

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner.

IPR2025-00217
U.S. Patent No. 10,952,153

**PETITIONER'S OBJECTIONS TO EVIDENCE FILED
WITH THE PATENT OWNER PRELIMINARY RESPONSE**

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence

("FRE"), Petitioner Tesla, Inc. ("Petitioner") hereby objects to the following documents filed by Patent Owner Intellectual Ventures II LLC ("Patent Owner") with its Patent Owner Preliminary Response filed April 9, 2025. These objections are timely filed within 10 business days of the institution of the trial.

A. Exhibit 2010

FRE 901, 902: Petitioner objects to Exhibit 2010 as not properly authenticated under FRE 901 because Patent Owner has not presented evidence sufficient to support a finding that the document in question is what Patent Owner claims. There is no evidence that the document is self-authenticating under FRE 902.

FRE 401: Petitioner objects to Exhibit 2010 as not relevant because it is not cited or relied upon in the Patent Owner Preliminary Response.

B. Exhibit 2011

FRE 901, 902: Petitioner objects to Exhibit 2011 as not properly authenticated under FRE 901 because Patent Owner has not presented evidence sufficient to support a finding that the document in question is what Patent Owner claims. There is no evidence that the document is self-authenticating under FRE 902.

FRE 401: Petitioner objects to Exhibit 2011 as not relevant because it is not cited or relied upon in the Patent Owner Preliminary Response.

C. Exhibit 2012

FRE 901, 902: Petitioner objects to Exhibit 2012 as not properly authenticated under FRE 901 because Patent Owner has not presented evidence sufficient to support a finding that the document in question is what Patent Owner claims. There is no evidence that the document is self-authenticating under FRE 902.

FRE 401: Petitioner objects to Exhibit 2012 as not relevant because it is not cited or relied upon in the Patent Owner Preliminary Response.

D. Exhibit 2013

FRE 901, 902: Petitioner objects to Exhibit 2013 as not properly authenticated under FRE 901 because Patent Owner has not presented evidence sufficient to support a finding that the document in question is what Patent Owner claims. There is no evidence that the document is self-authenticating under FRE 902.

FRE 401: Petitioner objects to Exhibit 2013 as not relevant because it is not cited or relied upon in the Patent Owner Preliminary Response.

Respectfully submitted,

Dated: July 11, 2025
HAYNES AND BOONE, LLP
2801 N. Harwood St., Suite 2300
Dallas, Texas 75201
Customer No. 27683

/Scott T. Jarratt/
Scott T. Jarratt
Lead Counsel for Petitioner
Registration No. 70,297

CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e),
service was made on Patent Owner as detailed below.

Date of service July 11, 2025

Manner of service Electronic Service by E-mail: BTheiss@vklaw.com;
DGolub@vklaw.com; RODonnell@vklaw.com;
RLeonard@vklaw.com; rrigby@intven.com

Documents served **Petitioner's Objections to Evidence Filed With the
Patent Owner Preliminary Response**

Persons served Brandon R. Theiss
Daniel H. Golub
Ryan W. O'Donnell
Robert D. Leonard
VOLPE KOENIG
30 S. 17th Street, Suite 1800
Philadelphia PA 19103

Russell J. Rigby
Intellectual Ventures II LLC
3150 139th Avenue Southeast Building
4 Bellevue, WA 98005

/Scott T. Jarratt/
Scott T. Jarratt
Lead Counsel for Patent Owner
Registration No. 70,297