

Exhibit A-1

Invalidity of U.S. Patent No. 6,838,651 in view of U.S. Patent No. 6,704,049 to Fossum

Claims 1, 13, 18 of the '651 Patent are invalid as anticipated under 35 U.S.C. § 102 or rendered obvious under 35 U.S.C. § 103 by U.S. Patent No. 6,704,049 to Fossum ("Fossum"). Fossum, filed on February 23, 1998 qualifies as prior art under at least 35 U.S.C. §§ 102 and/or 103 as to the asserted claims of U.S. Patent 6,838,651 to Mann, ("the '651 patent"), as discussed in greater detail in the chart that follows.

To the extent Complainant alleges that Fossum does not disclose any particular limitation of Claims 1, 13, and 18 (the "Asserted Claims") of the '651 patent, either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority date of the '651 patent to modify Fossum and/or to combine the teachings of Fossum with other prior art references, including but not limited to the present prior art references found in OmniVision's Preliminary Invalidity Contentions and any supplements thereto and the relevant section of charts for other prior art for the '651 patent in a manner that would have rendered the Asserted Claims invalid as obvious. The inclusion of the particular limitation into the system described in Fossum would have been obvious for at least the following reasons: It would have been obvious to modify the methods and/or systems disclosed in Fossum to meet this limitation based on: (a) the teachings in Fossum itself; (b) a person of ordinary skill in the art implementing a predictable variation of the methods and/or systems disclosed in Fossum; (c) the logic, judgment, intelligence, creativity, innovation and common sense a person of ordinary skill in the art would employ; (d) the inferences and creative and routine steps that a person of ordinary skill in the art would employ; (e) market demand for methods and/or systems to include this limitation; and/or (f) design needs or market pressures to solve a problem with a finite number of solutions that could have produced the desired outcome.

Exhibit A-2

Invalidity of U.S. Patent No. 6,838,651 in view of U.S. Patent No. 5,982,984 to Inuiya

Claims 1, 13, 18 of the '651 Patent are invalid as anticipated under 35 U.S.C. § 102 or rendered obvious under 35 U.S.C. § 103 by U.S. Patent No. 5,982,984 to Inuiya ("Inuiya"). Inuiya, issued on November 9, 1999, qualifies as prior art under at least 35 U.S.C. §§ 102 and/or 103 as to the asserted claims of U.S. Patent 6,838,651 to Mann, ("the '651 patent"), as discussed in greater detail in the chart that follows.

To the extent Complainant alleges that Inuiya does not disclose any particular limitation of Claims 1, 13, and 18 (the "Asserted Claims") of the '651 patent, either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority date of the '651 patent to modify Inuiya and/or to combine the teachings of Inuiya with other prior art references, including but not limited to the present prior art references found in OmniVision's Preliminary Invalidity Contentions and any supplements thereto and the relevant section of charts for other prior art for the '651 patent in a manner that would have rendered the Asserted Claims invalid as obvious. The inclusion of the particular limitation into the system described in Inuiya would have been obvious for at least the following reasons: It would have been obvious to modify the methods and/or systems disclosed in Inuiya to meet this limitation based on: (a) the teachings in Inuiya itself; (b) a person of ordinary skill in the art implementing a predictable variation of the methods and/or systems disclosed in Inuiya; (c) the logic, judgment, intelligence, creativity, innovation and common sense a person of ordinary skill in the art would employ; (d) the inferences and creative and routine steps that a person of ordinary skill in the art would employ; (e) market demand for methods and/or systems to include this limitation; and/or (f) design needs or market pressures to solve a problem with a finite number of solutions that could have produced the desired outcome.

Exhibit A-3

Invalidity of U.S. Patent No. 6,838,651 in view of Japanese Patent Publication 2000-12819 to Isogai

Claims 1, 13, 18 of the '651 Patent are invalid as anticipated under 35 U.S.C. § 102 or rendered obvious under 35 U.S.C. § 103 by Japanese Patent Publication 2000-12819 to Isogai ("Isogai"). Isogai, published on January 14, 2000, qualifies as prior art under at least 35 U.S.C. §§ 102 and/or 103 as to the asserted claims of U.S. Patent 6,838,651 to Mann, ("the '651 patent"), as discussed in greater detail in the chart that follows.

To the extent Complainant alleges that Isogai does not disclose any particular limitation of Claims 1, 13, and 18 (the "Asserted Claims") of the '651 patent, either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority date of the '651 patent to modify Isogai and/or to combine the teachings of Isogai with other prior art references, including but not limited to the present prior art references found in OmniVision's Preliminary Invalidity Contentions and any supplements thereto and the relevant section of charts for other prior art for the '651 patent in a manner that would have rendered the Asserted Claims invalid as obvious. The inclusion of the particular limitation into the system described in Isogai would have been obvious for at least the following reasons: It would have been obvious to modify the methods and/or systems disclosed in Isogai to meet this limitation based on: (a) the teachings in Isogai itself; (b) a person of ordinary skill in the art implementing a predictable variation of the methods and/or systems disclosed in Isogai; (c) the logic, judgment, intelligence, creativity, innovation and common sense a person of ordinary skill in the art would employ; (d) the inferences and creative and routine steps that a person of ordinary skill in the art would employ; (e) market demand for methods and/or systems to include this limitation; and/or (f) design needs or market pressures to solve a problem with a finite number of solutions that could have produced the desired outcome.

Exhibit A-4

Invalidity of U.S. Patent No. 6,838,651 in view of U.S. Patent No. 7,133,073 to Neter

Claims 1, 13, 18 of the '651 Patent are invalid as anticipated under 35 U.S.C. § 102 or rendered obvious under 35 U.S.C. § 103 by U.S. Patent No. 7,133,073 to Neter ("Neter"). Neter, filed on February 2, 2000, qualifies as prior art under at least 35 U.S.C. §§ 102 and/or 103 as to the asserted claims of U.S. Patent 6,838,651 to Mann, ("the '651 patent"), as discussed in greater detail in the chart that follows.

To the extent Complainant alleges that Neter does not disclose any particular limitation of Claims 1, 13, and 18 (the "Asserted Claims") of the '651 patent, either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority date of the '651 patent to modify Neter and/or to combine the teachings of Neter with other prior art references, including but not limited to the present prior art references found in OmniVision's Preliminary Invalidity Contentions and any supplements thereto and the relevant section of charts for other prior art for the '651 patent in a manner that would have rendered the Asserted Claims invalid as obvious. The inclusion of the particular limitation into the system described in Neter would have been obvious for at least the following reasons: It would have been obvious to modify the methods and/or systems disclosed in Neter to meet this limitation based on: (a) the teachings in Neter itself; (b) a person of ordinary skill in the art implementing a predictable variation of the methods and/or systems disclosed in Neter; (c) the logic, judgment, intelligence, creativity, innovation and common sense a person of ordinary skill in the art would employ; (d) the inferences and creative and routine steps that a person of ordinary skill in the art would employ; (e) market demand for methods and/or systems to include this limitation; and/or (f) design needs or market pressures to solve a problem with a finite number of solutions that could have produced the desired outcome.