IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GREENTHREAD, LLC,
Patent Owner.

Case No. IPR2024-00018[1]
Patent No. 9,190,502

PETITIONER'S OBJECTIONS TO PATENT OWNERS' 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), Petitioners Cirrus Logic, Inc., Omnivision Technologies, Inc., and Texas Instruments Inc. (collectively, "Petitioners") objects to the following portions of the demonstratives filed by Greenthread, LLC ("Patent Owner").

Slide(s)	**Objection(s)**
15-18	Slides contain improper new claim construction argument regarding the term "minority carriers" in the challenged claims of the -00017, -00018, and -00021 proceedings, not advanced in any of Greenthread's Patent Owner Responses or Sur-Reply Briefs.
41-43	Slides contain improper new argument regarding Petitioner's mapping of the Payne reference to the "*graded concentration*" limitations, including the *span* of the graded concentration and the allegation that the concentration is "*flat*" is certain regions. Such arguments were not advanced in any of Greenthread's Patent Owner Responses or Sur-Reply Briefs, which only challenged Petitioner's showing of the alleged "*movement*" limitation (based on concentration *magnitude* and *other forces*).
44-46	Slides contain improper new argument regarding Petitioner's mapping of the Payne reference to the "*electric field*" limitations, including the *span* of the electric fields, based on the allegation that the concentration is "*flat*" is certain regions. Such arguments were not advanced in any of Greenthread's Patent Owner Responses or Sur-Reply Briefs, which only challenged Petitioner's showing of the alleged "*movement*" limitation (based on concentration *magnitude* and *other forces*).
54-57	Slides contain improper new argument regarding Petitioner's mapping of the Payne reference to the "*minority carriers*" limitations, specifically Petitioner's identification of which carrier type would be the claimed "minority carrier" in the N-well region of Payne's PMOS transistor.

	Such arguments were not advanced in any of Greenthread's Patent Owner Responses or Sur-Reply Briefs, which only challenged Petitioner's showing of the alleged "*movement*" limitation (based on concentration *magnitude* and *other forces*).
61-62	Slides contain improper new argument regarding Petitioner's mapping of the Onoda reference to the "*graded concentration*" limitations, including the *span* of the graded concentration and the allegation that the concentration is "*flat*" is certain regions. Such arguments were not advanced in any of Greenthread's Patent Owner Responses or Sur-Reply Briefs, which only challenged Petitioner's showing of the alleged "*movement*" limitation (based on concentration *magnitude* and *other forces*).
63-66	Slides contain improper new argument regarding Petitioner's mapping of the Onoda reference to the "*electric field*" limitations, including the *span* of the electric fields, based on the allegation that the concentration is "*flat*" is certain regions. Such arguments were not advanced in any of Greenthread's Patent Owner Responses or Sur-Reply Briefs, which only challenged Petitioner's showing of the alleged "*movement*" limitation (based on concentration *magnitude* and *other forces*).
67-70	Slides contain improper new argument regarding Petitioner's mapping of the Onoda reference to the "*minority carriers*" limitations, specifically Petitioner's identification of which carrier type would be the claimed "minority carrier" in the P-well region of Onoda's NMOS transistor. Such arguments were not advanced in any of Greenthread's Patent Owner Responses or Sur-Reply Briefs, which only challenged Petitioner's showing of the alleged "*movement*" limitation (based on concentration *magnitude* and *other forces*).

Respectfully submitted,

Dated: January 30, 2025

/Scott C. Weidenfeller/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on the date listed below, a copy of Petitioner's Objections to Patent Owner's Demonstratives was served on the Patent Owner by electronic mail to the following counsel of record for Patent Owner:

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