

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GREENTHREAD LLC
Patent Owner

Case: IPR2024-00018¹
U.S. Patent No. 9,190,502

**PATENT OWNER'S OBJECTIONS TO PETITIONERS'
DEMONSTRATIVES**

¹ Texas Instruments Incorporated, which filed a petition in IPR2024-00773, has been joined as a party to this proceeding.

Pursuant to the Board’s January 17, 2025, Order Setting Oral Argument (Paper 64), 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.

<u>Slide</u>	<u>Objection(s)</u>
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

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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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