

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LUXOTTICA OF AMERICA INC.,

Petitioner

v.

E-VISION SMART OPTICS, INC.,

Patent Owner.

Patent No. 11,971,612

IPR2025-01512

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**PATENT OWNER'S CORRECTED  
REQUEST FOR DISCRETIONARY DENIAL**

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## EXHIBIT LIST

<b>Exhibit Number</b>	<b>Description</b>
2001	File History of U.S. Pat. No. 11,487,138 (the '138 patent)

Patent Owner E-Vision Smart Optics, LLC (“Patent Owner”) respectfully requests that the Director exercise discretion to deny institution of an inter partes review trial in the present proceeding. Patent Owner submits that the Director should exercise his discretion to decline to institute the present petition for the reasons set forth herein.

**I. THE DIRECTOR SHOULD EXERCISE HIS DISCRETION TO DENY INSTITUTION UNDER 35 U.S.C. § 325(D)**

Institution should be denied under 35 U.S.C. § 325(d) because much of the prior art relied upon in the petition was previously presented to the Examiner and considered before allowing the claims of the ’612 patent. Despite relying heavily on old art, Petitioner has not identified any material error by the Examiner, and thus discretionary denial is warranted.

Section 325(d) provides that the Director may deny institution when “the same or substantially the same prior art or arguments previously were presented to the Office.” 35 U.S.C. § 325(d). Discretionary denial under § 325(d) is evaluated using the two-part *Advanced Bionics* framework: (1) whether the same or substantially the same prior art or argument previously was presented to the Office; and (2) if the first part is satisfied, whether the petitioner has demonstrated that the Office erred in a manner material to the patentability of challenged claims. *See Advanced Bionics LLC v. MED-EL Elektromedizinische Gerate GmbH*, IPR2019-01469, Paper 6, at 8 (PTAB Feb. 13, 2020) (precedential); *see also Becton, Dickinson & Co. v. B. Braun*

*Melsungen AG*, IPR2017-01586, Paper 8 (PTAB Dec. 15, 2017) (precedential as to § III.C.5, first paragraph).

For reference, the Petition nominally<sup>1</sup> sets forth six Grounds as follows:

Ground	Reference(s)	Basis	Challenged Claims
1	Howell and Gruber	§103	1-13, 15-27
2	Jannard-740	§103	1-27
3	Howell, Gruber, and Jannard-740	§103	2-14
4	Osterhout	§103	1-18, 23-26
5	Osterhout and Jannard-740	§103	2-14
6	Any of Grounds 2, 4, or 5 and Gruber	§103	1-27

Pet., 20.

**A. Howell was Considered by the Office**

Howell is a U.S. patent publication which issued as U.S. Patent No. 7,500,747, which was considered by the Examiner during prosecution. Ex-1001, p. 3. *Advanced Bionics* prong (1) is satisfied, and Petitioner must therefore demonstrate that the Office erred in a manner material to the patentability of the challenged claims. *Advanced Bionics*, Paper 6, at 8; see *Ecto World, LLC v. Rai Strategic*

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<sup>1</sup> As explained below, Ground 6 is in fact 3 separate Grounds.

*Holdings, Inc.*, IPR2024-01280, Paper 13, at 5 (Director May 19, 2025). Petitioner offers no specific analysis of how the Office allegedly erred in its prior evaluation of Howell.

Howell does not teach (and Petitioner does not contend that Howell teaches) the claimed response to a verbal query which was the Examiner's basis for allowance. *See* Pet., 17-18 (describing prosecution history), 22; Ex-1002, 15-16. Petitioner therefore cannot show that the Examiner erred in his analysis of Howell's teachings.

**B. The Teachings of Jannard-740 Relied on by Petitioner Were Considered by the Office**

Petitioner states that “[t]he Examiner did not consider Jannard-740 (Ex.1006).” Pet., 18. Petitioner omits that *Jannard-382* (Ex-1007), of which Jannard-740 is a continuation-in-part, *was considered by the Examiner* during prosecution of the '612 patent. Ex-1001, p. 4.

Jannard-382 was also used to reject the claims of U.S. Pat. No. 11,487,138 (the '138 patent), the parent of the '612 patent. During prosecution of the '138 patent, the Examiner rejected the claims over Jannard-382 (Ex-1007) and Tran.<sup>2</sup> The

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<sup>2</sup> U.S. Patent App. Publ. No. 2008/0001735 to Tran (“Tran”). There was an additional rejection of application claim 7 over U.S. Application No.

Examiner contended that Jannard-382 taught all elements of the then-pending independent claims except “a verbal query . . . wherein the verbal query causes the Bluetooth-enabled external device to obtain the response to the verbal query via the Internet.” (Ex-2001, 77, 71, 32-33). During prosecution of the ’138 patent, Patent Owner presented arguments against the rejections, amended independent claim 1 to further recite “by searching the Internet for the response to the verbal query,” and similarly amended the other independent claims. (*Id.*, 59-62). The Examiner then allowed the claims. (*Id.*, 27-34).

Petitioner now contends that Jannard-740 alone renders obvious all elements of all challenged claims. *See* Pet., 46. However, Petitioner relies on portions of Jannard-740 to teach the claimed verbal query and response that are ***substantively the same*** as disclosures in Jannard-382.<sup>3</sup> For example, Petitioner contends that “Jannard-740 explains the wearer may speak voice commands to offboard electronics, such as a cellular phone, which can communicate with a remote source such as the Internet” and identifies an “example[] of such transmission” at

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2011/0065428 (“Schroeter”). The subject matter of application claim 7 was eventually incorporated into issued claim 1.

<sup>3</sup> Petitioner also relies ***directly*** on Jannard-382 (Ex-1007) throughout the relevant sections of the Petition. *See* Pet., 49-53, 12.

paragraphs [0193]-[0195] and Figure 51 of Jannard-740. Pet., 50-53. A side-by-side comparison of Jannard-740, paragraphs [0193]-[0195], and Figure 51 and the equivalent disclosures in Jannard-328 is provided below:

<i>Compare</i> Jannard-740 (Ex-1006)	<i>with</i> Jannard-382 (Ex-1007)
<p>[0193] As illustrated in FIG. 51, an audio device 510C can be worn on the head 518 of a user U. Preferably, the audio device 510C is configured to provide one or two-way wireless communication with a source device, or the source device can be incorporated into the audio device 510C. The source device can be carried by the user U, mounted to a moveable object, stationary, or part of a local area or personal area network.</p>	<p>[0174] As illustrated in FIG. 8, the audio device 10C can be worn on the head 18 of a user U. Preferably, the audio device 10C is configured to provide one or two-way wireless communication with a source device, or the source device can be incorporated into the audio device 10C. The source device can be carried by the user U, mounted to a moveable object, stationary, or part of a local area or personal area network.</p>
<p>[0194] The user U can carry a “body borne” source device B such as, for example, but without limitation, a cellular phone, an MP3 player, a “two-way” radio, a palmtop computer, or a laptop computer. As such, the user U can use the audio device 510C to receive and listen to audio signals from the source device B, and/or transmit audio signals to the source device B. Optionally, the audio device 510C can also</p> <p>be configured to transmit and receive data signals to and from the source device B, described in greater detail below.</p>	<p>[0175] The user U can carry a “body borne” source device B such as, for example, but without limitation, a cellular phone, an MP3 player, a “two-way” radio, a palmtop computer, or a laptop computer. As such, the user U can use the audio device 10C to receive and listen to audio signals from the source device B, and/or transmit audio signals to the source device B. Optionally, the audio device 10C can also be configured to transmit and receive data signals to and from the source device B, described in greater detail below.</p>

[0195] Optionally, the device B can also be configured to communicate, via long or short range wireless networking protocols, with a remote source R. The remote source R can be, for example, but without limitation, a cellular phone service provider, a satellite radio provider, or a wireless internet service provider. For example, but without limitation, the source device B can be configured to communicate with other wireless data networks such as via, for example, but without limitation, long-range packet-switched network protocols including PCS, GSM, and GPRS. As such, the audio device 510C can be used as an audio interface for the source device B. For example, but without limitation, where the source device B is a cellular phone, the user U can listen to the audio output of the cellular phone, such as the voice of a caller, through sound transducers in the audio device 510C. Optionally, the user U can send voice signals or commands to the cellular phone by speaking into a microphone on the audio device 510C, described in greater detail below. Thus, the audio device 510C may advantageously be a receiver and/or a transmitter for telecommunications.

[0176] Optionally, the device B can also be configured to communicate, via long or short range wireless networking protocols, with a remote source R. The remote source R can be, for example, but without limitation, a cellular phone service provider, a satellite radio provider, or a wireless internet service provider. For example, but without limitation, the source device B can be configured to communicate with other wireless data networks such as via, for example, but without limitation, long-range packet-switched network protocols including PCS, GSM, and GPRS. As such, the audio device 10C can be used as an audio interface for the source device B. For example, but without limitation, where the source device B is a cellular phone, the user U can listen to the audio output of the cellular phone, such as the voice of a caller, through sound transducers in the audio device 10C. Optionally, the user U can send voice signals or commands to the cellular phone by speaking into a microphone on the audio device 10C, described in greater detail below. Thus, the audio device 10C may advantageously be a receiver and/or a transmitter for telecommunications.

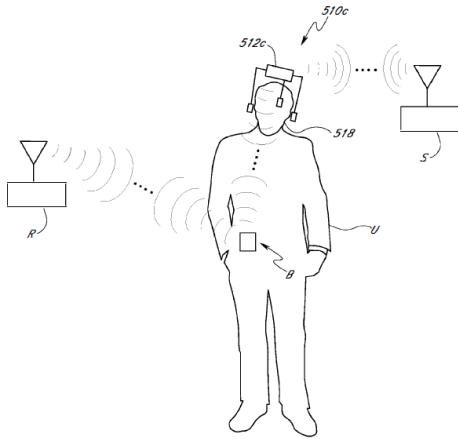


FIG. 51

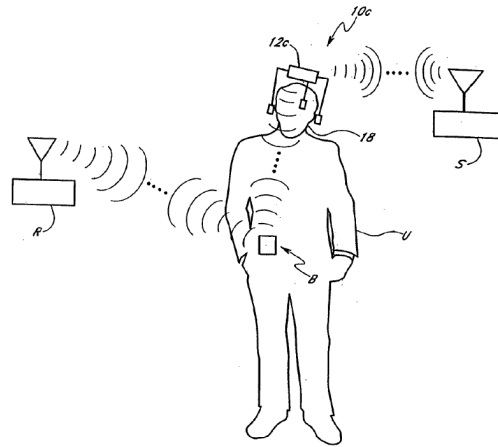


FIG. 8

As can be seen from the above, the disclosures are substantively identical—the only differences are in the reference numbers. The table below provides a correspondence between Jannard-740 paragraphs relied upon the relevant sections of the Petition and the corresponding portion of Jannard-382 with the same substantive content:

<b><i>Compare</i></b> Jannard-740 (Ex-1006) ( <i>See</i> Pet. 11-12, 49-53)	<b><i>with</i></b> Jannard-382 (Ex-1007)
[0003]	[0002] (similar)
[0104]	N/A
[0158]	N/A
[0160]	N/A
[0161]	N/A
[0185]	[0009]
[0188]-[0189]	[0082]-[0083]
[0192]	[0136]
[0193]-[0199]	[0174]-[0179]
[0202]	[0191]
[0205]-[0208]	[0202], [0200], [0201], [0202]
[0211]	[0205]
[0220]	[0214]
[0221]	[0215]
[0236]	[0301]
[0237]	[0302] / paragraph incorporates by reference of Jannard-382
[0239]	[0304]
[0240]	[0318]
Fig. 49	Fig. 3A
Fig. 51	Fig. 8

Petitioner thus now relies on effectively the same disclosures in Jannard-740 that were before the Examiner in Jannard-382. Because of this, Petitioner’s suggestion that Jannard-740’s teachings were not before the Examiner is inaccurate.

*Advanced Bionics* prong (1) is satisfied, and Petitioner must therefore demonstrate that the Office erred in a manner material to the patentability of the challenged claims. Petitioner offers no specific analysis of how the Office allegedly

erred in its prior evaluation of Jannard's teachings.

Instead, as set forth below, Jannard-740 does not teach the claimed response to a verbal query which was the Examiner's basis for allowance. *See* Pet., 17-18; Ex-1002, 15-16. Petitioner therefore cannot show that the Examiner erred in his analysis of Jannard's teachings.

**C. Osterhout is Cumulative of the Art Presented to the Office**

Osterhout (Ex-1005) was not previously before the Office during prosecution of the '612 patent. Petitioner contends that Osterhout alone renders obvious most of the challenged claims. *See* Pet., 20. However, as set forth below, Osterhout does not teach the claimed response to a verbal query which was the Examiner's basis for allowance. *See* Pet., 17-18; Ex-1002, 15016 Osterhout is therefore merely cumulative of the art that was before the Examiner and for this reason as well, the "same or substantially the same prior art" was presented to the Office in prosecution. *See Becton, Dickinson & Co.*, IPR2017-01586, Paper 8, at 17–18.

**D. Denial is Warranted Under 325(d)**

Three of the four prior art references relied upon by Petitioner were either previously considered or are cumulative of art considered by the Examiner. Notably, three of the Petitioner's six Grounds rely *solely* on these three pieces of art. Petitioner provides no analysis of how the Office erred in its evaluation of the art during prosecution. Because Petitioner has not done so, the Director should deny

institution under 35 U.S.C. § 325(d).

## **II. THE DIRECTOR SHOULD EXERCISE HIS DISCRETION TO DENY INSTITUTION UNDER 35 U.S.C. § 314(A)**

35 U.S.C. § 314(a) provides the Office with discretion to deny a petition. The Director’s discretion to institute an AIA trial is informed by 35 U.S.C. § 316(b), which requires that “the Director shall consider the effect of any such regulation on the economy, the integrity of the patent system, the efficient administration of the Office, and the ability of the Office to timely complete proceedings instituted.” *See also* the March 26, 2025, Memorandum setting forth the “Interim Process for PTAB Workload Management” (listing factors to be considered).

Patent Owner submits that instituting inter partes review of the present petition would be an inefficient use of the Office’s resources for the reasons set forth below.

### **A. Discretionary Denial is Appropriate because the Petition presents Duplicative and Overlapping Grounds**

Petitioner’s presentation of duplicative and overlapping grounds is, itself, yet another independent basis for exercising discretion to deny the petition. *Zhuhai Cosmx Battery Co., Ltd. v. Ningde Amperex Technology Ltd.*, IPR2025-00405, Paper 24, at 2 (Director, Oct. 15, 2025) (“[A]s a matter of policy, it is not an efficient use of Office resources to institute and maintain a trial when a petition presents a multitude of unfocused grounds leaving the work to be done by the Office.”); *Arashi*

*Vision LLC v. GoPro, Inc.*, IPR2024-01434, Paper 9, at 10-121 (PTAB March 31, 2025); *Adaptics Ltd. v. Perfect Co.*, Case IPR2018-01596, Paper 20, at 17 (PTAB March 6, 2019) (informative).

The Petition nominally has six Grounds. The Grounds are highly duplicative of each other. Independent claims 1 and 24 are challenged separately 5 different times—in Grounds 1, 2, 4, and twice in Ground 6. This is because Petitioner’s Ground 6 is a “catch-all Ground” which captures, according to Petitioner, “Any of Grounds 2, 4, or 5 and Gruber.” *See* Pet., 20. This means that Ground 6 is in fact 3 separate Grounds, as set forth below:

<b>Ground</b>	<b>Reference(s)</b>	<b>Basis</b>	<b>Challenged Claims</b>
6.a	Jannard-740, Gruber	§103	1-27
6.b	Osterhout, Gruber	§103	1-18, 23-26
6.c	Osterhout, Jannard-740, and Gruber	§103	2-14

The Petition thus more accurately has 8 Grounds, 5 of which separately challenge the independent claims.

The Office must institute on all grounds or none, *SAS Institute Inc. v. Iancu*, 584 U.S. 357, 364–65 (2018), and it is the Office’s policy that the Board address all

grounds in its final written decision.<sup>4</sup> Here, if the present proceeding is instituted, maintaining a trial in this case would require the Board and Patent Owner to expend resources addressing multiple claims and Grounds that do not meet the reasonable likelihood standard (as set forth below), as well as a number of duplicative grounds. Patent Owner submits that that is not an efficient use of Office or party resources and thus institution should be denied.

**B. Discretionary Denial is Appropriate Because the Merits of the Petition are Weak**

As summarized herein, and as will be explained in further detail in Patent Owner’s Preliminary Response, the petition fails to demonstrate a reasonable likelihood of prevailing with respect to a number of Grounds and claims. Patent Owner highlights below several of the most significant deficiencies in the Petition’s unpatentability theories. Because the Petition presents weak and unfocused challenges with respect to numerous claims, discretionary denial is also warranted.

**1. Ground 1 (Howell and Gruber) (claims 2-13)**

Claims 2-13 all require that the claimed eyewear have an “electronic lens” “having a display function that provides virtual reality, augmented reality, or gaming

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<sup>4</sup> See Memorandum entitled “Final Written Decision Procedures for AIA Trial Proceedings,” dated July 29, 2025, available at <https://www.uspto.gov/sites/default/files/documents/20250729095727582.pdf>.

to a person wearing the eyewear.” Ex-1001, claim 2. The Petition contends under Ground 1 that Howell discloses the claimed electronic lens. However, Petitioner does not identify any “electronic lens” in Howell, let alone one that can provide the claimed functionality. Instead, Petitioner points to “a display located at the inside 114 of [Howell’s] lens holder” as being the claimed “electronic lens.” See Pet., 32-33 (relying on Ex-1008, [0110], Fig. 1). As the Figure reproduced by Petitioner illustrates, the portion of Howell’s eyewear identified by Petitioner is *part of the frame* and is not a lens. See Pet., 32-33. The other portions of Howell’s paragraph 0110 make this plain: “There can be a display located at the inside 114 of the lens holder, or at the vicinity of the junction 116 or the hinge of a lens holder and its corresponding temple facing the user. Or, there can be a display at the inside surface of a temple, or at other locations on the glasses.” Ex-1008, [0110]. Petitioner also manufactures the alleged functioning of this “display” out of whole cloth. This is most apparent in the Petition’s analysis for claims 5 and 6, where it relies solely on expert testimony to supply the functionality required by the claims. Pet., 35-37.

Accordingly, Petitioner does not have a reasonable likelihood of prevailing with respect to, at least, claims 2-13 under Ground 1.

## **2. Ground 2 (Jannard-740) (all claims)**

Petitioner challenges all claims of the ’612 patent based on Jannard-740 alone. Independent claim 1 requires that the eyewear “receive a verbal query from a wearer

of the eyewear,” “transmit the verbal query to an external device, receive a response to the verbal query from the external device, and provide the response to the wearer via the speaker” “wherein the verbal query causes the external device to obtain the response to the verbal query by searching a computer network for the response to the verbal query.” Independent claim 24 is similar.

Jannard-740 does not teach the claimed verbal query and response “wherein the verbal query causes the external device to obtain the response to the verbal query by searching a computer network for the response to the verbal query.” Petitioner points to disparate teachings in Jannard-740’s relating to communication generally with an external device, but identifies no instance of a verbal query and response that in fact satisfies the claims. *See* Pet., 49-52. Petitioner’s citations to teachings relating to commands issued to select between audio content sources or issuance of voice commands to listen to content do not teach the claimed verbal query and response. At best, Petitioner can merely identify a teaching in Jannard-382 (which Petitioner contends is incorporated into Jannard-740) where when a “source device is configured to receive email, the device can be configured to signal the user with an audio signal that an email has been received. The user can send a signal to the source device so as to open the email. The text-to-speech engine can be configured to read the email to the user. Thus, a user can ‘listen’ to email through the audio device.” *See* Pet., 52 (*citing* Ex.1007, [0295]-[0299]). Nowhere in this example

does a “verbal query cause[] the external device to obtain the response to the verbal query by searching a computer network for the response to the verbal query.” Accordingly, Petitioner does not have a reasonable likelihood of prevailing with respect to any claims under Ground 2.

### **3. Ground 3 (Howell, Gruber, and Jannard-740) (claims 2-14)**

In Ground 3, Petitioner argues that for the claims requiring an “electronic lens” (claims 2-14), it would have been obvious to incorporate Jannard-740’s “lenses with optical devices” into “Howell-Gruber’s eyewear.” Pet., 72-73. As an initial matter, despite purporting to challenge claims 2-14, in this Ground, Petitioner only references its prior analysis of §VII(B) and §VIII(B) (Ground 1, claim 2 and Ground 2, claim 2). As a result, the precise nature of Petitioner’s contentions is unclear. Petitioner provides no specific claim mapping for any of claims 2-13, and thus it is unclear whether and to what extent Petitioner is relying on Jannard-740’s and/or Howell-Gruber’s teachings to satisfy the claims, including precisely what modifications Petitioner is proposing. This lack of clarity makes it difficult if not impossible to evaluate the Petition’s arguments. For example, as relevant to claims 8-11, Petitioner provides no analysis of how Jannard-740’s “processor” and “power supply,” which are external to the earstem, would have been incorporated into the frame of “Howell-Gruber” in a way that would meet the elements of claims 8-11, which require that the “processor” controlling the lenses and “a power supply” be

“disposed within the first temple” of Howell’s frame. *See* Ex-1001, claims 8-11; Pet., 54-56. This is particularly important given that Howell does not already teach the use of “electronic lenses” (as explained above) and further because both the “processor” and “power supply” must provide sufficient power to perform the claimed display functionality set forth in claim 2.

#### **4. Ground 4 (Osterhout) (all challenged claims)**

Petitioner challenges claims 1-18 and 23-26 of the ’612 patent based on Osterhout alone. Pet., 20. Osterhout also does not teach the claimed verbal query and response “wherein the verbal query causes the external device to obtain the response to the verbal query by searching a computer network for the response to the verbal query.” Petitioner points to Osterhout’s teachings of a user issuing a “voice command” to “access a database and search within the database for particular information, such as manuals or other repair and maintenance documents” where that database “can be accessible over the Internet or perhaps via an intranet.” Pet., 77-79 (citing Ex-1005, [0309]). Even if such a “command” is a verbal query, accessing a database over the internet is not the same as “searching a computer network for the response to the verbal query.” Accordingly, Petitioner does not have a reasonable likelihood of prevailing with respect to all claims under Ground 4.

#### **5. Ground 5 (Osterhout and Jannard-740) (claims 2-14)**

Similar to Ground 3, Petitioner argues for incorporating Jannard-740’s

“lenses with optical devices” into “Osterhout’s eyewear.” Pet., 99-101. Again, despite purporting to challenge claims 2-14, in this Ground, Petitioner references its prior analysis of §VIII(B) and §X(B). (Ground 2, claim 2 and Ground 4, claim 2), and, in passing refers to its prior analysis of §X(E) (Ground 4, claim 5). As a result, the precise nature of Petitioner’s contentions is unclear. Petitioner provides no specific claim mapping for any of claims 2-14, and thus it is unclear whether and to what extent Petitioner is relying on Jannard-740’s and/or Osterhout’s teachings to satisfy the claims, including precisely what modifications Petitioner is proposing. This is particularly important given that Osterhout does not anywhere teach that the “lenses 2106” themselves, can “provide[] virtual reality, augmented reality, or gaming to a person wearing the eyewear.” *See, e.g.*, Pet., 82-83. Osterhout’s disclosures relating to “augmented reality-based advertis[ing],” “virtual reality,” and “virtual 3D gaming experience[s],” *see*, Pet., 82-83 (*citing* Ex.1005, [0323]-[0326], [0356]) are not tied in any way to Osterhout’s “lenses 2106”—Petitioner identifies no teaching of a “variable lens,” Ex-1005, [0171], Pet., 99, 82, that could provide that functionality in Osterhout. The portions of Osterhout relied on by Petitioner instead appear to refer, at best, to functionality provided in connection with content projected onto waveguides. *See* Pet., 82-83. This lack of clarity again forces Patent Owner and the Office to guess at the nature of Petitioner’s contentions, and weighs against institution.

### **C. Discretionary Denial is Appropriate because the Petition Uses Expert Testimony to Fill in Missing Claim Limitations**

Discretionary denial is also appropriate because in numerous instances, the petition relies on expert testimony to supply missing claim limitations not found in the applied references. *See* March 26, 2025, Memorandum setting forth the “Interim Process for PTAB Workload Management,” p. 2; Director’s July 31, 2025 Memorandum entitled “Enforcement and Non-Waiver Of 37 C.F.R. § 42.104(B)(4) and Permissible Uses Of General Knowledge In Inter Partes Reviews”; 37 C.F.R. § 42.104(b)(4); *Xerox Corp. v. Bymark, Inc.*, IPR2022-00624, Paper 9, at 16 (PTAB August 24, 2022) (precedential). Patent Owner highlights significant instances of Petitioner’s use of expert testimony to supply missing claim limitations below:

- Ground 1: claim 2, claims 5-6
- Ground 2: claim 1, elements [1d] and [1e], claim 24, elements [24c] and [24d]
- Ground 2: claims 19-21
- Ground 2: claims 25-27
- Ground 4: claim 1, elements [1d] and [1e], claim 24, elements [24c] and [24d]
- Ground 4: claim 5
- Ground 4: claims 25-26

### III. CONCLUSION

Patent Owner respectfully requests that the Director deny institution of the present petition.

Date: <u>December 17, 2025</u>	<u>/Elizabeth A. Laughton/ (RN 70,484)</u> Matthew A. Smith Elizabeth A. Laughton SMITH BALUCH LLP 700 Pennsylvania Ave. SE Second Floor Washington, D.C. 20003 (202) 669-6207 (703) 585-8839 smith@smithbaluch.com laughton@smithbaluch.com  <i>Counsel for Patent Owner E-Vision Smart Optics, LLC</i>
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Patent Owner's Corrected Request for Discretionary Denial, together with all exhibits and other documents filed therewith, was served by filing the documents through the Patent Trial and Appeal Case Tracking System (P-TACTS) and via electronic mail, using at the following addresses:

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Date: December 17, 2025

/Elizabeth A. Laughton/ (RN 70,484)