

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY INTERACTIVE ENTERTAINMENT LLC,
Petitioner,

v.

QUANTUM IMAGING LLC,
Patent Owner.

Case No. IPR2023-00954
U.S. Patent No. 8,458,028

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S HEARING
DEMONSTRATIVES**

Petitioner Sony Interactive Entertainment LLC (“Sony”) hereby objects to the demonstrative exhibits submitted by Patent Owner in the above-captioned proceeding. In accordance with the Board’s Order Setting Oral Argument (Paper 41), this objection is being timely filed and served no later than the time of the Board’s Hearing on September 13, 2024. Petitioner has met and conferred with Patent Owner, but the parties were unable to resolve the objections below.

Pursuant to Paper No. 41, the objections “shall identify with particularity which portions of the demonstratives are subject to objection (and should include a copy of the objected-to portions) and include a one (1) sentence statement of the reason for each objection. No argument or further explanation is permitted.” The following is an inclusion of the objected-to demonstratives, as well as an identification of the portions being objected to and a statement of the reason for each objection:

- Slide 13 – Petitioner objects to Patent Owner’s depiction of the claim construction process in Slide 13 because it misstates the record, including by (1) mischaracterizing Petitioner’s Reply by incorrectly implying that it proposes a claim construction and (2) omitting the critical word “other” from Patent Owner’s Response, resulting in a misleading statement.

“Game Application”				
Petition	Decision	POR	Reply	Sur-Reply
“no express constructions of the claims are necessary”	“we need not expressly construe any claim terms”	“no [] express claim constructions are required”	“a program designed to assist in the performance of a game”	“no construction [is] required, including for ‘game application.’”
Pet. 12-13	Decision 15	POR 2	Reply 9, 25	Sur-Reply 4
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE				

IPR2023-00954

Dated: September 12, 2024

Respectfully submitted,

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Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PETITIONER'S OBJECTIONS TO
PATENT OWNER'S HEARING DEMONSTRATIVES was served as of the
below date via email (by agreement) to the following counsel of record for the

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