

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner,

v.

YECHEZKAL EVAN SPERO,
Patent Owner.

U.S. Patent No. 10,894,503 B2

Case No.: IPR2023-00328

ERRATA TO EX. 2006
SECOND DELCARATION OF MATTHEW A. TURK PhD

This Errata amends Patent Owner's Exhibit 2006 (Second Declaration of Matthew A. Turk, PhD), Paragraphs 162, 165, 168-169, 181, 184, 188-189, 245, 248, 250, 253, 257 to correct errors:

162. As explained in ¶~~137-161~~, ~~N~~neither Petitioner nor Thominet suggest any reason/advantage of a curved LED array.

165. As explained in ¶¶~~134-135-158-159~~ Petitioner fails to explain how automated control or segmentation would be achieved without Thominet's software.

168. As explained in ¶¶~~122-125-146-149~~ Petitioner fails to explain how Thominet's automated functions would not conflict with Beam's benefits in software combinations.

169. As explained in ¶¶~~127-132-151-156~~ Petitioner fails to address issues created by combining Beam's Software (maximum intensity/blanking) with Thominet's Software (segmented automatic functionality).

181. As explained in ¶~~137-161~~, ~~N~~neither Petitioner nor Thominet suggest any reason/advantage of a curved LED array.

184. As explained in ¶¶~~134-135-158-159~~ Petitioner fails to explain how

automated control or segmentation would be achieved without Thominet's software.

188. As explained in ¶¶~~122-125~~~~146-149~~ Petitioner fails to explain how Thominet's automated functions would not conflict with Beam's benefits in software combinations.

189. As explained in ¶¶~~127-132~~~~151-156~~ Petitioner fails to address issues created by combining Beam's Software (maximum intensity/blanking) with Thominet's Software (segmented automatic functionality).

245. As explained in ¶~~154~~~~178~~, Petitioner does not present a reason to use the curve from Harbers.

248. As explained in ¶¶~~146-147~~~~170-171~~, Petitioner never explains how any segmentation would occur in the absence of Harbers' software.

250. As explained in ¶¶~~149-153~~~~173-177~~ Petitioner fails to address the problems that selective blanking creates in an array of colored LEDs.

253. As explained in ¶¶~~143-145~~~~167-169~~ Petitioner never explains how to merge conflicting functionality of Harbers and Karlsson software.

257. As explained in ¶¶ ~~156-159~~~~180-183~~, ~~in~~ combinations having multiple control strategies from software (e.g., Beam-Thominet, Karlsson-Harbers, Karlsson-Harbers-Gotou, etc.), and multiple controllable hardware elements (e.g., LED array with a modulator), Petitioner never explains which controls are applied to which controllable elements.

This paper is Board authorized and unopposed.

Dated: January 25, 2024

Respectfully submitted,

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Certificate of Service

The undersigned hereby certifies that on January 25, 2024, a complete and entire copy of **ERRATA TO EX. 2006**, was served via electronic mail by serving the correspondence email address of record as follows:

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