

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners

v.

FENDGO, LLC,

Patent Owner

Case IPR2024-00113

U.S. Patent No. 11,265,404

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

Pursuant to the Board's Order Setting Oral Argument (Paper 22, at 3-5), Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together "Samsung") object to slides 6, 9 and 27 of Patent Owner Fendgo, LLC's ("Patent Owner") Corrected Demonstrative Exhibits (Ex. 2004) filed on February 17, 2025. A copy of Patent Owner's objected-to slides 6, 9, and 27 are provided as Attachment A to this paper.

Samsung and Patent Owner met and conferred regarding their respective objections to the other's demonstrative exhibits on February 14, 2025. The parties were able to resolve their respective objections other than the ones presented herein.

Slide 6: Samsung objects to this slide as containing new figures, evidence and annotations that were never discussed or cited in the Patent Owner's POR (or Sur-reply), and while the '404 patent is of record, Figure 1A is presented in a new manner not in the papers.

Slide 9: Samsung objects to this slide as containing new figures and arguments that were not discussed or cited in the Patent Owner's POR (or Sur-reply).

Slide 27: Samsung objects to this slide as containing new evidence, figures and annotations that were never discussed or cited in the Patent Owner's POR (or

Sur-reply); while Zellner is of record, Zellner's Fig. 4 was not cited in Patent Owner's submissions much less annotated in the manner in this slide.

Date: February 18, 2025

Respectfully submitted,

/Ali R. Sharifahmadian/

Ali R. Sharifahmadian (Reg. No. 48,202)
Counsel for Petitioners

CERTIFICATE OF SERVICE

I certify that on February 18, 2025, I caused a true and correct copy of the foregoing Petitioners' Objections to Patent Owner's Demonstrative Exhibits to be served on the Patent Owner via electronic mail to Patent Owner's counsel of record below:

James R. Nuttall (jnuttall@steptoe.com)
SJFendgoSamsung@Steptoe.com

/Ali R. Sharifahmadian/

Ali R. Sharifahmadian (Reg. No. 48,202)
Counsel for Petitioners

Attachment A

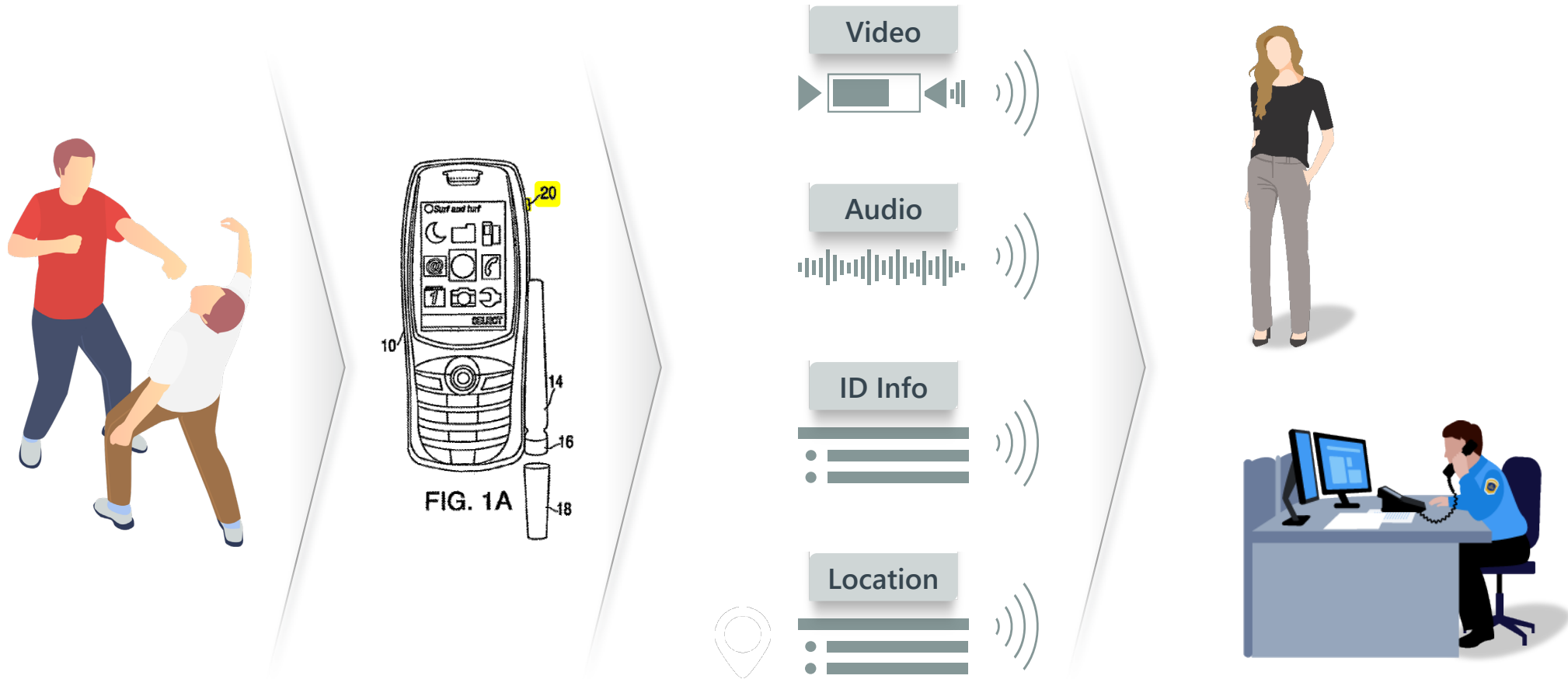
Samsung Electronics Co., Ltd., and
Samsung Electronics, America, Inc.,
v. FENDGO, LLC

PATENT OWNER *FENDGO* PRESENTATION

Inter Partes Review of
U.S. Patent No. 11,265,404

IPR2024-00113

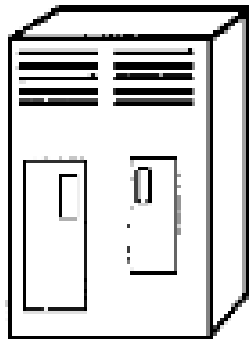
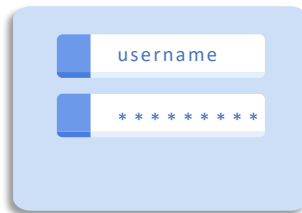
The '404 Patent Is Directed To A "Self-Defense Device"



Walker Is Directed To An Electronic Eyewitness Data Storage System

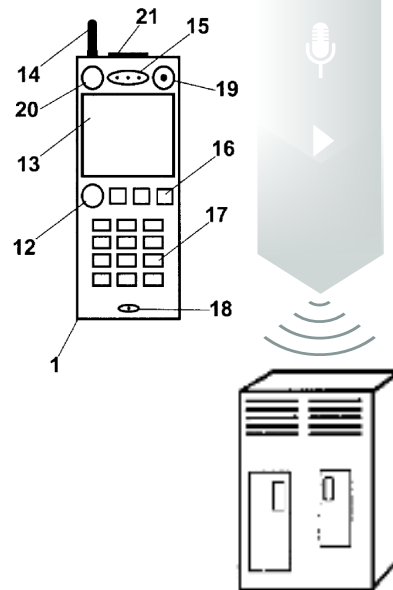
1

Create account with
Data Storage Facility



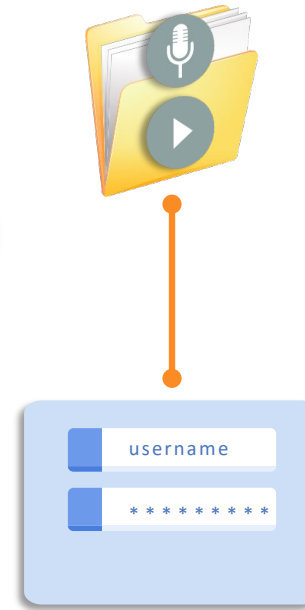
2

Device sends data
to Data Storage
Facility



3

Database link
between file
and account



4

Future access to file
by accessing data
storage facility



Zellner Is Directed To A Device For Emergency Assistance

