UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROCHIP TECHNOLOGY, INC.,
Petitioner,

v.

APTIV TECHNOLOGIES AG,
Patent Owners.

Patent No. 9,619,420

Inter Partes Review No. IPR2024-00495

PATENT OWNER'S OBJECTIONS TO EVIDENCE SUBMITTED WITH THE PETITION FOR *INTER PARTES* REVIEW

Aptiv Technologies AG ("Aptiv" or "Patent Owner") hereby object to the following evidence that was submitted by Microchip Technology, Inc. ("Microchip" or "Petitioner") with the petition ("Pet.," Paper 2) in the above-captioned proceeding. In accordance with 37 C.F.R. § 42.64(b)(1), these objections are being timely filed and served within ten (10) business days of the institution of the trial by the Patent and Trial Appeal Board ("Board"), which is reflected in the Board's Institution Decision dated August 27, 2024 (Paper 13).

A. Exhibit 1013 (Declaration of Eric Welch)

Aptiv objects to Exhibit 1013 as irrelevant, lacking foundation, assuming facts not in evidence, calling for legal conclusion, and mischaracterizing evidence. Aptiv further objects to Exhibit 1013 to the extent that it includes expert opinions for which the factual bases have not been disclosed, for which Dr. Welch does not have personal knowledge (Fed. R. Evid. (FRE) 602), and to the extent that Dr. Welch's opinions constitute unreliable expert testimony under FRE 702 and 703.

Aptiv objects to the portions of Exhibit 1013 not discussed or cited in the Petition as not being relevant to any issue on which trial has been instituted. Additionally, if the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Petitioner's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, at least paragraphs 1-44, 60-

61, 64, 100-123, 169-174, 203-220, 255, 267, 269, 295, and 320-328 of Exhibit 1013 were not cited or discussed in the Petition. Accordingly, at least those paragraphs of Exhibit 1013 are objected to as not being relevant to any issue in this *inter partes* review (IPR).

B. Exhibit 1016 (Overtoom)

Aptiv objects to Exhibit 1016 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1016 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses the abstract, paragraphs [0005], [0024], [0027] and Figure 2. Accordingly, all other pages, sections, and figures of Exhibit 1016 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

C. Exhibit 1017 (Hesse)

Aptiv objects to Exhibit 1017 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1017 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses paragraphs [0055]-[0057] and Figure 6. Accordingly, all other pages, sections, and figures of Exhibit 1017 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

D. Exhibit 1018 (USB 2.0 Specification)

Aptiv objects to Exhibit 1018 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1018 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1018 is what Microchip claims it to be.

Aptiv objects to Exhibit 1018 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1018 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses pages 31, 33, 34, 36, 38, 50-51, and 327; sections 4.1.1., 4.6.3, 4.9, and 11; and Figures 4-3 and 11-2. Accordingly, all other pages, sections, and figures of Exhibit 1018 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

E. Exhibit 1019 (USB Type-C Specification Release 1.2)

Aptiv objects to Exhibit 1019 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1019 was publicly accessible in its presented

form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1019 is what Microchip claims it to be.

Aptiv objects to Exhibit 1019 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1019 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1019 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

F. Exhibit 1020 (USB Power Delivery Specification Rev. 3.0 V1.0a)

Aptiv objects to Exhibit 1020 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1020 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1020 is what Microchip claims it to be.

Aptiv objects to Exhibit 1020 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is

irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1020 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1020 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

G. Exhibit 1021 (USB-IF Compliance Test Procedure Rev. 1.3)

Aptiv objects to Exhibit 1021 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1021 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1021 is what Microchip claims it to be.

Aptiv objects to Exhibit 1021 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1021 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any)

regarding the same. Accordingly, Exhibit 1021 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

H. Exhibit 1022 (USB OTG Supplement Rev. 2.0 v1.1a)

Aptiv objects to Exhibit 1022 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1022 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1022 is what Microchip claims it to be.

Aptiv objects to Exhibit 1022 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1022 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses pages 2 and 13 and sections 1.1, 3.1.1, and. Accordingly, all other pages and sections of

Exhibit 1022 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

I. Exhibit 1023 (USB 3.0 Specification)

Aptiv objects to Exhibit 1023 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1023 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1023 is what Microchip claims it to be.

Aptiv objects to Exhibit 1023 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1023 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses section 3.

Accordingly, all other sections of Exhibit 1023 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

J. Exhibit 1024 (Ravencraft Declaration)

Aptiv objects to Exhibit 1013 as irrelevant, lacking foundation, assuming facts not in evidence, calling for legal conclusion, and mischaracterizing evidence.

Aptiv objects to the portions of Exhibit 1024 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In fact, Exhibit 1024 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1024 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

K. Exhibit 1025 (Castleberry)

Aptiv objects to Exhibit 1025 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1025 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses 1:17-27, 1:36-43, 3:10-32, 3:40-4:8, 4:17-35, and 7:30-52. Accordingly, all other portions of Exhibit 1025 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

L. Exhibit 1029 (Chutorash)

Aptiv objects to Exhibit 1029 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1029 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the

objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses 27:26-28. Accordingly, all other portions of Exhibit 1029 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

M. Exhibit 1030 (Rafiee)

Aptiv objects to Exhibit 1030 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1030 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In fact, Exhibit 1030 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same.

Accordingly, Exhibit 1030 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

N. Exhibit 1031 (GL62USB-A)

Aptiv objects to Exhibit 1031 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1031 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1031 is what Microchip claims it to be.

Aptiv objects to Exhibit 1031 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1031 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1031 as a general example of a "commercial prior art bridge." Reliance on Exhibit 1031

for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

O. Exhibit 1032 (Wurzburg)

Aptiv objects to Exhibit 1032 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1032 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses paragraphs [0005], [0007], [0052], and [0102]. Accordingly, all other portions of Exhibit 1032 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

P. Exhibit 1033 (Bohm '885)

Aptiv objects to Exhibit 1033 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1033 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses paragraph [0040]. Accordingly, all other portions of Exhibit 1033 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

Q. Exhibit 1034 (Lin)

Aptiv objects to Exhibit 1034 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1034 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses the abstract, 5:56-59, and 7:7-11. Accordingly, all other portions of Exhibit 1034 which are not

cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

R. Exhibit 1035 (PL-2501 Product Brochure)

Aptiv objects to Exhibit 1035 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1035 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1035 is what Microchip claims it to be.

Aptiv objects to Exhibit 1035 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1035 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1035 as a general example of the desirability of "connecting two PCs." Reliance on

Exhibit 1035 for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

S. Exhibit 1036 (NET1080 USB TurboCONNECT Preliminary Specification)

Aptiv objects to Exhibit 1036 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1036 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1036 is what Microchip claims it to be.

Aptiv objects to Exhibit 1036 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1036 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1036 as a general example of a "commercial prior art bridge." Reliance on Exhibit 1036

for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

T. Exhibit 1037 (M5632 Preliminary Product Brief)

Aptiv objects to Exhibit 1037 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1037 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1037 is what Microchip claims it to be.

Aptiv objects to Exhibit 1037 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1037 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1037 as a general example of a "commercial prior art bridge." Reliance on Exhibit 1037

for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

U. Exhibit 1038 (Lai)

Aptiv objects to Exhibit 1038 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1038 not discussed or cited in the Petition, as not being relevant to any isue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses 1:38-40. Accordingly, all other portions of Exhibit 1038 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

V. Exhibit 1039 (Chen)

Aptiv objects to Exhibit 1039 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1039 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the

objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses paragraph [0004]. Accordingly, all other portions of Exhibit 1039 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

W. Exhibit 1040 (Fletcher)

Aptiv objects to Exhibit 1040 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1040 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses 4:39-5:29 and Exhibit 1040's description of a "switch controller" generally. Accordingly, all other portions of Exhibit 1040 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

X. Exhibit 1041 (Young)

Aptiv objects to Exhibit 1041 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1041 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses 1:20-36. Accordingly, all other portions of Exhibit 1041 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

Y. Exhibit 1042 (Bohm '759)

Aptiv objects to Exhibit 1042 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1042 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding

the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses paragraphs [0038], [0040]-[0042], and Figures 3 and 4a-b. Accordingly, all other portions of Exhibit 1042 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

Z. Exhibit 1045 (Aptiv Resps to Rogs set 1)

Aptiv objects to Exhibit 1045 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1045 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses portions of page 11. Accordingly, all other portions of Exhibit 1045 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

AA. Exhibit 1046 (Kellzi)

Aptiv objects to Exhibit 1046 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1046 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In fact, the Petition does not discuss the substance of Exhibit 1046 at all, but rather on the discussion of Exhibit 1046 during prosecution. Accordingly, Exhibit 1046 is irrelevant to any issue in this IPR.

BB. Exhibit 1047 (Wright)

Aptiv objects to Exhibit 1047 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1047 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding

the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Figure 5. Accordingly, all other portions of Exhibit 1042 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

CC. Exhibit 1049 (USB in Automotive_ No Longer Just for PCs)

Aptiv objects to Exhibit 1049 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1049 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1049 is what Microchip claims it to be.

Aptiv objects to Exhibit 1049 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1049 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly

prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 10349 for the general premise that cars had "become a PC on wheels." Reliance on Exhibit 1049 for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

DD. Exhibit 1050 (The Car Entertainment System (2014 Reprint))

Aptiv objects to Exhibit 1050 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1050 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1050 is what Microchip claims it to be.

Aptiv objects to Exhibit 1050 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1050 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1050 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

EE. Exhibit 1051 (The Car Entertainment System (2011 Online))

Aptiv objects to Exhibit 1051 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1051 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1051 is what Microchip claims it to be.

Aptiv objects to Exhibit 1051 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1051 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1051 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

FF. Exhibit 1052 (Wang)

Aptiv objects to Exhibit 1052 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1052 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses 3:7-50. Accordingly, all other portions of Exhibit 1052 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

GG. Exhibit 1053 (Sakaki)

Aptiv objects to Exhibit 1053 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1053 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses paragraphs [0031]-[0034] and Figure 1. Accordingly, all other portions of Exhibit 1053 which

are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

HH. Exhibit 1054 (AN2720)

Aptiv objects to Exhibit 1054 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1054 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1054 is what Microchip claims it to be.

Aptiv objects to Exhibit 1054 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1054 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1054 for the general premise that providing a USB device interface for each host

overcomes the "inherent incompatibility" of host-to-host communication. Reliance on Exhibit 1031 for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

II. Exhibit 1055 (Baker Book Excerpts)

Aptiv objects to Exhibit 1055 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1055 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1055 is what Microchip claims it to be.

Aptiv objects to Exhibits 1055 as being an incomplete copy under FRE 106. Exhibit 1055 contain only excerpts taken from a larger book, which creates a "misleading impression created by taking matters out of context." (Advisory Committee Notes to FRE 106.)

Aptiv objects to Exhibit 1055 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1055 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the

objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses pages 284-288 of Exhibit 1055. Accordingly, all other portions of Exhibit 1055 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

JJ. Exhibit 1059 (USB Switches, Function – Fairchild Semiconductor Site)

Aptiv objects to Exhibit 1059 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1059 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1059 is what Microchip claims it to be.

Aptiv objects to Exhibit 1059 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1059 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the

objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1059 for the general premise that commercial USB multiplexers were known. Reliance on Exhibit 1059 for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

KK. Exhibit 1060 (Fairchild Semiconductor FSUSB63)

Aptiv objects to Exhibit 1060 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1060 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1060 is what Microchip claims it to be.

Aptiv objects to Exhibit 1060 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1060 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the

objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1060 for the general premise that commercial USB multiplexers were known. Reliance on Exhibit 1060 for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

LL. Exhibit 1063 (MAX4989 Datasheet)

Aptiv objects to Exhibit 1063 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1063 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1063 is what Microchip claims it to be.

Aptiv objects to Exhibit 1063 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1063 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the

objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1063 as a general example of a crosspoint switch. Reliance on Exhibit 1063 for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

MM. Exhibit 1064 (Cypress Semiconductor AN96527)

Aptiv objects to Exhibit 1064 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1064 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1064 is what Microchip claims it to be.

Aptiv objects to Exhibit 1064 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1064 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has

had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1064 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

NN. Exhibit 1066 (Dunstan)

Aptiv objects to Exhibit 1066 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1066 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In fact, Exhibit 1066 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1066 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

OO. Exhibit 1067 (Ram)

Aptiv objects to Exhibit 1067 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1067 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses paragraph [0210] and Figure 16. Accordingly, all other portions of Exhibit 1067 which are not cited or discussed in the Petition are objected to as not being relevant to any issue in this IPR.

PP. Exhibit 1068 (Fairchild Semiconductor FSUSB30)

Aptiv objects to Exhibit 1068 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1068 was publicly accessible in its presented

form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1068 is what Microchip claims it to be.

Aptiv objects to Exhibit 1068 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

Aptiv objects to the portions of Exhibit 1068 not discussed or cited in the Petition, as not being relevant to any issue on which trial has been instituted. If the objected to material was not discussed or cited in the Petition, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Such information is irrelevant and its consideration would be unfairly prejudicial to Aptiv. In particular, the Petition only cites or discusses Exhibit 1068 for the general premise that commercial USB multiplexers were known. Reliance on Exhibit 1068 for any other reason not cited or discussed in the Petition is objected to as not being relevant to any issue in this IPR.

QQ. Exhibit 1069 (Horowitz and Hill Textbook Excerpts)

Aptiv objects to Exhibit 1069 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1069 was publicly accessible in its presented

form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1069 is what Microchip claims it to be.

Aptiv objects to Exhibit 1069 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1069 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1069 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

Aptiv objects to Exhibit 1069 as being an incomplete copy under FRE 106. For example, as an incomplete copy of the book, this exhibit is only part of a writing, which creates a "misleading impression created by taking matters out of context." (Advisory Committee Notes to FRE 106.) Exhibit 1069 includes only pages vii-xvii, 8, 23-25, 493-499, 612-614, 669, 879-88.

RR. Exhibit 1070 (Micro-USB Specification Rev. 1.01)

Aptiv objects to Exhibit 1070 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to

offer sufficient evidence that Exhibit 1070 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1070 is what Microchip claims it to be.

Aptiv objects to Exhibit 1070 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1070 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1070 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

SS. Exhibit 1071 (Fairchild Semiconductor FSA880/FSA/881)

Aptiv objects to Exhibit 1071 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1071 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1071 is what Microchip claims it to be.

Aptiv objects to Exhibit 1071 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1071 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1071 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

TT. Exhibit 1073 (MSFT Dictionary Excerpts (1999))

Aptiv objects to Exhibit 1073 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1073 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1073 is what Microchip claims it to be.

Aptiv objects to Exhibit 1073 as being an incomplete copy under FRE 106. For example, as an incomplete copy of the dictionary, this exhibit is only part of a writing, which creates a "misleading impression created by taking matters out of context." (Advisory Committee Notes to FRE 106.)

Aptiv objects to Exhibit 1073 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1073 is neither discussed or cited in the Petition at all and is therefore irrelevant to any issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1073 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

UU. Exhibit 1074 (STMicrosystems, RM0033 Reference Manual)

Aptiv objects to Exhibit 1074 as lacking foundation and lacking authentication under FRE 901. Aptiv objects to this exhibit as containing hearsay to the extent that Microchip attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Microchip fails to offer sufficient evidence that Exhibit 1074 was publicly accessible in its presented form as of the alleged publication date. Microchip fails to offer sufficient evidence that Exhibit 1074 is what Microchip claims it to be.

Aptiv objects to Exhibit 1074 as not being relevant to any issue in this IPR. This exhibit is not relied upon as prior art in the challenged grounds, and thus is irrelevant and/or unduly prejudicial. (*See* FRE 401–403.) In fact, Exhibit 1074 is neither discussed or cited in the Petition at all and is therefore irrelevant to any

issue on which trial has been instituted. Because it was not discussed, Aptiv has had no fair opportunity to respond to Microchip's unstated contentions (if any) regarding the same. Accordingly, Exhibit 1074 is irrelevant and its consideration would be unfairly prejudicial to Aptiv.

Dated: September 11, 2024

Respectfully submitted,

By: */s/ Andrew T. Jones*

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Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PATENT OWNER'S OBJECTIONS TO EVIDENCE SUBMITTED WITH THE PETITION FOR *INTER PARTES* REVIEW was served as of the below date via email on the Petitioner to the following counsel of record:

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Dated: September 11, 2024

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