

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

v.

GRAPHITE CHARGING COMPANY, LLC,
Patent Owner

Case No. IPR2024-00388
U.S. Patent No. 8,291,243

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S HEARING
DEMONSTRATIVES**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
Submitted Electronically via PTAB E2E

Pursuant to the Board’s April 18, 2025 Order Setting Oral Argument (“Order”; Paper 34), Patent Owner Graphite Charging Company, LLC (“PO” or “Graphite”) hereby submits its objections to Petitioner Tesla Inc.’s Hearing Demonstratives due to “the strict prohibition against the presentation of new evidence or arguments at a hearing[.]” (Paper 34 at 3.)

PO communicated these objections to counsel for Petitioner on May 23, 2025, and the parties were unable to resolve this dispute.

Demonstrative Slide	PO’s Objection
Slide #41	<p>Order at 3; Consolidated Trial Practice Guide (“CTPG”) at 84-86—Slide # 41 identifies Petition at 59-61 and Reply at 29 as parts of the record where Petitioner cited/quoted to Ex-1005 (Wang) at 60:31-61:9 in connection with claim 9 under Ground 1.</p> <p>In fact, Petitioner had previously cited to Ex-1005 at 61:2-4 and 61:4-9 (Pet. at 60) and Ex-1005 at 61:7-9 (Reply at 29) in connection with claim 9. Thus, the first portion of Petitioner’s quote to Wang, including additional yellow highlights (Ex-1005 at 60:31-61:1), is new evidence.</p>
Slide #50	<p>Order at 3; CTPG at 84-86—Slide # 50 identifies Reply at 7 as a part of the record where the Petitioner cited/quoted Ex-1027 at 10 and included the orange graphics from Ex-1027.</p> <p>In fact, that graphics was not included anywhere in</p>

	Petitioner’s Reply, and Petitioner only cited to Ex-1027 “generally” on page 7 of its Reply. Thus, that graphics and citation to Ex-1027 at 10 is new evidence.
--	---

Respectfully submitted,

Dated: May 23, 2025

/Nadiia Loizides/
 Jason M. Shapiro
 Nadiia Loizides (*pro hac vice*)
 Reg. No. 35,354
 DEVLIN LAW FIRM LLC
 1526 Gilpin Ave.
 Wilmington, DE 19806
 Tel: (302) 449-9010
 jshapiro@devlinlawfirm.com
 nloizides@devlinlawfirm.com

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on May 23, 2025, pursuant to 37 C.F.R. § 42.6(e), a copy of **PATENT OWNER'S OBJECTIONS TO PETITIONER'S HEARING DEMONSTRATIVES** was served via email (as consented to by counsel) to counsel of record for Petitioner as follows:

LEAD COUNSEL	BACKUP COUNSEL
Alexander B. Stein (Reg. No. 71,397) Alexander.stein@morganlewis.com MORGAN, LEWIS & BOCKIUS LLP 1400 Page Mill Road Palo Alto, CA 94304 Tel: (650) 843-4000	Brent A. Hawkins (Reg. No. 44,146) brent.hawkins@morganlewis.com Peter M. Loderup (Reg. No. 79,839) peter.loderup@morganlewis.com Nicholas A. Restauri (Reg. No. 71,783) Nicholas.restauri@morganlewis.com MORGAN, LEWIS & BOCKIUS LLP
Additional email for service: Tesla-Graphite243-IPR@morganlewis.com; pmargulies@tesla.com	

/Nadiia Loizides/
Nadiia Loizides (*pro hac vice*)