UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner.

IPR2024-00264
Patent 10,734,481

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Semiconductor Components Industries, LLC ("Petitioner") objects to the following exhibits filed by Patent Owner Greenthread, LLC ("Patent Owner") with its Patent Owner's Response (Paper No. 32).

Exhibit	**Objection(s)**
EX2064 – Declaration of Dr. Alexander Glew	**401-403/602/702/703/37 C.F.R. § 42.65:** Petitioner objects to EX2064 because 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. Petitioner also objects to EX2064 because at least paragraphs 68 through 106 are irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Moreover, these paragraphs are not responsive to the Petition or Institution Decision in this proceeding because they purport to address "OnSemi's replies and Greenthread's surreplies for IPRs 2023-01242, 2023-01243, and 2023-01244," which are separate proceedings, and "OnSemi's demonstratives from the hearing on November 13, 2024" for those proceedings.
EX2078 – Declaration of Mohan Rao	**602/702/703/37 C.F.R. § 42.65:** Petitioner objects to EX2078 because Patent Owner has not met its burden to show that Mr. Rao's testimony is helpful to the Board and therefore admissible. For example, Patent Owner cites EX2078 in connection to allegations of secondary considerations of non-obviousness, but Patent Owner has not provided any nexus between the statements in EX2078 and the challenged claims in this proceeding.

Exhibit	**Objection(s)**
EX2079 – Statista Information	**801/802/901:** Petitioner objects to EX2079 for containing hearsay and for 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.
EX2083 – Exhibit 2022 in *Texas Instruments Inc. v. Greenthread LLC*, IPR2024-00771 (including excerpts of the Deposition Transcript of Scott Warrick taken on June 7, 2024 along with marked Exhibits 3-5 in *Greenthread, LLC vs. Cirrus Logic, Inc.*, 1:23-cv-00369-DC (W.D. Tex.))	**401-403/801/802/901:** Petitioner objects to EX2083 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. This exhibit purports to be incomplete portions of testimony from an unrelated party obtained in a district court litigation, that was then submitted in a separate *Inter Partes* Review. That district court litigation and *Inter Partes* Review did not and do not involve Petitioner as a party, Petitioner did not sponsor or endorse the testimony, and Petitioner did not have an opportunity to cross examine the witness. Petitioner further objects to EX2080 for containing hearsay and for 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.

Exhibit	Objection(s)
EX2085 – Transcript of Deposition of Dr. Stephen A. Campbell, Monolithic Power Systems, Inc. v. Greenthread, LLC, IPR2024-00468 (Ex. 2058)	**401-403/801/802/901:** Petitioner objects to EX2085 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. This exhibit purports to be a deposition transcript obtained and submitted in a separate *Inter Partes* Review. That *Inter Partes* Review did not and does not involve Petitioner as a party, Petitioner did not sponsor or endorse the testimony, Dr. Campbell is not a witness in the present proceeding, Petitioner did not retain Dr. Campbell as an expert, and Petitioner did not have an opportunity to cross examine the witness. Petitioner further objects to EX2085 for containing hearsay and for 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.
EX2086 – Declaration of Dr. Stephen A. Campbell, Monolithic Power Systems, Inc. v. Greenthread, LLC, IPR2024-00468 (Ex. 1003).	**401-403/801/802/901:** Petitioner objects to EX2086 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. This exhibit purports to be a declaration submitted in a separate *Inter Partes* Review. That *Inter Partes* Review did not and does not involve Petitioner as a party, Petitioner did not sponsor or endorse the testimony, Dr. Campbell is not a witness in the present proceeding, Petitioner did not retain Dr. Campbell as an expert, and Petitioner did not have an opportunity to cross examine the witness. Petitioner further objects to EX2086 for containing hearsay and for 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.

Dated: November 27, 2024

/Roger Fulghum/
Roger Fulghum
Reg. No. 39,678

Counsel for Petitioner
Semiconductor Components
Industries, LLC

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 27th day of November, 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:

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November 27, 2024
Date

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