UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IRADION LASER, INC. Petitioner,

v.

NOVANTA CORPORATION Patent Owner.

> Case IPR2017-00244 Patent 6,198,759

PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION PURSUANT TO 37 C.F.R. § 42.107

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	E.	GROUND 1: Claims 11, 14, 24, 26, and 28 are Not Anticipated by Opower

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1.	Claims 11 and 14 – Opower lacks "the lasing media sections being shaped to have continuous variations in thickness along the longitudinal axis"	
2.	Claim 11 and 14 – Opower lacks "the first inner surface and the second inner surface being shaped along the longitudinal axis to have continuous variation in the inter-electrode gap."	
3.	Claim 14 – Opower lacks "the thickness of one of the lasing media sections at a first longitudinal position along the longitudinal axis is at least 10% different than the thickness of one of the other lasing media sections at a second longitudinal position along the longitudinal axis."	
4.	Claims 24, 26, and 28 – Opower lacks "varying the thickness of the lasing media sections to have continuous variations for portions of one or more sections of the set of lasing media sections along their respective longitudinal axes."	
5.	Claim 26 – Opower lacks "forming the lasing media sections to be symmetric with respect to one or more of the longitudinal axes."	
б.	Claim 28 – Opower lacks "forming one of the lasing media sections so that its thickness at a first longitudinal position is at least 15% different than one of the lasing media sections at a second longitudinal position."	
GROUND 2: Claims 11, 14, 24, 26, and 28 are Not Anticipated by Vitruk		
1.	Claims 11 and 14 – Vitruk lacks "the lasing media sections being shaped to have continuous variations in thickness along the longitudinal axis"	
2.	Claim 11 and 14 – Vitruk lacks "the first inner surface and the second inner surface being shaped along the longitudinal axis to have continuous variation in the inter-electrode gap."	
3.	Claim 14 – Vitruk lacks "the thickness of one of the lasing media sections at a first longitudinal position along the	

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	longitudinal axis is at least 10% different than the thickness of one of the other lasing media sections at a second longitudinal position along the longitudinal axis."	
4.	Claims 24, 26, and 28 – Vitruk lacks "varying the thickness of the lasing media sections to have continuous variations for portions of one or more sections of the set of lasing media sections along their respective longitudinal axes."	
5.	Claim 26 – Vitruk lacks "forming the lasing media sections to be symmetric with respect to one or more of the longitudinal axes."	
6.	Claim 28 – Vitruk lacks "forming one of the lasing media sections so that its thickness at a first longitudinal position is at least 15% different than one of the lasing media sections at a second longitudinal position."	
GROUND 3: Claims 11, 14, 24, 26, and 28 are Not Obvious over Opower and/or Vitruk		
1.	No Motivation to Combine	
2.	Claims 11 and 14 – Opower and/or Vitruk do not teach or render obvious "the lasing media sections being shaped to have continuous variations in thickness along the longitudinal axis"	
3.	Claim 11 and 14 – Opower and/or Vitruk do not teach or render obvious "the first inner surface and the second inner surface being shaped along the longitudinal axis to have continuous variation in the inter-electrode gap."	
4.	Claim 14 – Opower and/or Vitruk do not teach or render obvious "the thickness of one of the lasing media sections at a first longitudinal position along the longitudinal axis is at least 10% different than the thickness of one of the other lasing media sections at a second longitudinal position along the longitudinal axis."	

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5.	Claims 24, 26, and 28 – Opower and/or Vitruk do not teach or render obvious "varying the thickness of the lasing media sections to have continuous variations for portions of one or more sections of the set of lasing media sections along their respective longitudinal axes."			
6.	Claim 26 – Opower and/or Vitruk do not teach or render obvious "forming the lasing media sections to be symmetric with respect to one or more of the longitudinal axes."			
7.	Claim 28 – Opower and/or Vitruk do not teach or render obvious "forming one of the lasing media sections so that its thickness at a first longitudinal position is at least 15% different than one of the lasing media sections at a second longitudinal position."			
CONCLUSION				

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