

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REED SEMICONDUCTOR CORP

Petitioner,

v.

MONOLITHIC POWER SYSTEMS, INC.

Patent Owner.

Case No. IPR2024-01158

Patent No. 9,041,377

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
EVIDENCE UNDER 37 C.F.R. § 42.64(b)(1)**

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Monolithic Power Systems, Inc. (“MPS”) hereby objects to the February 24, 2025 Declaration of Maureen M. Honeycutt and Exhibits 1013A, 1013B, 1014A and 1014B submitted by Petitioner, Reed Semiconductor Corp. (“Reed”) as Supplemental Evidence to Patent Owner’s Objections to Evidence, which Reed served on February 25, 2025. The objections are based on 37 C.F.R. Part 42, and the relevant portions of the Federal Rules of Evidence (“F.R.E.”) that are applicable to *inter partes* review proceedings under 37 C.F.R. § 42.62. The objections have been timely filed and served within five business days of service of the evidence.

II. OBJECTIONS TO EVIDENCE

Patent Owner MPS hereby objects to the February 24, 2025 Declaration of Maureen M. Honeycutt and Exhibits 1013A, 1013B, 1014A and 1014B as lacking authentication under F.R.E. 901 because Petitioner has not produced any evidence “sufficient to support a finding that the item is what the proponent claims it is” (F.R.E. 901(a)), these exhibits are not self-authenticating, and they fail to authenticate Exhibits 1013 and 1014.

For example, Ms. Honeycutt states that because Exhibits 1013A and 1014A came from “TI’s records,” they are “true and correct” and that, somehow, this means Exhibits 1013 and 1014 are true and correct.

Further, Ms. Honeycutt relies on “Texas Instruments Channel Media Authorizations” screenshots (Exhibits 1013A and 1013B) to purport that Exhibits 1013A and 1014B were published (or not published) on certain dates, but Ms. Honeycutt has no personal knowledge that the documents were publicly available on those dates. As one example, Ms. Honeycutt relies on the Texas Instruments Channel Media Authorizations screenshot (EX1013B) to state that EX1013A (and thus, conclude EX1013) was published by National Semiconductor Corporation on the internet on October 11, 2005 and removed on May 18, 2009, but National Semiconductor Corporation was not acquired by Texas Instruments until 2011, according to Ms. Honeycutt, meaning she does not have personal knowledge about whether Exhibits 1013 and 1013A were publicly available as of October 11, 2005.

Patent Owner further objects to the Declaration of Maureen M. Honeycutt and Exhibits 1013A, 1013B, 1014A and 1014B to the extent that they are irrelevant under F.R.E. 401–402, or that their probative value is substantially outweighed by other considerations under F.R.E. 403, including confusion of the issues, waste of time, and needlessly presenting cumulative evidence. For example, these above documents do not appear to authenticate Exhibits 1013 and 1014, and therefore, do not appear to make any fact of consequence in determining this action more or less probable than it would be without them and are thus irrelevant and not admissible.

Patent Owner further objects to the Declaration of Maureen M. Honeycutt as containing inadmissible hearsay under F.R.E. 801–803. Ms. Honeycutt’s declaration contains out-of-court statements offered for the truth of the matter asserted—that Exhibits 1013 and 1014 are purportedly authentic and were publicly available on certain dates. Her statements do not fall under an exclusion from or exception to the rules against hearsay.

These objections have been timely filed and served within five business days of service of evidence, under 37 C.F.R. § 42.64(b)(1).

Dated: March 4, 2025

Respectfully submitted,

/ Cory Owan /

Lead Counsel

John P. Schnurer, Reg. No. 52,196

PERKINS COIE LLP
11452 El Camino Real, Suite 300
San Diego, California 92130
(858) 720-5700

Back-Up Counsel

Miguel Bombach, Reg. No. 68,636

Bing Ai, Reg. No. 43,312

John Esterhay, Reg. No. 73,512

Cory Owan, Reg. No. 79,841

Attorneys for Patent Owner

MONOLITHIC POWER SYSTEMS, INC.,

CERTIFICATE OF SERVICE

I hereby certify that on this 4th Day of March, 2025, true and correct copies of the foregoing **PATENT OWNER'S OBJECTION TO PETITIONER'S EXHIBITS** were served via electronic mail upon the following counsel of record for Petitioner:

Andrew J. Gray IV andrew.gray@morganlewis.com
Andrew V. Devkar andrew.devkar@morganlewis.com
Calvin M. Brien calvin.brien@morganlewis.com
Phillip D. Wolfe phillip.wolfe@morganlewis.com
Avery Joseph Welker avery.welker@morganlewis.com
MLB-Reed-IPR-Team@morganlewis.com

Dated: March 4, 2025

/Anita Chou /

Anita Chou
Paralegal