

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD., AND  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Petitioner,

v.

HARBOR ISLAND DYNAMIC, LLC,  
Patent Owner.

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Case No. IPR2024-01404  
U.S. Patent No. 9,147,609

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**PETITIONER'S OBJECTIONS TO EXHIBITS**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits the following objections to Exhibits 2008, 2010, and 2011. Petitioner's objections apply equally to Patent Owner's reliance on Exhibits 2008, 2010, and 2011 in any subsequently filed documents.

**Exhibits 2008, 2010, and 2011**

Petitioner objects to Exhibits 2008, 2010, and 2011 as irrelevant or, in the alternative, prejudicial, confusing, and a waste of time under Fed. R. Evid. §§ 401, 402, and 403.

For example, Exhibit 2008 appears to be an article, the front page of which notes "ICEP 2014 Proceedings" on the top left. But this is more than 2 years after the alleged critical date of the '609 patent, October 7, 2011. Ex. 1019, 9.

Similarly, Exhibit 2010 appears to be an IEEE article, the front page of which notes "IEEE TRANSACTIONS ON COMPONENTS, PACKAGING AND MANUFACTURING TECHNOLOGY, VOL. 4, NO. 4, APRIL 2014" on the top and bears a "©2014 IEEE" copyright notice on the bottom. This is also more than 2 years after the alleged critical date of the '609 patent.

Additionally, Exhibit 2011 appears to be an article, the front page of which notes "Engineering 38 (2024) 201-208" on the top and bears a "©2024 THE AUTHORS" copyright notice on the bottom. The front page further notes that it

was available online on April 3, 2024. This is more than 12 years after the alleged critical date of the '609 patent.

Therefore, Exhibits 2008, 2010, and 2011 have no relevance to the understanding or knowledge of a POSITA at the time of the alleged invention.

Petitioner also objects to Exhibits 2008, 2010, and 2011 as lacking authentication under Fed. R. Evid. § 901 because sufficient evidence has not been provided to establish their authenticity, dates, or public accessibility prior to the alleged critical date of the '609 patent.

Respectfully submitted,

Dated: July 7, 2025

By: /Joshua Goldberg/  
Joshua Goldberg, Reg. No. 59,369

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **Petitioner's Objections to Exhibits** was served on July 7, 2025, via email directed to counsel of record for Patent Owner at the following:

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Patent Owner has consented to service by email.

Dated: July 7, 2025

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