

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HANSHOW AMERICA INC. AND HANSHOW TECHNOLOGY CO., LTD.,

Petitioner,

v.

SES-IMAGOTAG SA,

Patent Owner.

Case No. IPR2024-00208

Patent No. 11,010,709

PATENT OWNER'S OBJECTIONS TO DEMONSTRATIVES

Pursuant to the Board’s January 15, 2025 Order Setting Oral Argument (Paper 39) in the above captioned *Inter Partes* Review, Patent Owner submits the following objections:

1. Petitioner’s demonstratives contain new argument improperly submitted for the first time in its demonstratives, CTPG 85-86: that Ex.1004 (Itou) discloses “locations” under Patent Owner’s construction, where neither the Petition (Paper 2) nor Petitioner’s Reply (Paper 31) cites to Itou for any claim limitation containing the term “location.”

Slide 7 at bullet point 3 (“Ex.1004 (Itou), [0097], FIG 9”)

Slide 9 (included in section labeled “Claim Construction – ‘Location’”)

Dated: February 14, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that true copies of the foregoing PATENT OWNER'S OBJECTIONS TO DEMONSTRATIVES was served electronically on February 14, 2025, in its entirety on the following counsel of record for Petitioner:

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Dated: February 14, 2025

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