

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EOPTOLINK TECHNOLOGY USA INC.,

Petitioner,

v.

APPLIED OPTOELECTRONICS, INC.,

Patent Owner.

Case IPR2026-00094

Patent No. 10,578,818

**PATENT OWNER RESPONSE TO PETITION FOR *INTER PARTES*
REVIEW OF U.S. PATENT 10,578,818**

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EXHIBITS

Exhibit No.	Description
2006	Declaration of Alan E. Willner, Ph. D.
2007	July 31, 2025 Memorandum from Acting Director Stewart

I. INTRODUCTION

Patent Owner Applied Optoelectronics, Inc. (“AOI”) submits this Patent Owner Response (“POR”) to the petition (“Petition”) of Eoptolink Technology USA Inc. (“Petitioner” or “Eoptolink”) for an *inter partes* review (“IPR”) of U.S. Patent No. 10,578,818 (the “’818 patent”, Exhibit 1001) entitled “Optical Transceiver.” The Petition challenges the patentability of Claims 1–12 (the “Challenged Claims”).

On April 1, 2026, the Board granted institution of IPR. The ’818 patent generally relates to an optical transceiver that includes a main body, an elastic component and a fastening component with two extending arms detachably fastenable with a cage. The ’818 patent has three independent claims: claims 1, 10, and 11. Claims 1 and 11 are directed to an optical transceiver configured to be inserted into a cage in a pluggable manner. Claim 10 is directed to an optical transceiver.

Eoptolink presents six grounds of invalidity against the Challenged Claims. *See* Petition at p. 4.

In Ground 1, Eoptolink challenges Claims 1–3, 5, 7, and 10 as anticipated by Wang (U.S. Patent Publication No. 2015/0263453, Ex. 1003).

In Ground 2, Eoptolink challenges Claims 4, 6, and 9 as obvious over Wang.

In Ground 3, Eoptolink challenges Claims 8, 11, and 12 as obvious over

Wang in view of Tsai (U.S. Patent No. 9,523,826, Ex. 1005).

In Ground 4, Eoptolink challenges Claims 1–3, 5, 7, and 10 as anticipated by Koutrokois (U.S. Patent Publication No. 2014/0104808, Ex. 1004).

In Ground 5, Eoptolink challenges Claims 4, 6, and 9 as obvious over Koutrokois.

In Ground 6, Eoptolink challenges Claims 8, 11, and 12 as obvious over Koutrokois in view of Tsai.

Wang does not disclose every limitation of Challenged Claims 19 and 11–12 in Grounds 1–3. Specifically, Wang does not disclose at least the following limitation recited in independent claims 1 and 11 (limitation 1[c4] and 11[c4]) requiring: “the two extending arms are detachably fasten-able with the cage”. Claims 2–9 depend from claim 1 and claim 12 depends from claim 11. Therefore, Wang also does not disclose this limitation, and Eoptolink does not use Tsai to cure this deficiency of Wang in Grounds 2 and 3. *See* Exhibit 2006 (June 23, 2026 Expert Declaration of Alan Willner) at ¶ 5.

Koutrokois does not disclose every limitation of Challenged Claims 3, 9 and 12 in Grounds 4–6. Specifically, Koutrokois does not disclose at least the limitation in Claim 3 requiring “wherein the main body comprises a first confined surface forming the confined groove, the confined portion of the fastening component

comprises a second confined surface facing toward the first confined surface, and the elastic component is disposed between the first confined surface and the second confined surface.” Furthermore, Koutrokois does not disclose or render obvious at least the limitation in Claim 9 requiring “wherein the optical transceiver is a QSFP-DD (Quad Small Form-factor Pluggable Double Density) optical transceiver.” Finally, Koutrokois in view of Tsai does not render obvious the limitation in Claim 12 requiring “wherein the bail is configured to remain in the upright position without application of external force.” *See* Exhibit 2006 at ¶ 6.

II. BACKGROUND

A. '818 Patent

The '818 Patent is directed to a pluggable optical transceiver comprising a main body, a fastening component movably disposed on the main body, and an elastic component disposed in a confined groove on an outer surface of the main body. Ex. 1001 at Abstract, col. 1:32–45. The fastening component comprises a linkage arm extending between two extending arms. *Id.* The extending arms are disposed on two lateral surfaces of the main body, and the linkage arm is disposed on the outer surface of the main body. *Id.* The fastening component further includes a confined portion connected to the linkage arm and the confined portion extends into the confined groove to compress the elastic component therein. *Id.* at col. 1:45–48.

The elastic component is configured to pass through an opening in the linkage arm during assembly when the elastic component is in a compressed state. *Id.* at col. 5:24–37, Figs. 5–7; *see also* Ex. 2006 at ¶ 53.

The optical transceiver 10a includes a main body 100a, a fastening component 200a, a bail 300a, and two elastic components 400a. *Id.* at col. 4:5–16. Fastening component 200a is movably disposed on main body 100a and is connected to bail 300a. *Id.* at col. 4:39–41, col. 4:59–5:7. In embodiments, the bail could remain at the upright position even without any application of the external force to the bail. *Id.* 5:5–7. The fastening component 200a includes two extending arms 220a with linkage arm 210a therebetween, wherein linkage arm 210a includes two confined portions 240a and two openings 250a. *Id.* at col. 4:39–58, Fig. 5. Two extending arms 220a are movably disposed on two lateral surfaces 130a, respectively, of main body 100a. *Id.* at col. 5:45–47. Extending arms 220a are detachably fasten-able with the cage. *Id.* Linkage arm 210a is disposed on outer surface 140a of main body 100a such that each opening 250a of the linkage arm is connected with a respective confined groove 150a on the outer surface. *Id.* at col. 5:47–51; *see also* Ex. 2006 at ¶ 54.

The two confined portions 240a of linkage arm 210a extend into respective confined grooves 150a. *Id.* at col. 4:51–54, Fig. 7. Each elastic component 400a positioned in a confined groove 150a is compressed by a first confined surface 170a

of main body 100a and a second confined surface 260a of confined portion 240a, where first confined surface 170a, in some embodiments, faces toward the second confined surface 260a. *Id.* at col. 5:8–15. When fastening component 200a moves relative to main body 100a, confined portion 240a also moves in confined groove 150a such that elastic component 400a is compressed. *Id.* at col. 5:8–18, Fig. 7; *see also* Ex. 2006 at ¶ 55.

B. Relevant File History

Application no. 16/153,685 for the '818 Patent was filed on October 15, 2018. *See* “'818 Patent File History,” Exhibit 1002. (See Exhibit 1002 for the full prosecution history.) The Patent Office issued a Non-Final Office Action dated June 5, 2019, rejecting pending claims 1–11 as obvious over U.S. Patent Publication No. 2015/0093083 to Tsai *et al.* in view of U.S. Patent Publication No. 2017/0363828 to Zhu *et al.* (“Zhu,” Ex. 1006). Ex. 1002, pp. 38-46. Tsai is the publication of the same patent that Eoptolink uses here for its obviousness arguments. The claims were amended, and the '818 patent issued on March 3, 2020, with 12 claims, including three independent claims. *See* Ex. 2006 at ¶ 56.

C. Alleged Prior Art References

1. Wang (Exhibit 1003)

Wang discloses latch mechanisms for modules. A module includes a housing

and a release slide. The housing includes a first rib located on a first side of the housing and a second rib located on a second side of the housing. The release slide is slidably positioned on the housing. The release slide includes a release slide base, a first release slide arm extending from the release slide base, and a second release slide arm extending from the release slide base. A first flange extending from the first release slide arm is positioned at least partially over the first rib. A second flange extending from the second release slide arm is positioned at least partially over the second rib. Ex. 1003 at Abstract; *see also* Ex. 2006 at ¶ 58.

2. Koutrokois (Exhibit 1004)

Koutrokois discloses a latch mechanism for communication modules. In an example embodiment, a module latch mechanism includes a follower configured to be slidably positioned relative to a housing and a driver configured to be rotatably positioned relative to the housing. The follower includes a first arm configured to facilitate selective engagement of the housing with a host device. The follower may further include a fastening mechanism configured to facilitate selective engagement of the follower with the housing. The driver is configured to be positioned relative to the follower such that the driver urges the follower toward a first position relative to the housing as the driver is rotated from an unlatched position to a latched position. Ex. 1004 at Abstract; *see also* Ex. 2006 at ¶ 59.

3. Tsai (Exhibit 1005)

Tsai discloses a pluggable optical transceiver module for insertion into a plugging slot that includes a main body and a sliding component. The main body has “opposite two side surfaces and two sliding slots.” Ex. 1005 at Abstract. The two sliding slots are located at the two side surfaces. The sliding component includes a linkage arm and two extending arms. The two extending arms are connected to the linkage arm. Each extending arm has a second fastening part. The main body is between two extending arms. The two extending arms are disposed on the two sliding slots to have a fastening position and a releasing position. The two first fastening parts are fastened to the two second fastening parts when the two extending arms are in the fastening position. The two second fastening parts press the two first fastening parts, respectively, so that the two first fastening parts will be farther from each other when the two extending arms are located at releasing position. Ex. 1005 at Abstract; *see also* Ex. 2006 at ¶ 60.

III. DEFINITION OF A PERSON OF ORDINARY SKILL IN THE ART

For the purposes of this Patent Owner Response, AOI applies Eoptolink’s proposed level of skill in the art: A person of ordinary skill in the art (“POSITA”) knowledgeable in the technical field of the ’818 Patent would have had (1) a bachelor’s degree in electrical or electronic engineering or an equivalent degree,

and (2) 2–4 years of work experience in optoelectronics, optical networking, optical communications, or a closely related field. *See* Petition at p. 12; *see also* Ex. 2006 at ¶¶ 39-42.

IV. CLAIM CONSTRUCTION

Eoptolink states that no claim terms require claim construction. *See* Petition at p. 12. Therefore, for the purposes of this Patent Owner Response, AOI will give all claim terms their plain and ordinary meaning as understood by a POSITA at the time of the invention. *See* Ex. 2006 at ¶ 57.

V. GROUND 1: EOPTOLINK HAS NOT SHOWN THAT WANG ANTICIPATES CLAIMS 1–3, 5, AND 7.

A. Claim 1

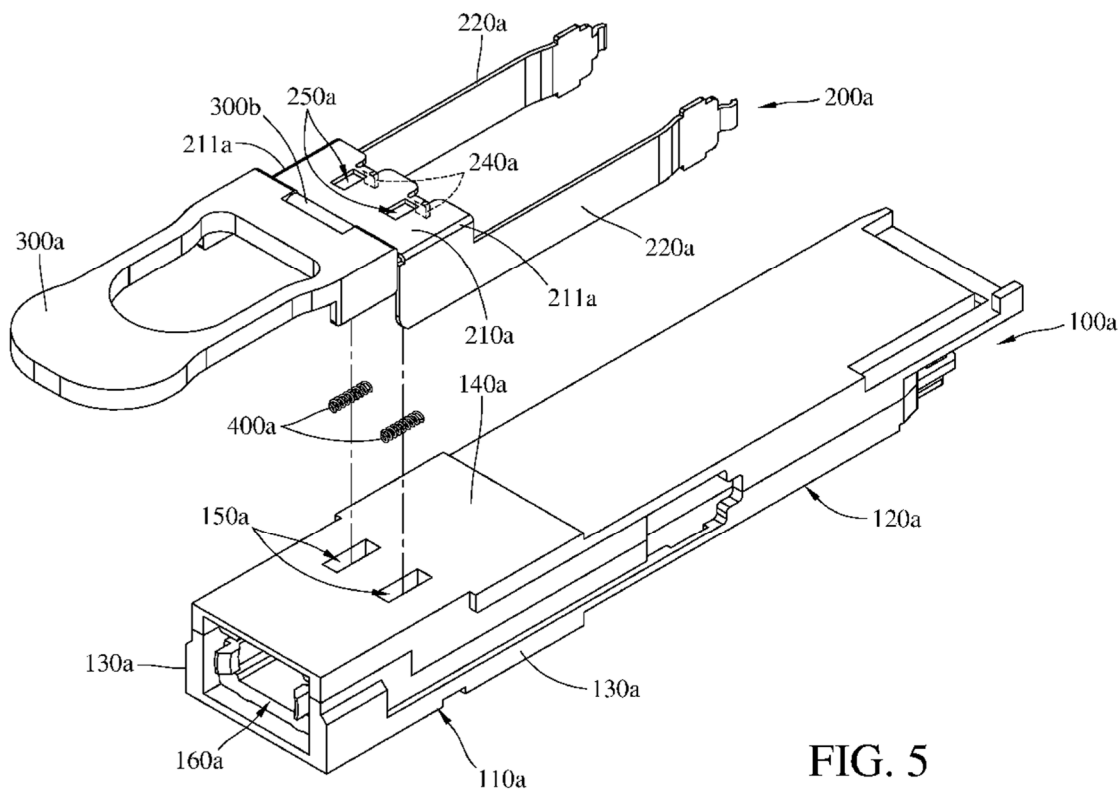
Limitation 1[c4] of claim 1 recites “the two extending arms are detachably fasten-able with the cage.” Wang fails to disclose this limitation. *See* Ex. 2006 at ¶ 61.

The ‘818 patent describes the extending arms as:

“The fastening component 200a is movably disposed on the main body 100a and includes a linkage arm 210a, two extending arms 220a and two confined portions 240a. The two extending arms 220a are respectively connected with two opposite ends of the linkage arm 210a, such that the linkage arm 210a is located between the two extending arms 220a. The two extending arms 220a are movably

disposed on the lateral surfaces 130a respectively, and the extending arms 220 are detachably fasten-able with the cage [20].” Ex. 1001, Col. 4:39–48; *see also* Ex. 2006 at ¶ 62.

This is shown in Figure 5 of the '818 patent.



See Ex. 1001 at Fig. 5; *see also* Ex. 2006 at ¶ 63.

Specifically, the two extending arms 220a extend well into the cage 20 in order to make contact with the cage. Moreover, the '818 patent states that the “fastening portion 230 extends along a direction **far away** from the lateral surface 130 [130a] to be detachably fasten-able with the cage 20.” *Id.* Col. 2:67 - Col. 3:2 (emphasis added); *see also* Ex. 2006 at ¶ 64.

This is shown in Figure 1 of the '818 patent.

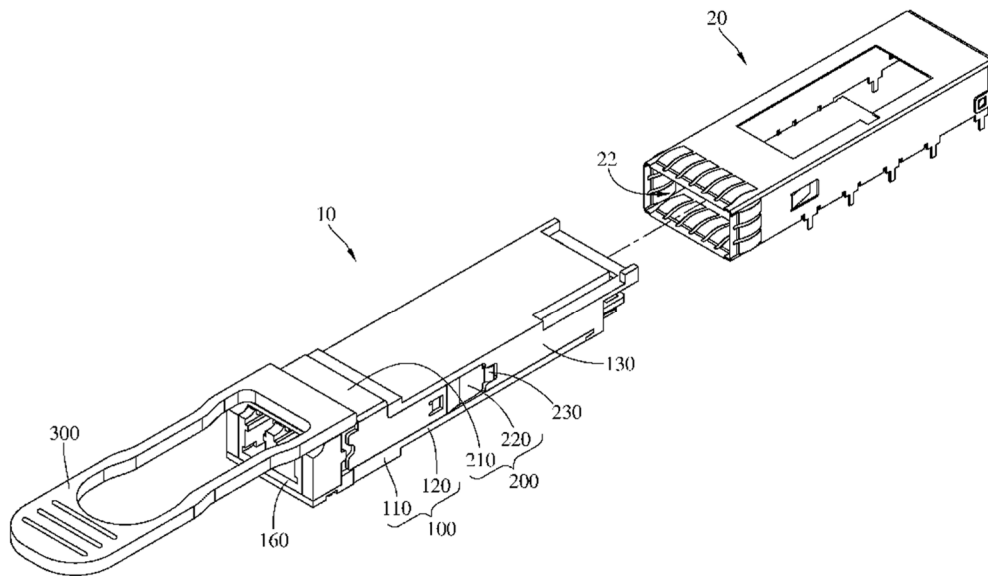
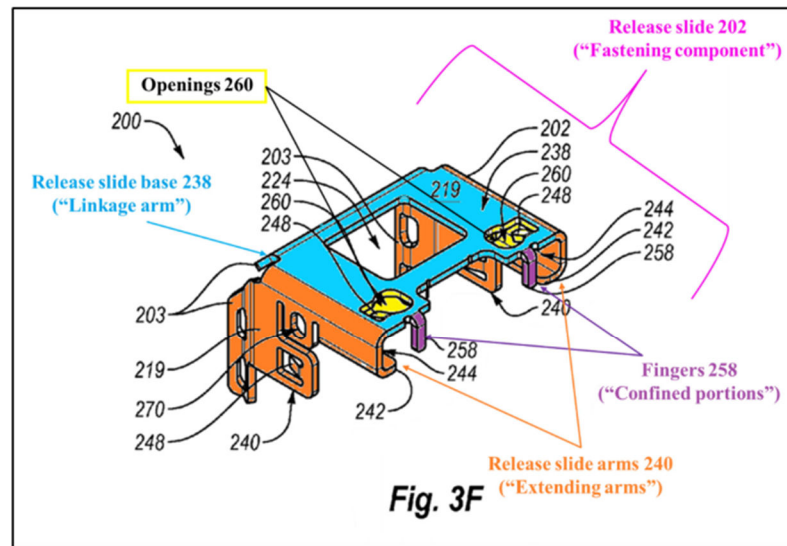


FIG. 1

See Ex. 1001 at Fig. 5; *see also* Ex. 2006 at ¶ 65.

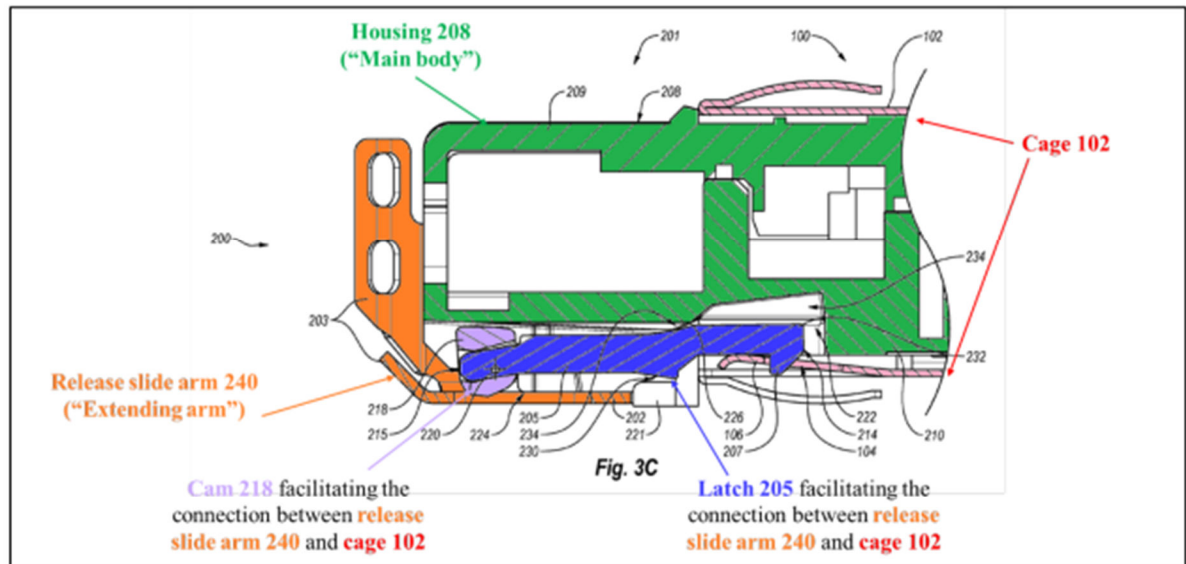
In contrast, Eoptolink argues that release slide arms 240 of the release slide 202 as described in Wang are the equivalent of the claimed extending arms in the '818 patent. *See* Petition at p. 29. In support of its argument, Petitioner references its own annotated Figure 3F of Wang, which is reproduced below. *See id.*



Ex. 1003, Fig. 3F, excerpted (showing **release slide arms 240** connected with **release slide base 238**) (annotations added)

See id. (Annotations made by Petitioner); *see also* Ex. 2006 at ¶ 66.

However, comparing the “release slide arms” of Wang to the extending arms of the claimed apparatus in the ’818 patent, it is clear that the “release slide arms” of Wang do not come near the cage, much less being extending arms that are detachably fasten-able with the cage. Indeed, Eoptolink does not even suggest that this is the case. This deficiency is shown in Petitioner’s annotated Figure 3C from Wang, reproduced below. *See, e.g.*, Petition at pp. 28–30; *see also* Ex. 2006 at ¶ 67.



Ex. 1003, Fig. 3C (showing **release slide arms 240** detachably fastened with **cage 102** via **cam 218** and **latch 205**) (annotations added)

See Ex. 1003 at ¶ 84. (Annotations made by Petitioner.)

Instead, Eoptolink argues that the “release slide arms” as disclosed in Wang “are detachably fasten-able with the cage *via cam 218 and latch 205, which includes engagement pin 207.*” *Id.* at p. 31 (emphasis added). But, Eoptolink fails to actually show that the “arms” of Wang “are detachably fasten-able with the cage.” That is because they are not. See Ex. 2006 at ¶ 68.

Instead, Eoptolink unsuccessfully argues that a path between the arms and the cage that includes numerous interim parts somehow satisfies the claim limitation requiring the “the two extending arms are detachably fasten-able with the cage.” This argument is inconsistent with the plain language of the claim

which says the arms must be “detachably fasten-able *with* the cage.” *See* Ex. 1001 at Claim 1; *see also* Ex. 1001 at col. 2:67-3:2 (“The fastening portion **230** extends along a direction far away from the lateral surface **130** to be detachably fasten-able with the cage **20**.”); *see also* Ex. 2006 at ¶ 69.

In making this argument, Eoptolink ignores the multiple interactions that occur between the release slide arms and the cage of Wang. *See, e.g.*, Ex. 1003 at ¶¶ [0076], [0083]-[0084]. These paragraphs from Wang provide as follows:

“...The cam 218 may interface with the release slide 202 such that the cam 218 rotates about a cam axis 220 as the release slide 202 is moved relative to the housing 208. For example, the cam 218 may rotate from a latched position to an unlatched position as the release slide 202 is moved from its latched position to its unlatched position.

....

When the cam 218 rotates about the cam axis 220, the seat 276 travels along a circular curve having a radius equal to the radial offset of the seat from the cam axis 220. Rotation of the cam 218 may thus urge the post 280 along the same or similar circular curve as the seat 276. As the cam 218 is rotated from its latched position to its unlatched position, the cam 218 may urge the second end section 215 of the latch 205 outwards, e.g., away from a longitudinal midline of the optoelectronic module 200, or downwards. The second end section 215 may also be urged towards the rear of the housing 208, e.g., towards the end of the optoelectronic module 200 opposite the front end section 201.

The motion of the second end section 215 of the latch 205 may urge the latch 205 to rotate and slide relative to a crossbar 221 of the bottom housing 210, thus urging the first end section 214 of the latch 205 inwards, i.e., towards a longitudinal midline of the optoelectronic module 200 or upwards, and towards the rear of the housing 208. The bottom housing 210 may include a recess 222 sized and shaped to receive the latch 205 such that the engagement pin 207 disengages from

the cage recess 104 and allows the optoelectronic module 200 to be removed from the cage 102.”

See id.; *see also* Ex. 2006 at ¶ 70.

Further, Petitioner’s annotated Figure 3C from Wang, reproduced above, shows that the release side arms 240 of Wang are not detachably fasten-able *with the cage*. *See* Ex. 2006 at ¶ 71.

Consequently, Eoptolink fails to show Wang disclosures “*the two extending arms* are detachably fasten-able with the *cage*.” (emphasis added); *See* Ex. 2006 at ¶ 72.

For at least these reasons, Eoptolink has not shown that Wang discloses the limitation requiring “the two extending arms are detachably fasten-able with the cage” of Claim 1. Accordingly, Eoptolink has not shown that Wang anticipates Claim 1. *See* Ex. 2006 at ¶ 73.

A. Claims 2, 3, 5, and 7

Claims 2, 3, 5, and 7 depend from Claim 1. Because Wang does not disclose all limitations of Claim 1, Wang also does not disclose all limitations of Claims 2, 3, 5, and 7. Accordingly, Eoptolink has not shown that Wang anticipates Claims 2, 3, 5, or 7. *See* Ex. 2006 at ¶ 74.

**VI. GROUND 2: EOPTOLINK HAS NOT SHOWN THAT WANG
RENDERS OBVIOUS CLAIMS 4, 6, AND 9.**

Claims 4, 6, and 9 depend from Claim 1. Because Wang does not disclose all limitations of Claim 1, Wang also does not disclose all limitations of Claims 4, 6, or 9. *See* Ex. 2006 at ¶ 75.

As discussed *supra*, Wang does not disclose “the two extending arms are detachably fasten-able with the cage.” Eoptolink does not argue that it is obvious in view of Wang that this feature is disclosed. *See, e.g.*, Petition at pp. 46-50. For at least this reason, Eoptolink has not shown that Wang discloses the limitation “the two extending arms are detachably fasten-able with the cage” of Claim 1. *See* Ex. 2006 at ¶ 76.

Accordingly, Eoptolink has not shown that Wang renders obvious Claims 4, 6, or 9. *See* Ex. 2006 at ¶ 77.

**VII. GROUND 3: EOPTOLINK HAS NOT SHOWN THAT WANG IN
VIEW OF TSAI RENDERS OBVIOUS CLAIMS 8, 11, AND 12.**

Claim 8 depends from Claim 1. As discussed above, Wang does not disclose “the two extending arms are detachably fasten-able with the cage.” Eoptolink does not use Tsai to make up for the deficiencies of Wang. *See, e.g.*, Petition at pp. 55-56; *see also* Ex. 2006 at ¶ 78.

Limitation 11[c4] of Claim 11 also recites “the two extending arms are

detachably fasten-able with the cage.” As discussed above, Wang does not disclose “the two extending arms are detachably fasten-able with the cage.” Eoptolink does not use Tsai to make up for the deficiencies of Wang. *See, e.g.*, Petition at p. 60; *see also* Ex. 2006 at ¶ 79.

Claim 12 is dependent from Claim 11. For the reasons discussed above, Wang does not disclose “the two extending arms are detachably fasten-able with the cage” and Eoptolink does not argue that Tsai makes up for the deficiencies of Wang. *See* Ex. 2006 at ¶ 80.

Furthermore, for reasons discussed in Section X below, Tsai does not disclose a bail “configured to remain in the upright position without application of external force” as required by Claim 12. *See* Ex. 2006 at ¶ 81.

For at least these reasons, Eoptolink has not shown that Wang discloses the limitation “the two extending arms are detachably fasten-able with the cage” of Claims 1 or 11 and has not argued that Tsai makes up for the deficiencies of Wang. Accordingly, Eoptolink has not shown that Wang in view of Tsai renders obvious Claims 8, 11, or 12. *See* Ex. 2006 at ¶ 82.

VIII. GROUND 4: EOPTOLINK HAS NOT SHOWN THAT KOUTROKOIS ANTICIPATES CLAIM 3.

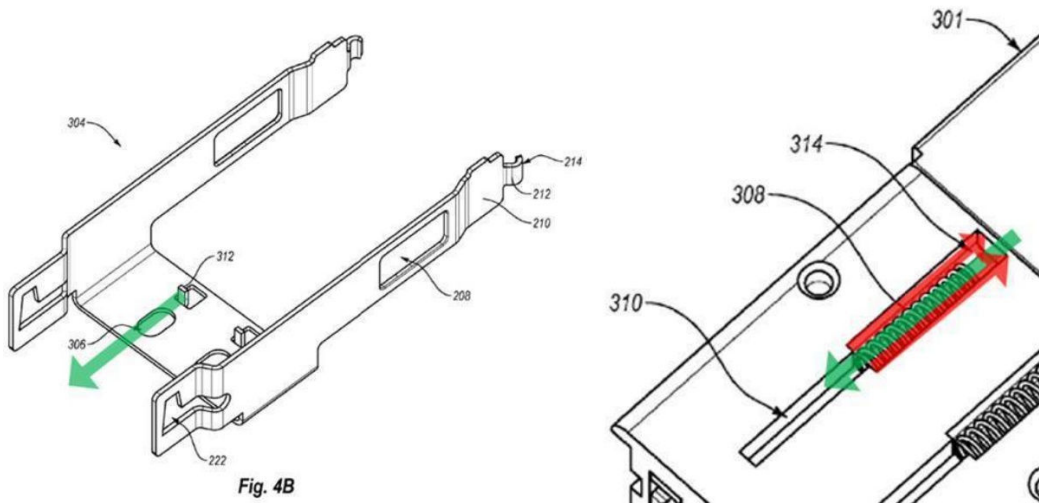
Claim 3 requires that “wherein the main body comprises a first confined surface forming the confined groove, the confined portion of the fastening

component comprises a second confined surface facing toward the first confined surface, and the elastic component is disposed between the first confined surface and the second confined surface.” Koutrokois does not disclose this limitation. *See* Ex. 2006 at ¶ 83.

Eoptolink argues that Koutrokois discloses a channel 314 housing the spring 308 wherein the engaging member 312 of the fastening component is a second confined surface and the proximal end of the channel 314 is a first confined surface. Petition at pp. 79–80. However, Koutrokois does not show a second confined surface *facing toward* a first confined surface as required by claim 3. *See* Ex. 2006 at ¶ 84.

As shown below in Fig. 4B and a zoomed and annotated closeup of Fig 4C of Koutrokois, the alleged first confined surface of channel 314 are only a set of two small “ledges” (or “lips”) and do not extend across the entirety of the spring. Only the edges of the spring 308 are retained by the “ledges” of channel 314. Further, the alleged second confined surface (engaging member 312) engages within the channel 314, but *faces toward* the far end of the assembly slot 310. The alleged second confined surface (engaging member 312) is in the middle of the spring and does not face the alleged first confined surface *ledges* that retain the spring. The engaging member faces through the channel and to the other end of the

assembly slot. *See* Ex. 2006 at ¶ 85.



A POSITA would understand that for two surfaces to be *facing toward* each other, a vector normal (perpendicular) to the first surface would correspond in the negative direction to a vector normal to the second surface. However, this is not the case with Koutrokois. The alleged second surface normal vector does not face the normal vector of the alleged first surface, but rather the end of the assembly slot. Thus, these two normal vectors appear to be parallel in opposite directions but do not appear to overlap in space. Consequently, a POSITA would not understand that Koutrokois expressly discloses a second confined surface facing toward a first confined surface. *See* Ex. 2006 at ¶ 86.

For at least this reason, Koutrokois does not disclose the limitation of claim 3 requiring that “wherein the main body comprises a first confined surface forming

the confined groove, the confined portion of the fastening component comprises a second confined surface facing toward the first confined surface, and the elastic component is disposed between the first confined surface and the second confined surface.” Accordingly, Eoptolink has not shown that Koutrokois anticipates claim 3. *See* Ex. 2006 at ¶ 87.

IX. GROUND 5: EOPTOLINK HAS NOT SHOWN THAT KOUTROKOIS RENDERS OBVIOUS CLAIM 9.

Claim 9 requires that “wherein the optical transceiver is a QSFP-DD (Quad Small Form-factor Pluggable Double Density) optical transceiver.” Koutrokois does not disclose this limitation nor does it render it obvious.

Eoptolink relies on expert testimony to argue that the optical transceiver of Koutrokois being a QSFP-DD optical transceiver would be obvious to a POSITA. Petition at p. 88 (asserting “From these disclosures, it would have been obvious to a POSITA that optoelectronic module 200/300 would have included a QSFP-DD transceiver because it can provide eight data lanes, with each lane operating at 100 Gbps.”); *see also* Ex. 1007 at ¶ [150].

However, it is impermissible to rely on the general knowledge of a POSITA to supply a claim limitation in an IPR as outlined in the July 31, 2025 memo from Acting USPTO Director Coke Morgan Stewart. (“July Memo”). In the July Memo, Acting Director Stewart instructed the agency “that applicant admitted prior art

(AAPA), *expert testimony*, common sense, and other evidence that is not ‘prior art consisting of patents or printed publications’ (collectively, ‘general knowledge’) may not be used to supply a missing claim limitation” and came into force on September 1, 2025, prior to the filing of the Petition. *See* Exhibit 2007 at p. 1, July 31, 2025 Memorandum from Acting Director Stewart (emphasis added). Thus, as here, if a prior art reference admittedly lacks a specific element, petitioners can no longer argue that a POSITA would inherently understand or fill that gap based on background knowledge, and the IPR should be denied. *See id.* (“As a practical matter, enforcement of Rule 104(b)(4) means that applicant admitted prior art (AAPA), *expert testimony*, common sense, and other evidence that is not ‘prior art consisting of patents or printed publications’ (collectively, ‘general knowledge’) may not be used to supply a missing claim limitation. Per 35 U.S.C. § 312(a)(4), the Board shall deny an IPR petition that fails to comply with Rule 104(b)(4).”).

Therefore, Eoptolink cannot rely on its expert’s opinion about the general knowledge of a POSITA. Consequently, Eoptolink has not shown that Koutrokois discloses the limitation of claim 9 requiring that “wherein the optical transceiver is a QSFP-DD (Quad Small Form-factor Pluggable Double Density) optical transceiver.”

For at least this reason, Koutrokois does not disclose the limitation of claim

9 requiring “wherein the optical transceiver is a QSFP-DD (Quad Small Form-factor Pluggable Double Density) optical transceiver.” Accordingly, Eoptolink has not shown that Koutrokois renders obvious claim 9.

IX. GROUND 6: EOPTOLINK HAS NOT SHOWN THAT KOUTROKOIS IN VIEW OF TSAI RENDERS OBVIOUS CLAIM 12.

Claim 12 requires that “wherein the bail is configured to remain in the upright position without application of external force.” Koutrokois in view of Tsai does not disclose this limitation. *See* Ex. 2006 at ¶ 88.

Eoptolink argues that Tsai discloses this feature by quoting a passage that states, “the pull handle is pivoted about the sliding component so that the pull handle is located in front of the main body or on the top of the main body. ... The pull handle does not interfere with the optical fiber plug when located on the main body.” Petition at p. 95. Eoptolink’s expert further states that Tsai discloses that the pull handle does not interfere with the optical fiber plug when located on the main body, and it is therefore more convenient for users to insert the optical plug into the optical fiber terminal. Ex. 1007 at ¶ [164]. Eoptolink’s expert then states that this would “indicate” that the pull handle of Tsai “is configured to remain in the upright position on top of the main body without application of external force.” *Id.*; *see also* Ex. 2006 at ¶ 89.

However, it is not permissible to rely on the general knowledge of a

POSITA to supply a claim limitation in an IPR. *See* Exhibit 2007 at p. 1.

Regardless, Tsai does *not* make such a disclosure. Indeed, Eoptolink's expert himself only deduces that it might be more convenient to configure the bail to remain in the upright position without application of external force. But the teachings of Tsai do not teach or suggest this. *See* Ex. 2006 at ¶ 90.

Consequently, Tsai does not disclose a bail configured to remain in the upright position without application of external force. *See* Ex. 2006 at ¶ 91.

For at least this reason, Koutrokois does not disclose the limitation of claim 12 requiring that "wherein the bail is configured to remain in the upright position without application of external force." Accordingly, Eoptolink has not shown that Koutrokois in view of Tsai renders obvious claim 12. *See* Ex. 2006 at ¶ 92.

XI. CONCLUSION

For the reasons set forth above, Applied Optoelectronics, Inc., respectfully requests that the Board deny Eoptolink's request to cancel the Challenged Claims of the '818 Patent.

Dated: June 24, 2026

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CERTIFICATE OF WORD COUNT

Under the provisions of 37 C.F.R. § 42.24(d), the undersigned hereby certifies that the Microsoft Office word count including all footnotes for the foregoing Patent Owner Response, excluding the table of contents, table of authorities, certificate of word count, appendix and certificate of service, totals 4,541 words, which is less than the 14,000 words allowed under 37 C.F.R. § 42.24(b)(2).

Dated: June 24, 2026

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CERTIFICATE OF SERVICE

The undersigned hereby certifies service on the Petitioner, pursuant to 37 C.F.R. § 42.6(e) and by agreement of counsel, by electronic (e-mail) delivery of a true copy of the foregoing **PATENT OWNER RESPONSE** which was served on June 24, 2026 to the following Counsel for Petitioner via e-mail:

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