

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOBILEYE GLOBAL, INC.,
Petitioner

v.

FACET TECHNOLOGY CORP.,
Patent Owner

Case IPR2024-01110
Patent No. 9,335,255 B2

PETITIONER'S OBJECTIONS TO PATENT OWNER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits the following objections to certain exhibits submitted by Patent Owner. Petitioner's objections apply equally to Patent Owner's reliance on these exhibits in any previously filed or subsequently filed documents. These objections are timely, having been filed within ten business days of the institution of the trial to which the objections are directed. Petitioner objects to the following exhibits:

Exhibit No.	Description
2009	National Institute of Standards and Technology, "Redefinition of 'Candela,'" available at https://www.nist.gov/siredefinition/candela
2010	International Commission on Illumination, Standard. No. CIE S 017:2020 ILV: International Lighting Vocabulary, 2nd edition., entry no. 17-21-050, available at https://cie.co.at/eilvterm/17-21-050
2011	Excerpts from Stefanov, Konstantin D. CMOS Image Sensors. Bristol, UK: IOP Publishing, 2022.
2012	Ang, Bernard, Keysight Technologies, "How to Achieve Accurate Sensor Characterization Using a Digital Multimeter" (Feb. 21, 2019), available at https://www.keysight.com/blogs/en/tech/bench/2019/01/24/howto-achieve-accurate-sensor-characterization-using-a-digitalmultimeter
2013	Steely, Sidney L., H. S. Lowery III, and R. H. Fugerer. "Laser-based direct-write scene generation methods for closed-loop focal-plane-array diagnostics." Technologies for Synthetic Environments: Hardware-in-the-Loop Testing. Vol. 2741. SPIE, 1996.
2014	Collins Dictionary Entry for "profile," available at https://www.collinsdictionary.com/us/dictionary/english/profile
2022	Joseph White, "GM Has 'Heightened Partnership' with Mobileye for Autonomous Cars" (October 1, 2015) (available at https://www.reuters.com/article/us-gm-investors-mobileyeidUSKCN0RV4ZC20151001/)

Exhibits 2009-2012 and 2014

Petitioner objects to Exhibits 2009-2012 and 2014 under Federal Rule of Evidence (“FRE”) 901 because Patent Owner fails to provide the authentication required for these documents, and the Exhibits are not self-authenticating under FRE 902.

Petitioner further objects to Exhibits 2009-2012 and 2014 under FRE 401, 402, and 403 due to the risk of unfair prejudice and confusion of the issues. Patent Owner cites to Exhibits 2009-2012 and 2014 as alleged evidence of the ordinary meaning of certain terms like “light intensity” (Ex. 2009), “luminance” (Exs. 2009 and 2010), “sensor characterization” (Exs. 2011 and 2012), and “profile” (Ex. 2014). *See* Patent Owner Preliminary Response (Paper 7) at 7-8, 12. But Patent Owner has not proposed a construction for any claim term and, instead, asserted that no “claim term should receive an express construction.” *Id.* at 6. Additionally, Patent Owner does not provide evidence that Exhibits 2009-2012 and 2014 were available before the alleged invention. The Exhibits include the following dates:

- Exhibit 2009 was created in May 16, 2019.
- Exhibit 2010 has a copyright date of 2020.
- Exhibit 2011 has a copyright date of 2022.
- Exhibit 2012 was published February 21, 2019.

- Exhibit 2014 has no date of publication, but was accessed December 9, 2024.

Thus, Exhibits 2009-2012 and 2014 are not relevant to the ordinary meaning of any claim term as of the date of the alleged invention and risk confusion and undue prejudice and to the meaning of any claim term at the relevant time period.

Exhibit 2013

Petitioner objects to Exhibit 2013 under FRE 802 as inadmissible hearsay.

Exhibit 2022

Petitioner objects to Exhibit 2022 under FRE 802 as inadmissible hearsay.

Respectfully submitted,

Dated: March 19, 2025

By: /Cory C. Bell/

Cory C. Bell, Lead Counsel
Reg. No. 75,096

*Counsel for Petitioner Mobileye
Global, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioner's
Objections to Patent Owner's Exhibits** was served electronically via email on
March 19, 2025, in its entirety on the following:

Michael D. Saunders
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Patent Owner has consented to service by email.

Date: March 19, 2025

By: /Lisa C. Hines/
Lisa C. Hines
Case Manager

Finnegan, Henderson, Farabow,
Garrett & Dunner, LLP