UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION,
Petitioner,

v.

FACETEC, INC.,
Patent Owner.

Patent No. 10,776,471

Inter Partes Review No. IPR2025-00106

PETITIONER'S OBJECTIONS TO EVIDENCE SUBMITTED WITH PATENT OWNER RESPONSE

Petitioner Jumio Corporation ("Petitioner" or "Jumio") hereby objects to the following evidence that was submitted by Patent Owner FaceTec, Inc. ("Patent Owner" or "FaceTec"), with its Patent Owner Response ("POR") (Paper 43 (sealed), Paper 44)) 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 2033 (U.S. Pub. No. 2025/0161718)

Petitioner objects to Exhibit 2033 as irrelevant and/or unduly prejudicial under FRE 401-403. 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, the exhibit's alleged publication date (May 22, 2025) is several years after the '471 patent's priority date (August 28, 2014). Additionally, Patent Owner offers no evidence that a person of ordinary skill in the art would have relied upon this exhibit at the time of the '471 patent's priority date (May 22, 2025).

Petitioner objects to the portion of this exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 describing securing biometric data. Accordingly, at least the exhibit's disclosures outside of securing biometric data are objected to as not relevant to any issue in this proceeding.

B. Exhibit 2034 (Memorandum Opinion and Order, *Howe v. Speedway LLC*, Case No. 1:19-CV-01374)

Petitioner objects to Exhibit 2034 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Dr. Daft allegedly lacks experience in facial biometric security. Accordingly,

at least the exhibit's discussions outside of Dr. Daft's experience in facial biometric security are objected to as not relevant to any issue in this proceeding.

C. Exhibit 2035 (Motion to Exclude, *CPC Patent Tech v. HMD Global Oy*, Case No. 6:21-cv-00166-ADA)

Petitioner objects to Exhibit 2035 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

D. Exhibit 2036 (FaceTec Article), Exhibit 2037 (iBeta Letter), Exhibit 2038 (BixeLab Letter), Exhibit 2039 (BixeLab Letter), Exhibit 2040 (Praetorian Letter), Exhibit 2041 (FaceTec Article), Exhibit 2078 (iBeta Letter)

Petitioner objects to Exhibits 2036-2041 and Exhibit 2078 as 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 them to be.

Petitioner objects to the portions of the exhibits not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 these exhibits for showing that FaceTec allegedly earned certifications. Accordingly, at least the exhibits' discussions outside of FaceTec's certifications are objected to as not relevant to any issue in this proceeding.

E. Exhibit 2043 (Jumio Article)

Petitioner objects to Exhibit 2043 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Petitioner allegedly recognized a distinction between certified and uncertified methods. Accordingly, at least the exhibit's discussions outside of the distinction between certified and uncertified methods are objected to as not relevant to any issue in this proceeding.

F. Exhibit 2043 (Deepfake Article)

Petitioner objects to Exhibit 2043 as irrelevant and/or unduly prejudicial under FRE 401-403. 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, the exhibit's alleged publication date (October 10, 2019) is several years after the '471 patent's priority date (August 28, 2014). Additionally, Patent Owner offers no evidence that a person of ordinary skill in the art would have relied upon this exhibit at the time of

the ’471 patent’s priority date (May 22, 2025). Further, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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 2044 (Jumio Article)

Petitioner objects to Exhibit 2044 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Petitioner’s marketing materials allegedly featured FaceTec’s technology.

Accordingly, at least the exhibit's discussions outside of Petitioner's marketing materials allegedly featuring FaceTec's technology are objected to as not relevant to any issue in this proceeding.

H. Exhibit 2045 (FaceApp Article)

Petitioner objects to Exhibit 2045 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that FaceTec's technology allegedly fits a face into an oval on the screen. Accordingly, at least the exhibit's discussions outside that FaceTec's technology allegedly fitting a face into an oval on the screen are objected to as not relevant to any issue in this proceeding.

I. Exhibit 2046 (FaceTec Article)

Petitioner objects to Exhibit 2046 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that FaceTec allegedly offers participants a bounty. Accordingly, at least the exhibit's discussions outside of FaceTec allegedly offering a bounty are objected to as not relevant to any issue in this proceeding.

J. Exhibit 2047 (IEEE Article)

Petitioner objects to Exhibit 2047 as irrelevant and/or unduly prejudicial under FRE 401-403. 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, the exhibit's alleged

publication date (December 18, 2014) is several years after the alleged "early 2000s" date for biometric technologies. (POR, 18.) Additionally, Patent Owner fails to offer any evidence that this exhibit is what Patent Owner claims it to be.

Petitioner objects to the portions of the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that biometric technologies allegedly became increasingly common in the early 2000s. Accordingly, at least the exhibit's discussions outside of biometric technologies allegedly becoming increasingly common in the early 2000s are objected to as not relevant to any issue in this proceeding.

K. Exhibit 2048 (Jumio Article) and Exhibit 2049 (Jumio Article)

Petitioner objects to Exhibit 2048 and Exhibit 2049 as irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to these exhibits 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 these exhibits are what Patent Owner claims it to be.

Petitioner objects to the portions of these exhibits not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 these exhibits for showing that Petitioner allegedly added or replaced a liveness detection feature. Accordingly, at least the exhibits' discussions outside of Petitioner adding or replacing a liveness detection feature are objected to as not relevant to any issue in this proceeding.

L. Exhibit 2050 (MIT Technology Review Article)

Petitioner objects to Exhibit 2050 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that there was allegedly skepticism about FaceTec's software-based 3D liveness detection technology. Accordingly, at least the exhibit's discussions outside of allegedly skepticism about FaceTec's software-based 3D liveness detection technology are objected to as not relevant to any issue in this proceeding.

M. Exhibit 2051 (Confidential and Public Versions) (Images)

Petitioner objects to Exhibit 2051 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 1-5 and 7-10 of this exhibit were not cited or discussed in the POR. Accordingly, at least those pages of the exhibit are objected to as not relevant to any issue in this proceeding.

N. Exhibit 2052 (Confidential and Public Versions) (Images)

Petitioner objects to Exhibit 2052 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 4 of this exhibit were not cited or discussed in the POR. Accordingly, at least those pages of the exhibit are objected to as not relevant to any issue in this proceeding.

O. Exhibit 2053 (Confidential and Public Versions) (Images)

Petitioner objects to Exhibit 2053 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 page 1 of this exhibit was not cited or discussed in the POR. Accordingly, at least that page of the exhibit is objected to as not relevant to any issue in this proceeding.

P. Exhibit 2054 (Confidential and Public Versions) (Images)

Petitioner objects to Exhibit 2054 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that there were alleged sessions conducted on FaceTec's app. Accordingly, at least the exhibit's discussions outside of the alleged sessions conducted on FaceTec's app are objected to as not relevant to any issue in this proceeding.

Q. Exhibit 2055 (Confidential and Public Versions) (Images) and Exhibit 2056 (Confidential and Public Versions) (Images)

Petitioner objects to Exhibit 2055 and Exhibit 2056 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 them to be.

Petitioner objects to the portions of these exhibits not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 these exhibits for showing that alleged access to FaceTec's 3D liveness detection technology. Accordingly, at least the portions of the exhibits outside of alleged access to

FaceTec's 3D liveness detection technology are objected to as not relevant to any issue in this proceeding.

R. Exhibit 2057 (Video) and Exhibit 2085 (Machine Transcription of Exhibit 2057)

Petitioner objects to Exhibit 2057 and Exhibit 2085 as irrelevant and/or unduly prejudicial under FRE 401-403. Petitioner objects to these exhibits 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 these exhibits are what Patent Owner claims them to be.

Petitioner objects to the portions of these exhibits not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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, only 11:10 of Exhibit 2057 was cited and discussed in the POR. Accordingly, at least the portions of Exhibit 2057 outside of 11:10 and Exhibit 2085 are objected to as not relevant to any issue in this proceeding.

S. Exhibit 2058 (Confidential and Public Versions) (Sales Transactions)

Petitioner objects to Exhibit 2058 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Petitioner allegedly paid Patent Owner for licensing. Accordingly, at least the exhibit's discussions outside of Petitioner allegedly paying Patent Owner for licensing are objected to as not relevant to any issue in this proceeding.

T. Exhibit 2059 (Confidential and Public Versions) (Declaration of Josh Rose)

Petitioner objects to Exhibit 2059 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. Rose does not have personal knowledge (FRE 602), and to the extent that Mr. Rose's opinions constitute inadmissible lay opinion testimony under FRE 701.

Petitioner objects to the portions of the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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, 26, 29, and 56-127 of this exhibit were not cited or discussed in the POR. Accordingly, at least those paragraphs of the exhibit are objected to as not relevant to any issue in this proceeding.

U. Exhibit 2060 (Declaration of Mina Ching)

Petitioner objects to Exhibit 2060 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 Ms. Ching does not have personal knowledge (FRE 602), and to the extent that Ms. Ching's opinions constitute inadmissible lay opinion testimony under FRE 701.

Petitioner objects to the portions of the exhibit not cited or discussed in

the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 1-4, 6, and 7 of this exhibit were not cited or discussed in the POR. Accordingly, at least those pages of the exhibit are objected to as not relevant to any issue in this proceeding.

V. Exhibit 2061 (Confidential and Public Versions) (Declaration of Matthew Turk, Ph.D.)

Petitioner objects to Exhibit 2061 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. Turk does not have personal knowledge (FRE 602), and to the extent that Dr. Turk's opinions constitute unreliable expert testimony under FRE 702 and 703.

Petitioner objects to the portions of the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 1-28, 30-38, 47, 50, 54-57, 59-62, 76-80, 100-102, 123, 124, 138-141, 179-455, 459-466, 468, 469, and 472-487, and Appendices A-H of this exhibit were not cited or discussed in the POR. Accordingly, at least those paragraphs and Appendices of the exhibit are objected to as not relevant to any issue in this proceeding.

W. Exhibit 2062 (Video)

Petitioner objects to Exhibit 2062 as irrelevant and/or unduly prejudicial under FRE 401-403. 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Patent Owner's alleged marketing of its software's 3D liveness security. Accordingly, at least the exhibit's discussions outside of Patent Owner's alleged

marketing of its software's 3D liveness security are objected to as not relevant to any issue in this proceeding.

X. Exhibit 2063 (FaceTec Report)

Petitioner objects to Exhibit 2063 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

Y. Exhibit 2064 (FaceTec Article)

Petitioner objects to Exhibit 2064 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that alleged industry comments about FaceTec. Accordingly, at least the exhibit's discussions outside of the alleged industry comments about FaceTec are objected to as not relevant to any issue in this proceeding.

Z. Exhibit 2065 (Screenshot from iProov Website)

Petitioner objects to Exhibit 2065 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing certain individuals as iProov employees. Accordingly, at least the exhibit's discussions outside of the alleged showing of certain individuals as iProov employees are objected to as not relevant to any issue in this proceeding.

AA. Exhibit 2066 (LinkedIn Profile of Aarti Samani)

Petitioner objects to Exhibit 2066 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Aarti Samani accessed FaceTec's 3D liveness detection technology. Accordingly, at least the exhibit's discussions outside of the alleged showing that Aarti Samani accessed FaceTec's 3D liveness detection technology are objected to as not relevant to any issue in this proceeding.

BB. Exhibit 2067 (Confidential and Public Versions) (FaceTec Document)

Petitioner objects to Exhibit 2067 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

CC. Exhibit 2068 (FaceTec Request A Quote)

Petitioner objects to Exhibit 2068 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

DD. Exhibit 2069 (Video), Exhibit 2070 (Video), Exhibit 2071 (Video)

Petitioner objects to Exhibit 2069, Exhibit 2070, and Exhibit 2071 as 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 also objects to these exhibits for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

EE. Exhibit 2072 (Video)

Petitioner objects to Exhibit 2072 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that a spoof attempt. Accordingly, at least the exhibit's discussions outside of the alleged spoof attempt are objected to as not relevant to any issue in this proceeding.

FF. Exhibit 2073 (Confidential and Public Versions) (FaceTec Document)

Petitioner objects to Exhibit 2073 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Petitioner allegedly made comments about FaceTec's software. Accordingly,

at least the exhibit's discussions outside of Petitioner's alleged comments about FaceTec's software are objected to as not relevant to any issue in this proceeding.

GG. Exhibit 2074 (Jumio Document)

Petitioner objects to Exhibit 2074 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

HH. Exhibit 2075 (FaceTec Document)

Petitioner objects to Exhibit 2075 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

II. Exhibit 2076 (Jumio Article)

Petitioner objects to Exhibit 2076 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

JJ. Exhibit 2077 (Jumio Article)

Petitioner objects to Exhibit 2077 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Petitioner allegedly released its own liveness detection. Accordingly, at least the exhibit's discussions outside of Petitioner's alleged released of its own liveness detection are objected to as not relevant to any issue in this proceeding.

KK. Exhibit 2079 (Jumio Article)

Petitioner objects to Exhibit 2079 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 showing that Petitioner allegedly described FaceTec's software. Accordingly, at least the exhibit's discussions outside of Petitioner's descriptions of FaceTec's software are objected to as not relevant to any issue in this proceeding.

LL. Exhibit 2080 (iProov Document)

Petitioner objects to Exhibit 2080 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

MM. Exhibit 2081 (U.S. Pub. No. 2025/0121215)

Petitioner objects to Exhibit 2081 as irrelevant and/or unduly prejudicial under FRE 401-403. 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, the exhibit's alleged publication date (April 17, 2025) is several years after the '471 patent's priority date (August 28, 2014). Additionally, Patent Owner offers no evidence that a person of ordinary skill in the art would have relied upon this exhibit at the time of the '471 patent's priority date (May 22, 2025).

Petitioner also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

NN. Exhibit 2082 (Deposition Transcript of Dr. Chris Daft Dated August 29, 2025)

Petitioner objects to Exhibit 2082 for each of the reasons noted in the objections made during the underlying deposition.

Petitioner objects to the portions of the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 1:1-13:7, 13:24-24:9, 25:8-25:19, 26:3-48:1, 51:18-52:2, 53:12-68:12, 68:20-73:25, and 74:12-75:19 of this exhibit were not cited or discussed in the POR. Accordingly, at least those passages of the exhibit are objected to as not relevant to any issue in this proceeding.

OO. Exhibit 2083 (Confidential and Public Versions) (iProov Agreement)

Petitioner objects to Exhibit 2083 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 1-14 and 17-78 of this exhibit were not cited or discussed in the POR. Accordingly, at least those pages of the exhibit are objected to as not relevant to any issue in this proceeding.

PP. Exhibit 2084 (CNET Article)

Petitioner objects to Exhibit 2084 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 3-8 of this exhibit were not cited or discussed in the POR. Accordingly, at least those pages of the exhibit are objected to as not relevant to any issue in this proceeding.

QQ. Exhibit 2086 (Deposition Transcript of Jessica Kaiser Dated October 9, 2025)

Petitioner objects to Exhibit 2086 for each of the reasons noted in the objections made during the underlying deposition.

Petitioner objects to the portions of the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 1:1-10:5, 10:20-12:8, 12:17-13:12, 13:20-14:17, 14:23-16:15, 16:24-28:14, 29:22-38:9, 38:20-41:5, 41:14-44:16, 45:9-62:5, 63:4, 65:11, 66:24-68:13, 69:16-73:9, 73:13-74:7, 74:12-78:13, 79:11-23, 83:16-97:15, 97:25-112:8, and 113:1-127:11 of this exhibit were not cited or discussed in the POR. Accordingly, at least those passages of the exhibit are objected to as not relevant to any issue in this proceeding.

RR. Exhibit 2087 (Declaration of Jessica Kaiser, *FaceTec, Inc. v. Jumio Corporation*, Case No. 5:24-cv-3623-RFL)

Petitioner objects to Exhibit 2087 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

SS. Exhibit 2088 (Declaration of Grant Kinsel, *FaceTec, Inc. v. Jumio Corporation*, Case No. 5:24-cv-3623-RFL)

Petitioner objects to Exhibit 2088 as 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 the exhibit not cited or discussed in the POR, as not relevant to any issue in this proceeding. Since the objected to material was not cited or discussed in the POR, 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 1-6 and 8-15 of this exhibit were not cited or discussed in the POR. Accordingly, at least those paragraphs of the exhibit are objected to as not relevant to any issue in this proceeding.

TT. Exhibit 2089 (Law360 Article)

Petitioner objects to Exhibit 2089 as 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 also objects to this exhibit for not being cited or discussed in the POR. Since the objected to material was not cited or discussed in the POR, 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.

Dated: October 23, 2025

Respectfully submitted,

By: */s/ Jean Nguyen*

Jean Nguyen, Reg. 71,051
MORRISON & FOERSTER LLP
707 Wilshire Blvd., Suite 6000
Los Angeles, CA 90017
Email: JNguyen@mofo.com
Tel: 213-892-5200

Counsel for Petitioner

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

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

Joshua L. Goldberg (Reg. No. 59,369)
Christopher C. Johns (Reg. No. 68,664)
Jason Stach (Reg. No. 54,464)
Chen Zang (Reg. No. 81,568)
Anthony Berlenbach (Reg. No. 77,963)
Kassandra M. Officer (Reg. No. 74,083)
Finnegan, Henderson, Farabow, Garrett, & Dunner LLP
901 New York Avenue NW
Washington, DC 20001-4413
Email: Joshua.Goldberg@finnegan.com
Email: Christopher.Johns@finnegan.com
Email: Jason.Stach@finnegan.com
Email: Chen.Zang@finnegan.com
Email: Anthony.Berlenbach@finnegan.com
Email: Kassandra.Officer@finnegan.com
Email: FaceTec-Jumio-IPRs@finnegan.com

Dated: October 23, 2025

/s/ Jean Nguyen
Jean Nguyen