

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

GREENTHREAD LLC
Patent Owner

Case: IPR2024-00745
U.S. Patent No. 11,663,474

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE
SUBMITTED WITH PETITIONER'S REPLY AND OPPOSITION TO
PATENT OWNER'S MOTION TO AMEND**

Pursuant to 37 C.F.R. § 42.64(b)(1), Autonomous Devices, LLC (“Patent Owner”) objects to the following exhibits filed by Tesla, Inc. (“Petitioner”) with its Reply (Paper 18) and Opposition to Patent Owner’s Motion to Amend (Paper 19).

<u>Exhibit</u>	<u>Objection(s)</u>
Ex. 1022 – Supplemental Declaration of Dr. Jason Janet	FRE 401-403/702/703; 37 C.F.R. § 42.23(b) Patent Owner objects to Ex. 1022 as containing information that is irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Additionally, Patent Owner objects to new argument and evidence presented in Ex. 1022 that were not presented in the Petition (Paper 2) nor are responsive to arguments raised in the Patent Owner Response (Paper 13). <i>See, e.g.</i>, Reply at 9 (new argument and evidence regarding what constitutes a “network merge” in Buibas); 12-14 (new argument and evidence regarding Buibas’s “partitioned neuromorphic apparatus in FIG. 11D”); 15 (new argument and evidence regarding Buibas’s “partitioned brain image”); 16-17 (new argument and evidence regarding “re-training”); 18-19 (new argument and evidence regarding the “higher-level effect” of merging weight vectors); 24 (new argument and evidence regarding Buibas’s lack of teaching in a Grotmol-Buibas ground).
Ex. 1028 – Deposition of Dr. Eli Saber (April 4, 2025)	Patent Owner objects to Ex. 1028 for each of the reasons noted in the objections made during the taking of the underlying deposition.
Ex. 1032 – Deposition of Dr. Eli Saber in IPR2023-00172 (June 21, 2024)	Patent Owner objects to Ex. 1032 for each of the reasons noted in the objections made during the taking of the underlying deposition.

Date: April 18, 2025

Respectfully submitted,

/s/ Arvind Jairam

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CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that the foregoing **PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE SUBMITTED WITH PETITIONER'S REPLY AND OPPOSITION TO PATENT OWNER'S MOTION TO AMEND** has been served on Petitioner via email on the following counsel of record:

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Dated: April 18, 2025

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