UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GREENTHREAD LLC
Patent Owner

_____

Case: IPR2024-00017[1]
U.S. Patent No. 8,421,195

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PATENT OWNER'S OBJECTIONS TO PETITIONERS' DEMONSTRATIVES

[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00771, has been joined as a party to this proceeding.

Pursuant to the Board's January 17, 2025, Order Setting Oral Argument (Paper 65), 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)**
29	This is an improper new argument regarding the indication and location of holes and the accompanying arrows to the right that are not presented in the Petition or Reply.
30	This is an improper new argument regarding the indication and location of electrons and the accompanying arrows to the right that are not presented in the Petition or Reply.
32	This is an improper new argument regarding the icons representing Boron and the electron (with arrow) outside of the figure that are not presented in the Petition or Reply.
33	This is an improper new argument regarding the icons representing Arsenic and the hole (with arrow) outside of the figure that are not presented in the Petition or Reply.
42	This is an improper new argument regarding an exhibit (Ex. 1069) that is not presented in the Petition or Reply.
52	The excerpt of the specific claim amendment from the prosecution history (pg. 123) is not presented in the Petition or Reply and this is an improper new argument.
69	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.
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.

Slide	Objection(s)
96	This is an improper new argument regarding Dr. Banerjee's deposition testimony that is not presented in the Petition or Reply.
97	This is an improper new argument regarding an excerpt of Ex. 1070 that is not presented in the Petition or Reply.
98	This is an improper new argument regarding portions of the specification that are not presented in the Petition or Reply.
99	This is an improper new argument regarding portions of the patents' specification and Dr. Banerjee's testimony that is not presented in the Petition or Reply.
100	This is an improper new argument regarding portions of the patents' specification that is not presented in the Petition or Reply.
102	This is an improper new argument regarding claims in the '195 patent that are not subject of the present proceedings and is not presented in the Petition or Reply.

Date: January 30, 2025

Respectfully submitted,

/s/ Alan Whitehurst

Alan Whitehurst
Reg. No. 43,263
awhitehurst@mckoolsmith.com
Nicholas Matich
Reg. No. L1,373
nmatich@mckoolsmith.com
Arvind Jairam
Reg. No. 62,759
ajairam@mckoolsmith.com
MCKOOL SMITH, P.C.
1717 K St. NW, Suite 1000
Washington, DC 20006
Telephone: (202) 370-8300
Facsimile: (202) 370-8344

Archis "Neil" Ozarkar
Reg. No. 71,265
nozarkar@mckoolsmith.com
MCKOOL SMITH, P.C.

600 Travis Street, Suite 600
Houston, TX 77002
Telephone: (713) 485-7300
Facsimile: (713) 485-7344

Counsel for Patent Owner
Greenthread, LLC

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:

Scott Weidenfeller
sweidenfeller@cov.com
Raj Paul
rpaul@cov.com
Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5923
Facsimile: (202) 778-5923

Anupam Sharma
asharma@cov.com
Covington & Burling LLP
3000 El Camino Real
5 Palo Alto Square,
Palo Alto, CA 94305
Telephone: (650) 632-4720
Facsimile: (650) 632-4800

Bert Greene
bgreene@duanemorris.com
Andrew Liddell
waliddell@duanemorris.com
Las Cimas IV
900 S. Capital of Texas Hwy., Suite 300
Austin, TX 78746
Telephone: (512) 277-2246
Facsimile: (51@) 277-2301

David H. Bluestone
dbluestone@beneschlaw.com
Barack Ferrazanno Kirschbaum & Nagelberg LLP
200 West Madison St., Suite 3900
Chicago, IL 60606
Telephone: (312) 984-3106
Facsimile: (312) 984-3150

GT-OmniVisionIPR@beneschlaw.com
GT-Cirrus-IPR@cov.com

Joshua A. Griswold
Patrick J. Bisenius
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
griswold@fr.com
bisenius@fr.com
IPR12189-0084IP1@fr.com
PTABInbound@fr.com

Dated: January 30, 2025

By: */s/ Alan Whitehurst*
Alan Whitehurst
Reg. No. 43,263

Counsel for Patent Owner
Greenthread, LLC