UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CIRRUS LOGIC, INC.; AND
OMNIVISION TECHNOLOGIES, INC.,
TEXAS INSTRUMENTS INCORPORATED,
Petitioners,

v.

GREENTHREAD LLC
Patent Owner

Case: IPR2024-00001[1]
U.S. Patent No. 10,734,481

PATENT OWNER'S OBJECTIONS TO PETITIONERS' DEMONSTRATIVES

[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00772, has been joined as a party to this proceeding.

Pursuant to the Board's January 17, 2025, Order Setting Oral Argument (Paper 67), Greenthread, LLC ("Patent Owner") objects to the following portions of the demonstratives filed by Petitioners Cirrus Logic, Inc., Omnivision Technologies, Inc., and Texas Instruments Inc. (collectively, "Petitioners").

Slide	**Objection(s)**
32	This is an improper new argument regarding the blue arrow to the left and accompanying notation ("Electric Field (static)") that is not found in the Petition or Reply.
33	This is an improper new argument regarding the blue arrow to the right and accompanying notation ("Electric Field (static)") and the indication of the arrow to the right with "h" that is not found in the Petition or Reply.
35	This is an improper new argument regarding the blue arrow to the left and accompanying notation ("Electric Field (static)") as well as the icons resenting Boron that is not found in the Petition or Reply.
36	This is an improper new argument regarding the blue arrow to the left and accompanying notation ("Electric Field (static)") as well as the icons resenting Arsenic that is not found in the Petition or Reply.
37	This is an improper new argument regarding the blue arrow to the left and accompanying notation ("Electric Field (static)") that is not found in the Petition or Reply.
44	The excerpt of Ex. 1069 (108:15-23) is not presented in the Petition or Reply; this is an improper new argument.
54	The excerpt of the specific claim amendment from the '195 prosecution history (pg. 123) is not presented in the Petition or Reply; this is an improper new argument.
70	This is an improper new argument regarding Dr. Banerjee's testimony discussing other categories of forces that aid carrier movement that is not presented in the Petition or Reply.
71	This is an improper new argument regarding Dr. Banerjee's testimony discussing other categories of forces that aid carrier movement that is not presented in the Petition or Reply.
72	This is an improper new argument regarding Dr. Banerjee's testimony discussing other categories of forces that aid carrier movement that is not presented in the Petition or Reply.

73	This is an improper new argument regarding Dr. Banerjee's testimony discussing other categories of forces that aid carrier movement that is not presented in the Petition or Reply.
89	The excerpt of Ex. 1069 (28:3-9) is not presented in the Petition or Reply; this is an improper new argument.

Date: January 27, 2025

Respectfully submitted,

/s/ Alan Whitehurst

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S OBJECTIONS TO PETITIONERS' DEMONSTRATIVES** has been served on Petitioner via email on the following counsel of record for Petitioner:

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