

# United States Court of Appeals for the Federal Circuit

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YANBIN YU, ZHONGXUAN ZHANG,  
*Plaintiffs-Appellants,*

— v. —

APPLE INC.,  
*Defendant-Appellee.*

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YANBIN YU, ZHONGXUAN ZHANG,  
*Plaintiffs-Appellants,*

— v. —

SAMSUNG ELECTRONICS CO. LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
*Defendants-Appellees.*

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*On Appeal from the United States District Court, Northern District  
of California, in Case Nos. 3:18-cv-06181-JD, 3:18-cv-06339-JD,  
Judge James Donato*

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## DEFENDANTS-APPELLEES RESPONSE TO PETITION FOR REHEARING *EN BANC*

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## CLAIM LANGUAGE

Claim 1 recites:

1. An improved digital camera comprising:

a first and a second image sensor closely positioned with respect to a common plane, said second image sensor sensitive to a full region of visible color spectrum;

two lenses, each being mounted in front of one of said two image sensors;

said first image sensor producing a first image and said second image sensor producing a second image;

an analog-to-digital converting circuitry coupled to said first and said second image sensor and digitizing said first and said second intensity images to produce correspondingly a first digital image and a second digital image; an image memory, coupled to said analog-to-digital converting circuitry, for storing said first digital image and said second digital image; and

a digital image processor, coupled to said image memory and receiving said first digital image and said second digital image, producing a resultant digital image from said first digital image enhanced with said second digital image.

Claim 2 recites:

2. The improved digital camera as recited in claim 1, wherein said first image sensor sensitive to said full region of visible color spectrum.

Claim 4 recites:

4. The improved digital camera as recited in claim 1, wherein said analog-to-digital converting circuitry comprises two individual analog-to-digital converters, each integrated with one of said first and second image sensors so that said first and second digital images are digitized independently and in parallel to increase signal throughput rate.

**CERTIFICATE OF INTEREST**

Counsel for Appellee, Apple Inc. certifies the following:

1. The full name of every party or amicus represented by me is:

Apple Inc.

2. The name of the real party in interest (Please only include any real party in interest NOT identified in Question 3. below) represented by me:

None.

3. All parent corporations and any publicly held companies that own 10 percent or more of the stock of the party or amicus curiae represented by me are:

None.

4. The names of all law firms and the partners or associates that appeared for the party or amicus now represented by me in the trial court or agency or are expected to appear in this court are:

COOLEY LLP: Heidi L. Keefe, Phillip E. Morton, Lowell D. Mead,  
Priya Viswanath, Dena Chen, Alexandra Leeper

5. The title and number of any case known to counsel to be pending in this or any other court or agency that will directly affect or be directly affected by this court's decision in the pending appeal. *See* Fed. Cir. R. 47. 4(a)(5) and 47.5(b).

*Apple Inc. v. Yu, et al.*, IPR2019-02158 (USPTO PTAB);  
*Samsung Electronics Co., Ltd. et al. v. Yu, et al.*, IPR2020-00492  
(USPTO PTAB); *Apple Inc. v. Yu, et al.*, No. 21-1723 (Fed. Cir.).

6. All information required by Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6):

None.

Dated: August 12, 2021

/s/ Heidi L. Keefe

Heidi L. Keefe

COOLEY LLP

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