

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION,
Petitioner,

v.

FACETEC, INC.,
Patent Owner.

Patent No. 11,157,606

Inter Partes Review No. IPR2025-00107

PETITIONER'S MOTION FOR ENTRY OF PROTECTIVE ORDER

Petitioner’s Updated Exhibit List for *Inter Partes* Review of
U.S. Patent No. 11,157,606

Exhibit Description	Exhibit #
U.S. Patent No. 11,157,606 (“the ’606 Patent”)	1001
File History of the ’606 Patent	1002
Declaration of Dr. Chris Daft	1003
Dr. Chris Daft Curriculum Vitae	1004
U.S. Patent 8,437,513 (“Derakhshani”)	1005
U.S. Patent Application Publication 2011/0299741 (“Zhang”)	1006
U.S. Patent Application Publication 2002/0113884 (“Tanii”)	1007
U.S. Patent Application Publication 2014/0028823 (“Tahk”)	1008
U.S. Patent Application Publication 2004/0239799 (“Suzuki”)	1009
U.S. Patent Application Publication 2010/0014720 (“Hoyos”)	1010
U.S. Patent 9,077,891	1011
U.S. Patent 8,965,064	1012
Zhengyou Zhang et al., <i>A Robust Technique for Matching Two Uncalibrated Images Through the Recovery of the Unknown Epipolar Geometry</i> , Institut National De Recherche En Informatique Et En Automatique (May 1994)	1013
U.S. Patent Application Publication 2010/0158319	1014

Exhibit Description	Exhibit #
U.S. Patent Application Publication 2007/0127787	1015
U.S. Patent Application Publication 2004/0036574	1016
Eugene Hect & Alfred Zajac, <i>Optics</i> , Addison-Wesley Publishing Co. (1974)	1017
Anil K. Jain et al., <i>Introduction to Biometrics</i> , Springer (2011)	1018
B. Honlinger & H.H. Nasse, <i>Distortion</i> , Zeiss (Oct. 2009)	1019
Hue and Hatchet, <i>What is the Focal Plane?</i> , https://hueandhatchet.com/what-is-the-focal-plane/	1020
<i>Introduction to Astronomy</i> , https://physics.weber.edu/palen/phsx1040/lectures/ldistcomp.html	1021
Daniel Baker, <i>Face distortion is not due to lens distortion</i> , (May 5, 2012), https://bakerdh.wordpress.com/2012/05/05/face-distortion-is-not-due-to-lens-distortion/	1022
Richard Hartley & Andrew Zisserman, <i>Multiple View Geometry in Computer Vision</i> , Cambridge Univ. Press (2 nd ed. 2011)	1023
Daniel Moreno & Gabriel Taubin, <i>Simple, Accurate, and Robust Projector-Camera Calibration</i> , Brown Univ., mesh.brown.edu/calibration/	1024
Serge Belongie, <i>CSE 252B: Computer Vision II, Lecture 4: Planar Scenes and Homography</i> (Apr. 7, 2004)	1025
Merriam-Webster's Collegiate Dictionary (11 th ed. 2014)	1026
Laurenz Wiskott, <i>Face Recognition by Elastic Bunch Graph Matching</i> (1999)	1027

Exhibit Description	Exhibit #
Axis Communications, <i>CCD and CMOS sensor technology: Technical White Paper</i> (2010)	1028
Jeff Meyer, <i>What is Depth of Field? How aperture, focal length and focus control sharpness</i> , Digital Camera World (July 17, 2013), https://prism.org.gg/wp-content/uploads/2016/07/Depth-of-Field.pdf	1029
Brian Klug, <i>Understanding Camera Optics & Smartphone Camera Trends, A Presentation by Brian Klug</i> , Anandtech (Feb. 22, 2013), https://www.anandtech.com/Show/Index/6777?cPage=2&all=False&sort=0&page=2&slug=understanding-camera-optics-smartphone-camera-trends	1030
<i>Portrait mode now available on iPhone 7 Plus with iOS 10.1</i> , Apple (Oct. 24, 2016)	1031
<i>The Timeline of Evolution of the Camera from the 1600s to 21st Century</i> , Capture.com (May 5, 2023), https://www.capture.com/blogs/insights/evolution-of-the-camera	1032
John Biggs, <i>A Nokia Camera Phone That's More Like a Camera With a Phone Attached</i> , The New York Times (Nov. 29, 2007), https://www.nytimes.com/2007/11/29/technology/personaltech/29phone.html	1033
U.S. Patent 7,412,081	1034
U.S. Patent 8,457,367	1035
U.S. Patent 8,260,008	1036
Zac Hall, <i>Over a decade of selfies, starting with iPhone 4</i> , 9to5Mac (July 1, 2021), https://9to5mac.com/2021/07/01/iphone-4-selfie-celebration/	1037

Exhibit Description	Exhibit #
Duane C. Brown, <i>Decentering Distortion of Lenses</i> , Photogrammetric Engineering (1966)	1038
Complaint, <i>FaceTec, Inc. v. iProov Ltd.</i> , C.A. No. 2:21-cv-02252, ECF No. 1 (D.N.V. Dec. 28, 2021)	1039
First Amended Complaint, <i>FaceTec, Inc. v. iProov Ltd.</i> , C.A. No. 2:21-cv-02252, ECF No. 18 (D.N.V. Feb. 24, 2022)	1040
Minute Entry, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 38 (N.D. Cal. Sept. 18, 2024)	1041
Opposition to Motion to Intervene, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 40 (N.D. Cal. Sept. 30, 2024)	1042
Request for Voluntary Dismissal Without Prejudice, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 45 (N.D. Cal. Oct. 10, 2024)	1043
Opposition to Request for Voluntary Dismissal Without Prejudice, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 49 (N.D. Cal. Oct. 18, 2024)	1044
Reply in Support of Request for Voluntary Dismissal Without Prejudice, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 51 (N.D. Cal. Oct. 25, 2024)	1045
Complaint, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 1 (N.D. Cal. June 14, 2024)	1046
Motion to Intervene, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 36 (N.D. Cal. Sept. 16, 2024)	1047
Order Denying Motion to Voluntarily Dismiss Without Prejudice, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623, ECF No. 52 (N.D. Cal. Nov. 1, 2024)	1048

Exhibit Description	Exhibit #
Declaration of Jessica C. Kaiser	1049
Docket, <i>FaceTec, Inc. v. Jumio Corp.</i> , C.A. No. 24-cv-03623 (N.D. Cal.)	1050
Board Email of April 30, 2025, authorizing Motion to Withdraw	1051
Supporting Declaration of Kyle W.K. Mooney for <i>Pro Hac Vice</i> Admission (“Mooney Decl.”)	1052
Proposed Protective Order (marked-up version)	1053 [NEW]
Proposed Protective Order (clean version)	1054 [NEW]

Petitioner Jumio Corporation (“Petitioner” or “Jumio”) moves for entry of a Protective Order in the above-identified proceeding. Patent Owner FaceTec, Inc. assents to this Motion and agrees to the form of the proposed protective order, which has been modified from the Board’s Default Protective Order. A marked-up version of the proposed Protective Order is being submitted as Exhibit 1053 and a clean version of the proposed Protective Order is being submitted as Exhibit 1054.

Petitioner requests this Motion and reserves the right to request amendments to the proposed Protective Order should either Party seek to introduce documents in this proceeding that would require further protections than provided under the proposed Protective Order.

Dated: August 28, 2025

Respectfully submitted,

By: /s/ Alex S. Yap

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

I hereby certify that the attached PETITIONER'S MOTION FOR ENTRY OF PROTECTIVE ORDER was served as of the below date on the Patent Owner via email (by agreement) to the following counsel of record:

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