UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CIRRUS LOGIC, INC. AND
OMNIVISION TECHNOLOGIES, INC.
Petitioner,
v.

GREENTHREAD LLC,
Patent Owner

U.S. PATENT NO. 11,121,222

Case IPR2024-00020

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Cirrus Logic, Inc. and Omnivision Technologies, Inc. (collectively, "Petitioner") objects to the following exhibits filed by Patent Owner Greenthread, LLC ("Patent Owner") with its Response (Paper No. 45).

Exhibit	**Objection(s)**
EX2056 – Deposition Transcript of Scott Warrick	**FRE 105/106/402/403/602/702/703; 37 C.F.R. § 42.65**: Petitioner objects to EX2056 as containing information that is irrelevant and/or because its probative value is substantially outweighed by its prejudicial effect. Petitioner objects to EX2056 on the basis that Patent Owner has not established that Scott Warrick 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. Petitioner objects to EX2056 on the basis that it is not admissible as to all parties and must be limited as such, and that fairness requires the introduction of the Deposition Transcript of Scott Warrick, in part or in full.
EX2057 – Declaration of Dr. Alexander Glew	**FRE 602/702/703; 37 C.F.R. § 42.65**: Petitioner objects to EX2057 on the basis that 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.
EX2072 – Declaration of Mohan Rao	**FRE 402/403**: Petitioner objects to EX2072 as containing information that is irrelevant and/or because its probative value is substantially outweighed by its prejudicial effect.
EX2076 – Declaration of Dr. Travis Blalock	**FRE 602/702/703; 37 C.F.R. § 42.65**: Petitioner objects to EX2076 on the basis that Patent Owner has not established that Dr. Blalock 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.
EX2073 – Statista Information	**FRE 801/802/901**: Petitioner objects to EX2073 as containing hearsay and 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.
EX2001, EX2003-EX2011, EX2013-2018, EX2020-2022, EX2025-EX2030, EX2032-EX2035, EX2037-EX2047, EX2050	**FRE 402/403/801/802/901**: Petitioner objects to previously submitted EX2001, EX2003-EX2011, EX2013-2018, EX2020-2022, EX2025-EX2030, EX2032-EX2035, EX2037-EX2047, EX2050 as containing information that is irrelevant and/or because their probative value is substantially outweighed by their prejudicial effect. In particular, Patent Owner has offered these exhibits solely to argue that the Petitioner is time-barred due to privity with Greenthread's time-barred licensees. However, the Board has already ruled that none of the evidence in question tends to show that any of the time-barred Licensees are privies of Petitioner for purposes of § 315(b).
EX2077 – Greenthread Motion for Leave to Amend in *Greenthread v. Cirrus Logic*, No. 1:23-cv-369	**FRE 402/403**: Petitioner objects to EX2077 as containing information that is irrelevant and/or because its probative value is substantially outweighed by its prejudicial effect. In particular, Patent Owner offers this exhibit solely to argue that the Petitioner is time-barred due to privity with Greenthread's time-barred licensees. However, the Board has already ruled that none of the evidence in question tends to show that any of the time-barred Licensees are privies of Petitioner for purposes of § 315(b).

Date: August 22, 2024 Respectfully submitted,

By: / s / Scott C. Weidenfeller

Scott C. Weidenfeller
Registration No.: 54,531
COVINGTON & BURLING LLP
One CityCenter,
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5923
Facsimile: (202) 778-5923
Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), I certify that on August 23, 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:

Alan L. Whitehurst, awhitehurst@mckoolsmith.com
Nicholas T. Matich, nmatich@mckoolsmith.com
Arvind Jairam, ajairam@mckoolsmith.com
Stuart McCommas, smccommas@mckoolsmith.com
Archis "Neil" Ozarkar, nozarkar@mckoolsmith.com
Greenthread-Cirrus-MS@mckoolsmith.com
Greenthread-Omnivision-MS@mckoolsmith.com

Date: August 22, 2024

Respectfully submitted,

By: / s / Scott C. Weidenfeller

Scott C. Weidenfeller
Registration No.: 54,531
COVINGTON & BURLING LLP
One CityCenter,
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5923
Facsimile: (202) 778-5923
Counsel for Petitioner