

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSARA INC.
Petitioner

v.

MOTIVE TECHNOLOGIES, INC.
Patent Owner

Case IPR2025-00574
U.S. Patent No. 11,875,580

PETITIONER’S OBJECTIONS TO EVIDENCE

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner objects to Exhibit 2007 (the “Challenged Evidence”) under the Federal Rules of Evidence (FRE) Rules 106 and 401-403, and 37 C.F.R. § 42.23(b). Patent Owner filed and served Exhibit 2007 on March 25, 2026, with Patent Owner’s Sur-Reply to Petitioner’s Reply. Petitioner’s objections are therefore timely filed under 37 C.F.R. § 42.64(b)(1), within five business days of service of the evidence to which the objections are directed. Petitioner files these objections to provide notice to Patent Owner that Petitioner may move to exclude the Challenged Evidence under 37 C.F.R. § 42.64(c).

II. IDENTIFICATION OF GROUNDS FOR OBJECTIONS TO EX2007

Exhibit 2007 is an appendix to a Joint Claim Construction and Prehearing Statement filed in *Motive Technologies Inc. v. Samsara Inc.*, 3:24-cv-00902 (NDCA) on January 15, 2026. Petitioner objects to Exhibit 2007 under FRE Rules 106 and 401-403, and 37 C.F.R. § 42.23(b).

A. FRE Rules 401-403

Petitioner objects to Exhibit 2007 under FRE 401, 402, and 403 for including information that is irrelevant or whose probative value to any ground upon which trial is instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, or wasting time. Particularly, Exhibit 2007 includes proposed claim constructions that are outdated and do not accurately reflect the parties’ claim constructions in the district court. *See, e.g., Motive Techs.,*

Inc. v. Samsara Inc., Case 3:24-cv-00902, Plaintiff Motive Techs., Inc.’s Opening Claim Construction Brief, Dkt. 172, p. 12 n.3 (Mar. 12, 2026) (“On March 5, 2026, Samsara changed its claim construction proposal for ‘predictive model’ . . . to ‘plain and ordinary meaning.’”); Dkt. 179 at 10-14 (Samsara’s Responsive Claim Construction Brief, proposing plain and ordinary meaning for “predictive model”).

B. FRE Rule 106

Petitioner objects to Exhibit 2007 under FRE 106 because it is incomplete. As explained above in the objections under FRE 401-403, the exhibit omits the parties’ current proposed constructions and statements from the district court case, which in fairness ought to be considered at the same time.

C. 37 C.F.R. § 42.23(b)

Petitioner also objects to Exhibit 2007 as improper new evidence accompanying a sur-reply. Under 37 C.F.R. § 42.23(b), “[a] sur-reply may only respond to arguments raised in the corresponding reply and may *not* be accompanied by new evidence other than deposition transcripts of the cross-examination of any reply witness.” *See also* Paper 13, p. 6 (“The sur-reply may not be accompanied by new evidence . . .”). Patent Owner did not have prior Board authorization to file Exhibit 2007 with its sur-reply. Additionally, Exhibit 2007 does not respond to arguments raised in the Petitioner’s Reply.

III. CONCLUSION

To the extent Patent Owner fails to correct the defects associated with the Challenged Evidence in view of Petitioner's objections herein, Petitioner may file a motion to exclude the Challenged Evidence under 37 C.F.R. § 42.64(c).

Respectfully submitted,

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Date: April 1, 2026

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PETITIONER’S OBJECTIONS TO EVIDENCE** was served in its entirety on April 1, 2026 upon the following parties via electronic mail:

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