UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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JUMIO CORPORATION,
Petitioner

v.

FACETEC, INC.,
Patent Owner

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Case IPR2025-00109

U.S. Patent No. 11,874,910

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**PATENT OWNER'S OBJECTIONS TO PETITIONER'S REPLY 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 five business days of institution. Patent Owner objects to the following exhibits:

| Exhibit | Description |
|---|---|
| 1060 | Reply Declaration of Dr. Christopher Daft |
| 1072 | *3D vs. 2D Biometrics, Part 2: Jay Meier on Liveness Detection and Revolutionizing IDV*, ID Tech, https://idtechwire.com/3d-vs-2d-biometrics-part-2-jay-meier-on-liveness-detection-and-revolutionizing-idv/ |
| 1073 | Transcript of *3D vs. 2D Biometrics, Part 2: Jay Meier on Liveness Detection and Revolutionizing IDV* podcast |
| 1084 | Audio of *3D vs. 2D Biometrics, Part 2: Jay Meier on Liveness Detection and Revolutionizing IDV* podcast |

**Exhibit 1060**

Patent Owner objects to Exhibit 1060 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 1060 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. 1060 at Sections II-VII.

Patent Owner further objects to Exhibit 1060 under FRE 802 as inadmissible hearsay if Petitioner does not make Dr. Daft available for a deposition in this proceeding.

**Exhibits 1072, 1073, and 1084**

Patent Owner objects to Exhibits 1072, 1073, and 1084 as incomplete under FRE 106 and therefore unfairly prejudicial and confusing under FRE 403. Exhibits 1072, 1073, and 1084 purport to collectively be directed to the same "Part 2" interview with FaceTec's Jay Meier. Exhibit 1072 purports to be an article related to the interview, Exhibit 1073 purports to be a transcript of a podcast related to the interview, and Exhibit 1084 purports to be the audio recording of the podcast related to the interview, all of which are titled, "3D vs. 2D Biometrics, Part 2: Jay Meier on Liveness Detection and Revolutionizing IDV." Petitioner fails to provide the necessary context for Exhibits 1072, 1073, and 1084 because Petitioner has omitted "Part 1" of the interview with Mr. Meier. Like Part 2, Part 1 is covered in

an article (*3D vs. 2D Biometrics: Talking Photons, Bias, and Perspective Distortion with FaceTec's Jay Meier*, ID Tech (Jan. 7, 2025), https://idtechwire.com/3d-vs-2d-biometrics-talking-photons-bias-and-perspective-distortion-with-facetecs-jay-meier/) as well as a podcast (*3D vs. 2D Biometrics: Talking Photons, Bias, and Perspective Distortion with FaceTec's Jay Meier (Part 1)* podcast, *available at* https://idtalk.transistor.fm/episodes/3d-vs-2d-biometrics-talking-photons-bias-and-perspective-distortion-with-facetecs-jay-meier-part-1). The articles and podcasts pertaining to these two interviews "in fairness ought to be considered at the same time." FRE 106. Otherwise, Exhibits 1072, 1073, and 1084 should be excluded as unfairly prejudicial and confusing under FRE 403.

Date: January 28, 2026

Respectfully submitted,

/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 Reply Exhibits** was served on January 28, 2026, via email directed to counsel of record for the Petitioner at the following:

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Dated: January 28, 2026

By: /Daniel E. Doku/
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