

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOBILEYE GLOBAL, INC., and
ZF ACTIVE SAFETY AND ELECTRONICS US LLC¹

Petitioners

v.

FACET TECHNOLOGY CORP.,
Patent Owner

Inter Partes Review No. IPR2024-01110
U.S. Patent No. 9,335,255

PATENT OWNER'S UPDATED EXHIBIT LIST

¹ ZF Active Safety and Electronics US LLC, which filed a petition in IPR2025-00748, has been joined as a petitioner in this proceeding.

PATENT OWNER’S EXHIBIT LIST

Exhibit	Description
2001	Exclusive Patent License Agreement between Facet Technology Corp. and Mandli Communications, Inc. (and patent assignment coversheet), recorded at Reel No. 062371, Frame 0313
2002	Statutory Disclaimer of certain claims filed in file wrapper of U.S. Patent No. 9,335,255
2003	U.S. Provisional Patent Appl. No. 60/296,596
2004	Docket Control Order filed in <i>Facet Tech. Corp. v. Mobileye Glob., Inc.</i> , No. 2:24-cv-00058 (E.D. Tex.)
2005	Excerpts from U.S. District Court — Judicial Caseload Profile (2024 Ed.), <i>available at</i> https://www.uscourts.gov/file/78884/download
2006	Complaint Filed in <i>Facet Tech. Corp. v. Mobileye Glob., Inc.</i> , No. 2:24-cv-00058 (E.D. Tex.)
2007	Cover Pleading to Plaintiff’s Disclosure Of Asserted Claims And Infringement Contentions, as served on August 26, 2024 in <i>Facet Tech. Corp. v. Mobileye Glob., Inc.</i> , No. 2:24-cv-00058 (E.D. Tex.)
2008	Cover Pleading to Defendant’s Invalidity Contentions, as served on November 4, 2024 in <i>Facet Tech. Corp. v. Mobileye Glob., Inc.</i> , No. 2:24-cv-00058 (E.D. Tex.)
2009	National Institute of Standards and Technology, “Redefinition of ‘Candela,’” <i>available at</i> https://www.nist.gov/si-redefinition/candela
2010	International Commission on Illumination, Standard. No. CIE S 017:2020 ILV: International Lighting Vocabulary, 2nd edition., entry no. 17-21-050, <i>available at</i> https://cie.co.at/eilvterm/17-21-050
2011	Excerpts from Stefanov, Konstantin D. CMOS Image Sensors. Bristol, UK: IOP Publishing, 2022.

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2012	Ang, Bernard, Keysight Technologies, “How to Achieve Accurate Sensor Characterization Using a Digital Multimeter” (Feb. 21, 2019), <i>available at</i> https://www.keysight.com/blogs/en/tech/bench/2019/01/24/how-to-achieve-accurate-sensor-characterization-using-a-digital-multimeter
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,” <i>available at</i> https://www.collinsdictionary.com/us/dictionary/english/profile
2015	Plaintiff Facet Technology Corp.’s Opposed Motion For Leave To Join Additional Parties, filed as Dkt. No. 32 in <i>Facet Technology Corp. v. Mobileye Global, Inc.</i> , Case No. 2:24-cv-00058-RWS-RSP (E.D. Tex.).
2016	Defendant Mobileye Global, Inc.’s Opposition To Facet’s Motion For Leave To Join Additional Parties, filed as Dkt. No. 35 in <i>Facet Technology Corp. v. Mobileye Global, Inc.</i> , Case No. 2:24-cv-00058-RWS-RSP (E.D. Tex.).
2017	Complaint For Declaratory Judgment Of Noninfringement And Demand For Jury Trial, filed as Dkt. No. 1 in <i>Mobileye Vision Technologies Ltd. et al v. Facet Technology Corp.</i> , Case No. 0:24-cv-04149-NEB-DLM (D. Minn.)
2018	Complaint for Patent Infringement, filed as Dkt. No. 1 in <i>Facet Technology Corp. v. General Motors LLC</i> , Case No. 2:24-cv-00035-RWS-RSP (E.D. Tex.)

Exhibit	Description
2019	Docket Control Order, filed as Dkt. No. 22 in <i>Facet Technology Corp. v. General Motors LLC</i> , Case No. 2:24-cv-00035-RWS-RSP (E.D. Tex.)
2020	Mobileye, “Fact Sheet: Mobileye Advanced Driver-Assistance Systems (ADAS)” (July 19, 2020) (available at https://www.mobileye.com/blog/fact-sheet-mobileye-advanced-driver-assistance-systems-adass/)
2021	SEC, “Mobileye to Offer User-Generated Mapping for Autonomous Driving” (January 6, 2016) (available at https://www.sec.gov/Archives/edgar/data/1607310/000157104916010521/t1600008_ex99-1.htm)
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-mobileye-idUSKCN0RV4ZC20151001/)
2023	Declaration Of Nikolaos Papanikolopoulos, Ph.D. In Support Of Patent Owner's Response
2024	Curriculum Vitae of Nikolaos Papanikolopoulos, Ph.D.
2025	Transcript of Deposition of Dr. Thorpe, taken in IPR2024-01110 on May 30, 2025
2026	Transcript of Deposition of Dr. Thorpe, taken in IPR2024-01111 on May 29, 2025
2027	Definition of “photodiode,” A Dictionary of Physics, Oxford University Press. (6 ed.) <i>available at</i> , https://www.oxfordreference.com/display/10.1093/oi/authority.20110803100324432?p=emailAIVd1F/alp5o2&d=/10.1093/oi/authority.20110803100324432&print

Exhibit	Description
2028	National Institute of Standards and Technology, OSAC Lexicon, Definition of “Lux,” <i>available</i> at https://www.nist.gov/glossary-term/26871
2029	Fiorentin, P. & Iacomussi, Paola & Rossi, Giuseppe. (2005). Characterization and Calibration of a CCD Detector for Light Engineering. Instrumentation and Measurement, IEEE Transactions on. 54. 171 - 177. 10.1109/TIM.2004.834055., <i>available at</i> https://www.researchgate.net/publication/3090945_Characterization_and_Calibration_of_a_CCD_Detector_for_Light_Engineering
2030	Transcript of Deposition of Dr. Thorpe, taken in IPR2024-01110 on October 14, 2025, starting at 9:31 am CST
2031	—Intentionally Omitted—
2032	—Intentionally Omitted—
2033	—Intentionally Omitted—
2034	Patent Owner's Demonstratives

Dated: December 2, 2025

Respectfully submitted,

By: / Michael D. Saunders /
Michael D. Saunders (Reg. No. 77,739)
msaunders@princetonobel.com
Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on December 2, 2025, I will cause true and correct copies of the foregoing **PATENT OWNER'S UPDATED EXHIBIT LIST** and all associated exhibits or appendices referred to therein, to be served electronically upon the following attorneys who have consented to service via email.

Pet. at 75-76.

Cory C. Bell (Reg. No. 75,096) cory.bell@finnegan.com Finnegan, Henderson, Farabow, Garrett & Dunner, LLP 2 Seaport Lane, 6th Floor Boston, MA 02210-2001 Tel: 617-646-1626 Fax: 202-408-4400	Robert K. High (Reg. No. 75,786) robert.high@finnegan.com Benjamin R. Schlesinger (Reg. No. 78,630) benjamin.schlesinger@finnegan.com Wyatt L. Bazrod (Reg. No. 81,776) wyatt.bazrod@finnegan.com Finnegan, Henderson, Farabow, Garrett & Dunner, LLP 271 17th Street, NW, Suite 1400 Atlanta, GA 30363-6209 Tel: 404-653-6400 Fax: 404-653-6444 Gerson S. Panitch (Reg. No. 33,751) gerson.panitch@finnegan.com Finnegan, Henderson, Farabow, Garrett & Dunner, LLP 901 New York Avenue, NW Washington, DC 20001-4413 Tel: (202) 408-4000 Fax: (202) 408-4400
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/ Michael D. Saunders /
Michael D. Saunders (Reg. No. 77,739)
Counsel for Patent Owner