UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION,
Petitioner,

v.

FACETEC, INC.,
Patent Owner.

Patent No. 11,874,910

Inter Partes Review No. IPR2025-00109

PETITIONER'S MOTION FOR ENTRY OF PROTECTIVE ORDER

Petitioner's Updated Exhibit List for *Inter Partes* Review of U.S. Patent No. 11,874,910

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Eugene Hect & Alfred Zajac, *Optics*, Addison-Wesley Publishing Co. (1974)	1017
Anil K. Jain et al., *Introduction to Biometrics*, Springer (2011)	1018
B. Honlinger & H.H. Nasse, *Distortion*, Zeiss (Oct. 2009)	1019
Hue and Hatchet, *What is the Focal Plane?*, https://hueandhatchet.com/what-is-the-focal-plane/	1020
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Richard Hartley & Andrew Zisserman, *Multiple View Geometry in Computer Vision*, Cambridge Univ. Press (2nd ed. 2011)	1023
Daniel Moreno & Gabriel Taubin, *Simple, Accurate, and Robust Projector-Camera Calibration*, Brown Univ., mesh.brown.edu/calibration/	1024
Serge Belongie, *CSE 252B: Computer Vision II, Lecture 4: Planar Scenes and Homography* (Apr. 7, 2004)	1025
Merriam-Webster's Collegiate Dictionary (11th ed. 2014)	1026
Laurenz Wiskott, *Face Recognition by Elastic Bunch Graph Matching* (1999)	1027

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Axis Communications, *CCD and CMOS sensor technology: Technical White Paper* (2010)	1028
Jeff Meyer, *What is Depth of Field? How aperture, focal length and focus control sharpness*, Digital Camera World (July 17, 2013), https://prism.org.gg/wp-content/uploads/2016/07/Depth-of-Field.pdf	1029
Brian Klug, *Understanding Camera Optics & Smartphone Camera Trends, A Presentation by Brian Klug*, 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
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The Timeline of Evolution of the Camera from the 1600s to 21st Century, Capture.com (May 5, 2023), https://www.capture.com/blogs/insights/evolution-of-the-camera	1032
John Biggs, *A Nokia Camera Phone That's More Like a Camera With a Phone Attached*, The New York Times (Nov. 29, 2007), ttps://www.nytimes.com/2007/11/29/technology/personaltech/29phone.html	1033
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Zac Hall, *Over a decade of selfies, starting with iPhone 4*, 9to5Mac (July 1, 2021), https://9to5mac.com/2021/07/01/iphone-4-selfie-celebration/	1037

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Exhibit Description	Exhibit #
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*
Alex S. Yap, Reg. No.: 60,609
MORRISON & FOERSTER LLP
707 Wilshire Blvd., Suite 6000
Los Angeles, CA 90017
Email: AYap@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 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:

Joshua L. Goldberg (Reg. No. 59,369)
Christopher C. Johns (Reg. No. 68,664)
Chen Zang (Reg. No. 81,568)
Anthony Berlenbach (Reg. No. 77,963)
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: Chen.Zang@finnegan.com
Email: Anthony.Berlenbach@finnegan.com
Email: FaceTec-Jumio-IPRs@finnegan.com

Jason Stach (Reg. No. 54,464)
Finnegan, Henderson, Farabow, Garrett, & Dunner LLP
271 17th Street, NW, Suite 1400
Atlanta, GA 30363-6209
Email: Jason.Stach@finnegan.com

Dated: August 28, 2025

/s/ Alex S. Yap
Alex S. Yap