

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION,
Petitioner

v.

FACETEC, INC.,
Patent Owner

Case IPR2025-00109
U.S. Patent No. 11,874,910

PATENT OWNER'S OBJECTIONS TO PETITIONER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to certain exhibits submitted by Petitioner. Patent Owner's objections apply equally to Petitioner's reliance on these exhibits in any previously-filed or subsequently-filed documents. These objections are timely, having been filed within ten business days of institution. Patent Owner objects to the following exhibits:

Exhibit	Description
1003	Declaration of Dr. Chris Daft
1013	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
1017	Eugene Hect & Alfred Zajac, <i>Optics</i> , Addison-Wesley Publishing Co.
1018	Anil K. Jain et al., <i>Introduction to Biometrics</i> , Springer
1019	B. Honlinger & H.H. Nasse, <i>Distortion</i> , Zeiss
1020	Hue and Hatchet, <i>What is the Focal Plane?</i> , https://hueandhatchet.com/what-is-the-focal-plane/
1021	<i>Introduction to Astronomy</i> , https://physics.weber.edu/palen/phsx1040/lectures/ldistcomp.html
1022	Daniel Baker, <i>Face distortion is not due to lens distortion</i> , https://bakerdh.wordpress.com/2012/05/05/face-distortion-is-not-due-to-lens-distortion/
1023	Richard Hartley & Andrew Zisserman, <i>Multiple View Geometry in Computer Vision</i> , Cambridge Univ. Press (2 nd ed.)

Exhibit	Description
1024	Daniel Moreno & Gabriel Taubin, <i>Simple, Accurate, and Robust Projector-Camera Calibration</i> , Brown Univ., mesh.brown.edu/calibration/
1025	Serge Belongie, <i>CSE 252B: Computer Vision II, Lecture 4: Planar Scenes and Homography</i>
1026	Merriam-Webster's Collegiate Dictionary (11 th ed.)
1027	Laurenz Wiskott, <i>Face Recognition by Elastic Bunch Graph Matching</i>
1028	Axis Communications, <i>CCD and CMOS sensor technology: Technical White Paper</i>
1029	Jeff Meyer, <i>What is Depth of Field? How aperture, focal length and focus control sharpness</i> , Digital Camera World, https://prism.org.gg/wp-content/uploads/2016/07/Depth-of-Field.pdf
1030	Brian Klug, <i>Understanding Camera Optics & Smartphone Camera Trends</i> , <i>A Presentation by Brian Klug</i> , Anandtech, https://www.anandtech.com/Show/Index/6777?cPage=2&all=False&sort=0&page=2&slug=understanding-camera-optics-smartphone-camera-trends
1031	<i>Portrait mode now available on iPhone 7 Plus with iOS 10.1</i> , Apple
1032	<i>The Timeline of Evolution of the Camera from the 1600s to 21st Century</i> , Capture.com, https://www.capture.com/blogs/insights/evolution-of-the-camera
1033	John Biggs, <i>A Nokia Camera Phone That's More Like a Camera With a Phone Attached</i> , The New York Times, https://www.nytimes.com/2007/11/29/technology/personaltech/29phone.html
1037	Zac Hall, <i>Over a decade of selfies, starting with iPhone 4</i> , 9to5Mac, https://9to5mac.com/2021/07/01/iphone-4-selfie-celebration/

Exhibit	Description
1038	Duane C. Brown, <i>Decentering Distortion of Lenses</i> , Photogrammetric Engineering
1049	Declaration of Jessica C. Kaiser

Exhibit 1003

Patent Owner objects to Exhibit 1003 under Federal Rule of Evidence (“FRE”) 702 as failing to offer the opinion of an expert with requisite scientific, technical, or specialized knowledge. In addition, Petitioner has not demonstrated that Dr. Daft is qualified to provide relevant testimony from the perspective of a person of ordinary skill in the art at the relevant time. *See* Ex. 1003 at ¶¶10-18; Ex. 1004. Patent Owner further objects to Exhibit 1003 under FRE 702 as providing testimony that is not the product of reliable principles and methods. Dr. Daft offers opinions on the background technology, claim construction, disclosures in the prior art, and motivations to combine the prior art without demonstrating that Dr. Daft’s experience allows him to reliably opine on these issues. *See* Ex. 1003 at Sections V-XIV.

Patent Owner further objects to Exhibit 1003 under FRE 802 as inadmissible hearsay if Petitioner does not make Dr. Daft available for a deposition in this proceeding.

Exhibits 1020-1022, 1024, 1029-1033, and 1037

Patent Owner objects to Exhibits 1020-1022, 1024, 1029-1033, and 1037 under FRE 401-403 as being prejudicial, confusing, or a waste of time. These exhibits appear to be web pages from websites and authors that have not been established as providing accurate or reliable information, nor have their purported publication dates been properly established. Patent Owner also objects to these exhibits under FRE 901 as lacking evidence of authentication. And to the extent Petitioner relies on any of the information contained in them for the truth of the matters asserted, including their purported publication dates, Patent Owner objects to the exhibits under FRE 802 as inadmissible hearsay.

Exhibits 1013, 1017-1019, 1023, 1025-1028, and 1038

Patent Owner objects to Exhibits 1013, 1017-1019, 1023, 1025-1028, and 1038 under FRE 401-403 as being prejudicial, confusing, or a waste of time. These exhibits appear to be non-patent literature from publications and authors that have not been established as providing accurate or reliable information, nor have their purported publication dates been properly established. Patent Owner also objects to these exhibits under FRE 901 as lacking evidence of authentication. And to the extent Petitioner relies on any of the information contained in them for the truth of the matters asserted, including their purported publication dates, Patent Owner objects to the exhibits under FRE 802 as inadmissible hearsay.

Exhibit 1049

Patent Owner objects to Exhibit 1049 under FRE 401-403 as being prejudicial, confusing, or a waste of time. This exhibit is a declaration from Petitioner's former counsel, who was disqualified from representing Petitioner in related litigation due to her firm's ethical violations toward Patent Owner. She provided this declaration *after* being disqualified, and it is inappropriate and prejudicial for her or anyone else from the disqualified firm of Perkins Coie to continue to act adverse to FaceTec. Patent Owner further objects to Exhibit 1049 under FRE 802 as inadmissible hearsay if Petitioner does not make the declarant available for a deposition in this proceeding.

Respectfully submitted,

Dated: June 24, 2025

By: /Jason Stach/
Jason Stach
Reg. No. 54,464

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Patent Owner's Objections to Petitioner's Exhibits** was served on June 24, 2025, via email directed to counsel of record for the Petitioner at the following:

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Dated: June 24, 2025

By: /Lisa C. Hines/
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