

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, INC.,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner.

IPR2023-01242
Patent 11,121,222

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE
SUBMITTED WITH PATENT OWNER'S RESPONSE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Semiconductor Components Industries Inc. (“Petitioner”) objects to the following exhibits filed by Patent Owner Greenthread, LLC (“Patent Owner”) with its Response (Paper No. 47).

<u>Exhibit</u>	<u>Objection(s)</u>
EX2057 – Declaration of Dr. Alexander Glew	602/702/703/37 C.F.R. § 42.65: Petitioner objects to EX2057 because Patent Owner has not established that Dr. Glew is an expert in the area of semiconductor devices, and the structure and operation thereof, at the relevant timeframe, and Patent Owner has not met its burden to show that his testimony on this issue is helpful to the Board and therefore admissible.
EX2058 – Deposition Transcript of Dr. Travis Blalock	Petitioner objects to EX2058 for each of the reasons noted in the objections made during the taking of the underlying deposition.
EX2072 – Declaration of Phil John	602/702/703/37 C.F.R. § 42.65: Petitioner objects to EX2072 because Patent Owner has not established that Mr. John has any relevant knowledge about semiconductor devices, and the structure and operation thereof, at the relevant timeframe, and Patent Owner has not met its burden to show that his testimony on this issue is helpful to the Board and therefore admissible. For example, Patent Owner cites EX2072 in connection to allegations of secondary considerations of non-obviousness, but Patent Owner has not provided any nexus between the statements in EX2072 and the challenged claims in this proceeding. Nor does Mr. John have applicable technical knowledge to speak to such nexus.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2073 – Statistia Information	801/802/901: Petitioner objects to EX2073 for containing hearsay and for lacking authenticity. For example, Patent Owner has neither authenticated this exhibit, nor laid the foundation for any hearsay exception. Petitioner further objects to this exhibit because Patent Owner has not shown that it is an original document or authentic duplicate.

Dated: May 28, 2024

/Roger Fulghum/

Roger Fulghum

Reg. No. 39,678

BAKER BOTTS L.L.P.

One Shell Plaza

910 Louisiana Street

Houston, TX 77002

T: (713) 229-1234

F: (713) 229-1522

Counsel for Petitioner

Semiconductor Components

Industries Inc.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 28th day of May, 2024,
**Petitioner's Objections to Patent Owner's Evidence Submitted With Patent
Owner's Response** was served by email on the following counsel for Patent Owner:

Greenthread-OnSemi-MS@mckoolsmith.com

awhitehurst@mckoolsmith.com

nmatich@mckoolsmith.com

ajairam@mckoolsmith.com

smccommas@mckoolsmith.com

nozarkar@mckoolsmith.com

May 28, 2024
Date

/Roger Fulghum/
Roger Fulghum
Reg. No. 39,678

*Counsel for Petitioner
Semiconductor Components
Industries Inc.*