Paper No. __

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION,
Petitioner,

v.

OPTIMUM IMAGING TECHNOLOGIES, LLC,
Patent Owner.

Case No. IPR2024-00924

Patent No. 7,612,805

PETITIONER'S OBJECTIONS TO EVIDENCE SERVED WITH PATENT OWNER RESPONSE

Pursuant to 37 C.F.R. §42.64(b)(1), Petitioner submits the following objections to evidence submitted with the Patent Owner Response (Paper 16) on February 26, 2025. These objections have been timely filed and served within five business days of the Patent Owner filing the POR.

A. Exhibit 2044

Petitioner objects to EX2044, the Declaration of Dr. Omid Kia. Petitioners object to ¶¶90-91, and 348 under Fed. R. Evid. ("Rule") 802, 701, 702, 703, 401, and 402. The testimony is inadmissible because it is unhelpful to understanding the evidence, not based on sufficient facts or data, and not the product of reliable principles and methods. The testimony is inadmissible to the extent it recites out of court statements from others, or the content of documents, for the truth of the matter asserted. The testimony irrelevant under Fed. R. Evid. 401, and inadmissible under Fed. R. Evid. 402.

B. Exhibits 2037-2042

Petitioner objects to EX2037-2042 under Rule 901(a) as lacking foundation, under Rule 802 as inadmissible hearsay, and under Rule 402 as lacking relevance.

Respectfully submitted,
Sony Corporation

Date: March 5, 2025

By: /Adam R. Wichman/

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. §42.6 (e)(4)

I certify that on March 5, 2025, I caused a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

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Date: March 5, 2025

/Dara Del Rosario/
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Paralegal
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