UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARASHI VISION (U.S.) LLC (D/B/A INSTA360),
Petitioner,

v.

GOPRO, INC.,
Patent Owner.

Patent No. 10,574,894

Inter Partes Review No. IPR2024-01186

PETITIONER'S OBJECTION TO EVIDENCE SUBMITTED WITH PATENT OWNER'S RESPONSE

Petitioner Insta360 ("Petitioner" or "Insta360") objects to the following evidence that was submitted by Patent Owner GoPro, Inc. ("Patent Owner" or "GoPro") with its Patent Owner's Response (Paper 17 (sealed), Paper 19 (redacted)) in the above-captioned proceeding. In accordance with 37 C.F.R. § 42.64(b)(1), Petitioner is filing and serving these objections within five (5) business days of service of evidence to which the objections are directed.

A. Exhibit 2018 (Sealed and Redacted Versions) (Declaration of Hassan Foroosh, Ph.D.)

Petitioner objects to Exhibit 2018 as irrelevant, lacking foundation, assuming facts not in evidence, calling for legal conclusion, and mischaracterizing evidence. Petitioner further objects to the exhibit to the extent that it includes expert opinions for which the factual bases have not been disclosed, for which Dr. Foroosh does not have personal knowledge (FRE 602), and to the extent that Dr. Foroosh's opinions constitute unreliable expert testimony under FRE 702 and 703.

Petitioner objects to the portions of the exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue on which trial has been instituted. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least paragraphs 1-16, 22-33, 43, 53, 149, and 150 of

the exhibit were not cited or discussed in the Patent Owner Response. Accordingly, at least those paragraphs of the exhibit are objected to as not being relevant to any issue in this proceeding.

B. Exhibit 2019 (Public) (U.S. App. No. 61/407,630)

Petitioner objects to Exhibit 2019 for including portions of the exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue on which trial has been instituted. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least pages 2, 8-11, and 13-16 of the exhibit were not cited or discussed in the Patent Owner Response. Accordingly, at least those paragraphs of the exhibit are objected to as not being relevant to any issue in this proceeding.

C. Exhibit 2020 (Public) (Deposition Transcript of Dr. Aggelos Katsaggelos Dated April 4, 2025)

Petitioner objects to Exhibit 2020 for each of the reasons noted in the objections made during the underlying deposition.

D. Exhibit 2021 (Public) (Pages of a Hearing Transcript)

Petitioner objects to Exhibit 2021 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking

foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Although the hearing transcript spans over 1369 pages, the exhibit itself only reproduces a few pages from that hearing transcript. Considering the pages that Patent Owner selectively reproduced in isolation would unfairly prejudice Petitioner because the surrounding pages may be important, providing contextual clues for interpreting them. For the same reason, Petitioner objects to this exhibit as not being complete.

Petitioner objects to this exhibit for not being discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner.

E. Exhibit 2022 (Public) (Coursera Screenshot)

Petitioner objects to Exhibit 2022 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking

foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to this exhibit for not being discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner.

F. Exhibit 2023 (Public) (U.S. Patent No. 10,027,893)

Petitioner objects to Exhibit 2023 as irrelevant, lacking foundation, assuming facts not in evidence, calling for legal conclusion, and mischaracterizing evidence. Patent Owner admits that this exhibit is not relevant to any issue in this proceeding. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner.

G. Exhibit 2024 (Sealed and Redacted Versions) (Declaration of Pablo Lema)

Petitioner objects to Exhibit 2024 as irrelevant, lacking foundation, assuming facts not in evidence, and mischaracterizing evidence. Petitioner further objects to the exhibit to the extent that it includes lay opinions for which the factual bases have not been disclosed, for which Mr. Lema does not have personal knowledge (FRE 602), and to the extent that Mr. Lema's opinions constitute inadmissible lay opinion testimony under FRE 701.

Petitioner objects to the portions of the exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue on which trial has been instituted. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least paragraphs 1-5, 7-9, 25, and 26 of the exhibit were not cited or discussed in the Patent Owner Response. Accordingly, at least those paragraphs of the exhibit are objected to as not being relevant to any issue in this proceeding.

H. Exhibit 2025 (Sealed) (ITC Joint Stipulation Regarding Representative Domestic Industry Products)

Petitioner objects to Exhibit 2025 for not being discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner.

I. Exhibit 2026 (Sealed) (Document)

Petitioner objects to Exhibit 2026 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its

consideration would be unfairly prejudicial to Petitioner. Patent Owner cites this exhibit for allegedly discussing rotational velocity, rotational acceleration, and position information. And in particular, pages 1 and 4-10 of the exhibit were not cited or discussed in the Patent Owner Response. Accordingly, at least the exhibit's discussions on anything other than rotational velocity, rotational acceleration, and position information, and pages 1 and 4-10 are objected to as not being relevant to any issue in this proceeding.

J. Exhibits 2027-2029 and 2031-2039 (Sealed) (GoPro Source Code Files)

Petitioner objects to Exhibits 2027-2029 and 2031-2039 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to these exhibits as lacking foundation and lacking authentication under FRE 901. Petitioner objects to these exhibits as containing hearsay to the extent that Patent Owner attempts to rely on them to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that these exhibits are what Patent Owner claims it to be.

Petitioner objects to these exhibits for not being discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent

Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner.

Petitioner objects to these exhibits for being excerpts of the source code files, only reproducing a few lines from the source code. Considering the lines that Patent Owner selectively reproduced in isolation would unfairly prejudice Petitioner because the surrounding lines may be important, providing contextual clues for interpreting them. For the same reason, Petitioner objects to these exhibits as being incomplete copies under FRE 106.

K. Exhibit 2030 (Public) (Hero7 Black Document)

Petitioner objects to Exhibit 2030 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to this exhibit for not being discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. Additionally, if the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent

Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner.

L. Exhibit 2040 (Sealed) (Document)

Petitioner objects to Exhibit 2040 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, Patent Owner cites this exhibit for allegedly discussing advanced video stabilization. Accordingly, at least the exhibit's discussions on anything other than advanced video stabilization are objected to as not being relevant to any issue in this proceeding.

M. Exhibit 2041 (Sealed) (Document)

Petitioner objects to Exhibit 2041 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, Patent Owner cites this exhibit for allegedly discussing buyers selecting Hero11 Black's advanced video stabilization. Accordingly, at least the exhibit's discussions on anything other than buyers selecting Hero11 Black's advanced video stabilization are objected to as not being relevant to any issue in this proceeding.

N. Exhibit 2042 (Public) (GoPro Hero8 Black Article)

Petitioner objects to Exhibit 2042 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least pages 1, 2, and 4-7 were not cited or discussed in the Patent Owner Response. Accordingly, at least those pages of the exhibit are objected to as not being relevant to any issue in this proceeding.

O. Exhibit 2043 (Sealed) (Document)

Petitioner objects to Exhibit 2043 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking

foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least pages 1-3 and 5-14 were not cited or discussed in the Patent Owner Response. Accordingly, at least those pages of the exhibit are objected to as not being relevant to any issue in this proceeding.

P. Exhibit 2044 (Sealed) (Document)

Petitioner objects to Exhibit 2044 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802.

For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least pages 3-7 were not cited or discussed in the Patent Owner Response. Accordingly, at least those pages of the exhibit are objected to as not being relevant to any issue in this proceeding.

Petitioner objects to this exhibit as irrelevant, prejudicial, and misleading (FRE 401-403) to the extent that it is an inaccurate translation. Petitioner also objects to this exhibit under FRE 604 because it does not establish that the interpreter was qualified to produce a true and accurate translation.

Q. Exhibit 2045 (Sealed) (Document)

Petitioner objects to Exhibit 2045 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it

to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least pages 2-4 and 6-51 were not cited or discussed in the Patent Owner Response. Accordingly, at least those pages of the exhibit are objected to as not being relevant to any issue in this proceeding.

Petitioner objects to this exhibit as irrelevant, prejudicial, and misleading (FRE 401-403) to the extent that it is an inaccurate translation. Petitioner also objects to this exhibit under FRE 604 because it does not establish that the interpreter was qualified to produce a true and accurate translation.

R. Exhibit 2046 (Sealed) (Document)

Petitioner objects to Exhibit 2046 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this

exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least pages 2-17 were not cited or discussed in the Patent Owner Response. Accordingly, at least those pages of the exhibit are objected to as not being relevant to any issue in this proceeding.

Petitioner objects to this exhibit as irrelevant, prejudicial, and misleading (FRE 401-403) to the extent that it is an inaccurate translation. Petitioner also objects to this exhibit under FRE 604 because it does not establish that the interpreter was qualified to produce a true and accurate translation.

S. Exhibit 2047 (Sealed) (Document)

Petitioner objects to Exhibit 2047 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking

foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, at least pages 1, 3-6, and 8-24 were not cited or discussed in the Patent Owner Response. Accordingly, at least those pages of the exhibit are objected to as not being relevant to any issue in this proceeding.

Petitioner objects to this exhibit as irrelevant, prejudicial, and misleading (FRE 401-403) to the extent that it is an inaccurate translation. Petitioner also objects to this exhibit under FRE 604 because it does not establish that the interpreter was qualified to produce a true and accurate translation.

T. Exhibit 2048 (Public) (Insta360 Reframing Tool Document)

Petitioner objects to Exhibit 2048 as being irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to this exhibit as lacking foundation and lacking authentication under FRE 901. Petitioner objects to this exhibit as containing hearsay to the extent that Patent Owner attempts to rely on it to prove the truth of any matter described therein under FRE 801 and FRE 802. For example, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of this exhibit not discussed or cited in the Patent Owner Response, as not being relevant to any issue in this proceeding. If the objected to material was not discussed or cited in the Patent Owner Response, Petitioner has had no fair opportunity to respond to Patent Owner's unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly prejudicial to Petitioner. In particular, Patent Owner cites this exhibit for allegedly discussing in-camera electronic image stabilization technology. Accordingly, at least the exhibit's discussions on anything other than discussing in-camera electronic image stabilization technology are objected to as not being relevant to any issue in this proceeding.

Dated: April 25, 2025

Respectfully submitted,

By: */s/ Jean Nguyen*
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Counsel for Petitioner

Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PETITIONER'S OBJECTION TO EVIDENCE SUBMITTED WITH PATENT OWNER'S RESPONSE was served as of the below date on the Patent Owner via e-mail (by agreement) to the following counsel of record:

James M. Glass, Registration No. 46,729
John T. McKee, Registration No. 65,926
Quincy Lu, Registration No. 76,954
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Dated: April 25, 2025

/s/ Jean Nguyen
Jean Nguyen