

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 supplemental evidence submitted by 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 March 10, 2025.

A. Exhibit 2024 (Internet Archive Declaration)

Aptiv objects to Exhibit 2024 as not being relevant to any issue in this IPR. This exhibit is a declaration by an employee of the Internet Archive who attests that the sub-exhibits attached to the declaration are “true and accurate copies” of records kept by the Internet Archive. These sub-exhibits, however, do not appear to confirm or corroborate the authenticity or admissibility of previously filed exhibits on which Patent Owner relies. Thus, they are irrelevant and/or unduly prejudicial. (*See* FRE 401–403.)

For example, the first Internet Archive record submitted in Exhibit 2024 (*see* pages 4-7) is a purported screenshot of an archived webpage concerning a part called LM2990. The screenshot appears to include a link (though this is not confirmed in any other part of Exhibit 2024) to a datasheet for LM2990 dated August 31, 2010. The declarant represents that the page shown in the screenshot was archived in 2012. Patent Owner previously submitted an alleged datasheet for the LM2990 part as

Exhibit 2011 to this proceeding. But that datasheet is dated April 2013, making it clearly different from the 2010 document referenced in the 2012 webpage reflected in Exhibit 2024's screenshot. Exhibit 2024 is therefore irrelevant to the authenticity or admissibility of Exhibit 2011.

Similarly, the second Internet Archive record submitted in Exhibit 2024 (*see* pages 8-10) is a purported screenshot of a webpage for a part called L78MXXAB. The screenshot appears to include a link (not confirmed in any part of Exhibit 2024) to a 29-page datasheet for L78MXXAB, and a preview of some of the datasheet's pages. Patent Owner previously submitted an alleged datasheet for the L78MXXAB part as Exhibit 2012 to this proceeding. But that datasheet is 31 pages long. And on its cover page Exhibit 2012 has a bullet point list of "Features," in which each point occupies only one line of text. The datasheet whose cover page is previewed in the screenshot in Exhibit 2024, has at least one bullet point occupying two lines of text. The two datasheets are distinct, and Exhibit 2024 is irrelevant to the authenticity or admissibility of Exhibit 2012.

The fourth Internet Archive record submitted in Exhibit 2024 (*see* pages 33-56) is a purported copy of a file archived in 2012 from the Texas Instruments website at a link for a PDF. The file appears to be a datasheet for a part called LM1117, and bears the date April 2006. Patent Owner previously submitted an alleged datasheet for LM1117 as Exhibit 2016 to this proceeding. But that datasheet is dated 2012. It

also bears the logo of Texas Instruments on its first page, unlike the file included in Exhibit 2024, which shows the logo of National Semiconductor. The two datasheets also have different numbers of pages. Accordingly, Exhibit 2024 is irrelevant to the authenticity or admissibility of Exhibit 2016.

Aptiv further objects to Exhibit 2024 because it has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the exhibit's contents. Such information is not relevant and its consideration would be unfairly prejudicial to Aptiv.

Dated: March 17, 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: March 17, 2025

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