UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

XILINX, INC., ADVANCED MICRO DEVICES, INC.,
and ATI TECHNOLOGIES ULC,
Petitioner,

v.

SENTIENT SENSORS, LLC,
Patent Owner.

Case IPR2023-00195
Patent 6,938,177

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant 37 C.F.R. § 42.64(b), Petitioner objects to evidence submitted by Patent Owner in their Patent Owner's Preliminary Response filed June 23, 2023. Specifically, Petitioner objects to the following exhibits submitted by Patent Owner for the bases noted below:

Exhibit	Objections
EX2001 - Purported "USAF Cooperative Research and Development Agreement between Air Force Research Laboratory, Space Vehicles Directorate and MSI"	FRE 106 (incomplete record); FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 801-802 (hearsay); FRE 901 (authentication). EX2001 has not been shown to be properly authenticated (Sentient has failed to "produce evidence sufficient to support a finding that the item is what the proponent claims it is" per FRE 901(a)). Exhibit is incomplete and has missing pages (e.g., PDF p. 19 appears to start mid-sentence and is labeled "Page 51" and PDF p. 20 is labeled "Page 10"). Exhibit does not support the assertions for which it is cited (and is irrelevant to the proceeding), and is offered as hearsay.
EX2002 - Purported "JTAG Article FPGA4fun (1)"	FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 702 (improper "expert" testimony); FRE 801 (hearsay); FRE 901 (authentication). EX2002 is relied upon to for discussion of testing protocols that are misleading and non-responsive to the Petition's analysis, and does not support the assertion for which it is cited by Patent Owner. The exhibit is not authenticated. The exhibit is undated and not relevant. The exhibit is offered as de facto expert testimony without any expert qualifications or basis for the testimony. Exhibit is offered as hearsay.

EX2003 - Purported **"**TAP Article FPGA4fun (2)"	FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 702 (improper "expert" testimony); FRE 801 (hearsay); FRE 901 (authentication). EX2003 is relied upon to for discussion of testing protocols that are misleading and non-responsive to the Petition's analysis, and does not support the assertion for which it is cited by Patent Owner. The exhibit is not authenticated. The exhibit is undated and not relevant. The exhibit is offered as de facto expert testimony without any expert qualifications or basis for the testimony. Exhibit is offered as hearsay.
EX2004 – Purported "Xilinx JTAG Programmer Guide"	FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 801 (hearsay); FRE 901 (authentication). EX2004 is relied upon to for discussion of testing protocols that are misleading and non-responsive to the Petition's analysis, and does not support the assertion for which it is cited by Patent Owner. The exhibit does not appear authentic as it includes annotations of unspecified origin throughout the exhibit.
EX2005 – Purported "XLINX XC4000 TAP Application Note"	FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 801 (hearsay); FRE 901 (authentication). EX2005 is relied upon to for discussion of testing protocols that are misleading and non-responsive to the Petition's analysis, and does not support the assertion for which it is cited by Patent Owner.
EX2016 – Purported "MSI/Sentient Ownership Interest"	FRE 106 (incomplete record); FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 801 (hearsay); FRE 901 (authentication). EX2016 has not been

	shown to be properly authenticated (Sentient has failed to "produce evidence sufficient to support a finding that the item is what the proponent claims it is" per FRE 901(a)). Exhibit is incomplete as much of the Exhibit is redacted and not the original document. Exhibit appears to be part of a larger document that is not included. Exhibit purportedly relates to ownership during period prior to filing of the IPR. Exhibit does not support the assertions for which it is cited (and is irrelevant to the proceeding), and is offered as hearsay.
EX2017 – Purported **"**Letter from James Lyke in support of Management Sciences, Inc."	FRE 106 (incomplete record); FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 801 (hearsay); FRE 901 (authentication). EX2017 has not been shown to be properly authenticated (Sentient has failed to "produce evidence sufficient to support a finding that the item is what the proponent claims it is" per FRE 901(a)). Exhibit is incomplete as unsigned and missing "attachments: 1. PL/VTMI letter, dtd 2 Feb, less Atch 2." Exhibit does not support the assertions for which it is cited (and is irrelevant to the proceeding), and is offered as hearsay.
EX2018- Purported "Bus Arbitration In Computer Organization"	FRE 106 (incomplete record); FRE 401-403 (relevance; more prejudicial than probative; confusing; and misleading); FRE 702 (improper "expert" testimony); FRE 901 (authentication). EX2018 has not been shown to be properly authenticated (Sentient has failed to "produce evidence sufficient to support a finding that the item is what the proponent claims it is" per FRE 901(a)). Exhibit does not support the assertion for which it

	is cited and is not relevant. The exhibit is offered as de facto expert testimony without any expert qualifications or basis for the testimony, and is also hearsay. Document is incomplete, facially missing text on every page, including sentences that start and/or stop mid-sentence at the top and bottom of every page.

These objections have been timely filed and are being concurrently served on the Patent Owner.

Respectfully submitted,

Dated: October 4, 2023

/Craig A. Deutsch/

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(1) and 42.6(e)(4)(iii), the undersigned certifies that on October 4, 2023, a complete and entire copy of this Petitioner's Objections to Evidence was provided by email to the Patent Owner by serving the email correspondence addresses of record as follows:

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