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.

IPR2025-00221
U.S. Patent No. 11,664,889 B2

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 2015

FRE 901, 902: Petitioner objects to Exhibit 2015 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.

Respectfully submitted,

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

Dated: July 21, 2025
HAYNES AND BOONE, LLP
2801 N. Harwood St., Suite 2300
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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 21, 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**

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