

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APTIV SERVICES US, LLC,
Petitioner,

v.

MICROCHIP TECHNOLOGY INC.,
Patent Owner.

Patent No. 9,471,074

Inter Partes Review No. IPR2024-00646

**PETITIONER'S OBJECTION TO
PATENT OWNER'S SUPPLEMENTAL EVIDENCE**

Petitioner Aptiv Services US, LLC (“Petitioner” or “Aptiv”) hereby objects to the following Supplemental Evidence served by Patent Owner Microchip Technology Inc. (“Patent Owner” or “Microchip”) 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 five (5) business days of service of the Patent Owner’s Supplemental Evidence, which was served on January 30, 2025.

A. Exhibit 2023 (Declaration of Eric Glatfelter)

Aptiv objects to Exhibit 2023 as irrelevant, lacking foundation, assuming facts not in evidence, calling for legal conclusion, and containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein.

For example, Mr. Glatfelter declares that the conclusions set forth in Exhibit 2023 are based on Microchip’s purported corporate records, which have not been submitted or otherwise made available in this IPR, and to which Aptiv has not had a fair opportunity to respond.

Furthermore, although Mr. Glatfelter states that he has only been employed by Microchip Technology Inc. since 2021, he offers purported facts and conclusions about the public availability of a document in 2013. Mr. Glatfelter does not disclose what information he received to reach his conclusions. To the extent Patent Owner

seeks to rely on such information, including through Exhibit 2023, it would unfairly prejudice Aptiv.

Aptiv also incorporates its previously served objections to Exhibit 2019, on which the relevance of Exhibit 2023 depends.

Dated: February 6, 2025

By: /s/ Stephen Liu
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Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PETITIONER'S OBJECTION TO PATENT OWNER'S SUPPLEMENTAL EVIDENCE was served as of the below date on the Patent Owner via e-mail (by agreement) to the following counsel of record:

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Dated: February 6, 2025

/s/ Stephen Liu
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