UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG DISPLAY CO., LTD.
Petitioner

v.

PICTIVA DISPLAYS INTERNATIONAL LTD.,
Patent Owner

Case No. IPR2024-01222
Patent No. 6,949,389

PATENT OWNER'S OBJECTIONS TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Pictiva Displays International Ltd. ("Pictiva"), submits the following objections to evidence accompanying Petitioner's Reply. These objections are timely under 37 C.F.R. § 42.64(b)(1) because they are being filed within five (5) business days of service of Petitioner's Reply to Patent Owner's Response on October 9, 2025.

Pictiva reserves the right to present further objections to these or additional exhibits submitted by Petitioner, as allowed by the applicable rules or other authority, including without limitation upon conclusion of any depositions taken of Petitioner's witnesses.

Evidence	F.R.E. / C.F.R.	Objection(s)
EX1032 (Subramanian Reply Decl.)	F.R.E. 702 & 703 37 C.F.R. §§ 42.65, 42.104	Pictiva objects to ¶¶ 11-51 because Dr. Subramanian's testimony is not based on sufficient facts or data, is not the product of reliable principles and methods, and does not reflect a reliable application of the principles and methods to the facts of the case. Pictiva also objects to these paragraphs to the extent they contain new theories and arguments not present in the original declaration.
EX1028, EX1029, EX1030, EX1031, EX1034	F.R.E. 901 F.R.E. 902	Pictiva objects these documents because Petitioner has not established the authenticity of these documents and provides no testimony by someone possessing personal knowledge that these documents are authentic. Petitioner also provides no evidence that these

Evidence	F.R.E. / C.F.R.	Objection(s)
		exhibits falls within any of the self-authentication exceptions of FRE 902.
EX1028, EX1029, EX1030, EX1031, EX1034	F.R.E. 801	To the extent that Petitioner attempts to rely on the dates in these exhibits to establish public accessibility as printed publications, the dates are hearsay under FRE 801 and do not fall within a hearsay exception under FRE 802 and 803.
EX1033, EX1036	F.R.E. 901, 801-804	Pictiva objects to the exhibits because they are from a different proceeding and Petitioner attempts to rely on the statements therein to prove the truth of the matters allegedly stated in those documents.

Dated: October 17, 2025

Respectfully submitted,

By: */Jonathan Lindsay/*

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on October 17, 2025, a copy of the foregoing **PATENT OWNER'S OBJECTIONS TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)** was served by electronic mail, as agreed to by the parties, upon the following:

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