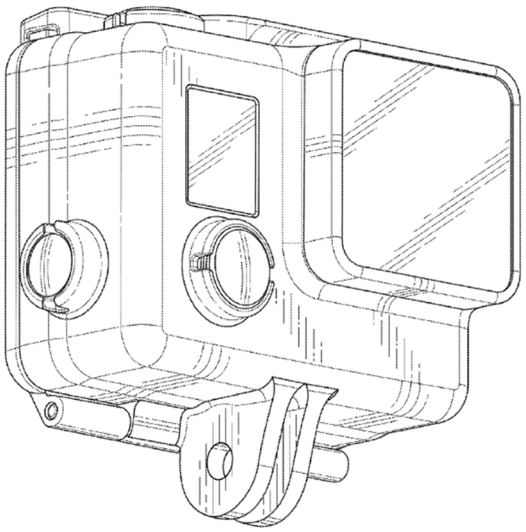
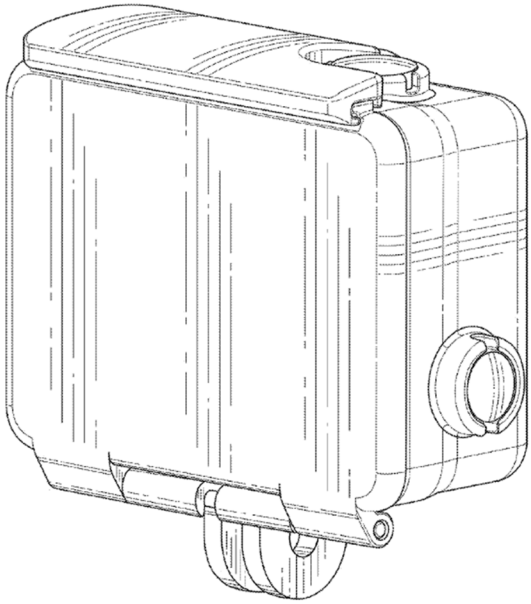
Figure 2 shows a front, bottom, and left side perspective view.	**Gioscia Front, Bottom, and Left Side View**  FIG. 2
Figure 3 shows a back, top, and left side perspective view.	**Gioscia Back, Top, and Left Side View**  FIG. 3

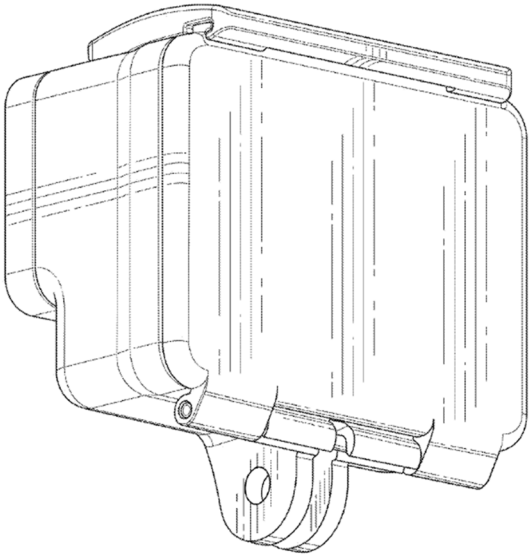
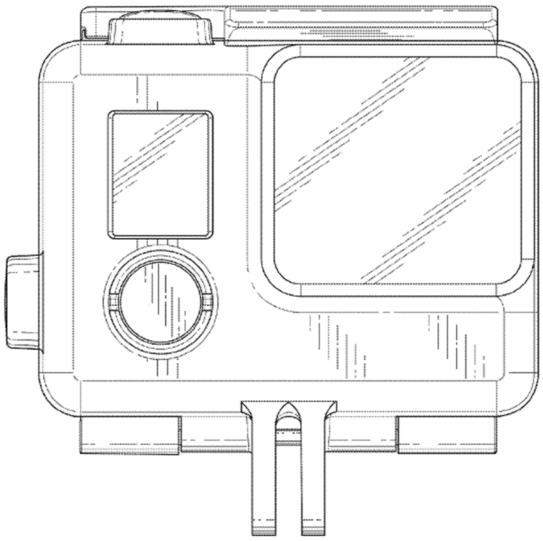
Figure 4 shows a back, bottom, and right side perspective view.	**Gioscia Back, Bottom, and Right Side View**  FIG. 4
Figure 5 shows a front elevational view.	**Gioscia Front View**  FIG. 5

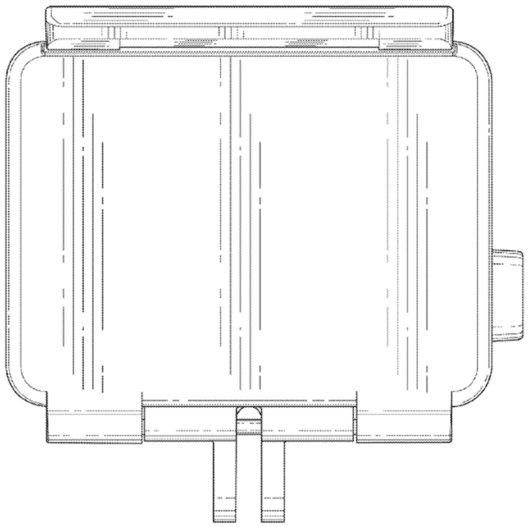
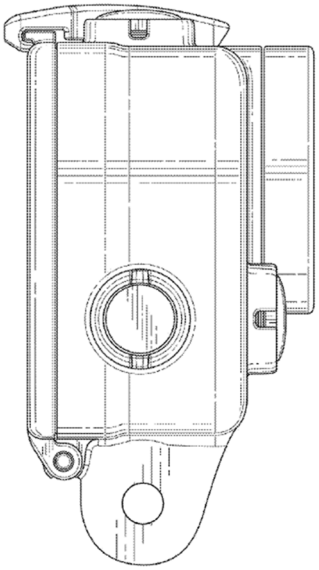
Figure 6 shows a back elevational view.	**Gioscia Back View**  FIG. 6
Figure 7 shows a left side elevational view.	**Gioscia Left Side View**  FIG. 7

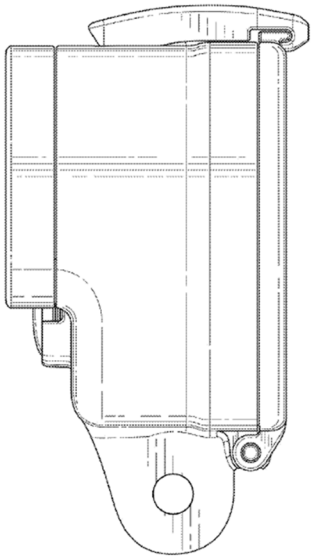
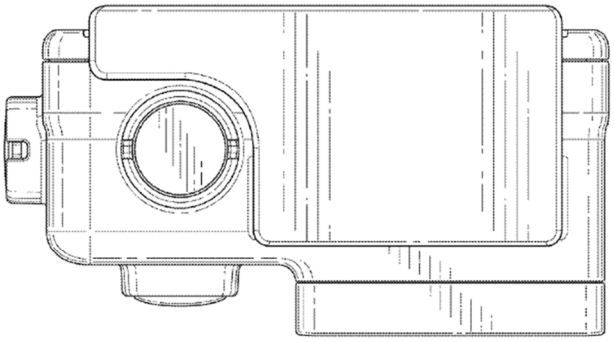
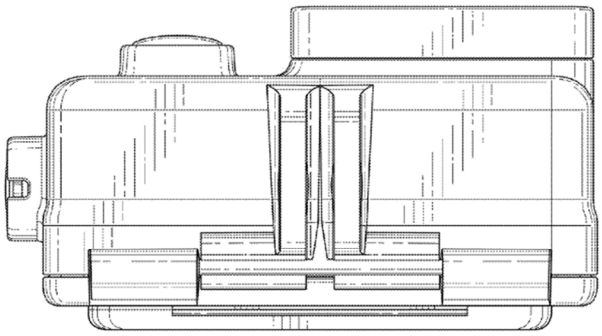
Figure 8 shows a right side elevational view.	**Gioscia Right Side View**  FIG. 8
Figure 9 shows a top plan view.	**Gioscia Top View**  FIG. 9

Figure 10 shows a bottom plan view.	**Gioscia Bottom View**  FIG. 10

48. As shown in Gioscia's figures above and as discussed in further detail in paragraphs 84-107, its design shows a rectangular body with flat faces and radiused corners, and a rectangular lens cover that protrudes outwards from the upper right corner of the front of the body. (EX1013, Figs. 1-10.) The front elevational view of Figure 5 shows a rectangle for a display at the front of the design (located near the left side) that is flush with the front face. (EX1013, Fig. 5.) The design shows a button that protrudes from the top of the design, near the left side in the front elevational view (Figure 5). (EX1013, Fig. 5) The rear elevational view of Figure 6 shows rectangles that occupy a large part of the back of the design. (EX1013, Fig. 6.) The design shows a button/access element on the left side as shown in Figure 7. (EX1013, Fig. 7.) The right side (Figure 8) and left

side (Figure 7) also show that the body and rectangular lens cover showing vertical lines. (EX1013, Fig. 7, Fig. 8.) The figures give Gioscia an overall visual impression of a rectangular "box-like" design with a rectangular lens cover that protrudes from the upper right corner of the front of the body.

3. Overview of Chen680

49. Chen680 discloses a "camera housing" design and uses eight figures to show different views of its design. (EX1014, Title.) The figures are:

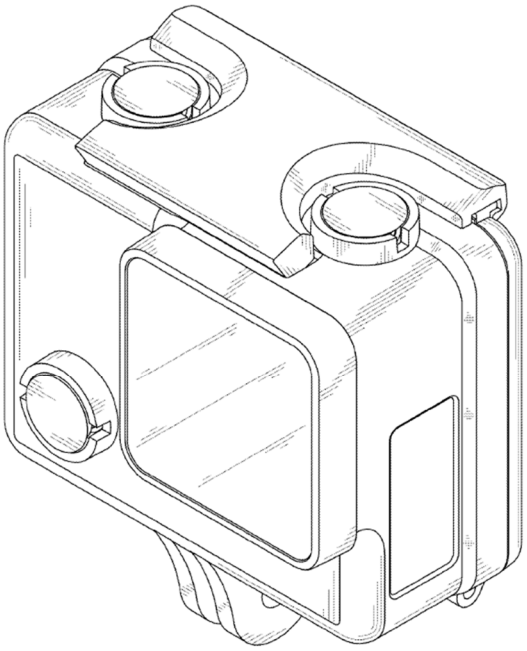
Figure 1 shows a front, top, and right side perspective view.	**Chen '680 Front, Top, and Right Side View**  FIG. 1

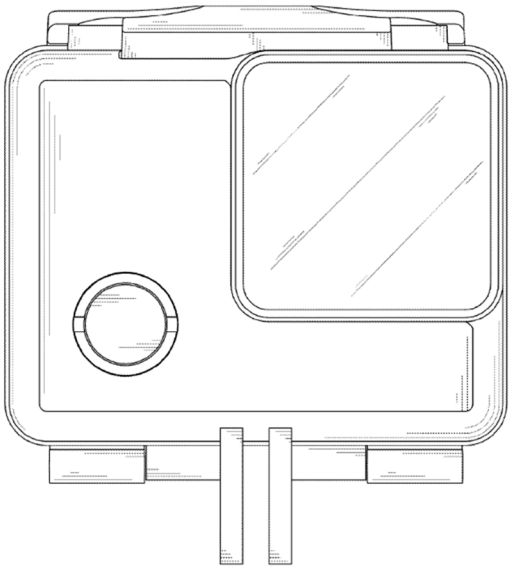
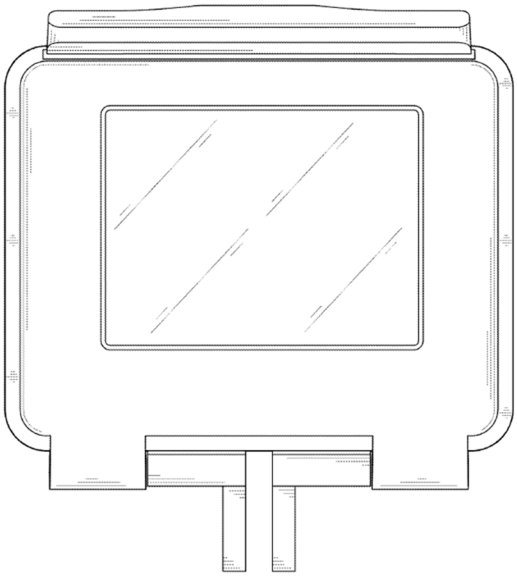
Figure 2 shows a front elevational view.	Chen '680 Front View  FIG. 2
Figure 3 shows a rear elevational view.	Chen '680 Rear View  FIG. 3

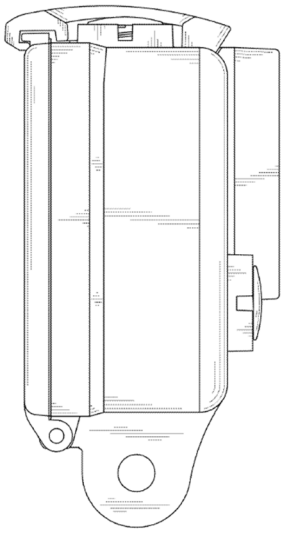
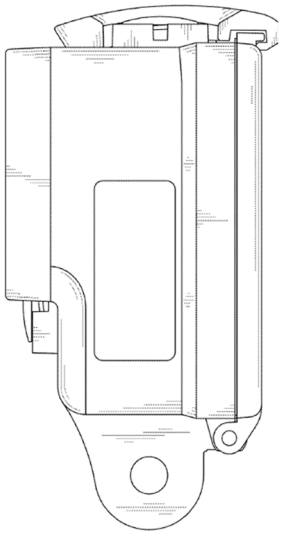
Figure 4 shows a left side elevational view.	**Chen '680 Left Side View**  FIG. 4
Figure 5 shows a right side elevational view.	**Chen '680 Right Side View**  FIG. 5

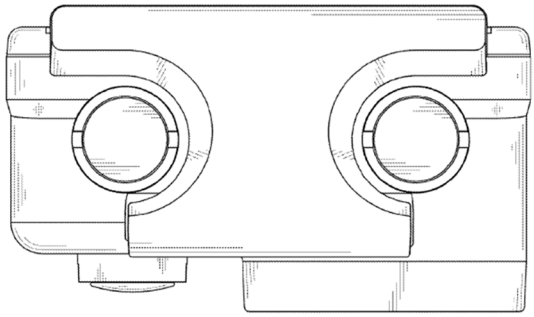
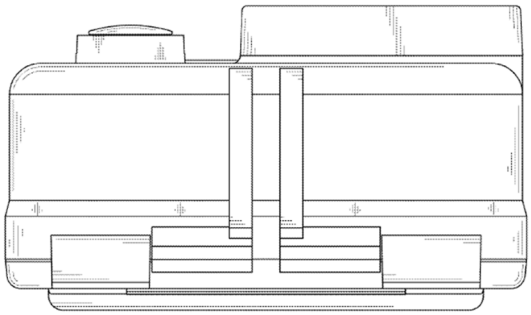
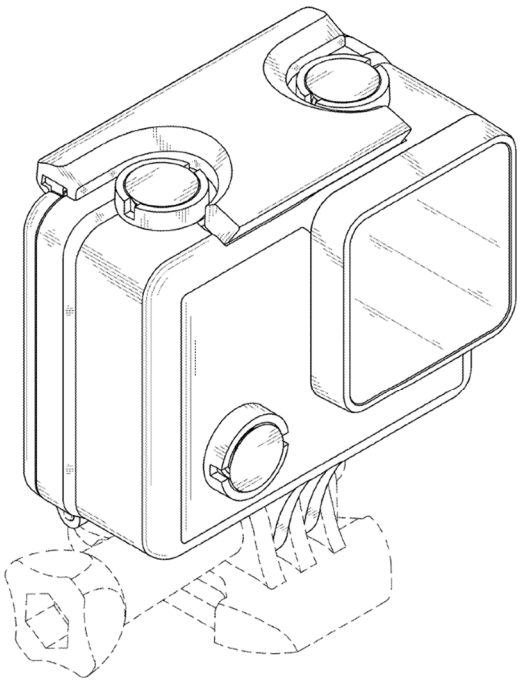
Figure 6 shows a top plan view.	**Chen '680 Top View**  FIG. 6
Figure 7 shows a bottom plan view.	**Chen '680 Bottom View**  FIG. 7

Figure 8 shows a front, top, and left side perspective view.	**Chen '680 Front, Top, and Left Side View**  FIG. 8

50. As shown in the figures above and as discussed in further detail in paragraphs 108-133, Chen680's design shows a rectangular body with flat faces and radiused corners. (EX1014, Figs. 1, 2, 4-8.) The design teaches a rectangular lens cover that protrudes outwards from the front of the body and shows a visible line. (*Id.*) The design shows a button that protrudes from the top of the design, as shown in Figures 1 and 8. (EX1014, Fig. 1, Fig. 8.) The back of the design (Figure 3) shows rectangles that occupy a large part of the back of the design. (EX1014, Fig. 3.) The right side of the design shows a rectangular button/access element, as

shown in Figure 5. (EX1014, Fig. 5.) The figures give Chen680 an overall visual impression of a rectangular "box-like" design with a rectangular lens cover that protrudes from the upper right corner of the front of the body.

4. Overview of Wang

51. Wang discloses a "sport camera heat dissipation protection housing." (EX1016, Title.) Wang uses seven figures to show different views of its design. The figures are:

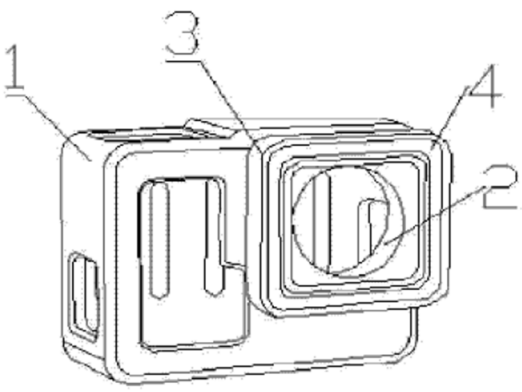
Figure 1 shows a structural diagram view.	Wang Structural Diagram View  FIG. 1

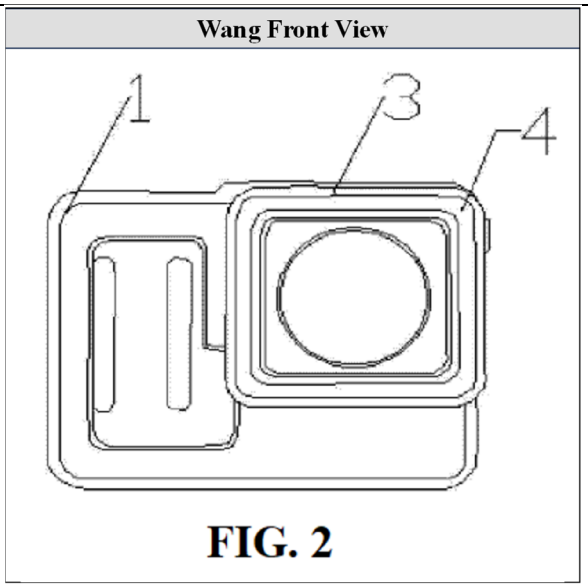
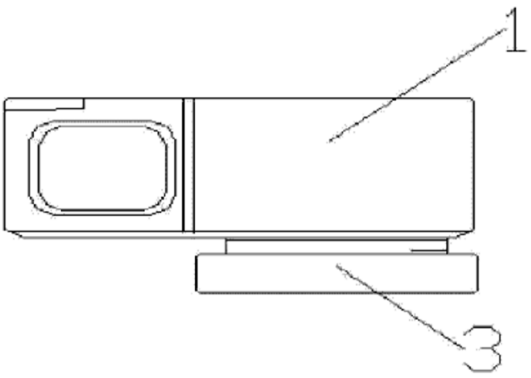
Figure 2 shows a front view.	Wang Front View  FIG. 2
Figure 3 shows a top view.	Wang Top View  FIG. 3

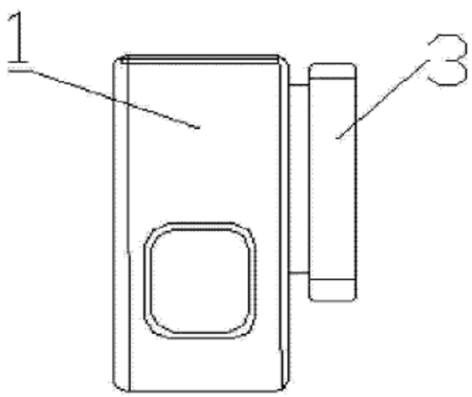
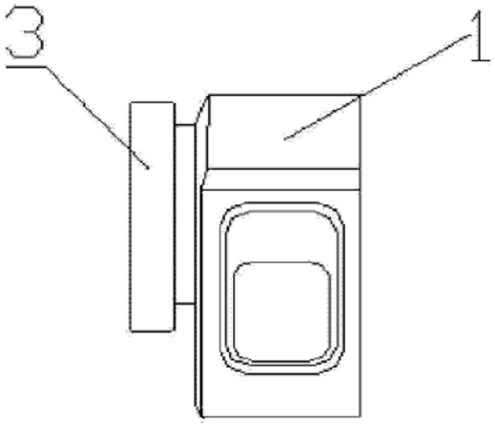
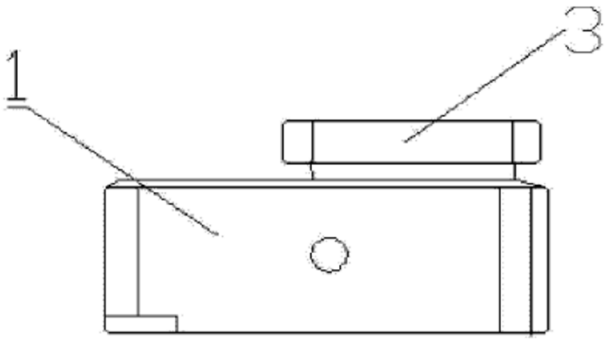
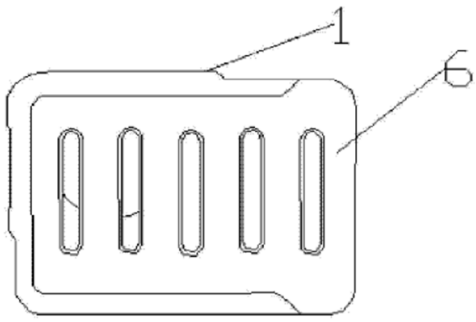
Figure 4 shows a left view.	Wang Left Side View  FIG. 4
Figure 5 shows a right view.	Wang Right Side View  FIG. 5

Figure 6 shows a bottom view.	Wang Bottom View  FIG. 6
Figure 7 shows a rear view.	Wang Rear View  FIG. 7

52. As shown in the figures above and as discussed in further detail in paragraphs 134-161, Wang's design shows a rectangular body with flat faces (including vertical lines) and radiused corners, and a rectangular lens cover that protrudes outwards from the body (including a visible line). (EX1016, Figs. 1-7.) At the front, Wang's design also shows a rectangle-like shape for a display that is flush with the front face. (*Id.*) Wang's design further shows rectangular access

elements at the top, left, and right sides of the design. (EX1016, Figs. 3-5.) The figures give Wang an overall visual impression of a rectangular "box-like" design with a rectangular lens cover that protrudes from the front of the body.

5. Overview of Chen686

53. Chen686 discloses a "camera" design and uses seven figures to show different views of its design. (EX1018, Title.) The figures are:

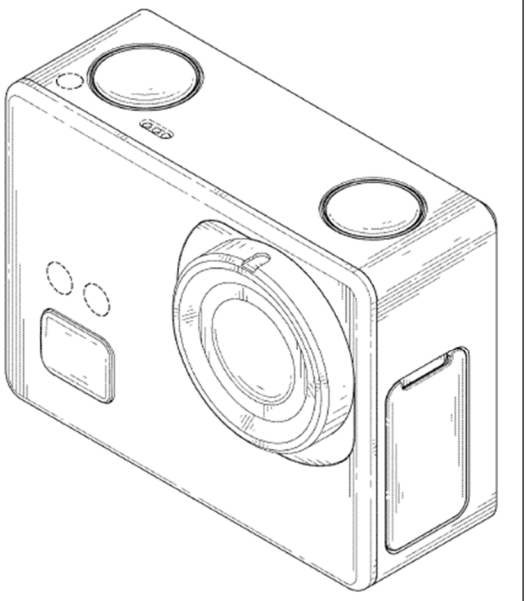
Figure 1 shows a front, top, and right side perspective view.	**Chen '686 Front, Top, and Right Side View**  FIG. 1

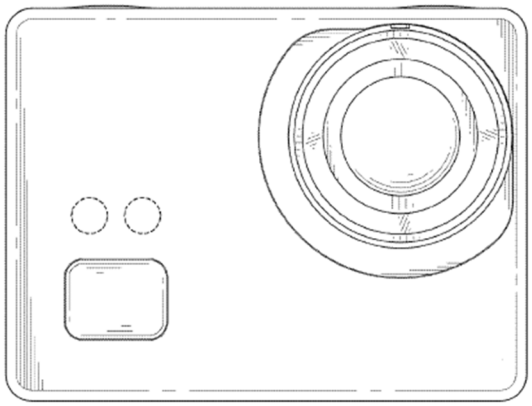
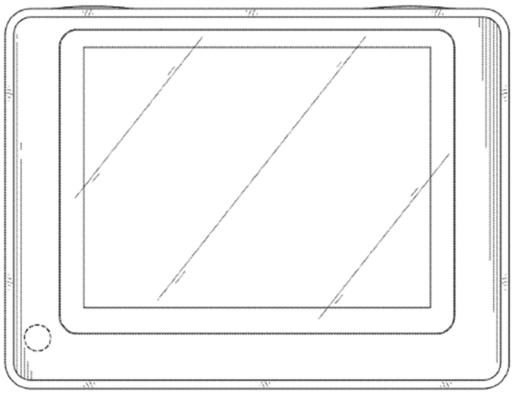
Figure 2 shows a front elevational view.	**Chen '686 Front View**  FIG. 2
Figure 3 shows a rear elevational view.	**Chen '686 Rear View**  FIG. 3

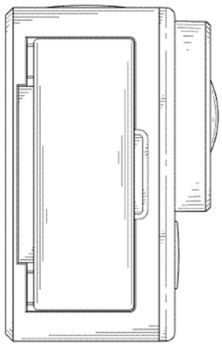
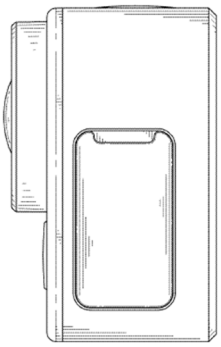
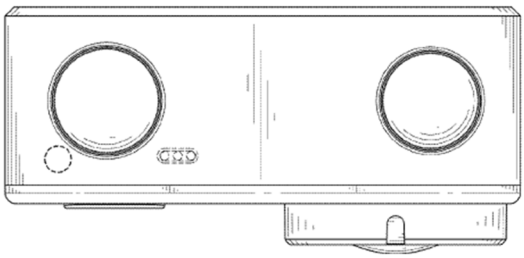
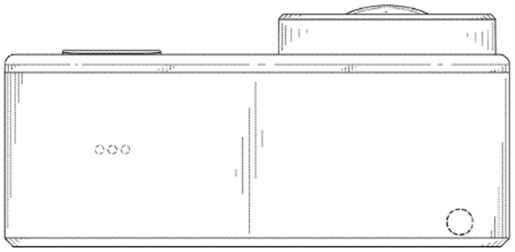
Figure 4 shows a left side elevation view.	Chen '686 Left Side View  FIG. 4
Figure 5 shows a right side elevation view.	Chen '686 Right Side View  FIG. 5

Figure 6 shows a top plan view.	**Chen '686 Top View**  FIG. 6
Figure 7 shows a bottom plan view.	**Chen '686 Bottom View**  FIG. 7

54. As shown in Chen686's figures above and as discussed in further detail in paragraphs 162-183, its design shows a rectangular body with flat faces and radiused corners. (EX1018, Fig. 1, Figs. 4-7.) The design shows a lens that protrudes outwards from the upper right corner of the front of the body. (EX1018,

Fig. 4, Fig. 6.) As shown in the front elevational view of Figure 2, the front of the design includes a rectangle located near the left side of the front face. (EX1018, Fig. 2.) The rear elevational view of Figure 3 shows rectangles that occupy a large part of the back of the design. (EX1018, Fig. 3.) The design shows buttons/access elements on the left side (Figure 4), right side (Figure 5), and top (Figure 6). (EX1018, Figs. 4-6.) The figures give Chen686 an overall visual impression of a rectangular "box-like" design with a protruding lens around the upper right corner of the body.

6. Overview of Woodman

55. Woodman discloses a "camera housing" design and uses 10 figures to show different views of its design. (EX1019, Title.) The figures are:

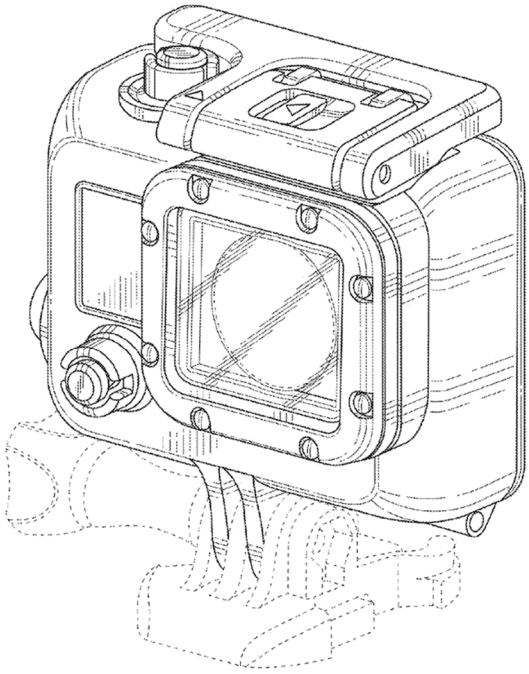
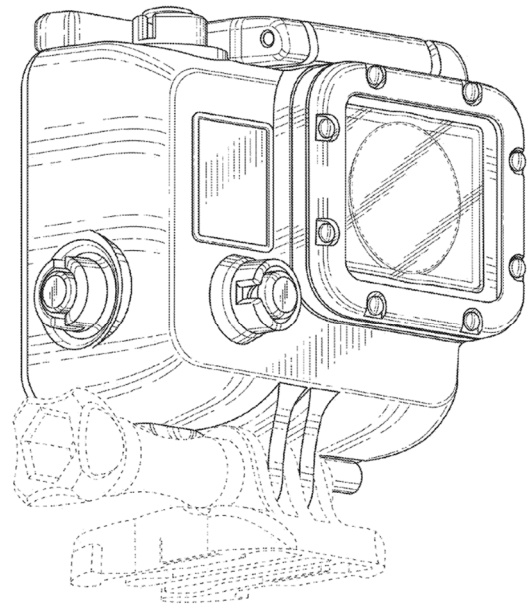
Figure 1 shows a front, top, and right side perspective view.	**Woodman Front, Top, and Right Side View**  FIG. 1
Figure 2 shows a front, bottom, and left side perspective view.	**Woodman Front, Bottom, and Left Side View**  FIG. 2

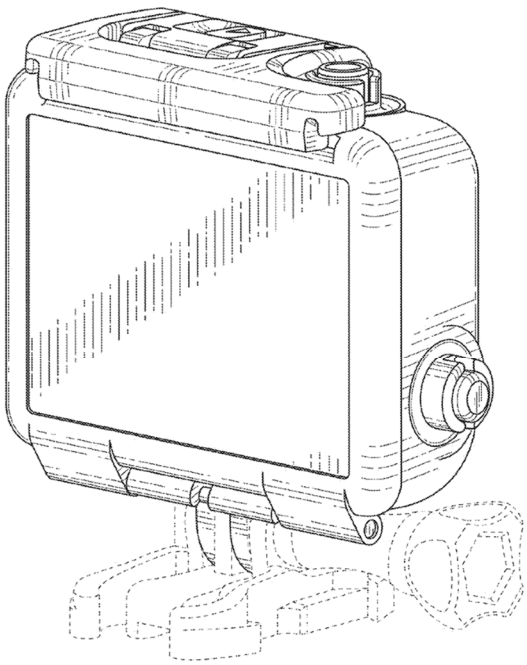
Figure 3 shows a back, top, and left side perspective view.	**Woodman Back, Top, and Left Side View**  FIG. 3

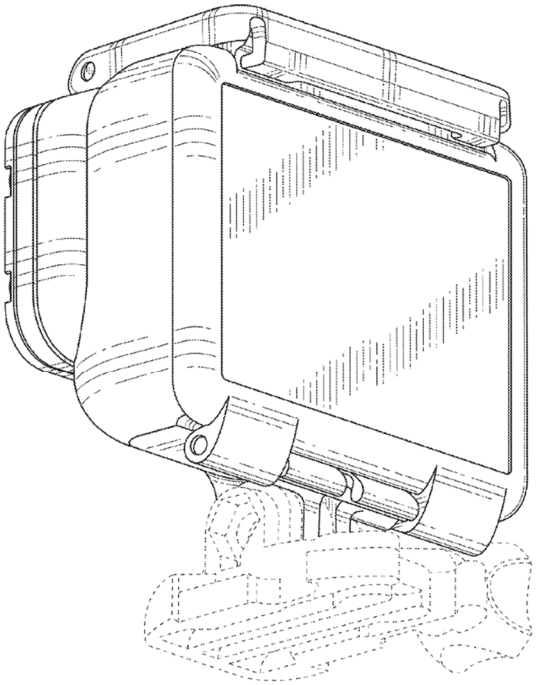
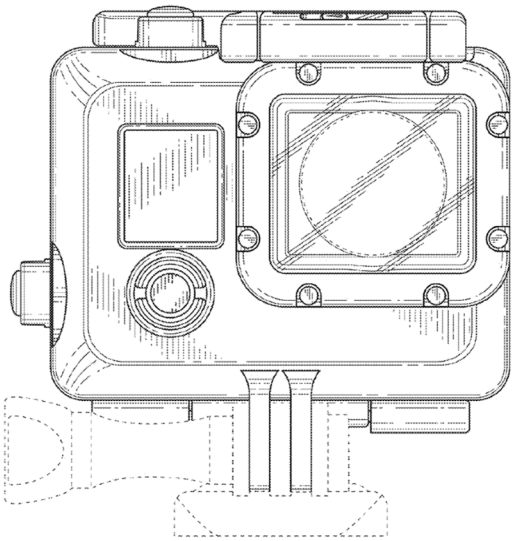
Figure 4 shows a back, bottom, and right side perspective view.	**Woodman Back, Bottom, and Right Side View**  FIG. 4
Figure 5 shows a front elevational view.	**Woodman Front View**  FIG. 5

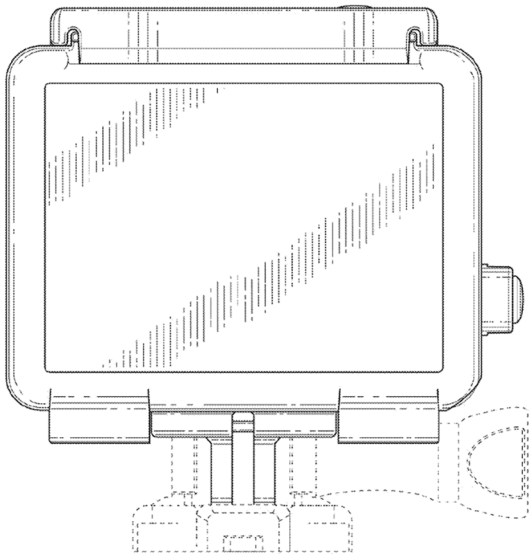
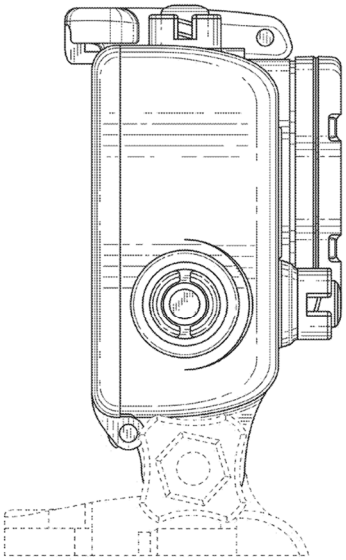
Figure 6 shows a rear elevational view.	**Woodman Rear View**  FIG. 6
Figure 7 shows a left side elevational view.	**Woodman Left Side View**  FIG. 7

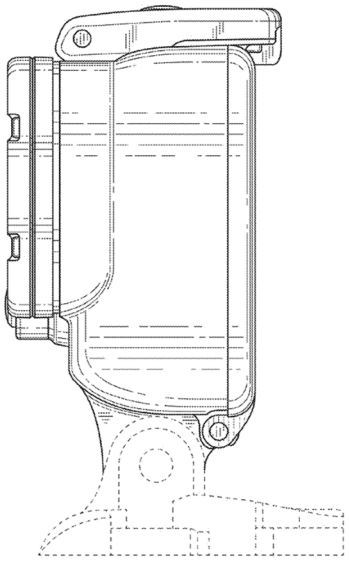
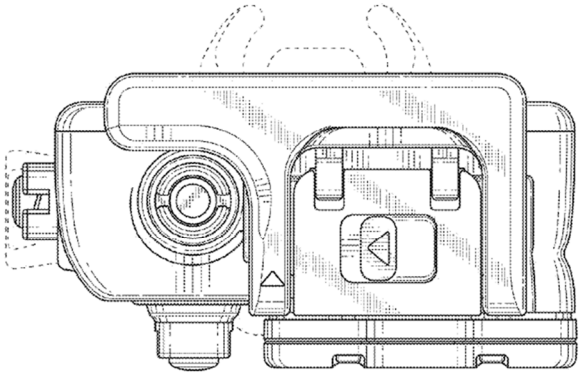
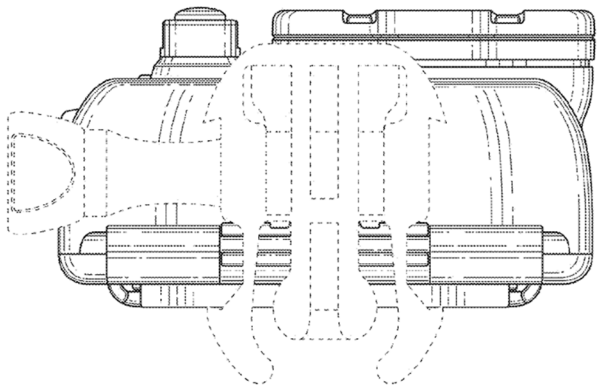
Figure 8 shows a right side elevational view.	**Woodman Right Side View**  FIG. 8
Figure 9 shows a top plan view.	**Woodman Top View**  FIG. 9

Figure 10 shows a bottom plan view.	**Woodman Bottom View**  FIG. 10

56. As shown in Woodman's figures above and as discussed in further detail in paragraphs 184-205, its design shows a roughly rectangular body with radiused corners, and a rectangular lens cover that protrudes outwards from the upper right corner of the front of the body and shows a visible line. (EX1019, Figs. 1-8.) Figure 5 shows a rectangle for a display at the front of the design. (EX1019, Fig. 5.) Figure 6 shows a rear elevational view of rectangles that occupy a large part of the back of the design. (EX1019, Fig. 6.) Figures 1, 2, and 5 show a top button protrusion, and Figure 7 shows buttons/access elements located at the left side of the design. (EX1019, Figs. 1, 2, 5, 7.) The figures give Woodman an overall visual impression of a roughly rectangular "box-like" design with a

rectangular lens cover that protrudes from the upper right corner of the front of the body.

7. Overview of Huang

57. Huang discloses a "[c]amera" design and uses six figures to show different views of its design. (EX1021, Title.) The figures are:

Front view	**Huang Front View**  Front view
Back view	**Huang Back View**  Back view

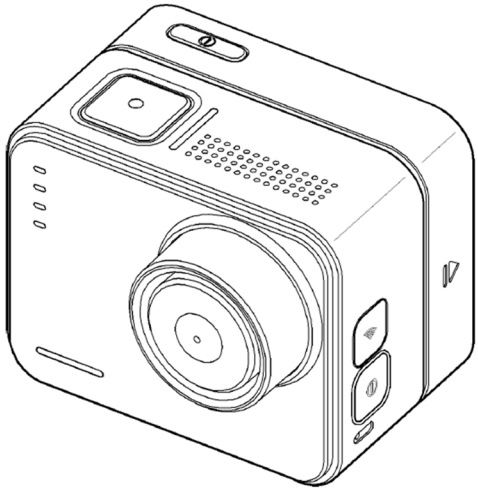
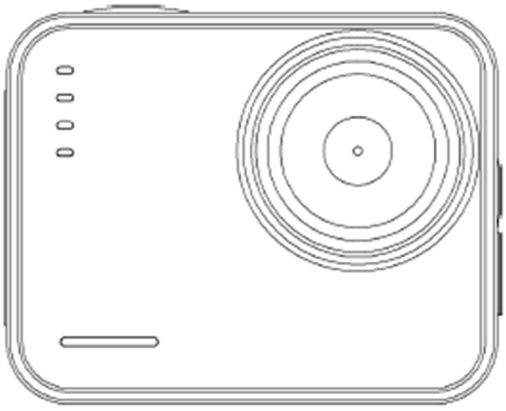
Left view	**Huang Left View**  Left view
Right view	**Huang Right View**  Right view

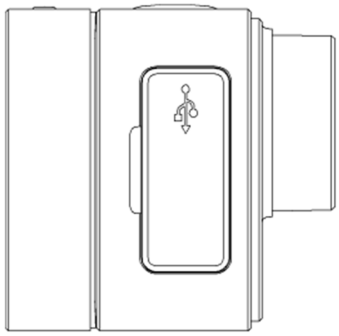
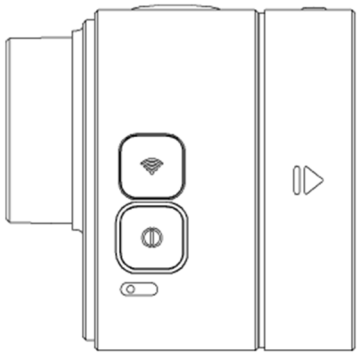
Top view	**Huang Top View**  Top view
Bottom view	**Huang Bottom View**  Bottom view

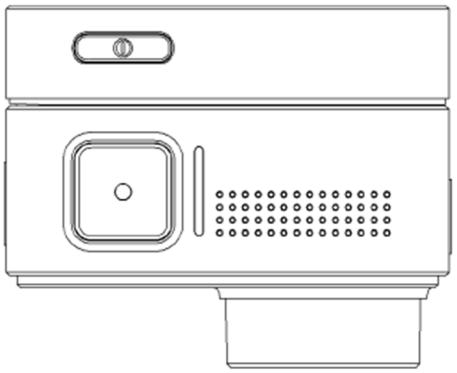
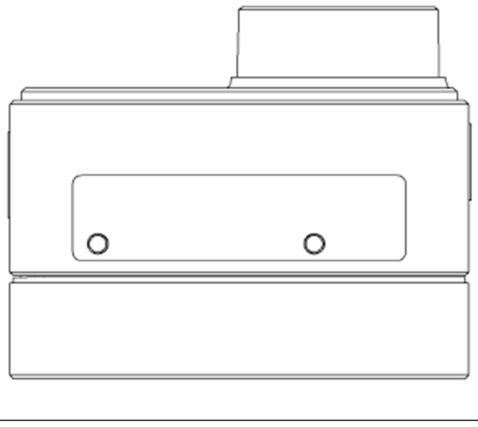
58. As shown in Huang's figures above, its design shows a roughly rectangular body with radiused corners, a protruding rectangular lens cover, a rectangle for a display located at the front and is flush with the front face, and multiple rectangular buttons and/or access elements located at the top, left side, right side, and bottom of the design. (EX1021, Front view, Left view, Right view, Top view, Bottom view.)

8. Overview of Heo

59. Heo discloses a "Portable Balckbox [sic]" design and uses seven figures to show different views of its design. (EX1024, Title.) The figures are:

Perspective view	**Heo Perspective View** *perspective view* 
Front side view	**Heo Front View** *front side view* 

Rear view	**Heo Rear View** *rear view* 
Left side view	**Heo Left Side View** *left side view* 
Right side view	**Heo Right Side View** *right side view* 

Plan view	**Heo Plane View** *plane view* 
Bottom view	**Heo Bottom View** *bottom view* 

60. As shown in Heo's figures above, its design shows a rectangular body with flat faces and radiused corners, a protruding lens around the upper right corner of the body, a large rectangle for a display that occupies a large part of the back of the design, and multiple rectangular buttons and/or access elements on the

top, left, right, and bottom. (EX1024, rear view, left side view, right side view, plan view, bottom view.)

9. Overview of Li

61. Li discloses a "[s]port camera" design and uses six figures to show different views of its design. (EX1027, Title.) The figures are:

Front view	**Li Front View**  Front view
Back view	**Li Back View**  Back view

Left view	Li Left Side View  Left view
Right view	Li Right Side View  Right view
Top view	Li Top View  Top view

Bottom view	**Li Bottom View**  Bottom view

62. As shown in Li's figures above, its design shows a rectangular body with flat faces with radiused corners, a protruding lens around the upper right corner of the body, and rectangles for displays including a small one at the front that is flush with the front face and a large one that occupies a large part of the back of the design. (EX1027, Front view, Back view.)

10. Overview of McVicker

63. McVicker discloses an "action camera system" including "[a] camera 38 within its waterproof case 40 [that] is attached to a flat adhesive mount 42 in the usual way." (EX1029, Abstract, 3:38-39.)

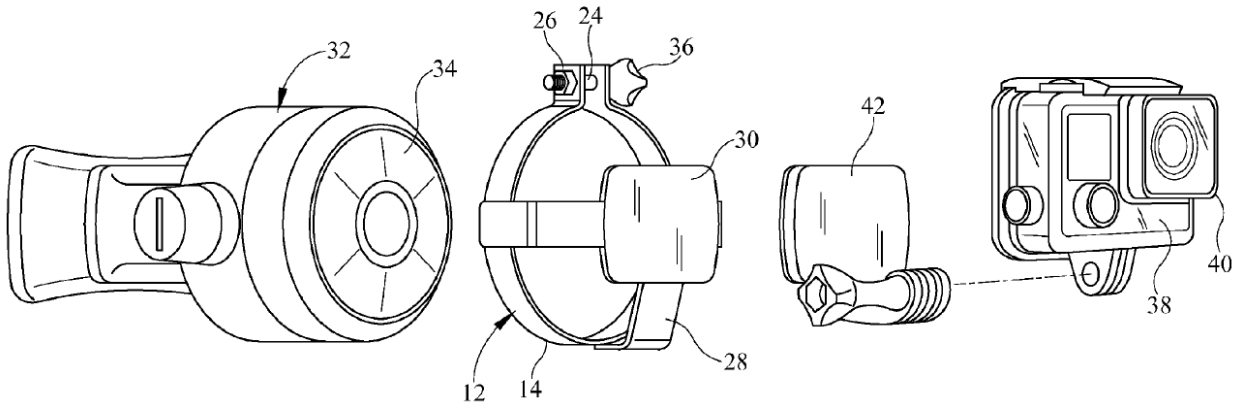


FIG. 2

64. As shown in Figure 2 above, McVicker's design shows a rectangular body with flat faces and radiused corners, a rectangular lens cover including a visible line, a small rectangle for a front display that is flush with the front face, and buttons located at the top and left side. (EX1029, Abstract.)

B. Camera and Camera Housing Designs

65. I note that there are several visual similarities between the designs (outer appearances and design elements) of cameras and camera housings. For example, cameras and camera housings typically show a body and shapes for outer components of the camera, such as circles or rectangles for buttons/access elements and a lens cover that protrudes from the front of the body. A camera would show a rectangle for a display, and similarly, a camera housing would present a rectangle for a display. A camera would present a circle or rectangle at the front for the lens cover, and a camera housing would present the same. Both a

camera and a camera housing would present circle(s) or rectangle(s) for button(s) or access element(s). There are prior art "camera" designs, such as Chen686, Huang, Heo, and Li, that show a body, button/access elements, and a lens cover as the outer appearance and structure of the design. There are also prior art "camera housing" designs, such as Gioscia, Chen680, and Woodman that similarly show a body, button/access elements, and a protruding lens cover as the outer appearance and structure of the design. Note that both cameras and camera housings are designed to protect the internal components and have other similar design considerations. An ordinary designer, for example, would have considered the size and weight of a camera and a camera housing (including an action camera and associated camera housing), where it would be desirable for the camera to be compact and lightweight. Brussaard describes lightweight cameras as being a "truly welcome tool," and "since the underwater housing is compact and made of plastic, its weight is also not too bad." (EX1039, 1.) And Kortler characterized a certain camera design as having an "impressively compact size." (EX1040, 2.) Further, Rock touted the design of a camera as "fit[ting] the housing like a glove." (EX1041, 1.) This shows that market wanted compact and lightweight cameras ***and*** camera housings, which is a goal that an ordinary designer would have considered. Although there may be differences in functional considerations among cameras and camera housings, it is my understanding that design patents do not

cover such purely functional considerations because they are functional rather than ornamental in nature. Since cameras and camera housings have similar outer appearances, in my view, an ordinary designer in the field of cameras would look to the designs of both cameras and camera housings for visual reference and motivation.

IX. ANALYSIS AND OPINIONS

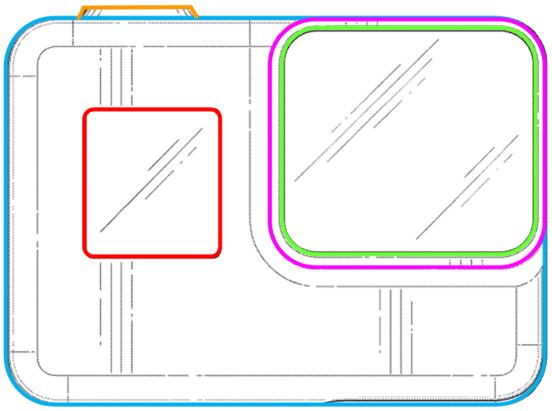
A. Hero4 in Combination with Huang and/or Heo Render Obvious the D'435 Patent

66. In my opinion, Hero4 in combination with Huang or Heo render obvious the claimed design of the D'435 patent. As discussed in more detail below, Hero4's design shows a rectangular body with flat faces and radiused corners, a rectangular lens cover that protrudes outwards from the upper right corner of the front of the body and shows a visible line, a rectangle for a display located at the front of the design that is flush with the front face, a rectangle for a display located at the back of the design that occupies a large part of the back, and buttons and/or access elements located on the top, left side, right side, and bottom. Thus, Hero4's design is something already in existence. Alone or in combination with Huang and/or Heo, it is visually similar to the D'435 claimed design.

67. When viewing the design of the D'435 patent and the design of Hero4 in combination with Huang and/or Heo, an ordinary designer would have perceived the two designs as visually similar, having the same overall appearance

of a rectangular "box-like" design with a rectangular body with radiused corners, a protruding rectangular lens cover in the upper right corner, rectangles for displays (front and rear), and rectangular buttons and access elements.

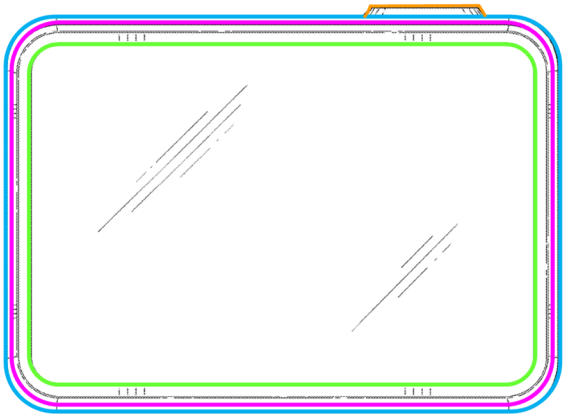
1. Front Elevational View

D'435	Hero 4
 FIG. 5	

68. Figure 5 of the D'435 patent (left) and an image from Hero4 (right) are reproduced and annotated above. (EX1001, Fig. 5; EX1011, 1.) Both designs of the D'435 patent and Hero4 present a ***rectangular body*** with flat faces and (***pink*** and ***green***) rectangles around the lens. Both designs of the D'435 patent and Hero4 present a ***small rectangle*** at the front of the design that is flush with the front face, and a ***top button protrusion***. In my opinion, an ordinary designer would have viewed the two as basically similar designs.

69. I note that Hero4's top button protrusion differs slightly from what is shown for the D'435 patent. In my view, this difference in the top button protrusion is insubstantial/slight/insignificant such it does not affect the overall impression of the rectangular "box-like" design, showing a rectangular body with radiused corners and a protruding rectangular lens cover, as a whole. That is, an ordinary designer would not have viewed a slightly different button as being a different "overall design." I also note that if the D'435 patent requires that the outer body include the ***small rectangle*** at the front, then it would have been obvious to an ordinary designer at the time of the D'435 purported invention. The Hero4 camera case is designed to be mostly transparent, where the transparent portions are designed such that certain components of the camera are visible when the camera is inside the camera case. For example, the transparent portions are designed to allow the front display to be visible when looking at the camera from the front view so that the photographer can use the front display to view information being displayed by the camera. A POSITA would have been motivated to have the small rectangle be part of the outer body because then it would help draw the photographer's attention to the front display. The additional rectangle at the front of the design contributes to the overall rectangular design.

2. Rear Elevational View

D'435	Hero 4
 FIG. 6	

70. Figure 6 of the D'435 patent (left) and an image from Hero4 (right) are reproduced and annotated above. (EX1001, Fig. 6; EX1006, 4.) Both designs of the D'435 patent and Hero4 present a ***rectangular body*** with flat faces and two inner (***pink*** and ***green***) rectangles that occupy a large part of the back of the design. In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

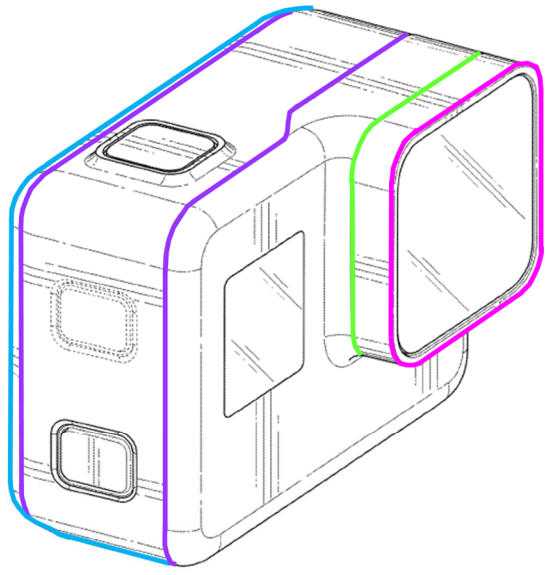
71. I note that the (***pink*** and ***green***) rectangles of Hero4's design differ slightly from what is shown for the D'435 patent. This is due to its design having extra pieces at the top and at the bottom. But an ordinary designer would have viewed the presence of these extra pieces as insubstantial/slight/insignificant

because the rectangles still occupy a large part of the back of the design, and the body still has a rectangular shape and a rectangular lens cover.



72. I also note that Hero4's ***top button protrusion*** is not visible in the rear elevational view of Hero4's image. This is due to the extra piece at the top. The ***top button protrusion*** is visible in the front, top, and left side perspective view (reproduced and annotated above). (EX1006, 3.)

3. Front, Top, and Left Side Perspective View

D'435	Hero 4
 FIG. 1	

73. Figure 1 of the D'435 patent (left) and an image from Hero4 (right) are reproduced and annotated above. (EX1001, Fig. 1; EX1006, 3; EX1036, 3.) Both designs of the D'435 patent and Hero4 present a ***rectangular body*** including ***lines*** (vertical when viewed from the left side and horizontal when viewed from the top). Both designs of the D'435 patent and Hero4 present a ***rectangular lens cover*** protruding outward from the body (including a visually dividing ***line*** that appears vertical when viewed from the left side). In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

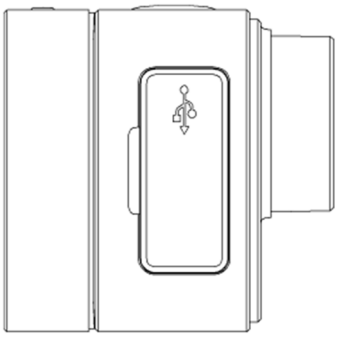
Huang Left View



Left view

Heo Left Side View

left side view



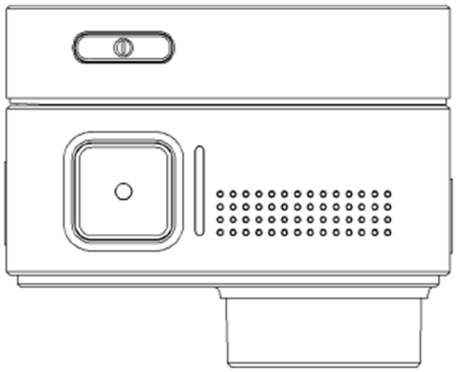
Huang Top View



Top view

Heo Plane View

plane view



74. There were designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the left side view of Huang (reproduced above) and the left side view of Heo (reproduced above) show rectangular buttons and/or access elements located at the left side of the design. Similarly, the top view of Huang (reproduced above) and the plan view of Heo (reproduced above) show rectangular buttons and/or access elements

located at the top of the design. An ordinary designer would have had the common knowledge and skill to understand that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to have an overall visual impression of a rectangular "box-like" design with a protruding rectangular lens cover. Cameras and camera housings show rectangular features, such as rectangular cameras bodies and rectangles for displays. At the time of the D'435 purported invention, there existed an existing industry custom to manufacture rectangular-shaped electronic devices and rectangular-shaped displays. (EX1033, 1.) At the time of the D'435 purported invention, it was also known that including a rectangular lens cover would lead to improved picture quality. As PRWeb explained, "[i]nspired by the Leica design, the rectangular shape of the hood will cut glare and lower the chance of vignetting at wide angles." (EX1030, 1.) Photo Review similarly states that "[r]ectangular lens hoods have a shape that closely matches the image frame shape. Best suited to wide-angle prime lenses, they can be longer than circular lens hoods without blocking the angle or view or cause vignetting." (EX1031, 6.) And the benefits of rectangular lens covers led to market demands, where manufacturers like Pentax, Sony, and Leica made them available (images below). (EX1032; EX1034; EX1035.) It was known to ordinary designers at the time of the D'435 purported invention that utilizing consistent visual features was appealing to observers and consumers. Given the

benefits of utilizing rectangular features, an ordinary designer would have been motivated to use consistent rectangular features in the design of a camera or camera housing.



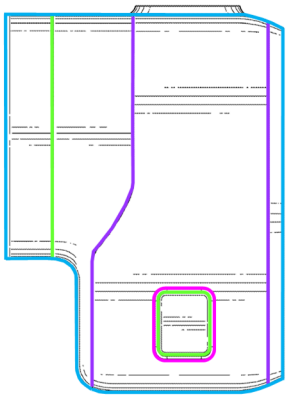




75. Additionally, including rectangular buttons helps to compliment an overall visual impression of a rectangular visual language. The designs of Huang

and/or Heo improve Hero4's design by using rectangular buttons/access elements, enhancing the overall visual impression of the rectangular visual language by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc.

4. Right Side Elevational View

D'435	Hero 4
 FIG. 8	

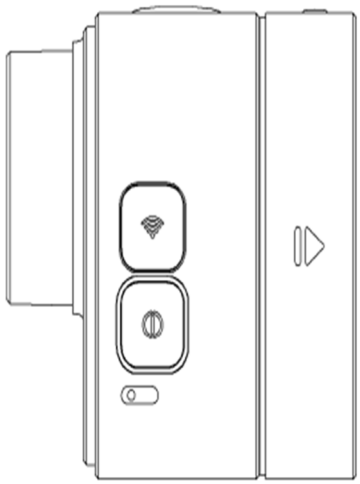
76. Figure 8 of the D'435 patent (left) and an image from Hero4 (right) are reproduced and annotated above. (EX1001, Fig. 8; EX1006, 4.) Both designs of the D'435 patent and Hero4 present a ***rectangular body***, and a ***rectangular lens cover*** protruding outward from the body. Both designs of the D'435 patent and Hero4 present (***purple*** and ***green***) vertical lines. And both designs of the D'435 patent and Hero4 present ***rectangle(s)*** for buttons/access elements on the right side

of the design. In my opinion, an ordinary designer would have viewed the two as having a basically similar design.



77. I note that Hero4's ***top button protrusion*** is not visible in the right side elevational view of Hero's image. This is due to the extra piece at the top. The ***top button protrusion*** is visible in the front, top, and left side perspective view (reproduced and annotated above). (EX1006, 3.)

78. I note that the number and size of Hero4's ***rectangle*** differ slightly from what is shown for the D'435 patent. In my view, this difference in number and size of the rectangles is insubstantial/slight/insignificant such that an ordinary designer would have regarded Hero4 as quite similar to the D'435 patent. The difference in number and size does not affect the overall impression of the rectangular "box-like" design as a whole.

Huang Right View	Heo Right Side View
 Right view	

79. If, for some reason, this difference in number and size of Hero4's rectangle is not considered insubstantial/slight/insignificant, then in my view, it would have been obvious to combine Hero4 with Huang or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the right side view of Huang (reproduced above) and the right side view of Heo (reproduced above) show rectangular buttons and/or access elements located at the right side of the design. (EX1021, Right view; EX1024, right side view.) An ordinary designer would have known that a design could be easily modified to show a rectangular button/access portion. And an ordinary designer would have been motivated to show rectangular buttons and/or access elements because the added buttons/access elements would enhance the overall visual impression of a

rectangular "box-like" design. The designs of Huang and/or Heo improve Hero4's design by using rectangular buttons/access elements, enhancing the overall visual impression of the rectangular visual language, a goal that would have been important to an ordinary designer. I note that if the D'435 patent requires that the outer body include a rectangle at the right side, then it would have been obvious to an ordinary designer at the time of the D'435 purported invention. The Hero4 camera case is designed to be mostly transparent, where the transparent portions are designed such that certain components of the camera are visible when the camera is inside the camera case. For example, there is a transparent portion on the right side of the design that is designed to allow the rectangle on the right side to be visible when looking at the camera from the right view so that the photographer can see the button/access element. A POSITA would have been motivated to have the rectangle on the right side be part of the outer body because then it would help draw the photographer's attention to the button/access element so that the photographer can easily find the button/access element. Additionally, the rectangle at the right side of the design contributes to the overall rectangular design.

5. Bottom Plan View

D'435 Bottom View

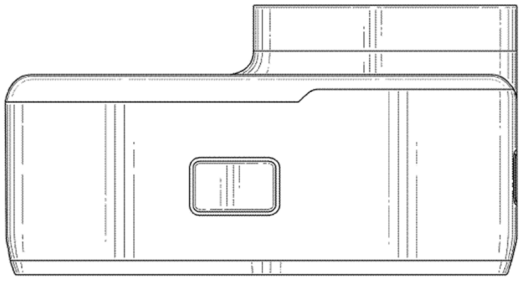


FIG. 10

80. The bottom view of the D'435 patent is reproduced above. (EX1001, Fig. 10.)

Hero4 (Without Case) Bottom View



81. The bottom view of Hero4 without a case is shown in the image reproduced above. (EX1010, 11.) Both designs of the D'435 patent and Hero4 (without the case) present a rectangular body and a rectangular button/access

element located at the bottom of the camera. As shown in the Hero4 images (discussed in paragraph 42), the Hero4 camera case is transparent (*see also* EX1004, 12, 116), and thus, when inside the camera case, the presence of a rectangular body and a rectangular button/access element at the bottom would not be eliminated. I note that if the D'435 patent requires that the outer body include a rectangle at the bottom, then it would have been obvious to an ordinary designer at the time of the D'435 purported invention. The Hero4 camera case is designed to be mostly transparent, where the transparent portions are designed such that certain components of the camera are visible when the camera is inside the camera case. For example, there is a transparent portion on the bottom of the design that is designed to allow the rectangle on the bottom side to be visible when looking at the camera from the bottom view so that the photographer can see the button/access element. A POSITA would have been motivated to have the rectangle on the bottom be part of the outer body because then it would help draw the photographer's attention to the button/access portion so that the photographer can easily find the button/access element. Additionally, the rectangle at the bottom of the design contributes to the overall rectangular design.

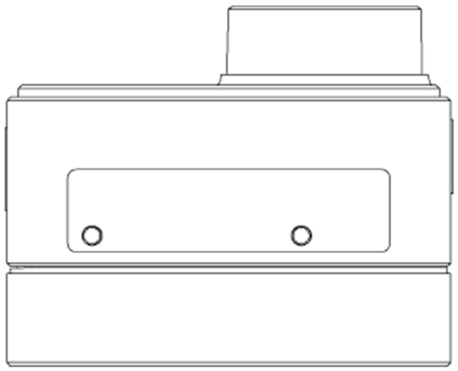
Huang Bottom View



Bottom view

Heo Bottom View

bottom view



82. Additionally, in my view, it would have been obvious to combine Hero4 and Huang and/or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access element. For example, the bottom view of Huang (reproduced above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have known that a design could be easily modified to show a rectangular button/access element. And an ordinary designer would have been motivated to show rectangular buttons and/or access portions because it was known to add rectangular buttons/access portions to the sides (including bottom) of the camera. The added buttons/access element also help enhance the overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Hero4's design by using rectangular buttons/access element, enhancing

the overall visual impression of the rectangular visual language. If, for some reason, an ordinary designer would not apply the teachings of a "camera housing" design to a "camera," in my view, it would have been obvious to combine the teachings from a "camera housing" design (such as Hero4's design) and a "camera" design (such as Huang's design and/or Heo's design). As I discussed in paragraph 65, camera designs and camera housing designs have similar outer appearances and design elements such as both show buttons and access element, both show lens covers, and both show rectangles for displays. Camera designs and camera housing designs are also similar in that they are designed to protect internal components (such as the battery, circuitry, etc.). And ordinary designers would have the same design considerations, as I discussed in paragraph 65. For action cameras, for example, designers wanted the cameras to be compact and light weight. Designers wanted the "camera [to] fit[] the housing like a glove," thereby designing the camera housing to be a thin skin around the camera. This resulted in the outer appearances of the camera and the camera housing designs being very similar. For example, Hardcastle described Hero4 as having a "skin-tight waterproof housing." (EX1042, 3.) This motivated designers to apply teachings of camera housing designs to camera designs. According to Patent Owner, its Hero5 camera represents the D'435 patent design. (EX1043, ¶32.) I have compared the Hero4 and Hero5 designs. I confirm that the outer appearances of the Hero4 and

Hero5 designs are visually similar, including that both are compact and lightweight rectangular "box-like" designs.

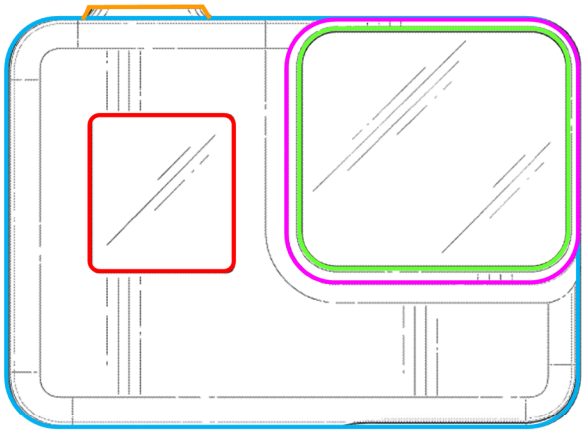
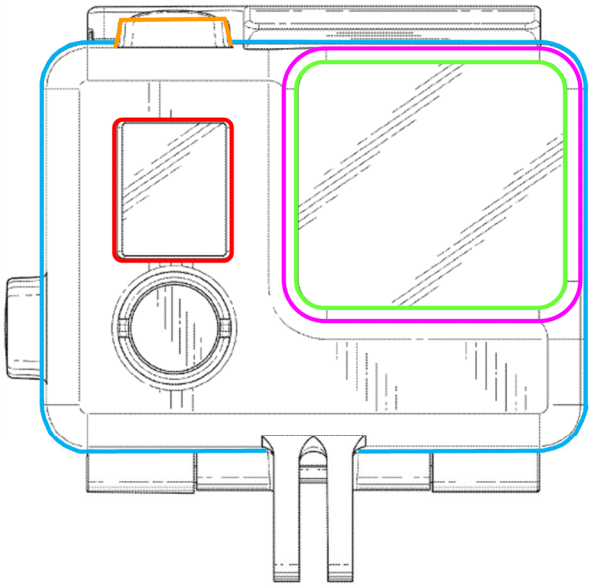
83. To summarize, both the designs of the D'435 patent and the combination of Hero4 with Huang and/or Heo provide an overall visual impression of a rectangular "box-like" design for a camera or camera housing, including a rectangular body with radiused corners, a protruding rectangular lens cover, rectangular buttons/access element, rectangles for displays, etc. in the eyes of an ordinary designer.

B. Gioscia in Combination with Huang and/or Heo Render Obvious the D'435 Patent

84. In my opinion, Gioscia in combination with Huang and/or Heo render obvious the claimed design of the D'435 patent. As discussed in more detail below, Gioscia's design shows a rectangular body with flat faces, a rectangular lens cover that protrudes outwards from the upper right corner of the front of the body, a rectangle for a display located at the front of the design that is flush with the front face of the design, and buttons and/or access element located on the top, left side, and right side. Thus, Gioscia's design is something already in existence. Alone or in combination with Huang and Heo, it is basically visually similar to the D'435 claimed design.

85. When viewing the design of the D'435 patent and the design of Gioscia in combination with Huang and/or Heo, an ordinary designer would have perceived the two designs as visually similar, having the same overall visual appearance of a rectangular "box-like" design with a rectangular body with radiused corners, and a protruding rectangular lens cover in the upper right corner.

1. Front Elevational View

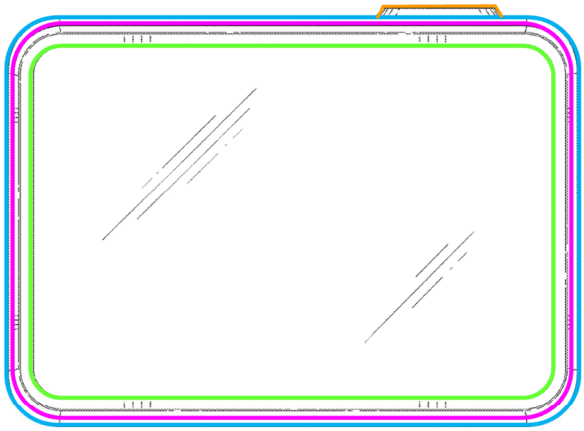
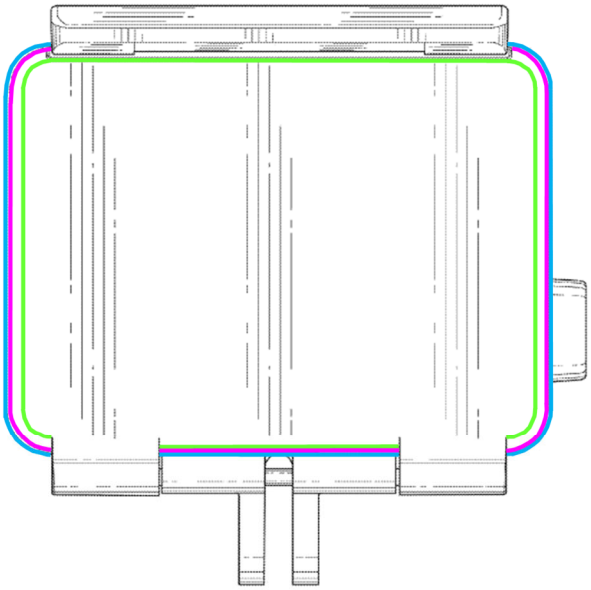
D'435	Gioscia
 FIG. 5	 FIG. 5

86. Figure 5 of the D'435 patent (left) and Figure 5 of Gioscia (right) are reproduced and annotated above. (EX1001, Fig. 5; EX1013, Fig. 5.) Both designs of the D'435 patent and Gioscia present a ***rectangular body*** with flat faces with radiused corners, and (***pink*** and ***green***) rectangles around the lens that protrude outwards from the body. Both designs of the D'435 patent and Gioscia present a

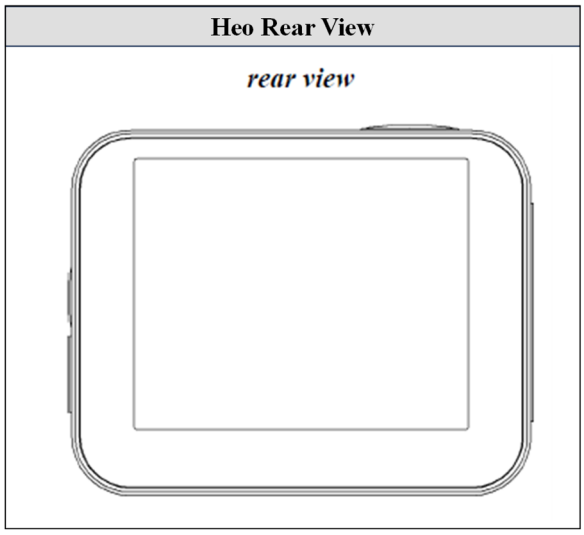
small rectangle at the front of the design that is flush with the front face and a ***top button protrusion***. In my opinion, an ordinary designer would have perceived the two as having similar overall designs.

87. I note that the size of Gioscia's top button protrusion differs from what is shown for the D'435 patent by being taller and circular. The dimensions of Gioscia's front rectangle also differs slightly from what is shown for the D'435 patent. In my view, this difference in size/dimensions of the top button protrusion and front rectangle is insubstantial/slight/insignificant such that an ordinary designer would have regarded Gioscia as very similar to the D'435 patent. This slight difference in size/dimension does not affect the overall impression of the rectangular "box-like" design with a rectangular body with radiused corners, a protruding rectangular lens cover in the upper right corner, and a rectangle for a display at the front of the body, as a whole.

2. Rear Elevational View

D'435	Gioscia
 FIG. 6	 FIG. 6

88. Figure 6 of the D'435 patent (left) and Figure 6 of Gioscia (right) are reproduced and annotated above. (EX1001, Fig. 6; EX1013, Fig. 6.) Both designs of the D'435 patent and Gioscia present a ***rectangular body*** with flat faces and radiused corners, and two inner (***pink*** and ***green***) rectangles that occupy a large part of the back of the design. In my opinion, an ordinary designer would have viewed the two as having similar visual impressions.



89. I note that the rectangles of Gioscia's design differ slightly from what is shown for the D'435 patent. This is due to its design having extra pieces at the top and at the bottom. But an ordinary designer would have viewed the presence of these extra pieces as insubstantial/slight/insignificant because the rectangles still occupy a large part of the back of the design, and the body still has a rectangular shape. If the D'435 patent requires that the back of the design include a display screen, then it would have been obvious to an ordinary designer at the time of the D'435 purported invention. An ordinary designer would have known about designs that had rear displays, such as Heo (reproduced above), and would have been motivated to include a display at the display at the back to display the picture captured or to be captured by the camera.

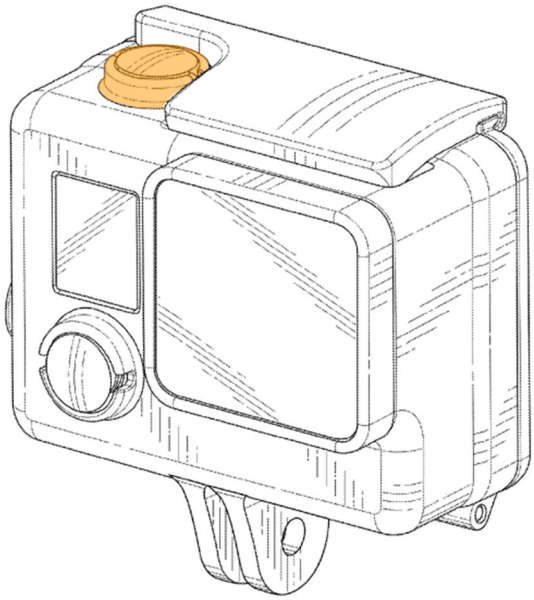
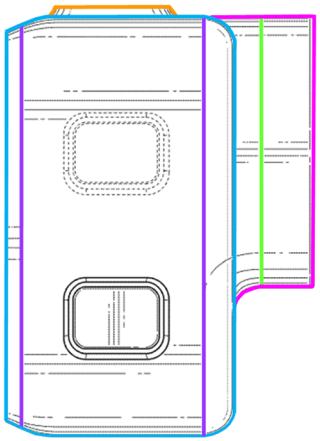
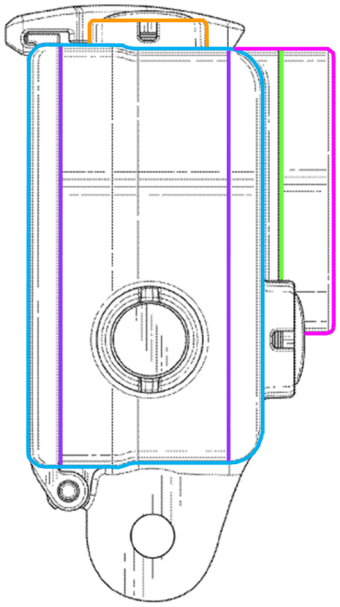


FIG. 1

90. I also note that Gioscia's ***top button protrusion*** is not visible in the rear elevation view of Gioscia's Figure 6. This is due to the extra piece at the top. The ***top button protrusion*** is visible in the back, bottom, and left side view of Figure 1 (reproduced and annotated above). (EX1013, Fig. 1.) Gioscia's Figure 2 and Figure 3 also show the ***top button protrusion*** in the front, bottom, and left side perspective view, and in the back, top, and left side perspective view, respectively. (EX1013, Fig. 2, Fig. 3.)

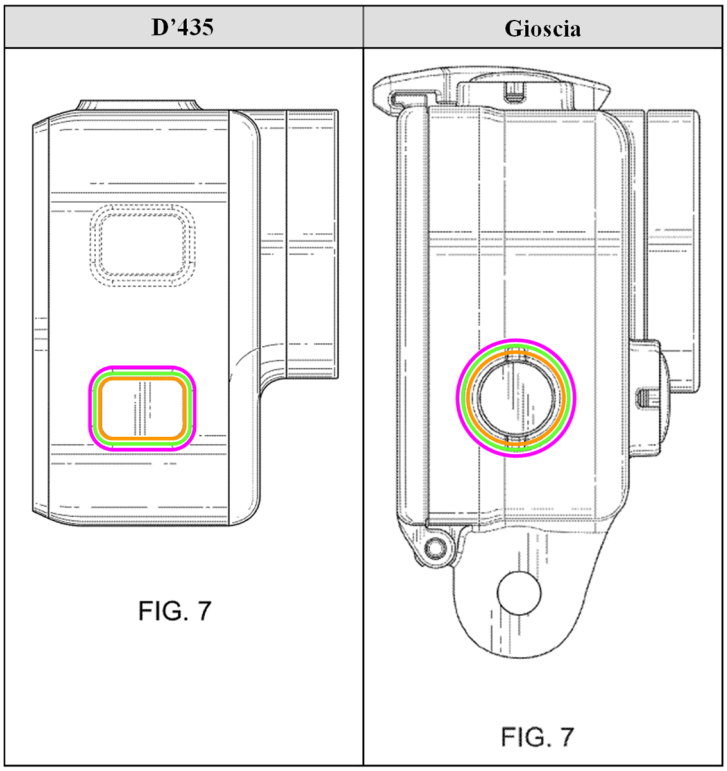
3. Left Side Elevational View

D'435	Gioscia
 FIG. 7	 FIG. 7

91. Figure 7 of the D'435 patent (left) and Figure 7 of Gioscia (right) are reproduced and annotated above. (EX1001, Fig. 7; EX1013, Fig. 7.) Both designs of the D'435 patent and Gioscia present a ***rectangular body*** including ***vertical lines***. Both designs of the D'435 patent and Gioscia present a ***top button protrusion***. And both designs of the D'435 patent and Gioscia present a ***rectangular lens cover*** protruding outward from the body (towards the right side of the figure) and including a ***vertical line***.

92. I note that the size of Gioscia's top button protrusion differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the top button protrusion is such that an ordinary designer would have regarded

Gioscia as very similar to the D'435 patent. The difference in size does not affect the overall impression of the rectangular "box-like" design with a rectangular lens cover as a whole. That is, an ordinary designer would not have viewed a slightly taller button as being a different "overall design."



93. Additionally, as shown above (annotated Figure 7 of the D'435 patent (left) and annotated Figure 7 of Gioscia (right)), both designs of the D'435 patent and Gioscia present three shapes for a button/access element located near the bottom of the left side. The shape of Gioscia's left button differs slightly from what is shown for the D'435 patent.

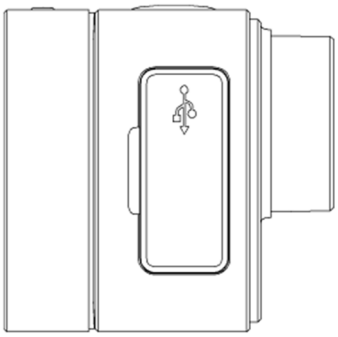
Huang Left View



Left view

Heo Left Side View

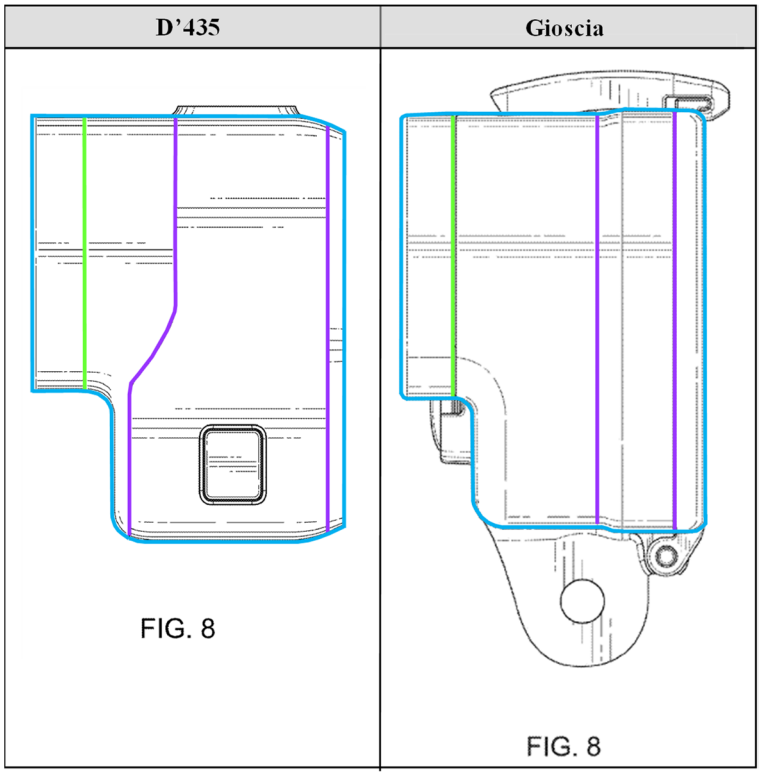
left side view



94. However, a designer of ordinary skill would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the left side view of Huang (reproduced above) and the left side view of Heo (reproduced above) show rectangular buttons and/or access elements located at the left side of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall rectangular visual language for the design. The designs of Huang and/or Heo improve Gioscia's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a

rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc. in the eyes of an ordinary designer.

4. Right Side Elevational View



95. Figure 8 of the D'435 patent (left) and Figure 8 of Gioscia (right) are reproduced and annotated above. (EX1001, Fig. 8; EX1013, Fig. 8.) Both designs of the D'435 patent and Gioscia present a ***rectangular body*** with a ***rectangular lens cover*** protruding outward from the body. Both designs of the D'435 patent and Gioscia present (***purple*** and ***green***) vertical lines. In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

96. I note that the path of one of Gioscia's vertical lines differs slightly from what is shown for the D'435 patent. In my view, this slight difference in path

is insubstantial/slight/insignificant such that an ordinary designer would have regarded Gioscia as basically the same as the D'435 patent. The difference in path does not affect the overall impression of the rectangular "box-like" design as a whole.

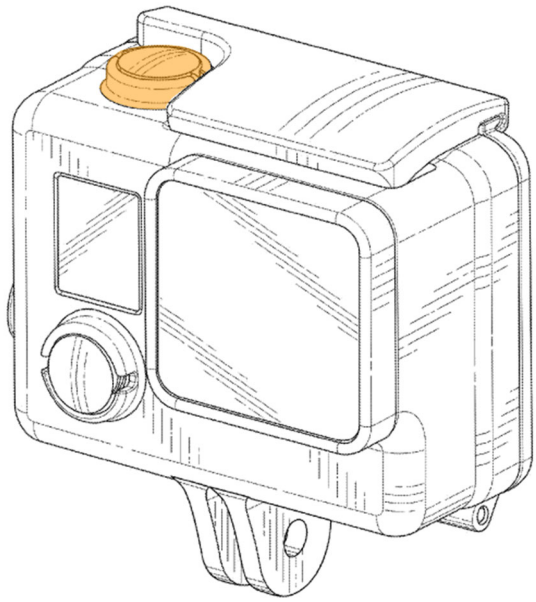
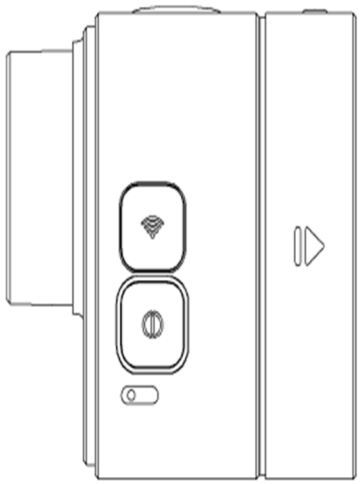


FIG. 1

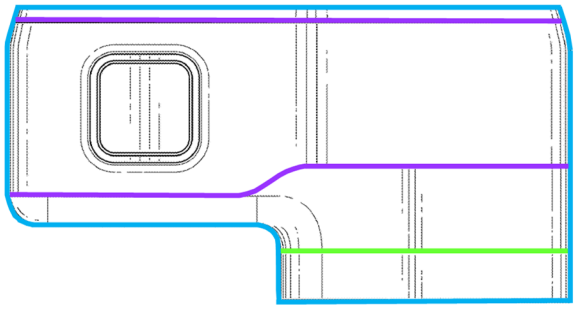
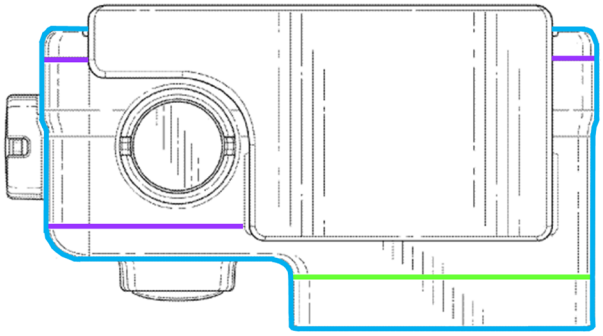
97. I also note that Gioscia's ***top button protrusion*** is not visible in the right side elevation view of Gioscia's Figure 8. This is due to the extra piece at the top. The ***top button protrusion*** is visible in the back, bottom, and left side view of Figure 1 (reproduced and annotated above). (EX1013, Fig. 1.) Gioscia's Figure 2 and Figure 3 also show the ***top button protrusion*** in the front, bottom, and left side perspective view, and the back, top, and left side perspective view, respectively. (EX1013, Fig. 2, Fig. 3.)

Huang Right View	Heo Right Side View
 Right view	

98. In my view, it would have been obvious to combine Gioscia and Huang/Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the right side view of Huang (reproduced above) and the right side view of Heo (reproduced above) show rectangular buttons and/or access elements located at the right side of the design. An ordinary designer would have known that a design could be easily modified to show a rectangular button/access portion. And an ordinary designer would have been motivated to show rectangular buttons and/or access elements because the added buttons/access elements also help compliment an overall visual language enhancing the impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Gioscia's design by using rectangular buttons/access elements, enhancing the

overall visual impression of a rectangular "box-like" design in the eyes of an ordinary designer..

5. Top Plan View

D'435	Gioscia
 FIG. 9	 FIG. 9

99. Figure 9 of the D'435 patent (left) and Figure 9 of Gioscia (right) are reproduced and annotated above. (EX1001, Fig. 9; EX1013, Fig. 9.) Both designs of the D'435 patent and Gioscia present a ***rectangular body*** with flat faces including ***horizontal lines***. And both designs show a ***rectangular lens cover*** protruding outward from the body (towards the bottom right part of the figure) including a ***horizontal line***. In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

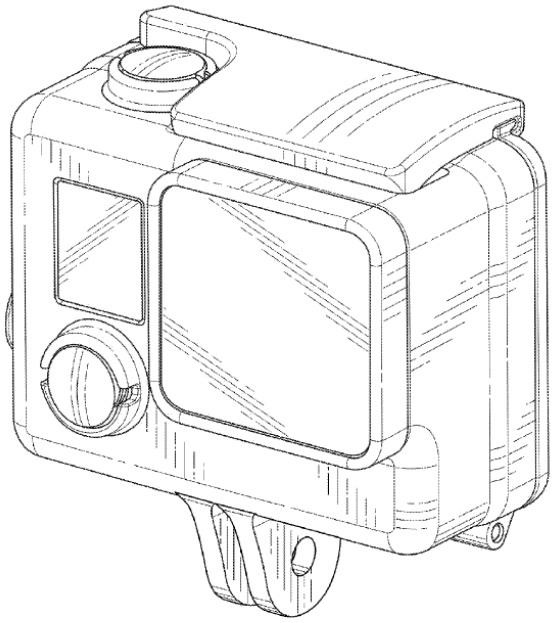
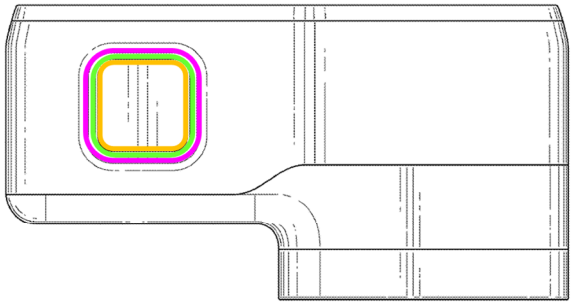
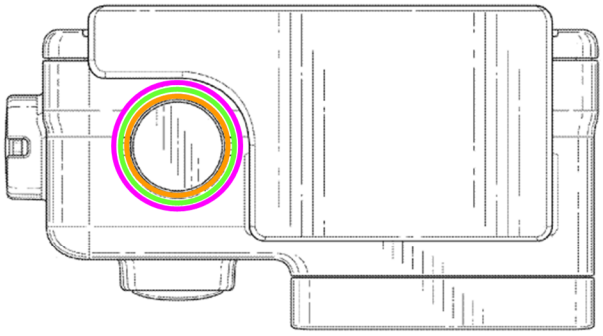
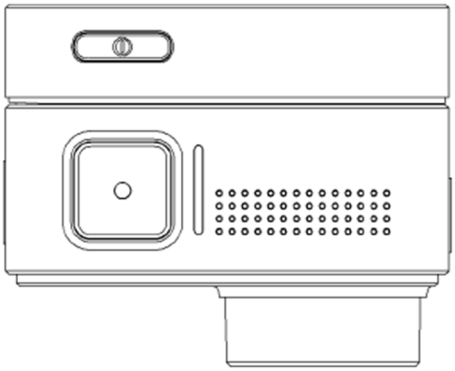


FIG. 1

100. I note that the horizontal lines of Gioscia's design differ slightly from what is shown for the D'435 patent. This is due to its design having an extra piece at the top, as shown in the front, top, and right perspective view of Figure 1 (reproduced above). But an ordinary designer would have viewed the presence of this extra piece as insubstantial/slight/insignificant because the horizontal lines are still present when viewed from the top of the design.

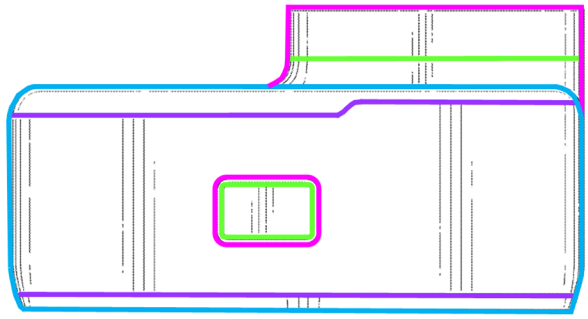
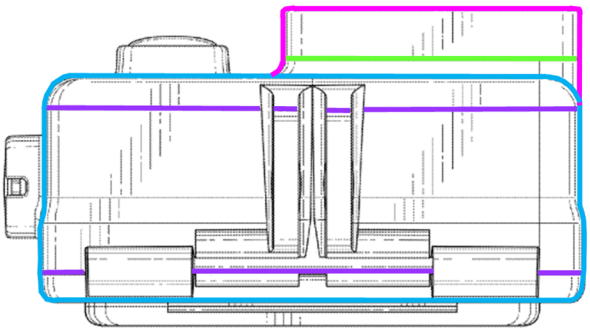
D'435	Gioscia
 FIG. 9	 FIG. 9

101. Additionally, as shown above (annotated Figure 9 of the D'435 patent (left) and annotated Figure 9 of Gioscia (right)), the designs of the D'435 patent and Gioscia present different shapes for a button/access element on the top side of the design.

Huang Top View	Heo Plane View
 Top view	*plane view* 

102. However, a designer of ordinary skill would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the top view of Huang (reproduced above) and the top view of Heo (reproduced above) show rectangular buttons and/or access elements located on the top of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual language for a rectangular "box-like" design. The designs of Huang and/or Heo improve Gioscia's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc. in the eyes of an ordinary designer.

6. Bottom Plan View

D'435	Gioscia
 FIG. 10	 FIG. 10

103. Figure 10 of the D'435 patent (left) and Figure 10 of Gioscia (right) are reproduced and annotated above. (EX1001, Fig. 10; EX1013, Fig. 10.) Both designs of the D'435 patent and Gioscia present a ***rectangular body*** including ***horizontal lines***. And both designs show a ***rectangular lens cover*** protruding outward from the body (towards the top right part of the figure) including a ***horizontal line***. In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

104. I note that the path of one of Gioscia's horizontal lines differs slightly from what is shown for the D'435 patent. In my view, this slight difference in path is insubstantial/slight/insignificant such that an ordinary designer would have regarded Gioscia as basically the same as the D'435 patent. The difference in path

does not affect the overall impression of the rectangular "box-like" design as a whole.

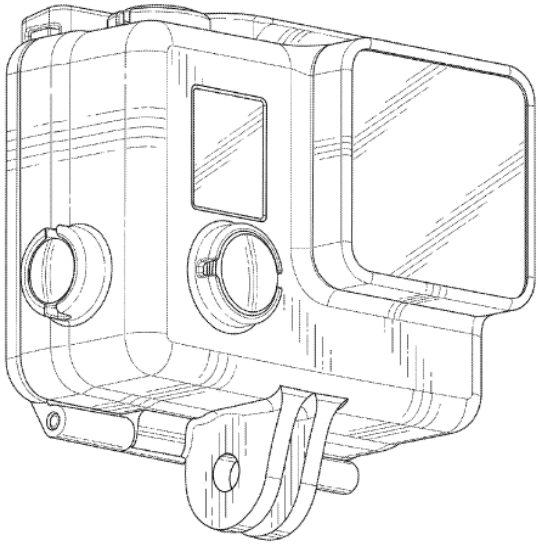
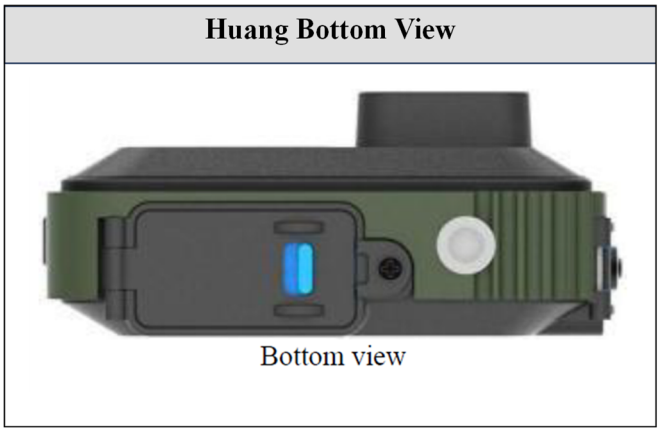
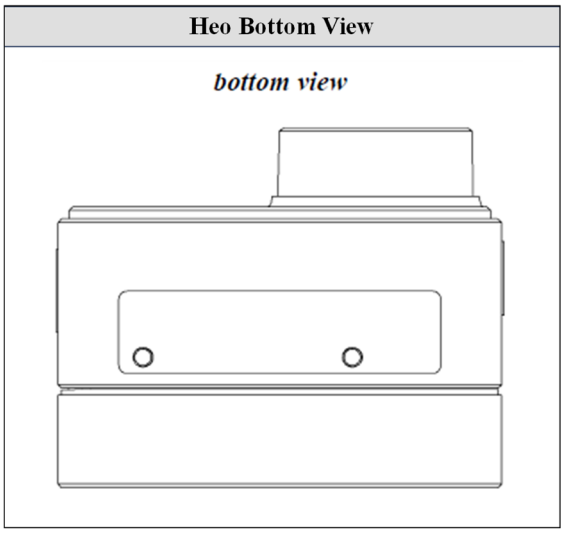


FIG. 2

105. I note that the bottom view of Gioscia's design differs slightly from what is shown for the D'435 patent. This is due to its design having an extra piece at the bottom, as shown in the front, bottom, and left side perspective view of Figure 2 (reproduced above). An ordinary designer would have viewed the presence of this extra piece as insignificant because the rectangular body, a rectangular lens cover, and horizontal lines are still viewable and part of the design.





106. In my view, it would have been obvious to combine Gioscia and Huang/Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the bottom view of Huang (reproduced above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons/access elements to compliment an overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Gioscia's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for

displays, rectangular buttons/access elements, etc. Additionally, in my view, it would have been obvious to combine Hero4 and Huang and/or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the bottom view of Huang (reproduced above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have known that a design could be easily modified to show a rectangular button/access element. And an ordinary designer would have been motivated to show rectangular buttons and/or access elements because it was known to add rectangular buttons/access elements to the sides (including bottom) of the camera. The added buttons/access elements also help enhance the overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Hero4's design by using rectangular buttons/access elements, enhancing the overall visual impression of the rectangular visual language. If, for some reason, an ordinary designer would not apply the forms illustrated by a "camera housing" design to a "camera" design, in my view, it would have been obvious to combine the teachings from a "camera housing" design (such as Gioscia's design) and a "camera" design (such as Huang's design and/or Heo's design). As I discussed in paragraph 65, camera designs and camera housing designs have similar outer appearances and design elements such as both

show buttons and access elements, both show lens covers, and both show rectangles for displays. Camera designs and camera housing designs are also similar in that they are designed to protect internal components (such as the battery, circuitry, etc.). And ordinary designers would have the same design considerations, as I discussed in paragraph 65. For action cameras, for example, designers wanted the cameras to be compact and light weight. Designers wanted the "camera [to] fit[] the housing like a glove," thereby designing the camera housing to be a thin skin around the camera. This resulted in the outer appearances of the camera and the camera housing designs being very similar, motivating designers to apply teachings of camera housing designs to camera designs. (EX1042, 3.)

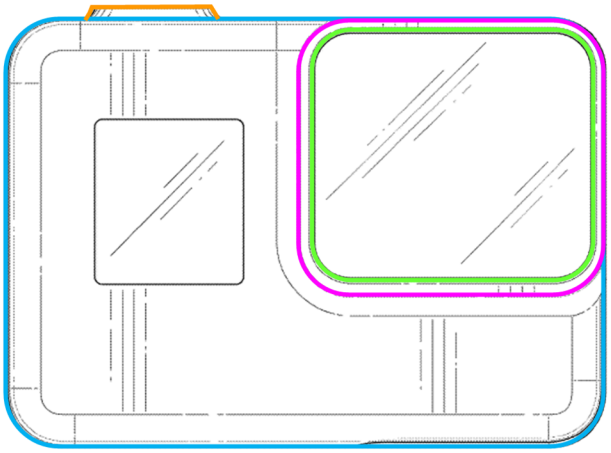
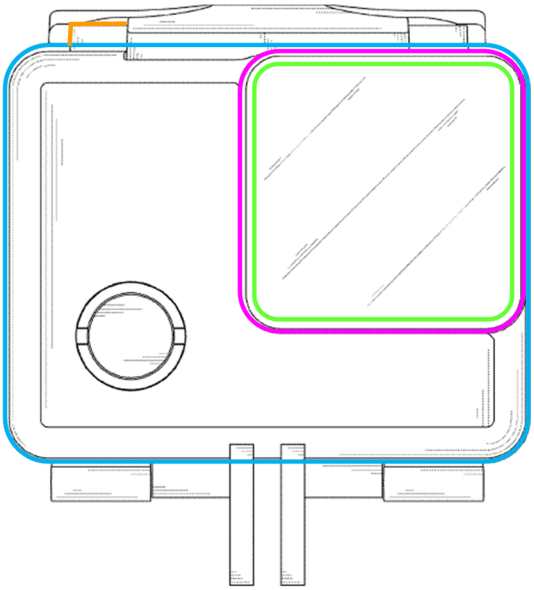
107. To summarize, both designs of the D'435 patent and the combination of Gioscia with Huang and/or Heo present the same overall visual impression of a rectangular "box-like" design for a camera or camera housing, including a rectangular body with radiused corners, a protruding rectangular lens cover in the upper right corner of the body, rectangular buttons/access elements, rectangles for displays, etc. in the eyes of an ordinary designer.

C. Chen680 in Combination with Huang, Heo, Li, and/or McVicker Render Obvious the D'435 Patent

108. In my opinion, Chen680 in combination with Huang, Heo, Li, and/or McVicker render obvious the claimed design of the D'435 patent. As discussed in more detail below, Chen680's design shows a rectangular body with flat faces, a rectangular lens cover that protrudes outwards from the front of the body and shows a visible line, a rectangle for a display located at the back of the design that occupies a large part of the back, and buttons and/or access elements located on the top and right side. Thus, Chen680's design is something already in existence. Alone or in combination with Huang, Heo, Li, and/or McVicker, it is basically similar to the D'435 patent claimed design.

109. When viewing the design of the D'435 patent and the design of Chen680 in combination with Huang, Heo, Li, and/or McVicker, an ordinary designer would have perceived the two designs as visually similar, having the same overall visual appearance of a rectangular "box-like" design with a protruding rectangular lens cover at the upper right corner of the body.

1. Front Elevational View

D'435	Chen '680
 FIG. 5	 FIG. 2

110. Figure 5 of the D'435 patent (left) and Figure 2 of Chen680 (right) are reproduced and annotated above. (EX1001, Fig. 5; EX1014, Fig. 2.) Both designs of the D'435 patent and Chen680 present a ***rectangular body*** with flat faces and (***pink*** and ***green***) rectangles around the lens. Both designs of the D'435 patent and Chen680 present a ***top button protrusion***. In my opinion, an ordinary designer would have viewed the two as very similar designs.

111. I note that the size of Chen680's top button protrusion differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the top button protrusion is insubstantial/slight/insignificant such that an ordinary

designer would have regarded Chen680 as very similar to the D'435 patent. The difference in size does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly taller button as being a different "design."

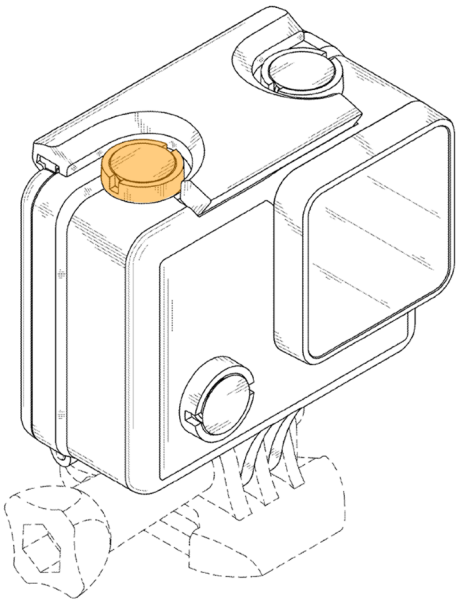


FIG. 8

112. I also note that Chen680's ***top button protrusion*** is partially visible in the front elevational view of Figure 5. This is due to its design having an extra piece at the top. The entirety of the ***top button protrusion*** is visible in the front, top, and left perspective side view of Figure 8 (reproduced and annotated above).

Huang Front View



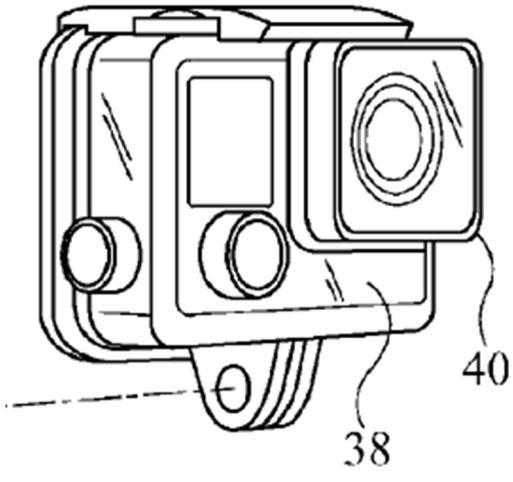
Front view

Li Front View



Front view

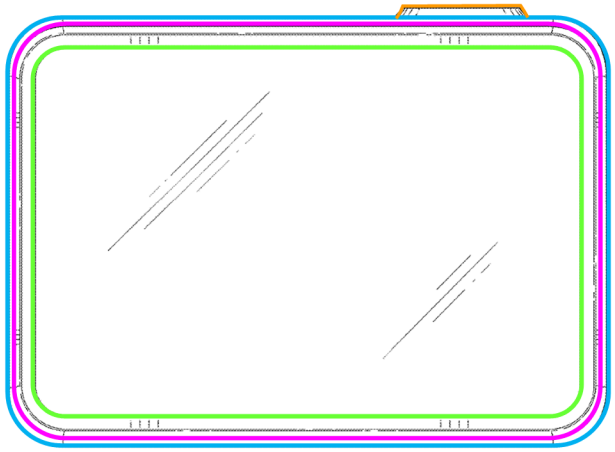
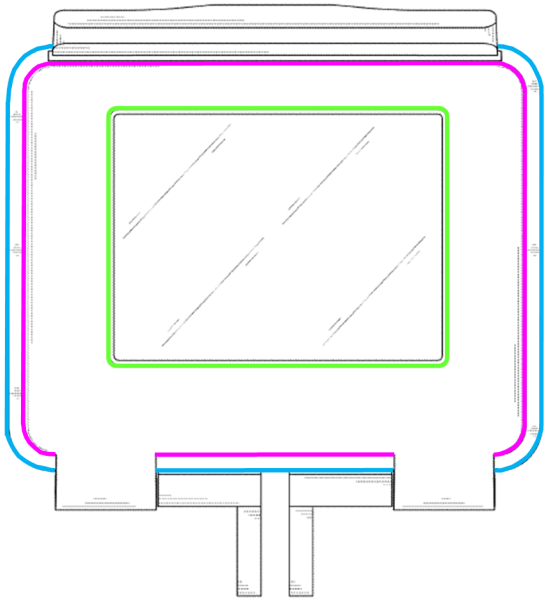
McVicker Left and Front View



113. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed a rectangle for a display located at the front of the design. For example, the front view of Huang (reproduced above), the front view of Li (reproduced above), and Figure 2 of McVicker (reproduced above) show rectangles for displays located at the front of the design that are flush with the front faces. An ordinary designer would have been motivated to show the

rectangle for a display at the front to display information to the photographer when viewing the front of the design. The designs of Huang, Li, and/or McVicker improve Chen680's design with the inclusion of a small rectangle for a display at the front of the design, enhancing the overall visual impression of a rectangular "box-like" design.

2. Rear Elevational View

D'435	Chen '680
 FIG. 6	 FIG. 3

114. Figure 6 of the D'435 patent (left) and Figure 3 of Chen680 (right) are reproduced and annotated above. (EX1001, Fig. 6; EX1014, Fig. 3.) Both designs of the D'435 patent and Chen680's present a ***rectangular body*** with flat faces and two (***pink*** and ***green***) rectangles that occupy a large part of the back of the design.

In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

115. I note that the ***blue*** and ***pink*** rectangles of Chen680's design differ slightly from what is shown for the D'435 patent. This is due to its design having extra pieces at the top and at the bottom. But an ordinary designer would have viewed the presence of these extra pieces as insubstantial/slight/insignificant because the rectangles both still occupy a large part of the back of the design, and the body still has a rectangular shape.

116. I note that the size of Chen680's ***rectangle*** differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the rectangle is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen680 as basically the same as the D'435 patent. The slight difference in size does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly smaller rectangle as being a different "overall design."

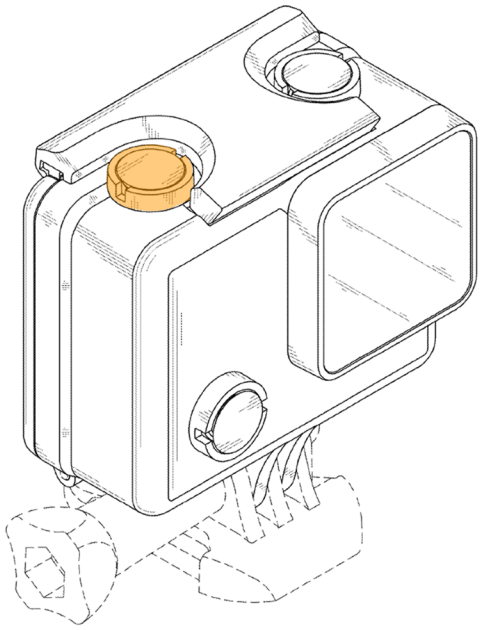
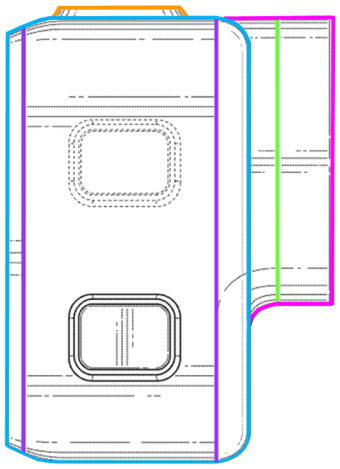
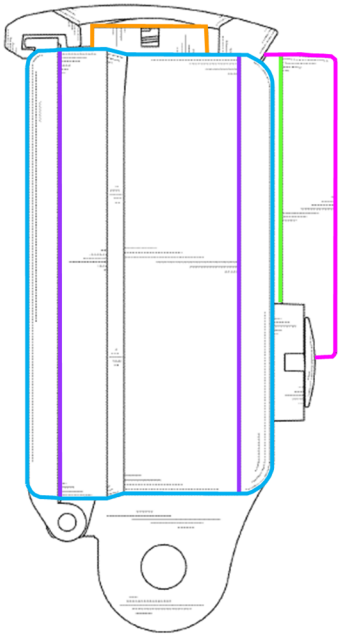


FIG. 8

117. I also note that Chen680's ***top button protrusion*** is not visible in the rear elevational view of Chen680's Figure 3. This is due to an extra piece at the top. The ***top button protrusion*** is visible in the front, top, and right side elevational view of Figure 8 (reproduced and annotated above), and thus is part of Chen680's design. (EX1014, Fig. 8.)

3. Left Side Elevational View

D'435	Chen '680
 FIG. 7	 FIG. 4

118. Figure 7 of the D'435 patent (left) and Figure 4 of Chen680 (right) are reproduced and annotated above. (EX1001, Fig. 7; EX1014, Fig. 4.) Both designs of the D'435 patent and Chen680 present a ***rectangular body*** with flat faces and shows ***vertical lines***. Both designs of the D'435 patent and Chen680 show a ***top button protrusion***. And both designs of the D'435 patent and Chen680 present a ***rectangular lens cover*** protruding outward from the body upper right corner of the body and including a ***vertical line***.

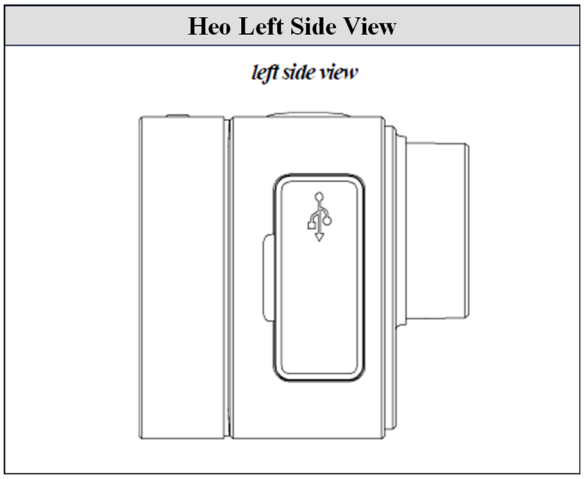
119. I note that the size of Chen680's top button protrusion differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the top button protrusion is insubstantial/insignificant such that an ordinary designer would have regarded Chen680 as very similar to the D'435 patent. The difference in size does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly taller button as being a different "overall design."

Huang Left View



Left view

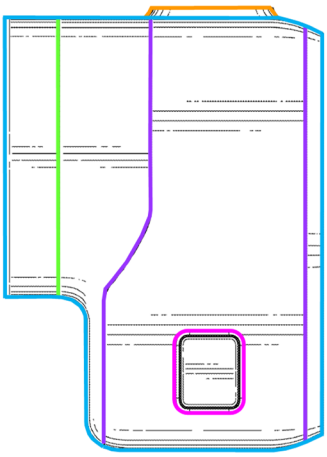
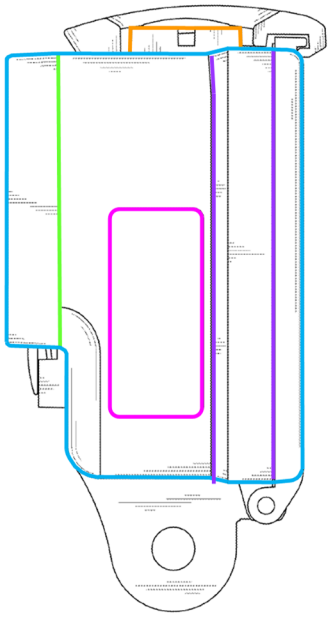
Heo Left Side View



120. Additionally, in my view, it would have been obvious to combine Chen680 and Huang and/or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements at the left side of the design. For example, the left side view of Huang (reproduced above) and the left side view of Heo (reproduced

above) show rectangular buttons and/or access elements located at the left side of the design. An ordinary designer would have been motivated to show rectangular buttons and/or access portions because it was known that to add rectangular buttons/access portions to the sides of the camera. The added buttons/access elements also enhances the overall visual impression of a rectangular "box-like" overall design. The designs of Huang and/or Heo improve Chen680's design by using rectangular buttons/access elements, enhancing the overall rectangular visual language of the design.

4. Right Side Elevational View

D'435	Chen '680
 FIG. 8	 FIG. 5

121. Figure 8 of the D'435 patent (left) and Figure 5 of Chen680 (right) are reproduced and annotated above. (EX1001, Fig. 8; EX1014, Fig. 5.) Both designs of the D'435 patent and Chen680 present a ***rectangular body*** with a ***rectangular lens cover*** protruding outward from the body. Both designs of the D'435 patent and Chen680 present (***purple*** and ***green***) vertical lines. And both designs of the D'435 patent and Chen680 present a ***top button protrusion***. Both designs also present ***rectangle(s)*** for a button and/or access element located on the right side of the design. In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

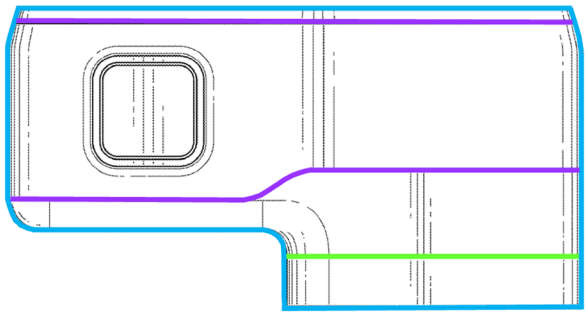
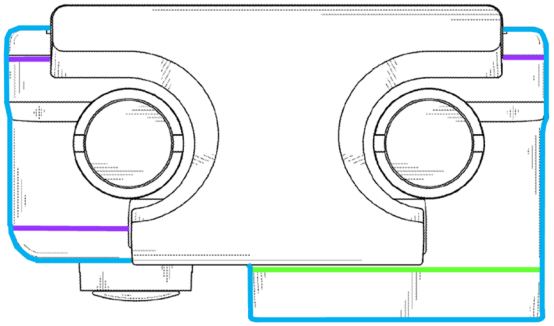
122. I note that the number and path of one of Chen680's vertical lines differ slightly from what is shown for the D'435 patent. In my view, this slight difference in number and path in a line is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen680 as basically the same as the D'435 patent. The difference does not affect the overall impression of the rectangular "box-like" design as a whole.

123. I note that the size of Chen680's top button protrusion differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the top button protrusion is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen680 as very similar to the D'435 patent. The difference in size does not affect the overall impression of the rectangular "box-

like" design as a whole. That is, an ordinary designer would not have viewed a slightly taller button as being a different "overall design."

124. I also note that the number and size of Chen680's rectangle differ slightly from what is shown for the D'435 patent. In my view, this difference in number and size of the rectangle is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen680 as basically the same as the D'435 patent. The difference in number and size does not affect the overall impression of the rectangular "box-like" design as a whole in the eyes of the ordinary designer.

5. Top Plan View

D'435	Chen '680
 FIG. 9	 FIG. 6

125. Figure 9 of the D'435 patent (left) and Figure 6 of Chen680 (right) are reproduced and annotated above. (EX1001, Fig. 9; EX1014, Fig. 6.) Both designs

of the D'435 patent and Chen680 present a ***rectangular body*** including ***horizontal lines***. And both designs show a ***rectangular lens cover*** protruding outward from the body (towards the bottom right part of the figure) including a ***horizontal line***. In my opinion, an ordinary designer would have viewed the two as having basically similar designs.

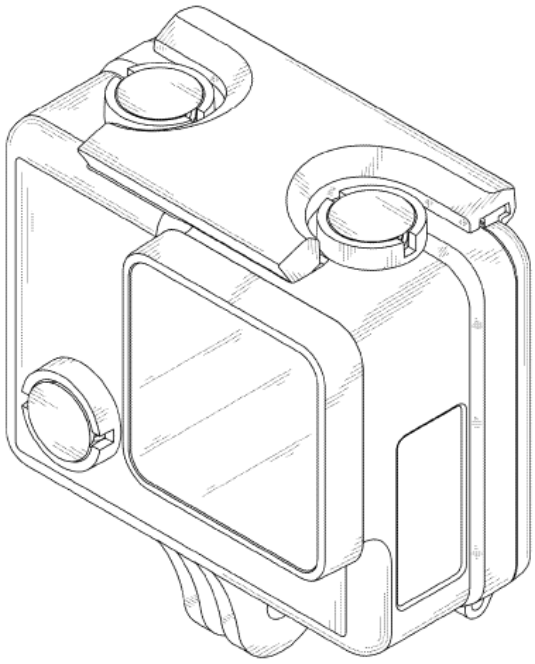
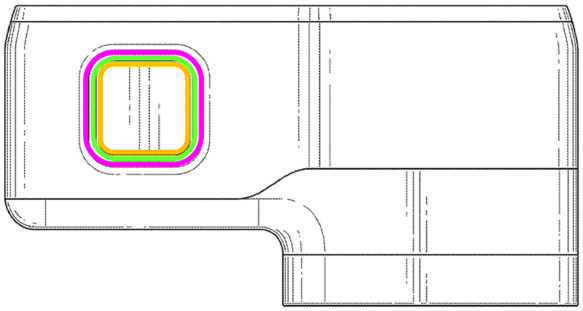
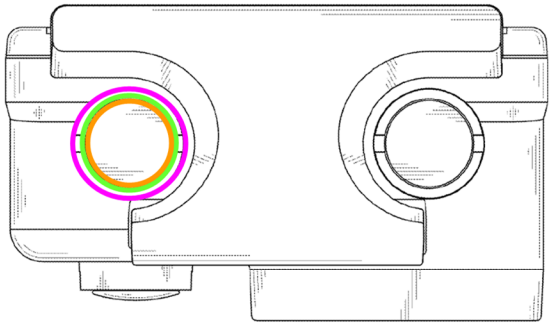


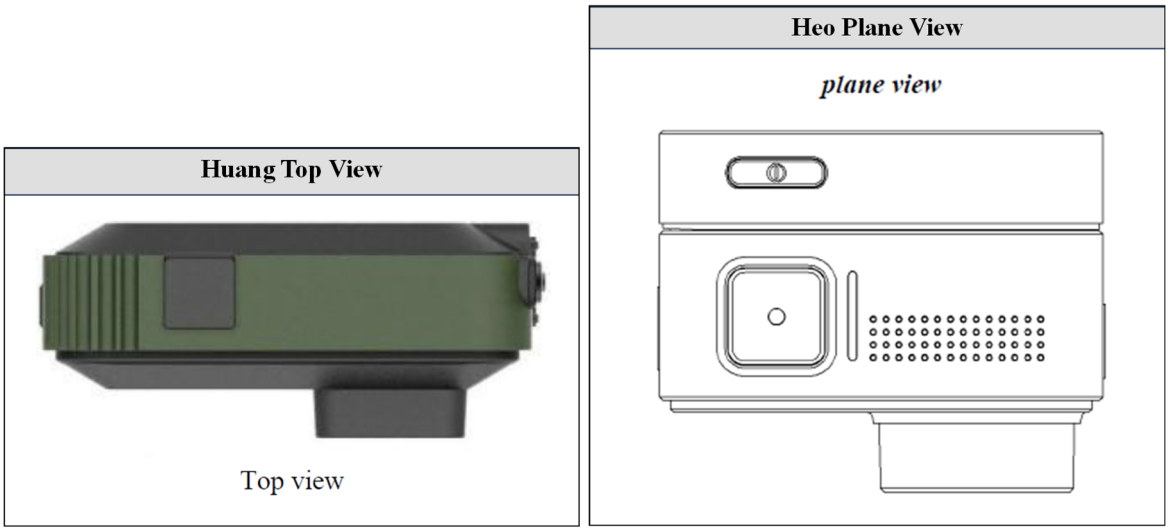
FIG. 1

126. I note that the horizontal lines of Chen680's design differ slightly from what is shown for the D'435 patent. This is due to its design having an extra piece at the top, as shown in the front, top, and right perspective view of Figure 1 (reproduced above). But an ordinary designer would have viewed the presence of

this extra piece as insubstantial/slight/insignificant because the horizontal lines are still present when viewed from the top of the design.

D'435	Chen '680
 FIG. 9	 FIG. 6

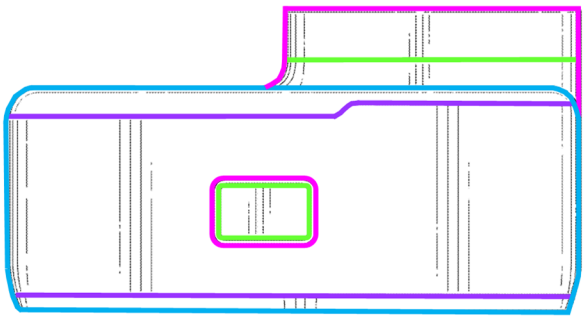
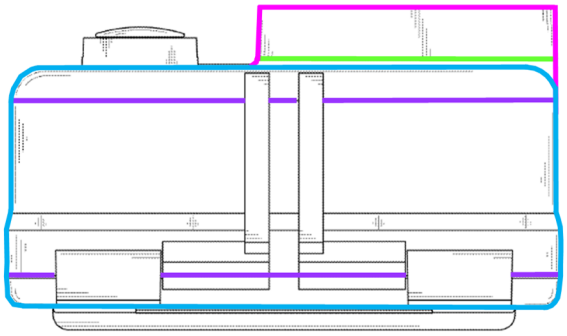
127. Additionally, as shown above (annotated Figure 9 of the D'435 patent (left) and annotated Figure 6 of Chen680 (right)), both designs of the D'435 patent and Chen680 present different shapes for a button/access element on the top side of the design.



128. However, a designer of ordinary skill would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the top view of Huang (reproduced above) and the top view of Heo (reproduced above) show rectangular buttons and/or access elements located on the top of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual impression of "box-like" design with a rectangular visual language. The designs of Huang and/or Heo improve Chen680's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens

cover, rectangles for displays, rectangular buttons/access elements, etc. in the eyes of the ordinary designer.

6. Bottom Plan View

D'435	Chen '680
 FIG. 10	 FIG. 7

129. Figure 10 of the D'435 patent (left) and Figure 7 of Chen680 (right) are reproduced and annotated above. (EX1001, Fig. 10; EX1014, Fig. 7.) Both designs of the D'435 patent and Chen680 present a ***rectangular body*** with flat faces including ***horizontal lines***. And both designs show a ***rectangular lens cover*** protruding outward from the body (towards the top right part of the figure) including a ***horizontal line***. In my opinion, an ordinary designer would have viewed the two as having basically similar overall design.

130. I note that the path of one of Chen680's horizontal lines differs slightly from what is shown for the D'435 patent. In my view, this slight difference in the path is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen680 as basically the same as the D'435 patent. The difference in path does not affect the overall impression of the rectangular "box-like" design as a whole.

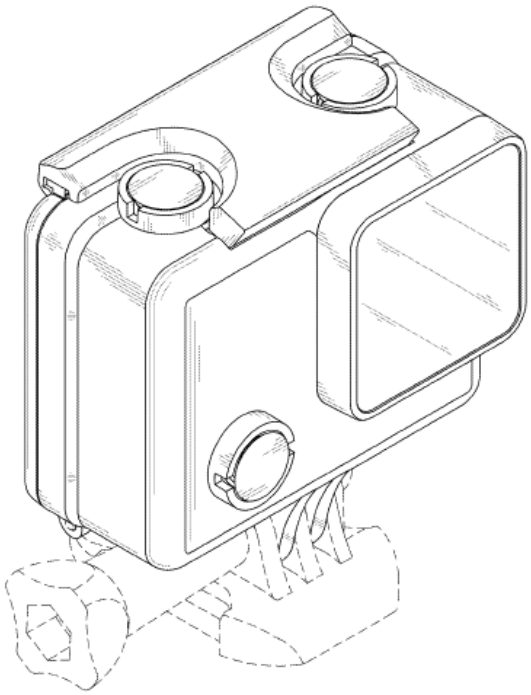
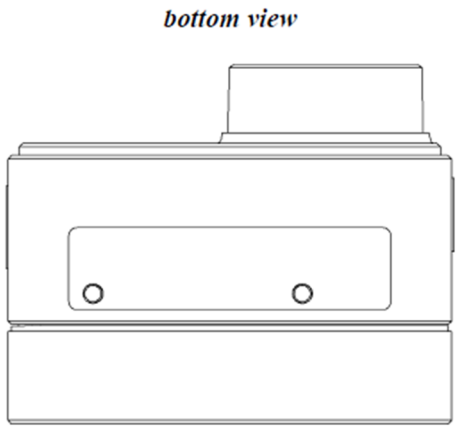


FIG. 8

131. I note that the bottom view of Chen680's design differs slightly from what is shown for the D'435 patent. This is due to its design having an extra piece at the bottom, as shown in the front, top, and left side perspective view of Figure 8

(reproduced above). An ordinary designer would have viewed the presence of this extra piece as insubstantial because the rectangular body, rectangular lens cover, and horizontal lines are still visible and part of the design.

Heo Bottom View



Huang Bottom View



Bottom view

132. Additionally, in my view, it would have been obvious to combine Chen680 and Huang and/or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the bottom view of Huang (reproduced above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have been motivated to show a rectangular button/access element at the bottom of the design to compliment an overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Chen680's design by using rectangular buttons/access elements, enhancing the

overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc. Additionally, in my view, it would have been obvious to combine Chen680 and Huang/Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the bottom view of Huang (reproduced above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Gioscia's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc. Additionally, in my view, it would have been obvious to combine Hero4 and Huang and/or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the bottom view of Huang (reproduced above) and the bottom view of

Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have known that a design could be easily modified to show a rectangular button/access element. And an ordinary designer would have been motivated to show rectangular buttons and/or access elements because it was known to add rectangular buttons/access elements to the sides (including bottom) of the camera. The added buttons/access elements also help enhance the overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Hero4's design by using rectangular buttons/access elements, enhancing the overall visual impression of the rectangular visual language. If, for some reason, an ordinary designer would not apply the teachings of a "camera housing" design to a "camera," in my view, it would have been obvious to combine the teachings from a "camera housing" design (such as Chen680's design and/or McVicker's design) and a "camera" design (such as Huang's design, Heo's design, and/or Li's design). As I discussed in paragraph 65, camera designs and camera housing designs have similar outer appearances and design elements such as both show buttons and access elements, both show lens covers, and both show rectangles for displays. Camera designs and camera housing designs are also similar in that they are designed to protect internal components (such as the battery, circuitry, etc.). And ordinary designers would have the same design considerations, as I discussed in paragraph 65. For action

cameras, for example, designers wanted the cameras to be compact and light weight. Designers wanted the "camera [to] fit[] the housing like a glove," thereby designing the camera housing to be a thin skin around the camera. This resulted in the outer appearances of the camera and the camera housing designs being very similar, motivating designers to apply teachings of camera housing designs to camera designs. (EX1042, 3.)

133. To summarize, both designs of the D'435 patent and the combination of Chen680 with Huang, Heo, Li, and/or McVicker present the same overall visual impression of a rectangular "box-like" overall design for a camera/camera housing, including a rectangular body with radiused corners, a protruding rectangular lens cover in the upper right corner, rectangular buttons/access elements, rectangles for displays, etc. in the eyes of an ordinary designer.

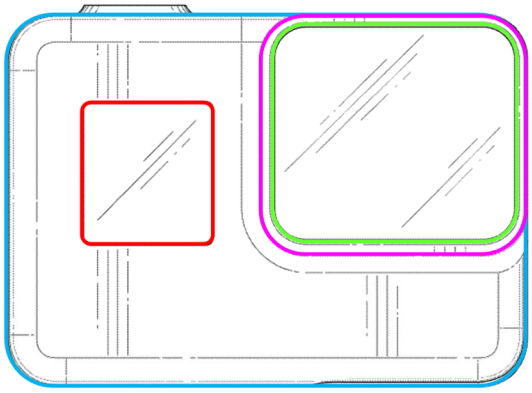
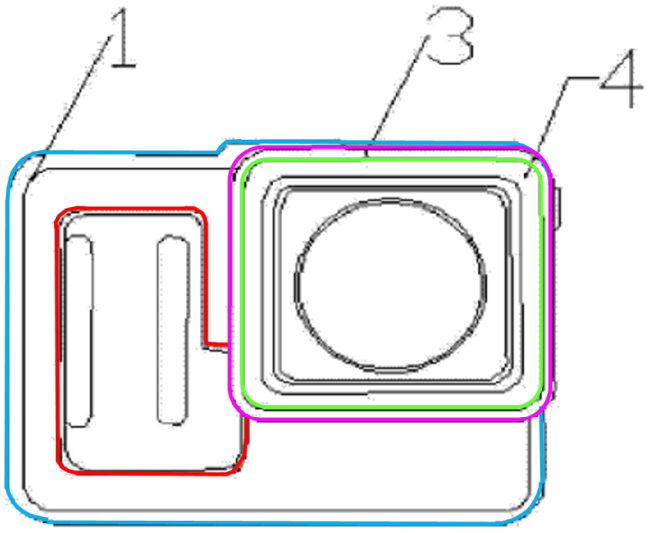
D. Wang in Combination With Huang, Heo, Li, and/or McVicker Render Obvious the D'435 Patent

134. In my opinion, Wang in combination with Huang, Heo, Li, and/or McVicker render obvious the claimed design of the D'435 patent. As discussed in more detail below, Wang's design shows a rectangular body with flat faces, a rectangular lens cover that protrudes outwards from the upper right corner of the front of the body including a visible line, a rectangle-like shape for a display located at the front of the design that is flush with the front face, and rectangular

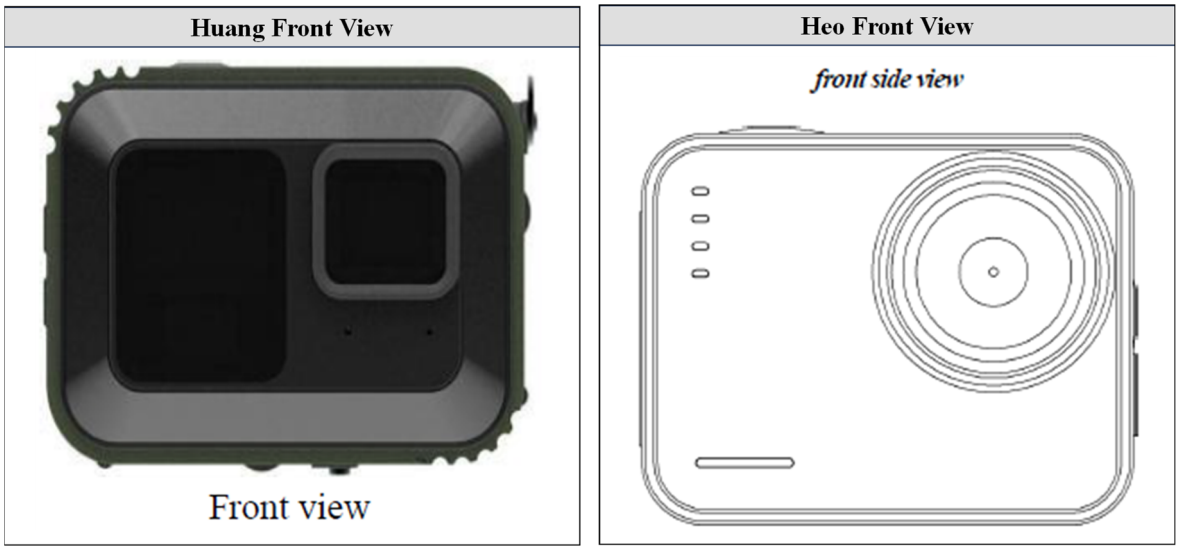
access elements located on the top, left side, and right side. Thus, Wang's design is something already in existence. Alone or in combination with Huang, Heo, Li, and/or McVicker, it is visually similar to the D'435 patent claimed design.

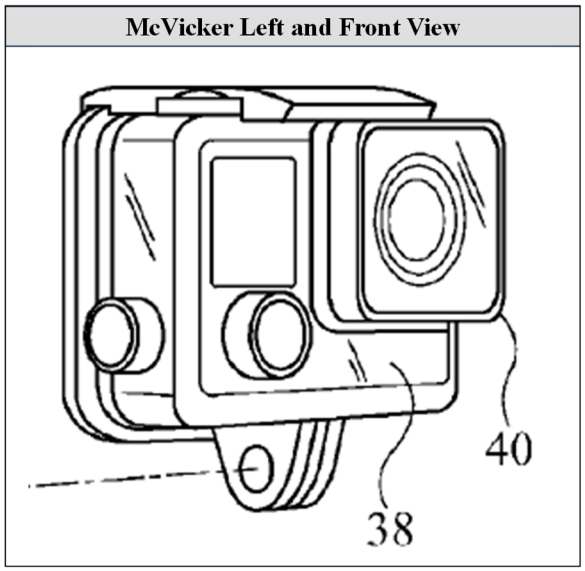
135. When viewing the design of the D'435 patent and the design of Wang in combination with Huang, Heo, Li, and/or McVicker, an ordinary designer would have perceived the two designs as visually similar, having the same overall visual appearance of a rectangular "box-like" design with a rectangular body and radiused corners, and a protruding rectangular lens cover in the upper right corner of the body.

1. Front Elevational View

D'435	Wang
	
FIG. 5	**FIG. 2**

136. Figure 5 of the D'435 patent (left) and Figure 2 of Wang (right) are reproduced and annotated above. (EX1001, Fig. 5; EX1016, Fig. 2.) Both designs of the D'435 patent and Wang present a ***rectangular body*** with flat faces and (***pink*** and ***green***) rectangles around the lens. Both designs of the D'435 patent and Wang present a ***rectangle-like shape*** at the front of the design that appears flush with the front face. In my opinion, an ordinary designer would have viewed the two as having similar designs.





137. I note that Wang's design differs slightly from what is shown for the D'435 patent with respect to the top button protrusion. An ordinary designer would have known about designs at the time of the D'435 purported invention that show a top button protrusion. For example, the front view of Huang (reproduced above), the front view of Heo (reproduced above), and the Figure 2 view of McVicker (reproduced above) show designs having a top button protrusion. An ordinary designer would have been motivated to include a top button protrusion in the design because it enabled a photographer to take a picture. The designs of Huang, Heo, and/or McVicker improve Wang's design by including a top button protrusion.

138. I also note that the shape of Wang's front rectangle differs slightly from what is shown for the D'435 patent. In my view, this difference in shape is insubstantial/slight/insignificant such that an ordinary designer would have

regarded Wang as very similar to the D'435 patent. The difference in shape does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly different shape as being a different "design."

Huang Front View



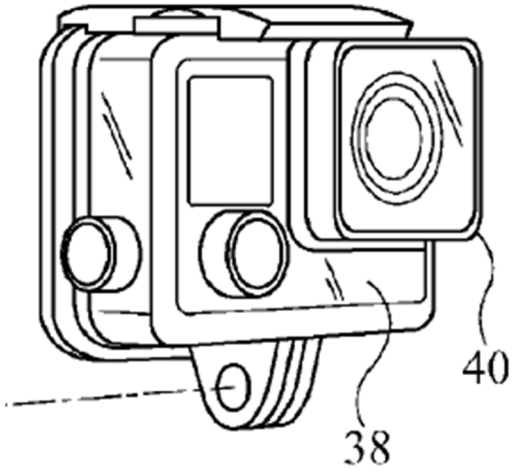
Front view

Li Front View



Front view

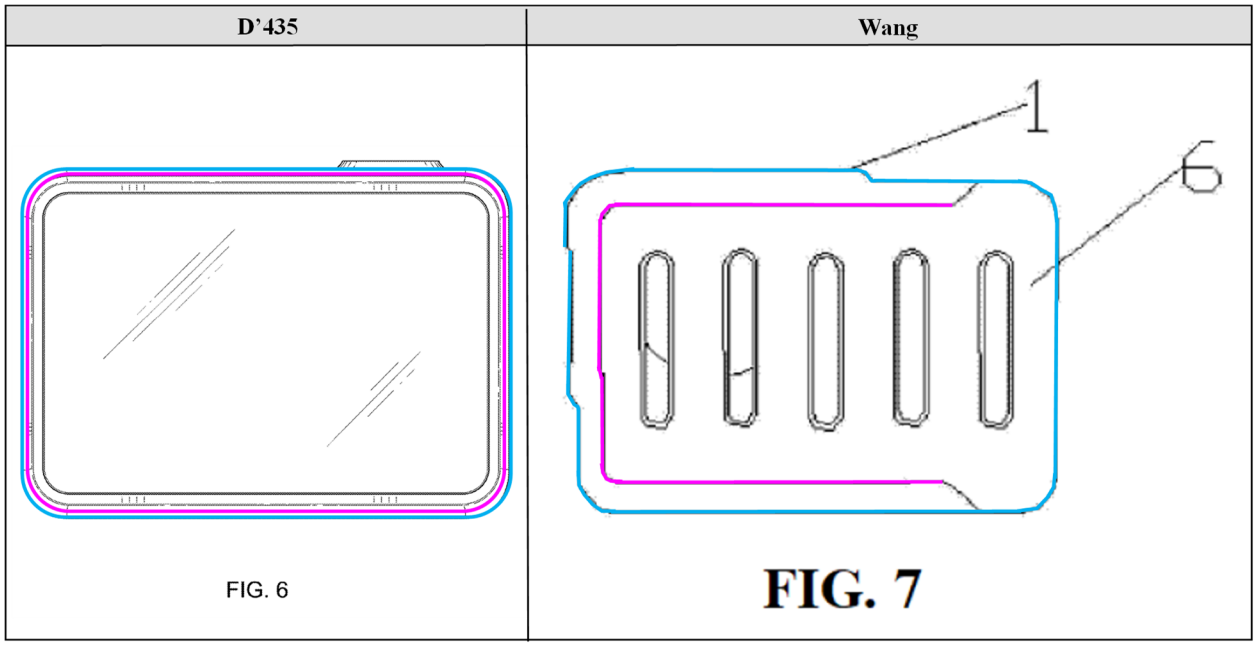
McVicker Left and Front View



139. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed a rectangle for a display located at the

front of the design for displaying information. For example, the front view of Huang (reproduced above), the front view of Li (reproduced above), and Figure 2 of McVicker (reproduced above) show rectangles for displays located at the left side of the front face of the design. An ordinary designer would have been motivated to show the rectangle for a display at the front to display information to the photographer when viewing the front of the design. The designs of Huang, Li, and/or McVicker improve Wang's design by including a small rectangular shape for a front display.

2. Rear Elevational View



140. Figure 6 of the D'435 patent (left) and Figure 7 of Wang (right) are reproduced and annotated above. (EX1001, Fig. 6; EX1016, Fig. 7.) Both designs of the D'435 patent and Wang present a ***rectangular body*** with flat faces and an

inner rectangle-like shape that occupies a large part of the back of the design. In my opinion, an ordinary designer would have viewed the two as having similarities in design.

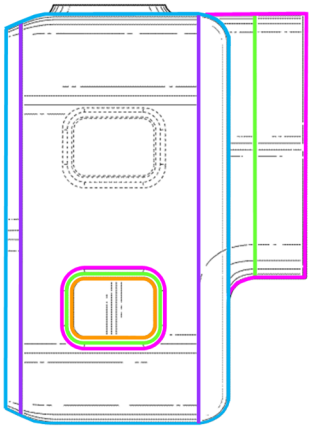
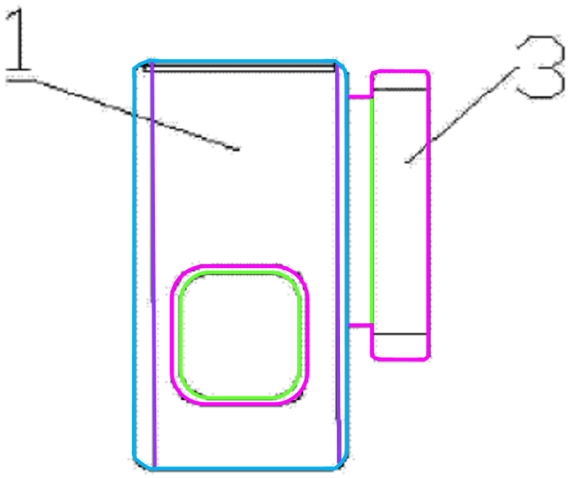
141. I note that the Wang's ***rectangle*** differs due to being a "push-pull metal rear cover" at the back of the design. (EX1016, [0026].) In my view, the use of the metal rear cover is purely a functional consideration based on the functional aspects of the push-pull mechanism for the metal rear cover. (EX1016, [0027].) It is my understanding that design patents do not cover such purely functional considerations because they are functional rather than ornamental in nature. An ordinary designer would have wanted to utilize this rear surface area to provide a large display, as was part of the designs known by an ordinary designer at the time of the purported D'435 invention. Wang's rectangles still occupy a large part of the back of the design, and the body still has a rectangular shape.

Heo Rear View	Li Back View
rear view 	 Back view

142. Additionally, an ordinary designer would have known about designs at the time of the D'435 purported invention that showed a rectangle for a display located at the back of the design having the same size/shape as the design of the D'435 patent. For example, the rear view of Heo (reproduced above) and the rear view of Li (reproduced above) show rectangles for displays located at the back of the design. An ordinary designer would have known that the design could include a rectangle for a display at the back , and would want it to be as large to facilitate viewing. And an ordinary designer would have been motivated to show the rectangle for a display at the back to display the picture captured or to be captured by the camera. The aforementioned design elements of Heo and/or Li improve Wang's design by including a large display at the back of the design.

143. Wang's design differs because it does not show a top button protrusion. As discussed in paragraph 137, an ordinary designer would have been motivated to combine Wang with Huang, Heo, and/or McVicker (teachings of a top button protrusion).

3. Left Side Elevational View

D'435	Wang
 FIG. 7	 FIG. 4

144. Figure 7 of the D'435 patent (left) and Figure 4 of Wang (right) are reproduced and annotated above. (EX1001, Fig. 7; EX1016, Fig. 4.) Both designs of the D'435 patent and Wang present a ***rectangular body*** with flat faces including ***vertical lines***. Both designs of the D'435 patent and Wang present a protruding ***rectangular lens cover*** including a ***vertical line***. Both designs of the D'435 patent and Wang also present (***green*** and ***pink***) rectangles for a button and/or access element located near the bottom of the left side of the design. In my opinion, an ordinary designer would have viewed the two as having similar designs.

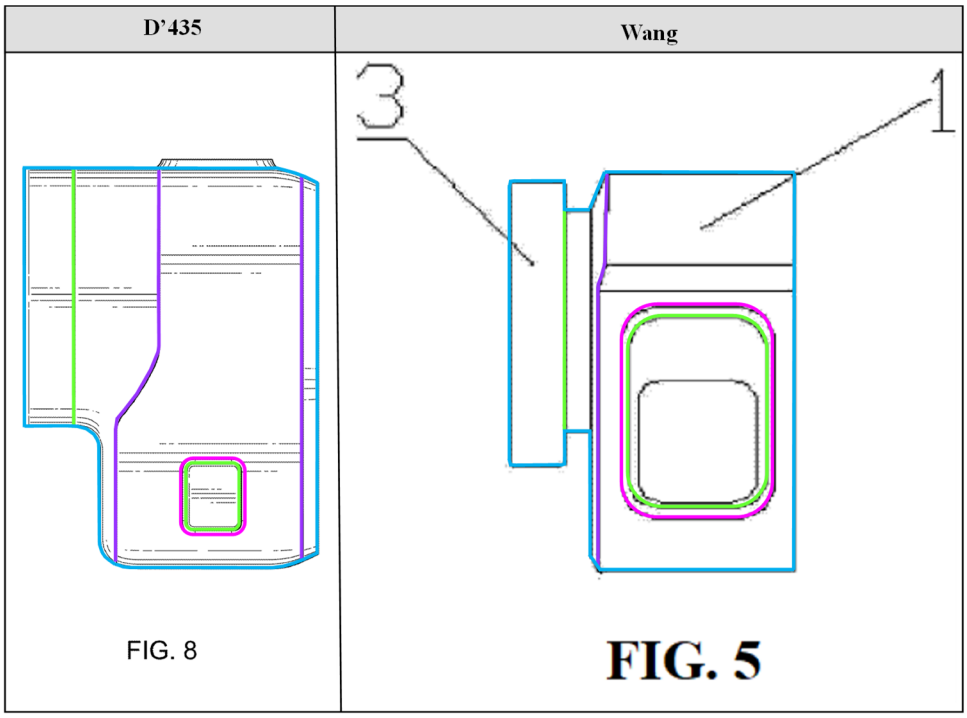
145. I note that the number and size of Wang's rectangles differ slightly from what is shown for the D'435 patent. In my view, this difference in number and size of the rectangles is insubstantial/slight/insignificant such that an ordinary

designer would have regarded Wang as similar to the D'435 patent. The difference in number and size does not affect the overall impression of the rectangular "box-like" overall design as a whole.

146. I also note that Wang's rectangular lens cover differs slightly from what is shown for the D'435 patent. In my view, this recess between the body and the rectangular lens cover is insignificant such that an ordinary designer would have regarded Wang as basically the same as the D'435 patent. This small difference does not affect the overall impression of the rectangular "box-like" design as a whole. An ordinary designer would not have viewed small recesses in the rectangular lens cover as being a different "overall design." Additionally, an ordinary designer would have been motivated to remove the recesses to compliment the overall rectangular nature of Wang and to simplify its design.

147. Wang's design differs slightly from what is shown for the D'435 patent with respect to the top button protrusion. As discussed in paragraph 137, an ordinary designer would have been motivated to combine Wang with Huang, Heo, and/or McVicker (teachings of a top button protrusion).

4. Right Side Elevational View



148. Figure 8 of the D'435 patent (left) and Figure 5 of Wang (right) are reproduced and annotated above. (EX1001, Fig. 8; EX1016, Fig. 5.) Both designs of the D'435 patent and Wang present a ***rectangular body*** with a ***rectangular lens cover*** protruding outward from the body. Both designs of the D'435 patent and Wang present (***purple*** and ***green***) vertical lines. And both designs of the D'435 patent and Wang present (***pink*** and ***green***) rectangles for a button/access element at the right side of the design. In my opinion, an ordinary designer would have viewed the two as having similar designs.

149. I note that the number of Wang's vertical lines differs slightly from what is shown for the D'435 patent. In my view, this slight difference in number is

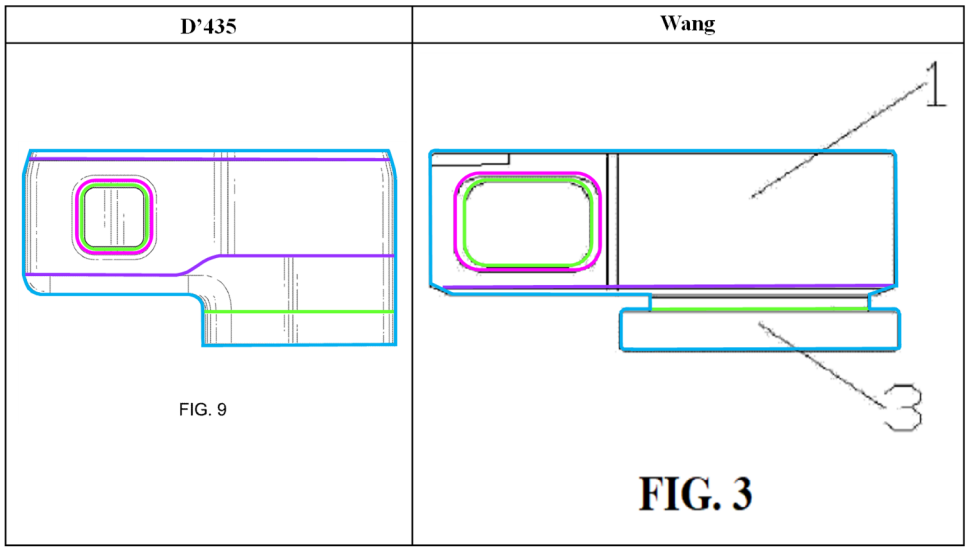
insubstantial/slight/insignificant such that an ordinary designer would have regarded Wang as similar to the D'435 patent. The difference in number does not affect the overall impression of the rectangular "box-like" design as a whole.

150. I note that the size of Wang's rectangles differ slightly from what is shown for the D'435 patent. In my view, this difference in size of the rectangles is insubstantial/slight/insignificant such that an ordinary designer would have regarded Wang as very similar to the D'435 patent. The difference in size does not affect the overall impression of the rectangular "box-like" design as a whole.

151. I also note that Wang's rectangular lens cover differs slightly from what is shown for the D'435 patent. In my view, these recesses between the body and the rectangular lens cover are insignificant such that an ordinary designer would have regarded Wang as basically the same as the D'435 patent. The difference does not affect the overall impression of the rectangular "box-like" design as a whole. An ordinary designer would not have viewed recesses in the rectangular lens cover as being a different "design."

152. Wang's design differs slightly from what is shown for the D'435 patent with respect to the top button protrusion. As discussed in paragraph 137, an ordinary designer would have been motivated to combine Wang with Huang, Heo, and/or McVicker (teachings of a top button protrusion).

5. Top Plan View



153. Figure 9 of the D'435 patent (left) and Figure 3 of Wang (right) are reproduced and annotated above. (EX1001, Fig. 9; EX1016, Fig. 3.) Both designs of the D'435 patent and Wang present a ***rectangular body*** with flat faces including a ***horizontal line***. And both designs show a ***rectangular lens cover*** protruding outward from the body (towards the bottom right part of the figure) including a ***horizontal line***. Both designs of the D'435 patent and Wang further present (***pink*** and ***green***) rectangles for a button at the top of the design. In my opinion, an ordinary designer would have viewed the two as having very similar designs.

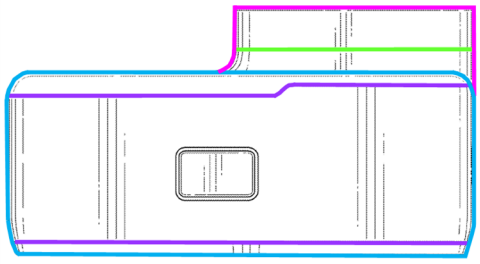
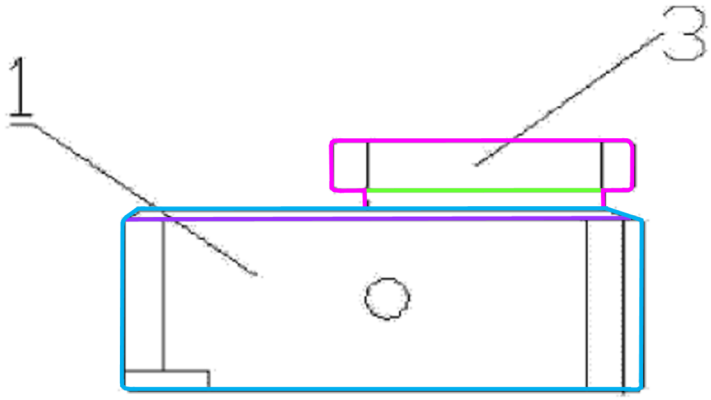
154. I note that the number of Wang's horizontal lines differ slightly from what is shown for the D'435 patent. In my view, this slight difference in number is insubstantial/slight/insignificant such that an ordinary designer would have regarded Wang as basically the same as the D'435 patent. The difference in

number does not affect the overall impression of the rectangular "box-like" design as a whole.

155. I note that the size of Wang's rectangles differ slightly from what is shown for the D'435 patent. In my view, this difference in size of the rectangles is insubstantial/slight/insignificant such that an ordinary designer would have regarded Wang as basically the same as the D'435 patent. The difference in size does not affect the overall impression of the rectangular "box-like" design as a whole.

156. I also note that Wang's rectangular lens cover differs slightly from what is shown for the D'435 patent. In my view, these recesses between the body and the rectangular lens cover are insignificant such that an ordinary designer would have regarded Wang as basically similar to the D'435 patent. The recess does not affect the overall impression of the rectangular "box-like" design as a whole. An ordinary designer would not have viewed a slightly larger rectangle or small recesses in the rectangular lens cover as being a different "overall design."

6. Bottom Plan View

D'435	Wang
 FIG. 10	 FIG. 6

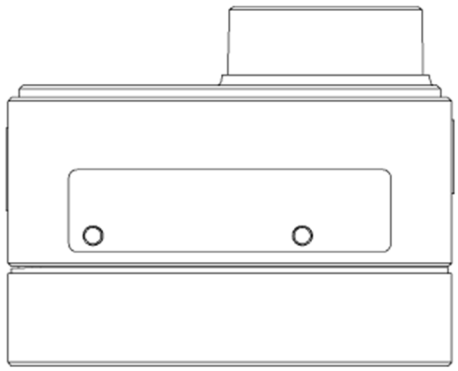
157. Figure 10 of the D'435 patent (left) and Figure 6 of Wang (right) are reproduced and annotated above. (EX1001, Fig. 10; EX1016, Fig. 6.) Both designs of the D'435 patent and Wang present a ***rectangular body*** with flat faces including ***horizontal line(s)***. And both designs show a ***rectangular lens cover*** protruding outward from the body (towards the top right part of the figure) including a ***horizontal line***. In my opinion, an ordinary designer would have viewed the two as having very similar designs.

158. I further note that the number of Wang's horizontal lines differ slightly from what is shown for the D'435 patent. In my view, this slight difference in number is insubstantial/slight/insignificant such that an ordinary designer would have regarded Wang as basically the same as the D'435 patent.

The difference in number does not affect the overall impression of the rectangular "box-like" design as a whole.

159. I also note that Wang's rectangular lens cover differs slightly from what is shown for the D'435 patent. In my view, these recesses between the body and the rectangular lens cover are insignificant such that an ordinary designer would have regarded Wang as basically the same as the D'435 patent. The recesses do not affect the overall impression of the rectangular "box-like" design as a whole. An ordinary designer would not have viewed a slightly larger rectangle or small recesses in the rectangular lens cover as being a different "design."

Heo Bottom View



Huang Bottom View



Bottom view

160. Additionally, in my view, it would have been obvious to combine Wang and Huang and/or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular

buttons and/or access elements. For example, the bottom view of Huang (reproduced above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have known that the shape of a button/access element could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual impression of a rectangular "box-like" overall design. The designs of Huang and/or Heo improve Wang's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc. in the eyes of the ordinary designer. If, for some reason, an ordinary designer would not apply the teachings of a "camera housing" design to a "camera," in my view, it would have been obvious to combine the teachings from a "camera housing" design (such as Wang's design and/or McVicker's design) and a "camera" design (such as Huang's design, Heo's design, and/or Li's design). As I discussed in paragraph 65, camera designs and camera housing designs have similar outer appearances and design elements such as both show buttons and access elements, both show lens covers, and both show rectangles for displays. Camera designs and camera housing designs are also similar in that they are designed to protect internal

components (such as the battery, circuitry, etc.). And ordinary designers would have the same design considerations, as I discussed in paragraph 65. For action cameras, for example, designers wanted the cameras to be compact and light weight. Designers wanted the "camera [to] fit[] the housing like a glove," thereby designing the camera housing to be a thin skin around the camera. This resulted in the outer appearances of the camera and the camera housing designs being very similar, motivating designers to apply teachings of camera housing designs to camera designs. (EX1042, 3.)

161. To summarize, both designs of the D'435 patent and the combination of Wang with Huang, Heo, Li, and/or McVicker present the same overall visual impression of a rectangular "box-like" design for a camera or camera housing, including a rectangular body, a rectangular lens cover, rectangular buttons/access elements, rectangles for displays, etc. in the eyes of the ordinary designer.

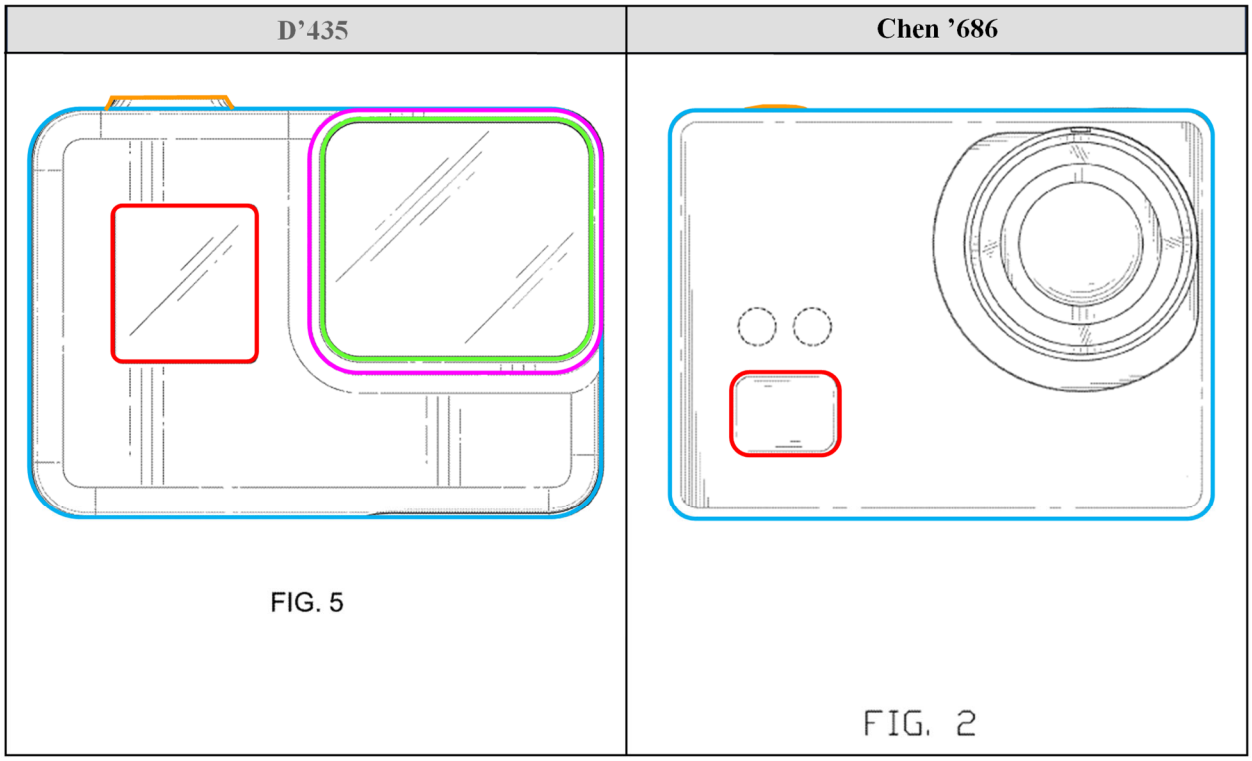
E. Chen686 in Combination with Huang, Heo, Li, and/or McVicker Render Obvious the D'435 Patent

162. In my opinion, Chen686 in combination with Huang, Heo, Li, and/or McVicker render obvious the claimed design of the D'435 patent. As discussed in more detail below, Chen686's design shows a rectangular body with flat faces, a rectangle at the front of the design that is flush with the front face and a rectangle for a display located at the back of the design that occupies a large part of the back,

and buttons and/or access elements located on the top, left side, and right side. Thus, Chen686's design is something already in existence. Alone or in combination with Huang, Heo, Li, and/or McVicker, it is visually similar to the D'435 patent claimed design.

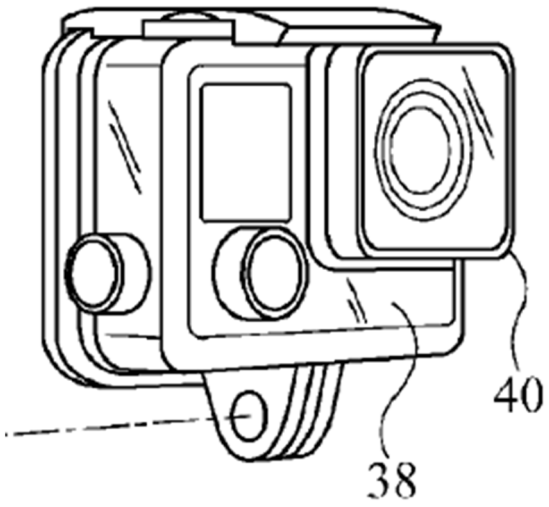
163. When viewing the design of the D'435 patent and the design of Chen686 combined with Huang, Heo, Li, and/or McVicker, an ordinary designer would have perceived the two designs as visually similar, having the same overall visual appearance of a rectangular "box-like" design.

1. Front Elevational View



164. Figure 5 of the D'435 patent (left) and Figure 2 of Chen686 (right) are reproduced and annotated above. (EX1001, Fig. 5; EX1018, Fig. 2. Both designs

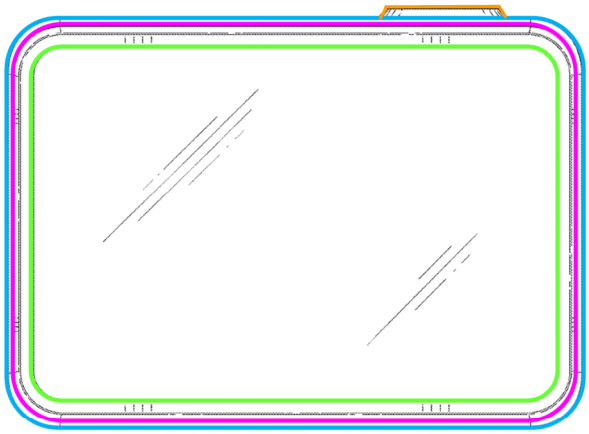
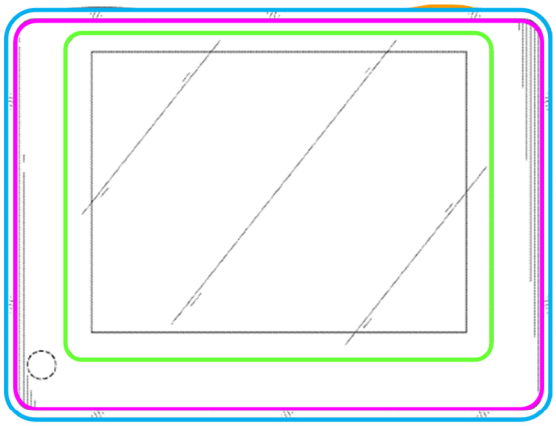
of the D'435 patent and Chen686 present a ***rectangular body*** with flat faces. Both designs of the D'435 patent and Chen686 present a ***small rectangle*** at the front of the design that is flush with the front face, and a ***top button protrusion***. In my opinion, an ordinary designer would have viewed the two as overall having similar designs.

Huang Front View	McVicker Left and Front View
 Front view	

165. I note that Chen686's design differs from what is shown for the D'435 patent with respect to the rectangular lens cover. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed a rectangular lens cover that protrudes outwards from the body. For example, the front view of Huang (reproduced above) and Figure 2 of McVicker (reproduced above) show designs having a rectangular lens cover protruding outwards from the body. An ordinary designer would have known that a design could be easily

modified to show a similar rectangular lens cover. An ordinary designer would have been motivated to show a rectangular lens cover because it was known that this rectangle results in improved image quality. For example, "the rectangular shape of the hood will cut glare and lower the chance of vignetting at wide angles." (EX1030, 1.) "Rectangular lens hoods have a shape that closely matches the image frame shape. Best suited to wide-angle prime lenses, they can be longer than circular lens hoods without blocking the angle or view or cause vignetting." (EX1031, 6.) The designs of Huang and/or McVicker improve Chen686's design by including a rectangular lens cover, enhancing the overall visual impression of a rectangular "box-like" design by creating a consistent rectangular shape throughout.

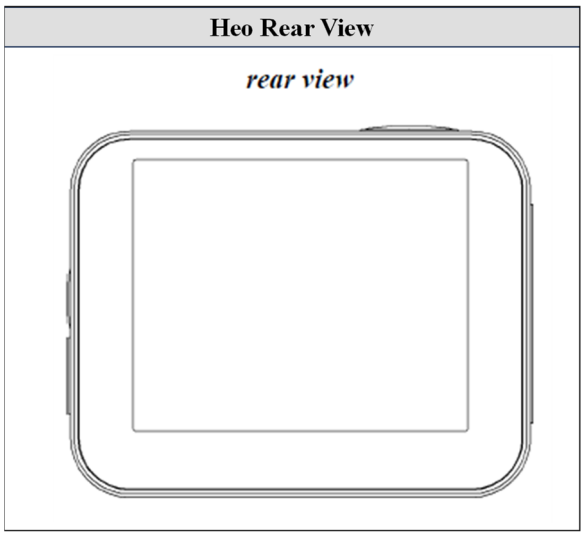
2. Rear Elevational View

D'435	Chen '686
 FIG. 6	 FIG. 3

166. Figure 6 of the D'435 patent (left) and Figure 3 of Chen686 (right) are reproduced and annotated above. (EX1001, Fig. 6; EX1018, Fig. 3.) Both designs of the D'435 patent and Chen686 present a ***rectangular body*** with flat rear faces and two inner (***pink*** and ***green***) rectangles that occupy a large part of the back of the design. Both designs of the D'435 patent and Chen686 present a ***top button protrusion***.

167. I note that the size of Chen686's ***rectangle*** differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the ***rectangles for the displays*** is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen686 as basically the same as the D'435 patent. The

slight difference in size does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly smaller rectangle as being a different "design."

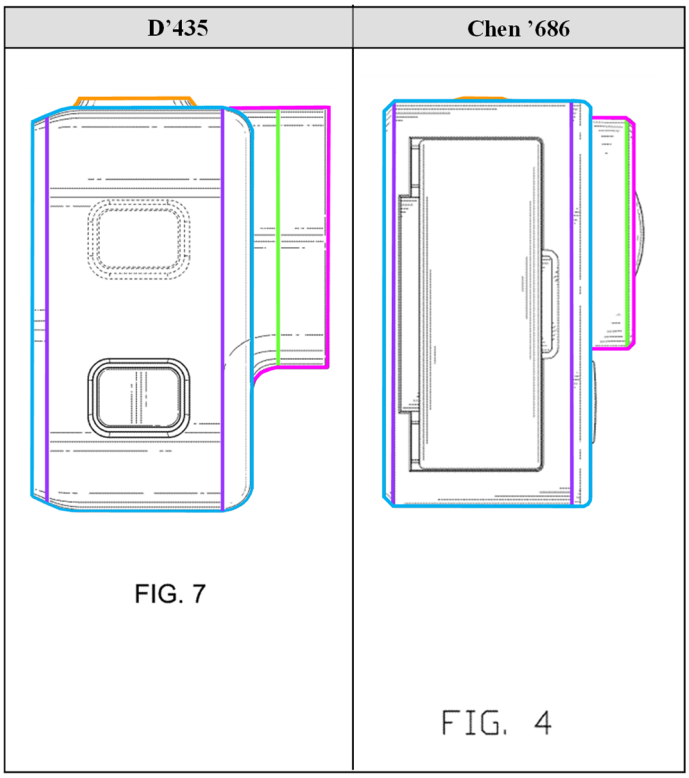




168. If, for some reason, an ordinary designer does not view this difference in size of Chen686's rectangle as being insubstantial/slight/insignificant, then in my view, it would have been obvious to combine Chen686 with Heo and/or Li. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed a full-sized rectangle for a display located at the back of the design. For example, the rear view of Heo (reproduced above) and the rear view of Li (reproduced above) show full-sized rectangles for displays located at the back of the design. An ordinary designer would have been motivated to show a full-sized rectangle for a display at the back so that the photographer can see a large version displayed of the picture captured or to be captured by the

camera. The designs of Heo and/or Li improve Chen 686's design by providing improved usability via a full-sized rectangle for a display at the back of the design.

3. Left Side Elevational View

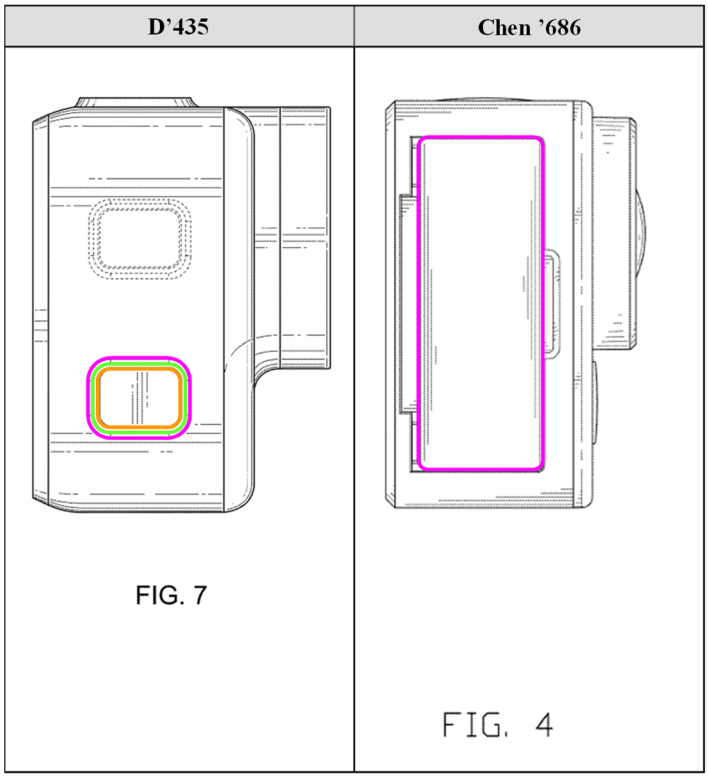


169. Figure 7 of the D'435 patent (left) and Figure 4 of Chen686 (right) are reproduced and annotated above. (EX1001, Fig. 7; EX1018, Fig. 4.) Both designs of the D'435 patent and Chen686 present a ***rectangular body*** with flat faces and including ***vertical lines***. Both designs of the D'435 patent and Chen686 present a ***top button protrusion***. And both designs of the D'435 patent and Chen686 present a ***lens*** (including a ***vertical line***) that protrudes outward from the body.

170. I note that the size of Chen686's top button protrusion differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the

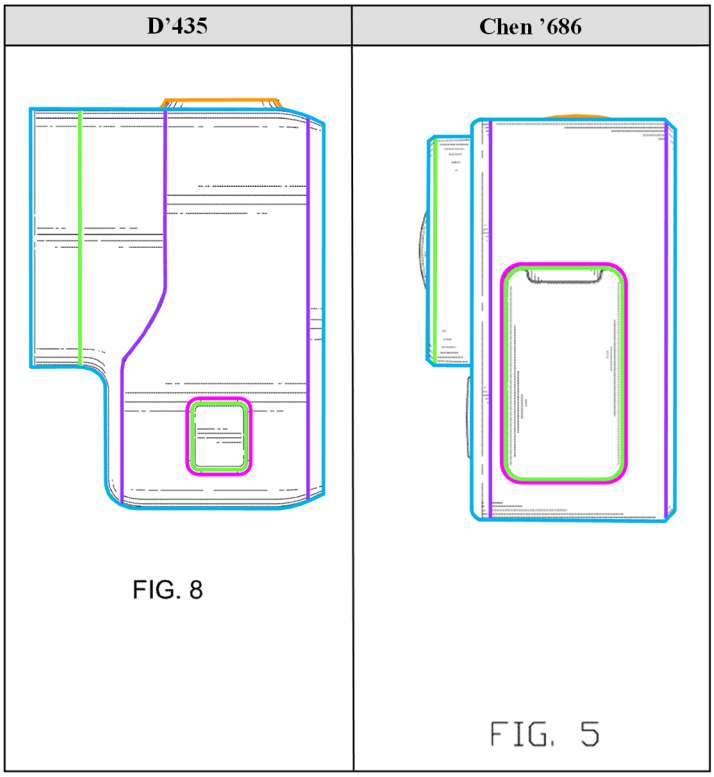
top button protrusion is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen686's very similar to the D'435 patent. The difference in size does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly shorter button as being a different "overall design."

171. Chen686's design differs slightly from what is shown for the D'435 patent with respect to the rectangular lens cover. As discussed in paragraph 165, an ordinary designer would have been motivated to combine Chen686 with Huang and/or McVicker (teachings of a rectangular lens cover).



172. Additionally, as shown above (annotated Figure 7 of the D'435 patent (left) and annotated Figure 4 of Chen686 (right)), both designs of the D'435 patent and Chen686 present rectangle(s) for a button and/or access element on the left side of the design. I note that the number and size of Chen686's rectangles differ from what is shown for the D'435 patent. In my view, this difference in number and size in the rectangles is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen686 as very similar as the D'435 patent. The difference in number and size does not affect the overall impression of the rectangular "box-like" design as a whole.

4. Right Side Elevational View



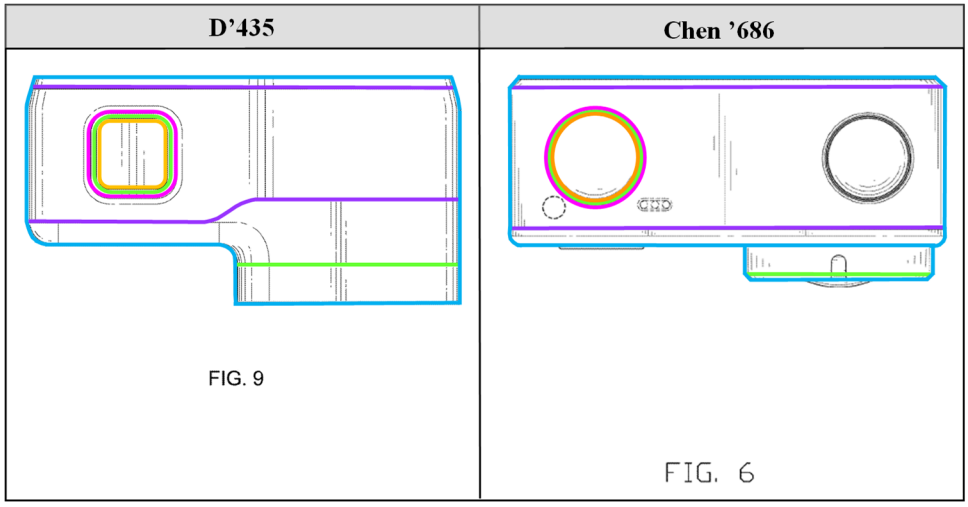
173. Figure 8 of the D'435 patent (left) and Figure 5 of Chen686 (right) are reproduced and annotated above. (EX1001, Fig. 8; EX1018, Fig. 5.) Both designs of the D'435 patent and Chen686 present a ***rectangular body*** with a ***lens*** protruding outward from the body. Both designs of the D'435 patent and Chen686 present a ***top button protrusion***. And both designs of the D'435 patent and Chen686 present (***purple*** and ***green***) vertical lines and (***pink*** and ***green***) rectangular buttons and/or access elements. In my opinion, an ordinary designer would have viewed the two as having very similar designs.

174. I note that the sizes of Chen686's rectangles and top button protrusion differ slightly from what are shown for the D'435 patent. In my view, this difference in sizes of the rectangles and top button protrusion is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen686 as very similar to the D'435 patent. The slight difference in size does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly larger rectangle or a slightly shorter top button as being a totally different "overall design."

175. I note that the path of one of Chen686's vertical lines differs slightly from what is shown for the D'435 patent. In my view, this slight difference in path is insubstantial/slight/insignificant such that an ordinary designer would have

regarded Chen686 as very similar as the D'435 patent. The difference in path does not affect the overall impression of the rectangular "box-like" design as a whole.

5. Top Plan View

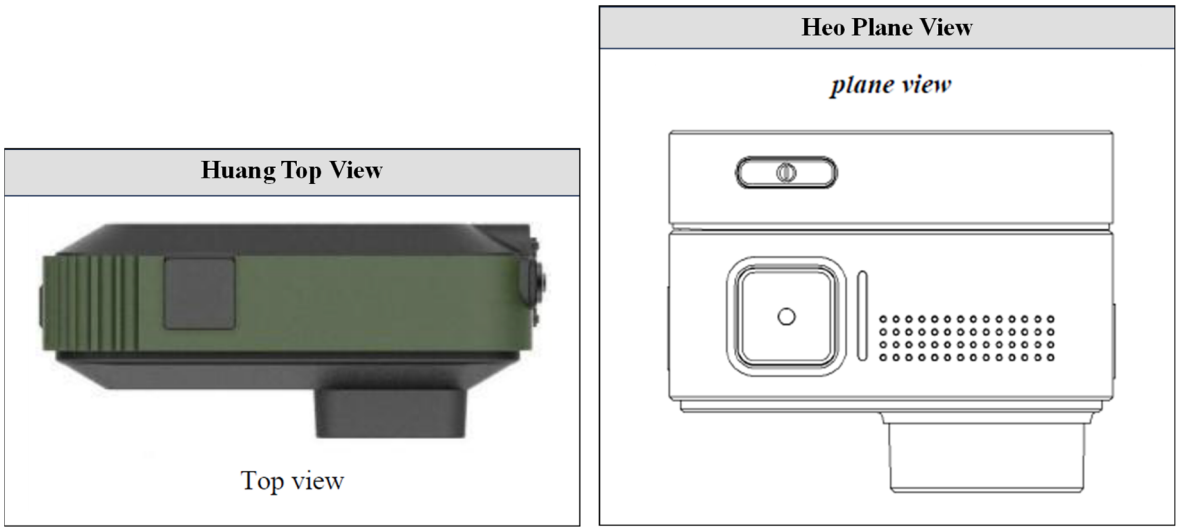


176. Figure 9 of the D'435 patent (left) and Figure 6 of Chen686 (right) are reproduced and annotated above. (EX1001, Fig. 9; EX1018, Fig. 6.) Both designs of the D'435 patent and Chen686 present a ***rectangular body*** with flat faces including ***horizontal lines***. And both designs show a ***lens*** protruding outward from the body (towards the bottom right part of the figure) including a ***horizontal line*** within. In my opinion, an ordinary designer would have viewed the two as having similarities in the design.

177. I note that the path of one of Chen686's horizontal lines differs slightly from what is shown for the D'435 patent. In my view, this slight difference in the path is insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen686 as very similar to the D'435 patent. The

difference in path does not affect the overall impression of the rectangular "box-like" design as a whole.

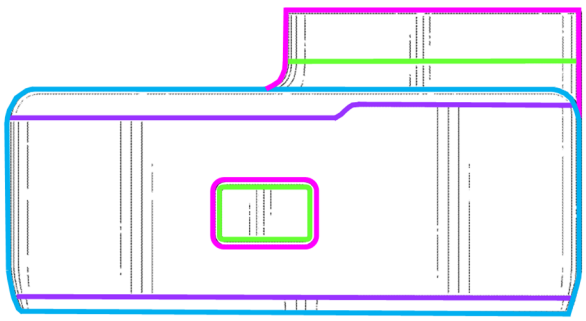
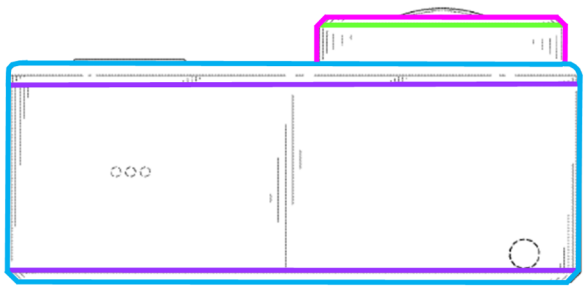
178. Additionally, as shown above, both designs of the D'435 patent and Chen686 present a button/access element on the top side of the design. The shape of Chen686's top button differs slightly from the shape of the top button for the D'435 patent.



179. However, a designer of ordinary skill would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the top view of Huang (reproduced above) and the top view of Heo (reproduced above) show rectangular buttons and/or access elements located on the top of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show

rectangular buttons to compliment an overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Chen686's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc.

6. Bottom Plan View

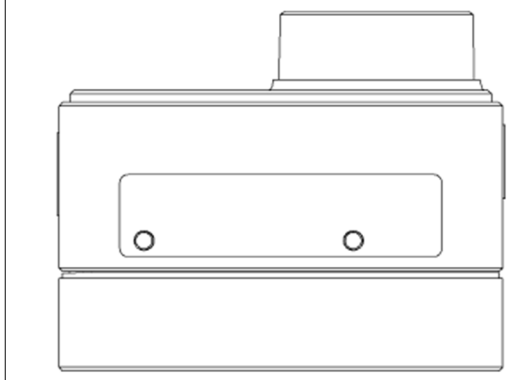
D'435	Chen '686
 FIG. 10	 FIG. 7

180. Figure 10 of the D'435 patent (left) and Figure 7 of Chen686 (right) are reproduced and annotated above. (EX1001, Fig. 10; EX1018, Fig. 7.) Both designs of the D'435 patent and Chen686 present ***rectangular body*** including

horizontal lines, and a ***lens*** that protrudes from the front of the body and shows a ***horizontal line***.

181. I note that the path of one of Chen686's horizontal lines and/or the location of another of Chen686's horizontal lines differ slightly from what is shown for the D'435 patent. In my view, these slight differences in path and/or location of lines are insubstantial/slight/insignificant such that an ordinary designer would have regarded Chen686 as basically the same as the D'435 patent. The difference in path does not affect the overall impression of the rectangular "box-like" design as a whole.

Heo Bottom View



Huang Bottom View



Bottom view

182. Additionally, in my view, it would have been obvious to combine Chen686 and Huang/Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the bottom view of Huang (reproduced

above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have known that the shape of a button or access element could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual impression of a rectangular "box-like" design. Cameras and camera housings show rectangular features, such as rectangular cameras bodies and rectangles for displays. At the time of the D'435 purported invention, there existed an existing industry custom to manufacture rectangular-shaped electronic devices and rectangular-shaped displays. (EX1033, 1.) At the time of the D'435 purported invention, it was also known that including a rectangular lens cover (also referred to as a lens hood) would lead to improved picture quality. (EX1030, 1; EX1031, 6.) The designs of Huang and/or Heo improve Chen686's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc. If, for some reason, an ordinary designer would not apply the teachings of a "camera housing" design to a "camera," in my view, it would have been obvious to combine the teachings from a "camera housing" design (such as McVicker's design) and a "camera" design (such as Chen686's design, Huang's design, Heo's

design, and/or Li's design). As I discussed in paragraph 65, camera designs and camera housing designs have similar outer appearances and design elements such as both show buttons and access elements, both show lens covers, and both show rectangles for displays. Camera designs and camera housing designs are also similar in that they are designed to protect internal components (such as the battery, circuitry, etc.). And ordinary designers would have the same design considerations, as I discussed in paragraph 65. For action cameras, for example, designers wanted the cameras to be compact and light weight. Designers wanted the "camera [to] fit[] the housing like a glove," thereby designing the camera housing to be a thin skin around the camera. This resulted in the outer appearances of the camera and the camera housing designs being very similar, motivating designers to apply teachings of camera housing designs to camera designs. (EX1042, 3.)

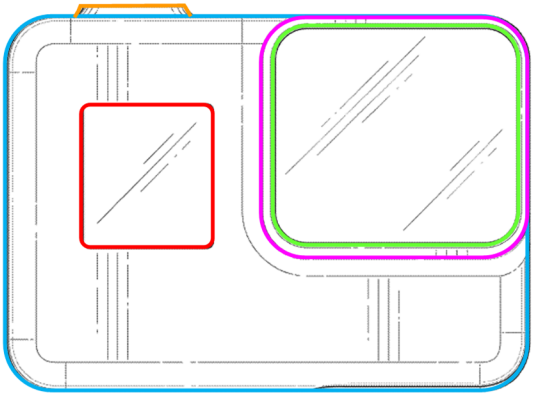
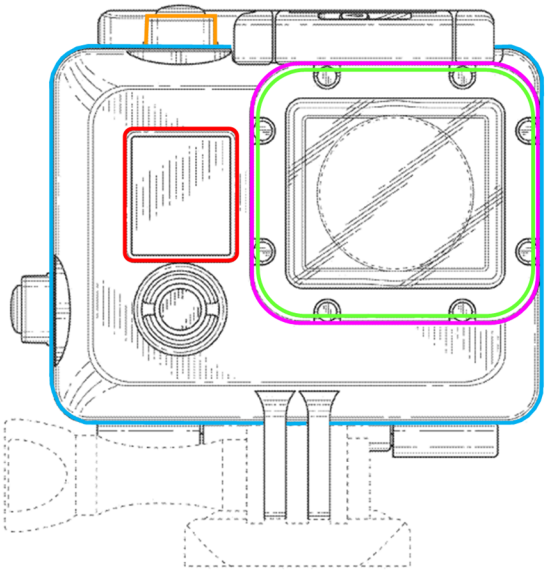
183. To summarize, both designs of the D'435 patent and the combination of Chen686 with Huang, Heo, Li, and/or McVicker present a substantially similar overall visual impression of a rectangular "box-like" design for a camera or camera housing, including a rectangular body, a rectangular lens cover, rectangular buttons/access elements, rectangles for displays, etc. in the eyes of the ordinary designer.

F. Woodman in Combination with Huang and/or Heo Render Obvious the D'435 Patent

184. In my opinion, Woodman in combination with Huang and/or Heo render obvious the claimed design of the D'435 patent. As discussed in more detail below, Woodman's design shows a roughly rectangular body, a rectangular lens cover that protrudes outwards from the front of the body and shows a visible line, a rectangle for a front display that is flush with the front face, and buttons and/or access elements located on the top and left side. Thus, Woodman's design is something already in existence. Alone or in combination with Huang and/or Heo, it is visually similar to the D'435 patent claimed design.

185. When viewing the design of the D'435 patent and the design of Woodman in combination with Huang and/or Heo, an ordinary designer would have perceived the two designs as visually similar, having the same overall visual appearance of a rectangular "box-like" design with a rectangular lens cover.

1. Front Elevational View

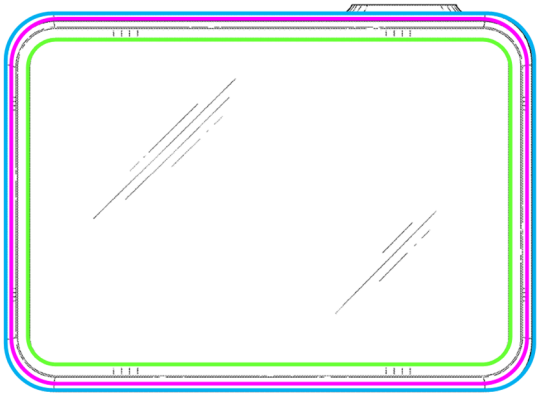
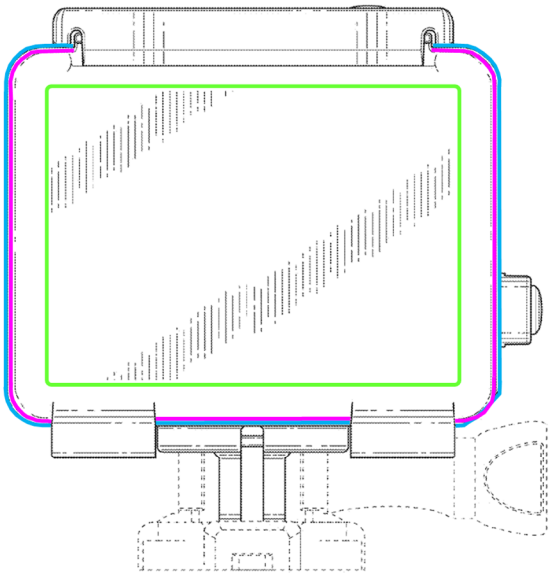
D'435	Woodman
 FIG. 5	 FIG. 5

186. Figure 5 of the D'435 patent (left) and Figure 5 of Woodman (right) are reproduced and annotated above. (EX1001, Fig. 5; EX1019, Fig. 5.) Both designs of the D'435 patent and Woodman present a roughly ***rectangular body*** and (***pink*** and ***green***) rectangles around the lens. Both designs of the D'435 patent and Woodman present a ***small rectangle*** at the front of the design that is flush with the front face, and a ***top button protrusion***. In my opinion, an ordinary designer would have viewed the two as having a similar design.

187. I note that the size of Woodman's top button protrusion differs slightly from what is shown for the D'435 patent. The dimensions of Woodman's front rectangle also differ slightly from what is shown for the D'435 patent.

Further, Woodman's rectangular lens cover is positioned slightly lower. In my view, this difference in size/dimensions/positions of the top button protrusion, front rectangle, and rectangular lens cover is insubstantial such that an ordinary designer would have regarded Woodman as similar to the D'435 patent. The slight difference in size/dimension/position does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly taller button, a rectangle having slightly different dimensions, or a rectangle that is positioned slightly lower as being a totally different "design."

2. Rear Elevational View

D'435	Woodman
 FIG. 6	 FIG. 6

188. Figure 6 of the D'435 patent (left) and Figure 6 of Woodman (right) are reproduced and annotated above. (EX1001, Fig. 6; EX1019, Fig. 6.) Both designs of the D'435 patent and Woodman present a roughly ***rectangular body*** and two inner (***pink*** and ***green***) rectangles that occupy a large part of the back of the design. In my opinion, an ordinary designer would have viewed the two as having similar designs.

189. I note that the (***blue*** and ***pink***) rectangles of Woodman's design differ slightly from what is shown for the D'435 patent. This is due to its design having extra pieces at the top and at the bottom. But an ordinary designer would have viewed the presence of these extra pieces as insubstantial because the rectangles still occupy a large part of the back of the design, and the body still has a roughly rectangular shape.

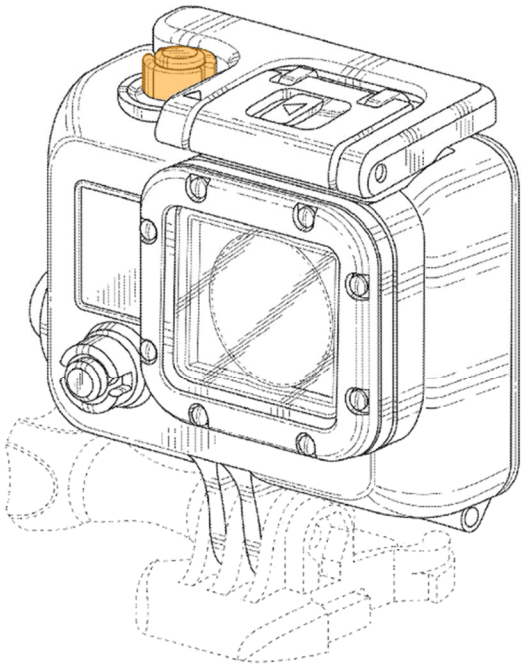
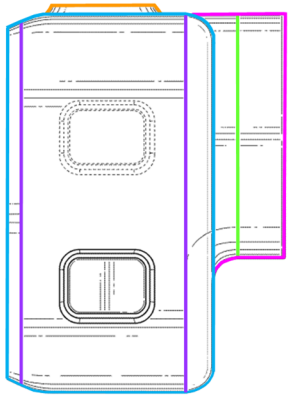
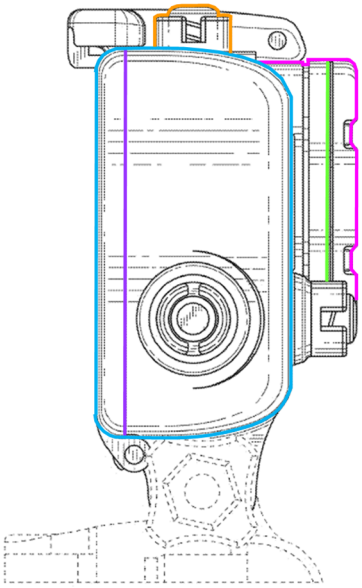


FIG. 1

190. I also note that Woodman's ***top button protrusion*** is not visible in the rear elevational view of Woodman's Figure 6. This is due to an extra piece at the top. The ***top button protrusion*** is visible in the front, top, and right side perspective view of Figure 1 (reproduced and annotated above) and is part of Woodman's design. (EX1019, Fig. 1.)

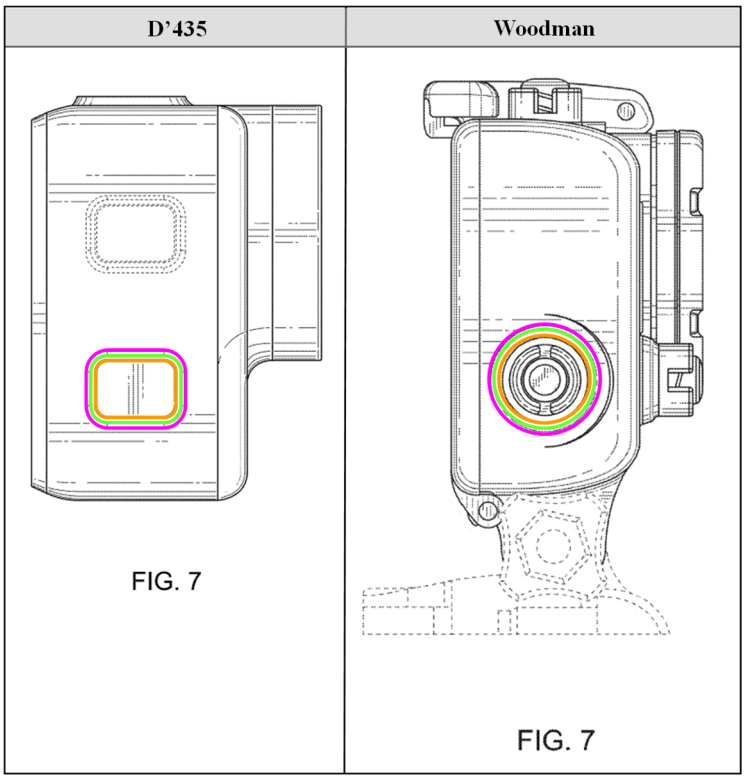
3. Left Side Elevational View

D'435	Woodman
 FIG. 7	 FIG. 7

191. Figure 7 of the D'435 patent (left) and Figure 7 of Woodman (right) are reproduced and annotated above. (EX1001, Fig. 7; EX1019, Fig. 7.) Both designs of the D'435 patent and Woodman present a roughly ***rectangular body*** including ***vertical line(s)***. Both designs of the D'435 patent and Woodman present a ***top button protrusion***. Additionally, both designs of the D'435 patent and Woodman present ***rectangular lens cover*** that protrude outward from the body (towards on the right side of the figure) that shows a ***vertical line***.

192. I note that the size of Woodman's top button protrusion differs slightly from what is shown for the D'435 patent. In my view, this difference in size of the top button protrusion is insubstantial such that an ordinary designer

would have regarded Woodman as similar to the D'435 patent. The slight difference in size does not affect the overall impression of the rectangular "box-like" design as a whole. That is, an ordinary designer would not have viewed a slightly taller button as being a different "overall design."



193. Additionally, as shown above (annotated Figure 7 of the D'435 patent (above) and annotated Figure 7 of Woodman (right)), both designs of the D'435 patent and Woodman present a button/access element located near the bottom of the left side. The shape of Woodman's left button differs slightly from what is shown for the D'435 patent.

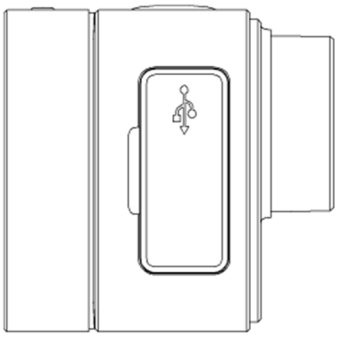
Huang Left View



Left view

Heo Left Side View

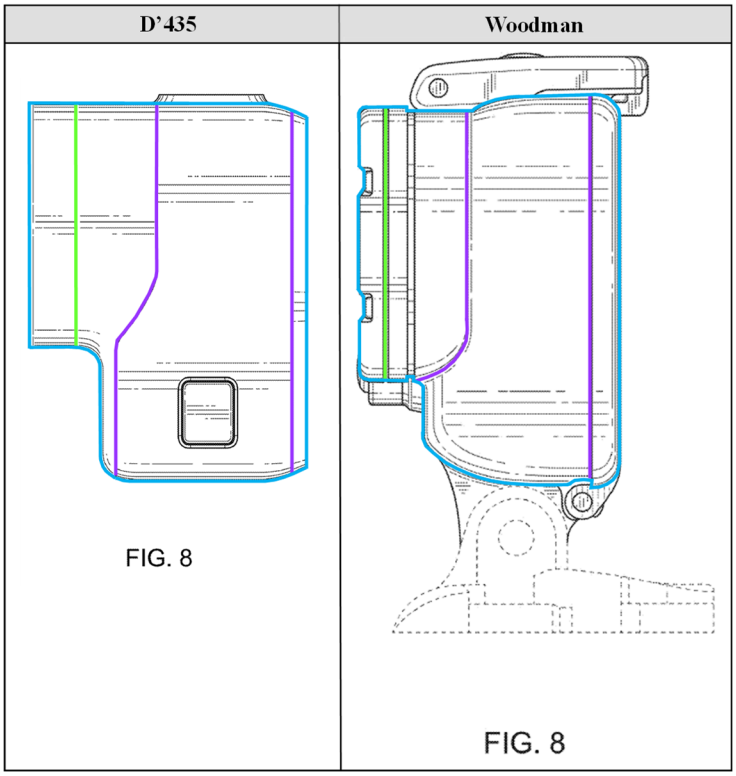
left side view



194. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the left side view of Huang (reproduced above) and the left side view of Heo (reproduced above) show rectangular buttons and/or access elements located at the left side of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Woodman's design by using rectangular buttons/access elements, enhancing the overall visual rectangular language of a "box-like" design by creating consistent rectangular features: a roughly rectangular

body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc.

4. Right Side Elevational View



195. Figure 8 of the D'435 patent (left) and Figure 8 of Woodman (right) are reproduced and annotated above. (EX1001, Fig. 8; EX1019, Fig. 8.) Both designs of the D'435 patent and Woodman present a roughly ***rectangular body*** with a ***rectangular lens cover*** protruding outward from the body. Both designs of the D'435 patent and Woodman present (***purple*** and ***green***) vertical lines. In my opinion, an ordinary designer would have viewed the two as having similar designs.

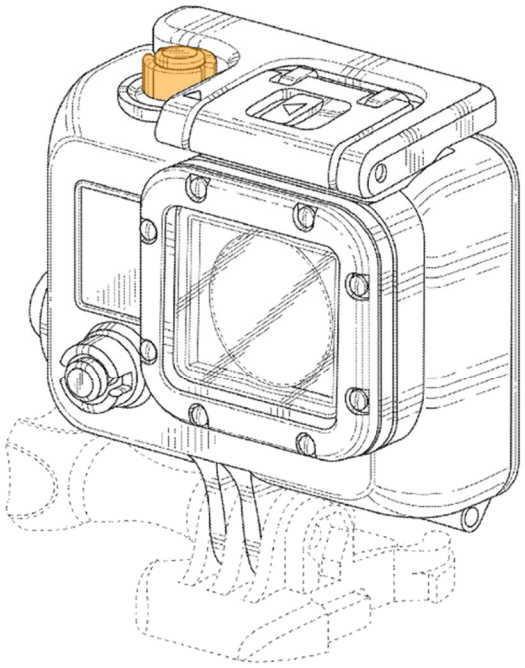


FIG. 1

196. I also note that Woodman's ***top button protrusion*** is not visible in the right side elevational view of Woodman's Figure 8. This is due to the extra piece at the top. The ***top button protrusion*** is visible in the front, top, and right side perspective view of Figure 1 (reproduced and annotated above) and is part of Woodman's design. (EX1019, Fig. 1.)

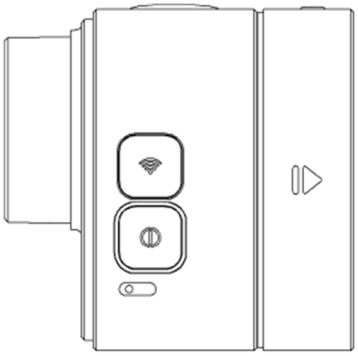
Huang Right View



Right view

Heo Right Side View

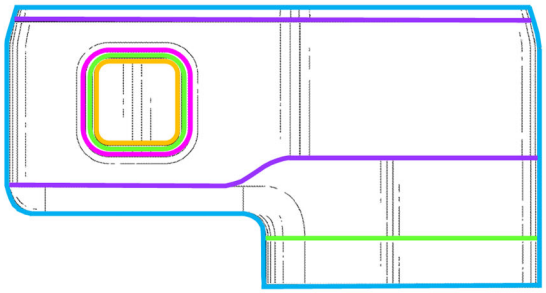
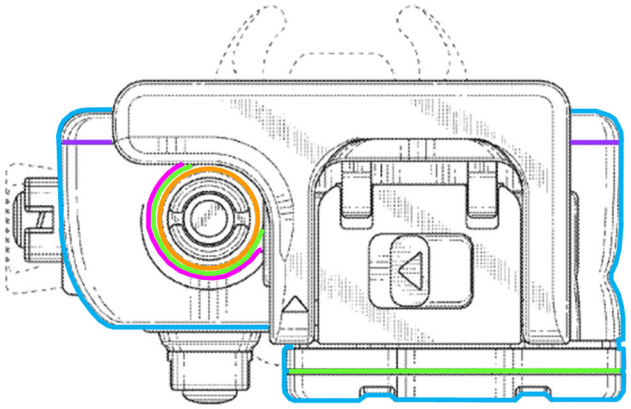
right side view



197. Additionally, in my view, it would have been obvious to combine Woodman and Huang and/or Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the right side view of Huang (reproduced above) and the right side view of Heo (reproduced above) show rectangular buttons and/or access elements located at the right side of the design. An ordinary designer would have known that a design could be easily modified to show a rectangular button/access element. And an ordinary designer would have been motivated to show rectangular buttons and/or access elements including on the right side because it was known to add rectangular buttons/access elements to the sides of the design. The added rectangular buttons/access elements also help compliment an overall visual impression of a rectangular "box-like" design

language. The designs of Huang and/or Heo improve Woodman's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design.

5. Top Plan View

D'435	Woodman
 FIG. 9	 FIG. 9

198. Figure 9 of the D'435 patent (left) and Figure 9 of Woodman (right) are reproduced and annotated above. (EX1001, Fig. 9; EX1019, Fig. 9.) Both designs of the D'435 patent and Woodman present a roughly rectangular body including horizontal line(s). And both designs show a rectangular lens cover protruding outward from the body (towards the bottom right part of the figure) including a horizontal line. In my opinion, an ordinary designer would have viewed the two as having similarities in their designs.

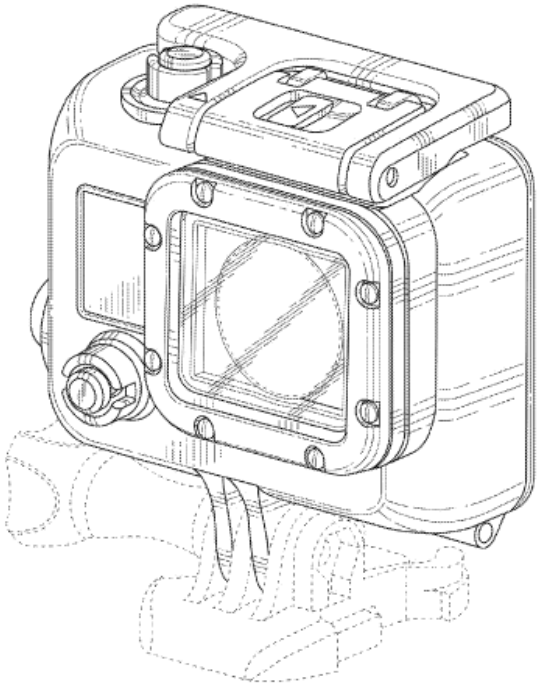
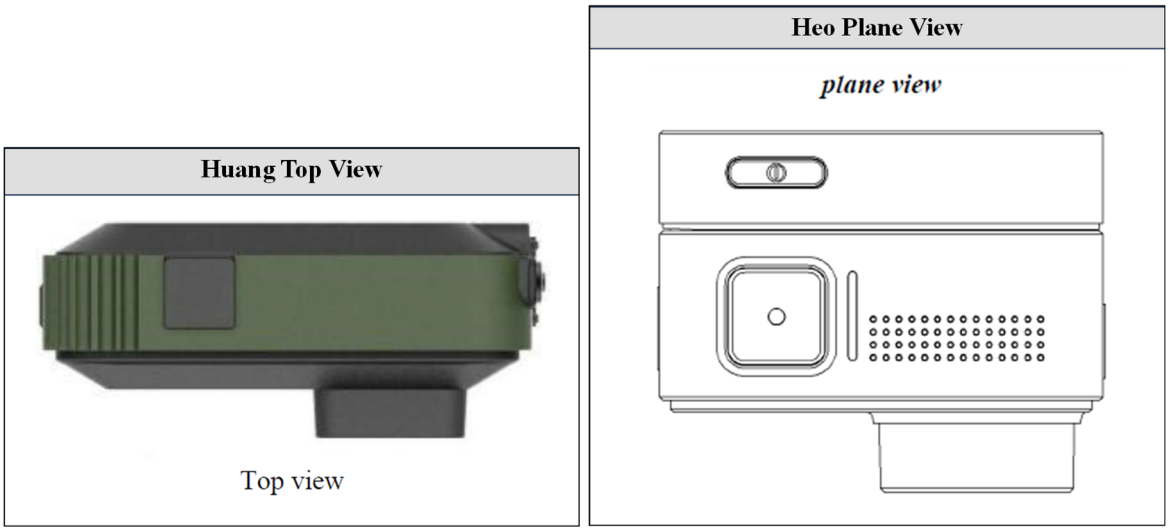


FIG. 1

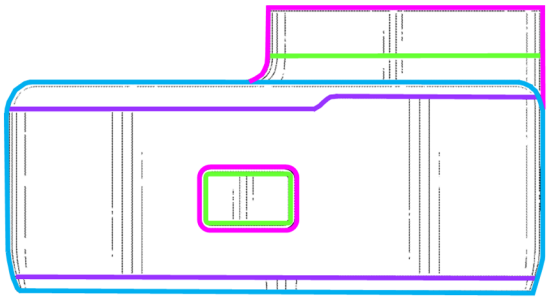
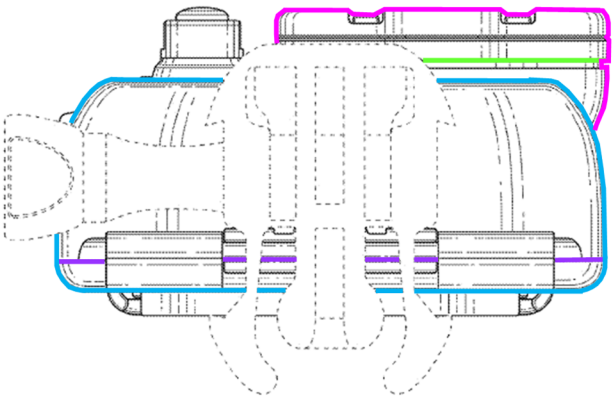
199. I note that the number of horizontal lines of Woodman's design differs slightly from what is shown for the D'435 patent. This is due in part to its design having an extra piece at the top, as shown in the front, top, and right perspective view of Figure 1 (reproduced above). But an ordinary designer would have viewed the presence of this extra piece as insubstantial because there is still a horizontal line that is present and visible from the top of the design.

200. Additionally, as shown above, both designs of the D'435 patent and Woodman present a button/access element on the top side of the design. The shape of Woodman's top button differs slightly from what is shown for the D'435 patent.



201. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the top view of Huang (reproduced above) and the top view of Heo (reproduced above) show rectangular buttons and/or access elements located at the top of the design. An ordinary designer would have known that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual impression of a rectangular "box-like" design. The designs of Huang and/or Heo improve Woodman's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular features: a roughly rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc.

6. Bottom Plan View

D'435	Woodman
 FIG. 10	 FIG. 10

202. Figure 10 of the D'435 patent (left) and Figure 10 of Woodman (right) are reproduced and annotated above. (EX1001, Fig. 10; EX1019, Fig. 10.) Both designs of the D'435 patent and Woodman present a roughly ***rectangular body*** including ***horizontal line(s)***. And both designs show a ***rectangular lens cover*** protruding outward from the body (towards the top right part of the figure) including a ***horizontal line***. In my opinion, an ordinary designer would have viewed the two as having similarities in their designs.

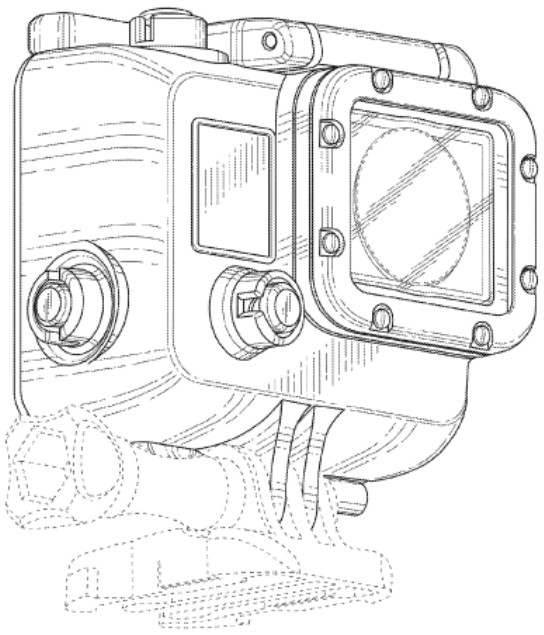


FIG. 2

203. I note that the bottom view (including the number and path of horizontal line(s)) of Woodman's design differs slightly from what is shown for the D'435 patent. This is due to its design having an extra piece at the bottom, as shown in the front, bottom, and left side perspective view of Figure 2 (reproduced above). An ordinary designer would have viewed the presence of this extra piece as insubstantial because the body maintains its rectangular profile (*e.g.*, a roughly rectangular body, rectangular lens cover, and a rectangle for a display) even with this extra piece.

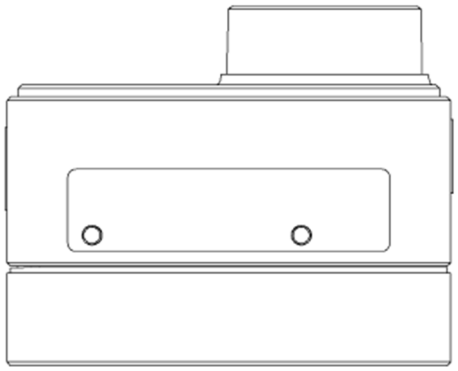
Huang Bottom View



Bottom view

Heo Bottom View

bottom view



204. Additionally, in my view, it would have been obvious to combine Woodman and Huang/Heo. An ordinary designer would have known about designs at the time of the D'435 purported invention that showed rectangular buttons and/or access elements. For example, the bottom view of Huang (reproduced above) and the bottom view of Heo (reproduced above) show rectangular buttons and/or access elements located at the bottom of the design. An ordinary designer would have had the common knowledge and skill to understand that the shape of a button could be easily modified to be rectangular. And an ordinary designer would have been motivated to show rectangular buttons to compliment an overall visual impression of a rectangular "box-like" design language. The designs of Huang and/or Heo improve Woodman's design by using rectangular buttons/access elements, enhancing the overall visual impression of a rectangular "box-like" design by creating consistent rectangular visual features: a

roughly rectangular body, a rectangular lens cover, rectangles for displays, rectangular buttons/access elements, etc. If, for some reason, an ordinary designer would not apply the teachings of a "camera housing" design to a "camera," in my view, it would have been obvious to combine the teachings from a "camera housing" design (such as Woodman's design) and a "camera" design (such as Huang's design and/or Heo's design). As I discussed in paragraph 65, camera designs and camera housing designs have similar outer appearances and design elements such as both show buttons and access elements, both show lens covers, and both show rectangles for displays. Camera designs and camera housing designs are also similar in that they are designed to protect internal components (such as the battery, circuitry, etc.). And ordinary designers would have the same design considerations, as I discussed in paragraph 65. For action cameras, for example, designers wanted the cameras to be compact and light weight. Designers wanted the "camera [to] fit[] the housing like a glove," thereby designing the camera housing to be a thin skin around the camera. This resulted in the outer appearances of the camera and the camera housing designs being very similar, motivating designers to apply teachings of camera housing designs to camera designs. (EX1042, 3.)

205. To summarize, both designs of the D'435 patent and the combination of Woodman with Huang and/or Heo present a substantially similar overall visual

impression of a rectangular “box-like” design for a camera or camera housing, including a roughly rectangular body, a rectangular lens cover, rectangular buttons/access elements, rectangles for displays, etc. in the eyes of the ordinary designer.

* * *

I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and that these statements were made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code.



Dated: 9/26/2024

Peter Bressler

APPENDIX A

Peter W. Bressler, FIDSA

PBressler, LLC, Product Design Consultant & IP Expert Witness
Founder, Bresslergroup, Inc.
Adjunct Associate Professor, University of Pennsylvania & Drexel University
Fellow Member of the Industrial Designers Society of America (IDSA)

Personal Information Date of Birth: June 24, 1946
Marital Status: Widowed

Education

B.F.A. Industrial Design
Rhode Island School of Design, Providence R.I., 1968
Graduate Research in Design for Disabilities
Rhode Island School of Design, Providence R.I, 1969-70
Certification, Synectics Group Creativity Process, Philadelphia, PA 1972
Certification: Design Patent Expert Witness Seminar, IDSA, 2008
CLE: Design Patents: Modernizing an Old Property Interest, Suffolk University Law School, Boston, MA. 11/2013
Completed Courses, SolidWorks Fundamentals, April, 2018

Employment

2022 to present	Adjunct Associate Professor, Product Design Dept., Drexel University
2012 to present	Product Design Consultant / Intellectual Property Expert Witness T/A PBressler, LLC
2006 to 2020	Adjunct Associate Professor, Integrated Product Design Program, University of Pennsylvania.
2012 to 2015	Founder, Bresslergroup, Inc. (1970)
2010 to 2011	Contracted Innovation Process consultant to the Delaware Valley Industrial Resource Center
1998 to 2011	Founder and Board Chair, Solar Roofing Systems, Inc. T/A SRS Energy
2009 to 2012	Board Chair, Bresslergroup, Inc.
1988 to 2009	Principal and CEO, Bresslergroup, Inc ....A 22-person design research, strategic product planning, industrial design, product development and engineering consulting firm. Noted by *Businessweek* magazine as “one of the top award-winning firms”.
1972 to 1988	Principal and President, Designs for Medicine, Inc. T/A Peter Bressler Design Associates...5 to 12-person User research, Product Development, Packaging & Graphic design consulting firm
1973 to 1974	Contracted consultant to the Franklin Institute Research Laboratories Founded “Center for the Enhancement of the Capabilities of the Handicapped
1970	Founded Designs for Medicine, Inc.

Teaching Experience

2021to present	Adjunct Associate Professor, Product Design Department, Drexel University, teaching Professional Practice, Design Research & Product Design Studio.
2006 to 2020	Adjunct Associate Professor, Integrated Product Design Program, University of Pennsylvania, teaching Ergonomics, Industrial Design & Integrated Product Design
Fall 2005	Adjunct Associate Professor, Ergonomics 1332, Philadelphia University, Philadelphia,
PA Fall 2001	Visiting Lecturer, Business Practices, University of the Arts, Philadelphia, PA
Spring 2000	Adjunct Associate Professor, Ergonomics DES 164, Lehigh University, Bethlehem,
PA Fall 1983	Visiting Lecturer, Industrial Design, Rhode Island School of Design, Providence, R.I.
Spring 1972	Instructor, Industrial Design Structures, Philadelphia College of Art, Philadelphia,
PA. 1971-72	Instructor, ID Prototype Shop, Philadelphia College of Art, Philadelphia, PA.

Expert Witness Experience

28 cases
34 reports
16 depositions
9 court testimonies

CARAWAY HOME v. SENSIO INC.

Case No. 1:23-cv-09756-PKC, The United States District Court for the Southern District of New York, DLA Piper, Philadelphia, PA, Consultation, Initial Invalidity Report. Settlement reached.

SANHO CORPORATION V. KAIJET TECHNOLOGY INTERNATIONAL LIMITED, INC.

Case No. 1:18-cv-05385-SGD, United States District Court for the Northern District of Georgia, Atlanta division, Hill, Kertscher & Wharton, Atlanta, Georgia, Consultation, Multiple reports and rebuttals, Depositions, and trial testimony. Jury award in Client's favor.

GLACIER, LLC

Child's Hanging Obstacle Course, Consultation, Expert Report.

PANASONIC CORPORATION v. GETAC, INC.,

Case No. 8:19-CV-01118, United States District Court for the Central District of California, (Multiple firms) Consultation, Multiple reports and rebuttals, Multiple Depositions, and trial testimony. Jury awarded $17M in Client's favor

HUNTER v. LUMINEX

Case No. 18-cv-344 in District Court for the Western District of Wisconsin (Baker, Donaldson, Bearman, Caldwell & Berkowitz, PC / Memphis, Tennessee) (Consultation, Declaration) Case settled in client's favor.

COHEN et al. v. COSTCO et l.

Case No. 17CV316277 Superior Court of California, County of Santa Clara (Boccardo Law Firm, San Jose, California) Consultation, Expert Report, Deposition. Case settled pretrial in client's favor.

HONEYWELL INTERNATIONAL V. RESEARCH PRODUCTS CORPORATION

Case No.3:17-cv-00723-wmc in the United States District Court of Wisconsin, (Foley & Lardner, LLC, Madison, WI) (Consultation, expert Invalidity & Non-Infringement reports) Case settled pre-trial in client's favor.

KREMERMAN v. OPEN SOURCE STEEL, LLC

Case No. C17-953-BAT in United States District Court, W.D. Washington, Seattle, (Sussman Godfrey, LLP, CA) (Consultation) Case settled

BODUM USA, INC.V. A TOP NEW CASTINGS, INC.

Case No.1:16-cv-02916 in The United States District Court for the Northern District of Illinois, Eastern Division. (Akerman, LLP. Chicago) (Consultation, expert report, rebuttal report, deposition and Testimony). Judge found for Plaintiff

HINRICHS & ASSOCIA TES; and PENTAGRAM DESIGN, INC.(Plaintiffs) v. vs.

BEATS ELECTRONICS, LLC; A DRE YOUNG PIK/Al DR. DRE, an individual; JIMMY IOVINE, an individual; STEVEN LAMAR, an individual; JIBE AUDIO, LLC; and DOES 1 through 30, inclusive (Defendants) Case No. BC 533089 in the Superior Court of the State of California, County of Los Angeles. (Sussman Godfrey, LLP, CA) (Consultation, Declarations, Expert Report, Summary Judgement, Appealed, Remanded in client's favor, Jury verdict in client's favor.

SPORT DIMENSION, INC. V. THE COLEMAN COMPANY, INC.

Civil Action No. 2:14-cv-00438-BRO-MRW in the United States District Court Central District of California- Western Division (Husch Blackwell, St. Louis, MO) (Consultation, Expert Report and Deposition, testimony excluded, Summary Judgement, appealed and remanded on Appeal/ case settled in client's favor)

THOMAS & BETTS INTERNATIONAL, LLC AND THOMAS & BETTS CORPORATION VS. BURNDY LLC, HUBBELL INC., 3M COMPANY AND ZHEJIANG SHANGYU CITY FENGFAN ELECTRICAL FITTINGS CO., LTD.

Civil Action no. 2:14-cv-02296-JPM-tmp in the United States District Court for the Western District of Tennessee (Steptoe & Johnson LLP, Washington, DC) (Consultation & Expert Report / Case settled in client's favor)

FUTURE MOTION, INC., VS. CHANGZHOU FIRST INTERNATIONAL TRADE CO, LTD.

Civil Action No. 2:16-cv-00013-MMD-CWH in the United States District Court for the District of Nevada (Merchant & Gould, PC, Madison, WI) (Consultation and Expert Report / Complaint dropped)

LARRY G JUNKER V. MEDICAL COMPONENTS INC. et al

Civil Action No. 13-4606 in the United States District Court for the Eastern District of Pennsylvania. (Mason & Petruzzi) (Consultation, Expert Report, Deposition &Testimony) Found for the Plaintiff

NOKIA V. HTC

International Trade Commission, Washington, DC / Investigation No.337-TA-885 matter of Certain Portable Electronic Communications Devices, Including Mobile Phones and Components Thereof. (Finnegan, Henderson, Farabow, Garrett & Dunner, LLP.) (Consultation only)

IMRE BATORI AND PROGRESS PROFILES SPA V. SCHLUTER SYSTEMS L.P. v. IMRE BATORI, PROGRESS PROFILES SPA, and PROGRESS PROFILES AMERICA INC.

Civil Action No. 1:15-cv-00144 CMH-IDD in the United States District Court, Eastern District of Virginia, Alexandria Division (LEE SHEIKH MEGLEY & HAAN, Chicago, Il) (Consultation and Expert Report / cases settled in client's favor)

BOSE CORPORATION V. ABLE PLANET INCORPORATED
Civil Action No. 11-01435
(Wilmer- Hale, Boston, MA) Consulting Expert …consultation / resolution unknown

VOLTSTAR TECHNOLOGIES, INC. F/K/A HORIZON TECHNOLOGIES, INC. V. AMAZON.COM, INC., Case: 1:13 -cv- 05570 in the United States District Court for the Northern District of Illinois, Eastern Division (Jenner & Block, Chicago, Ill.) (Consultation and Expert Report / Summary Judgment in client's favor)

SEED COMPANY LTD and SHGERU TAMAI v. WILLIAM F. WESTERMAN, ET AL
Case No. 1:08-CV-00355-RJL in United States District Court for The District of Columbia (London & Mead, Washington DC) (Consultation, Expert Report & Rebuttal Expert Report)

APPLE, Inc. v SAMSUNG Electronics Co., LTD, Case No. 11-cv-01846-LHK, United States District Court of Northern California, San Jose Division (Morrison Foerster San Francisco, Ca.) (Expert Reports, Depositions, Testimonies) Jury awarded $1.4B in clien'ts favor.

APPLE, Inc. v SAMSUNG Electronics Co., LTD, International Trade Commission, Washington, DC / Investigation No. 337-TA-796 matter of Certain Electronic Digital Media Devices, before the Honorable Thomas B. Pender. (2012 for Morrison Foerster, Washington DC) (Expert Reports, Deposition, Testimony) Judgement in client's favor.

HAMILTON BEACH BRANDS, INC. V SUNBEAM PRODUCTS, INC., D/B/A JARDEN CONSUMER SOLUTIONS, Civil Action No. 11-cv-22345, United States District Court for the Eastern District of Virginia, Richmond Division (Panitch, Schwartz & Belasario, Philadelphia, PA) (Expert Report, Deposition, Trial Testimony)

BLANCO V TOTS IN MIND ET AL (2009) (Scherffius, Ballard, Still & Ayres, Atlanta, GA.) (Expert Research and Report)

ATLAS EQUIPMENT CO. LLC V. WEIR SLURRY GROUP, INC., ET AL. (2008) (Perkins-Coie, Seattle, Washington) (Expert Report)

AJ INTERMEDIATE HOLDINGS LLC; AND AJ ACQUISITION 1 LLC D/B/A NATIONAL PAINTBALL SUPPLY V. PROCAPS L. P., ET AL, Civil Action No 1:07-00192, JHR-AMDM, United States District Court of New Jersey (2007) (Volpe- Koenig, Philadelphia, PA) (Expert Report)

SYMBOL TECHNOLOGIES, INC. V. METROLOGIC INSTRUMENTS, INC., Civil Action No. 2:05cv509, LED, United States District. Court of Pa., Eastern District (2007) (Deposition)

BECTON, DICKINSON AND COMPANY V. TYCO HEALTHCARE GROUP LP, Civil Action No. 02-1694 - GMS United States District Court of Delaware (2004) (Wilmer Hale, Washington, DC, Deposition and Testimony (Jury found in client's favor)

Awards and Recognitions

2017	Nominated for the Cooper Hewitt National Design Award in Product Design
2015	Recognized by IDSA as one of the top 50 Industrial Designers of the past 50 years
2010	Industrial Designers Society of America Personal Recognition Award for Lifetime Achievement
2008	IDSA Industrial Design Excellence Awards, Silver
2007	Appliance Manufacturer's EID Award, 1 Gold 2006
	IDSA Industrial Design Excellence Award, Gold
	Appliance Manufacturer's EID Award, 3 Gold
2005	R&D Magazine R&D100 Award, Gold
	Consumer Electronics Association Award
2004	IDSA Industrial Design Excellence Award, Bronze
2003	Appliance Manufacturers' Award
2002	Good Design Awards
2001	IDSA Industrial Design Excellence Award. Bronze
	Good Design Award
	Good Design Award
2000	IF Hanover Award
2000	Appliance Magazine Award
	Consumer Electronics Show Innovations Award 1999
	IDSA Industrial Design Excellence Awards, Bronze
1998	Product Design and Development Gold Award
	Consumer Electronics Show Innovations Award
1997	ID Magazine Design Distinction Award
1996	IDSA Industrial Design Excellence Awards, Gold
	Consumer Electronics Show Innovations Award
1995	G-Mark, Japan
1994	IF Award Hanover Fair, Germany
1994	IDSA Industrial Design Excellence Awards, Gold
1994	IDSA Industrial Design Excellence Awards, Bronze
1994	G-Mark, Japan
1993	Consumer Electronics Design Engineering Award, M Series Speakers, Polk Audio
	AudioVideo International Grand Prix, M3 Speaker, Polk Audio
1991	IDSA Industrial Design Excellence Awards, Gold
1991	ID Magazine Design Review, Honorable Mention
1991	IDSA Industrial Design Excellence Awards, Bronze
1990	ID Magazine Design Review, Honorable Mention
1989	Certificate of Excellence, American Institute of Graphic Artists
1988	ID Magazine Design Review
	2 Selections
	3 Honorable Mentions
	IDSA Industrial Design Excellence Awards Recognition
	Retailer's Choice Award of Distinction
	The Krupps International Design Competition, Honorable Mention
	Desi Award for Packaging
1987	IDSA Excellence awards, Recognition

1986 ID Magazine Designers Choice Award
1985 IDSA Industrial Design Excellence Awards, Recognition
3 products selected for exhibition in The United States Information Agency Traveling Exhibit for Eastern Europe, "Design America"
Worldesign '85 Certificate of Gratitude
1984 Products selected for "the Process of Design Exhibit", The Katonah museum
1982 "DESI" award for packaging design
Package Design Council Award of Excellence 1981 Package Design Council Award of Excellence
1979 DESI" award for packaging design
1976 ID Magazine Annual Design Review Award
1974 ID Magazine Annual Design Review Award
1973 American Iron and Steel Institute Design in Steel" Award for Scientific and Medical Equipment
Citation in Engineering for Scientific and Medical Equipment
1971 Ventures in Design Award
1968 Alcoa and Industrial Designers Society of America Merit Awards

Publications, Juries and Lectures

2016 Invited Presenter & Panelist, SPE Design in Plastics Conference
2015 Invited Presenter, United States Patent and Trademark Office, Design Day.
2014 Invited Panel Facilitator, Greater Philadelphia Manufacturing Summit, Track 1, Innovation: Creating New Value, Products, Processes & Markets
2014 Invited Opening Speaker, Wharton Education Design Studio; Design Thinking Intensive.
2014 Invited Speaker, Eastman Design Educators Luncheon, IDSA International Conf., Austin, TX
2013 Invited Juror, CES Innovation Award 2014
2013 Invited Juror, IDEA Brazil Awards, Objeto Brasil, Sao Paulo, Brazil
2013 Wharton Small Business Development Center, "Innovation in Small Business"
2012 Invited Speaker, United States Patent and Trademark Office, DesignDay.
2012 Invited Speaker, Industrial Designers Society of America NED Conference 20 Invited Speaker, Delaware Valley Industrial Resource Center
2009 Invited Speaker, Industrial Design Evolution, From Visual to Visceral to Virtual, Project Fusion Conference. Miami, FL
2009 Invited Speaker, Entrepreneur's Panel, Wharton Energy Conference, Philadelphia, PA 2008 Invited Speaker, Sustain 08, Chicago, "SRS Energy, Sustainability in Roofing Products 2008 Invited Speaker, Villanova University, "Doing Well by Doing Good".

2008 Invited Speaker, IDSA Spotlight Webinar, Residual Income, the Holy Grail 2007
University of Pennsylvania 20/20 lecture series
Juror, CES Innovation Award
2005 Juror, CES Innovation Award Juror, Dyson awards
Juror, P&G Innovations Award 2005
Juror, CES Innovation Award
Invited Speaker, National Conference of the Industrial Designers Society of America, Wash DC
Invited Speaker, the Green Conference, Boston, Massachusetts
2004 Juror, National Housewares Association innovations Awards

2003 Invited Speaker, Product Development Management Association, Philadelphia, PA
2001 Invited speaker, Paper presentation, Designing for Global Products, Rockwell Global Learning Fair: A Passport to Asia-Pacific, Cleveland, Ohio
2001 Invited Speaker, the Housewares Manufacturer's Association meeting, Chicago, Illinois 1999
Invited Speaker, the Housewares Manufacturer's Association meeting, Chicago, Illinois 1998
Invited Speaker, Industrial Designers Society of America Southern District Conference, St Augustine, FL
1998 Invited Speaker, The Housewares Manufacturer's Association meeting, Chicago, Illinois 1998
Invited Speaker, Temple University Association of Retired Professionals, Philadelphia, PA 1997
Invited Speaker, The Housewares Manufacturer's Association meeting, Chicago, Illinois
1996 Invited Juror, Innovative Use of Materials Award, Philadelphia Furniture Show, Philadelphia, PA
1995 Jury Chair, Industrial Designers Society of America's Industrial Design Excellence Awards program
1993 Invited Speaker, Quality in Design Workshop, National Academy of Sciences, Washington, DC
1993 Invited Juror, Industrial Designers Society of America's Industrial Design Excellence Awards program
1992 Invited Speaker, 14th Annual Design Interaction, Auburn University, Alabama 1992 Invited Speaker, The World Class Product Design Conference, Lehigh University, Bethlehem, PA ("The Emergence of Industrial Design")
1991 Invited Speaker, EEC Design conference, Toulon, France ("Designing the Product Development Team")
1991 Invited Speaker, Taidi' 91 Conference, Taipei, Taiwan ("The product design process")
1990 Invited Speaker, IDSA Annual Conference, Santa Barbara, California ("Designing the Product Development Team")
Invited Speaker, Design forum '90, Taipei, Taiwan ("The product's role in corporate identity")
Invited Speaker, Benjamin Franklin Technology Seminar Series ("How to evaluate and contract Industrial Design services")
1989 Invited Juror, The Krupps International Design Competition
Invited Speaker, The International Congress of Societies of Industrial Design, Nagoya, Japan ("Design excellence in a socio/cultural context")
1988 Invited Juror ID Magazine Design Review
1987 Invited Consultant and Lecturer (2 weeks) to The Peoples Republic of China, Tianjin, China ("Consumer electronics in western markets")
1986 Invited presenter to Yugoslavia for the "Design America" Exhibit by the United States Information Agency ("Design Consulting in the USA")
1985 Invited presenter at the International Congress of Industrial Designers International Conference, Washington, DC ('The concurrent design process")
1982 Invited Juror, Industrial Designers Society of America's Industrial Design Excellence Awards program
1975 Invited Juror, ID Magazine 1975 Design Review
1974 Invited participant of the National Academy of Sciences, National Research Council's 1st Workshop on Mobility for Spinal-cord Impaired People
Invited presentation of a Paper, "The Development of The Standup Wheelchair", to the American Society of Mechanical Engineers
1971 "The Standup Wheelchair" Published in Industrial Design, Interiors and Fortune Magazines; also AP and UP releases
1969 Publication of "The Standup Wheelchair" in Design News, Industrial Design and other professional journals

Associations / Affiliations

2017 Member, IPO, Inventor's professional organization
2016 Invited Guest Editor, Innovation Journal, professional journal of IDSA
2015 Member IDSA Intellectual Property Section, Co-chair Design IP Committee
2015 Member IDSA Nominations Committee
2011 Secretary / Treasurer, Industrial Designers Society of America
2007 Academy of Presidents, Industrial Designers Society of America
2005 Chair of the 2005 Design Gallery, IDSA National Conference in Washington, DC
2004 IDSA Academy of President's
1999 North East District Vice President, IDSA, two-year term
1995 1996 National Conference Committee, IDSA
1994 National Special Awards Committee, IDSA
1993 Industrial Design Excellence Awards Program, Chair
1992 Awarded Fellowship, Industrial Designers Society of America
1991 Chair of the Board, Industrial Designers Society of America, 2-year term President, The Worldesign Foundation, 2-year term
1989 President, Industrial Designers Society of America, 2-year term Executive Vice President, The Worldesign Foundation, 2-year term
1987 Executive Vice President, Industrial Designers Society of America IDSA Planning Committee, Chair
1985 Secretary/Treasurer, Industrial Designers Society of America, 2-year term
1984 Developer and Chair, Design Excellence Gallery, Worldesign '85
1984 Management & Planning Committee, ICSID Worldesign '85 (meeting of the International Congress of Societies of Industrial Design)
1981 National Vice President, Board of Directors, Industrial Designers Society of America, 2-year term
1979 Director, National Board of Directors, Industrial Designers Society of America, 2 year term
1977 Co-chair, National Committee for development of a professional field definition and entry level professional qualifications
1976 IDSA Annual Conference Chair
1973 to 1977 Co-founder and chapter Chair of The Philadelphia Chapter, Industrial Designers Society of America

Patents (authorship or co-authorship)

1	7018344	Retractable needle shielding device
2	7000988	Lift chair
3	D511203	Hose coupling
4	6926700	Needle assembly
5	6925716	Shaving apparatus
6	6881202	Needle assembly
7	D501673	Hose coupling
8	6651890	Combination hand-held and counter-top Omni directional scanner
9	D479405	Shark tooth shaped suede shoe brush
10	6553882	Pencil sharpener with integral receptacle
11	D471409	Ice cream scoop
12	D469789	Table saw
13	6412738	Portable stenographic machine stand
14	D455666	Streamlined pressure gauge
15	D450257	Pressure gauge
16	6257492	Combination hand-held and counter-top Omni-directional scanner
17	6241091	Decorative container for storing plunger
18	6206600	Combination toothbrush and toothpaste dispenser
19	D427200	Stand for a handheld optical scanner
20	D409931	Compact tire pressure gauge
21	5904806	Tape dispensing applicator and replaceable tape cartridge
22	D409509	Deluxe tire pressure gauge
23	D408806	Optical scanner
24	D408532	Hand held optical scanner
25	5830779	Method of making photovoltaic module
26	D399121	Slide latch
27	5735999	Applicator

28	D385881	Home health care terminal
29	5670014	Tape dispensing applicator and replaceable tape cartridge
30	5590495	Solar roofing system
31	5558232	Apparatus for sorting documents
32	5518576	Applicator
33	5466223	Needle assembly having single-handedly activatable needle barrier
34	D361785	Tape applicator
35	D351839	Speaker
36	D351388	Combined speaker and integral stand
37	5348544	Single-handedly actuatable safety shield for needles
38	D343782	Sealed lever latch
39	5248286	Aerobic climbing step/bench
40	5118096	Aerobic climbing step/bench
41	5116044	Aerobic climbing step/bench
42	5096186	Aerobic climbing step/bench
43	D324165	Flexible draw latch
44	D320950	Combined transmitter buoy and bracket therefor
45	D319799	Transmitter buoy
46	D319407	Transmitter buoy
47	D313761	Actuator plate for temperature control valve
48	D313719	Bathroom cabinet
49	4981453	Emergency transmitter buoy and bracket assembly
50	D303044	Lighted mirror
51	4856811	Device for transporting ski equipment
52	4636613	Combination dryer and iron
53	D285200	Handset telephone unit
54	D285197	Handset telephone unit
55	D278831	Paper and document handling and counting apparatus

56	D274520	Paper and document handling apparatus
57	D267553	Engine analyzer
58	D265482	Telescope
59	D262442	Engine analyzer
60	4269312	Apparatus for inflating a deflated tire
61	4255640	Door mounted oven controls
62	4129278	Tripod
63	D247854	Telescope
64	6918891	Safety device
65	D253598	Telescope mount
66	D253238	Telescope cradle
67	D253113	Telescope
68	D313761	Actuator Plate for Temperature Control Valve
69	4553711	Modular Holder for Paper Rolls
70	CA1138939	Door Mounted Microwave Oven Controls
71	3839751	Modular Therapy Pool Construction
72	3589769	The Standup Wheelchair

As a Design Consultant for over 45 years, Bressler has provided product design and development services to the following selected partial list of regional, national, and international Clients:

Applica
Becton Dickinson
Black & Decker
Bose Corporation Clairol
Inc.
DeWalt
Dentsply International, Inc.
E.I. Dupont de Nemours Co.
Edmund Scientific
Energizer
Eastman Kodak
Gridless Power, Inc.
Honeywell Controls
IBM R&D
Kidsmart
Leeds & Northrup
Litton, Microwave Division
Litton, Specialty Products Division
Motorola, Inc.
Metrologic
Moore Process Control
(Siemens)
Polk Audio
RCA, Broadcast
Division
Scott Paper Company
Scott/ Tyco Safety
Division
Schick Wilkinson
Sword
Siemens
Automotive
Siemens Medical
Southco Inc.
Solar Roofing Systems, Inc.
Thomson Consumer
Electronics
Teleflex
Trojan
Yachts
Vidar
Corporat
ion
Zenith Products