

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 UPDATED EXHIBIT LIST

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Patent Trial and Appeal Board
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Alexandria, VA 22313-1450

Petitioner files this Updated Exhibit List to accompany filing of Exhibit

1088, Petitioner's Oral Hearing Demonstratives.

Exhibit	Description
1001	U.S. Patent No. 11,875,580 to Hassan <i>et al.</i> ("Hassan")
1002	Prosecution History of U.S. Patent No. 11,875,580
1003	Declaration of Dr. Trevor Darrell
1004	<i>Curriculum Vitae</i> of Dr. Trevor Darrell
1005	U.S. Publication No. 2020/0410704 to Choe <i>et al.</i> ("Choe")
1006	Figures of U.S. Patent Application Publication No. 2020/0410704 to Choe <i>et al.</i> , available at the USPTO SCORE Database via Patent Center
1007	Khan <i>et al.</i> , "Lane Detection Using Lane Boundary Marker Network with Road Geometry Constraints," available at https://ieeexplore.ieee.org/document/9093296 (May 14, 2020) and https://openaccess.thecvf.com/content_WACV_2020/html/Khan_Lane_detection_using_lane_boundary_marker_network_with_road_geometry_WACV_2020_paper.html (Mar. 2020) ("Khan")
1008	Ali <i>et al.</i> , "Real-Time Vehicle Distance Estimation using Single View Geometry," available at https://ieeexplore.ieee.org/document/9093634 (May 14, 2020) and https://openaccess.thecvf.com/content_WACV_2020/papers/Ali_Real-time_vehicle_distance_estimation_using_single_view_geometry_WACV_2020_paper.pdf (Mar. 2020) ("Ali")
1009	He <i>et al.</i> , "Mask R-CNN" Version 3, available at https://arxiv.org/abs/1703.06870 (Jan. 24, 2018) ("He")
1010	PCT Application Publication No. PCT/EP2019/056356 to Westmacot <i>et al.</i> ("Westmacot")
1011	Scott Workman and Menghua Zhai and Nathan Jacobs, "Horizon Lines in the Wild," available at https://arxiv.org/abs/1604.02129 ("Workman")

Exhibit	Description
1012	L. Jiao, <i>et al.</i> , "A Survey of Deep Learning-Based Object Detection," IEEE Access vol. 7, p 128,837-128,868, 2019, <i>available at</i> https://arxiv.org/abs/1907.09408 . ("Jiao")
1013	B. C. Russell and A. Torralba, "Building a database of 3D scenes from user annotations," 2009 IEEE Conference on Computer Vision and Pattern Recognition, Miami, FL, USA, 2009, p 2711-2718 ("Russell")
1014	V. Bartl and A. Herout, "Fully Automatic Horizon Estimation for Surveillance Cameras," 2017 International Conference on Digital Image Computing: Techniques and Applications (DICTA), Sydney, NSW, Australia, 2017, p 1-8 ("Bartl")
1015	W. Rawat and Z. Wang, "Deep Convolutional Neural Networks for Image Classification: A Comprehensive Review," in Neural Computation, vol. 29, no. 9, p 2352-2449, Sept. 2017 ("Rawat")
1016	Declaration of Sylvia D. Hall-Ellis, Ph.D.
1017	Sylvia D. Hall-Ellis, Ph.D. Curriculum Vitae
1018	Attachment 1A to the Hall-Ellis Declaration – MARC Record for Ali
1019	Attachment 1B to the Hall-Ellis Declaration – MARC Record for Ali
1020	Attachment 1C to the Hall-Ellis Declaration – LOC Entry for Computer Vision Congresses
1021	Attachment 1D to the Hall-Ellis Declaration – LOC Entry for Optical Pattern Recognition Congresses
1022	Attachment 1E to the Hall-Ellis Declaration – IEEE Xplore Page for Ali, <i>available at</i> https://ieeexplore.ieee.org/document/9093634
1023	Attachment 1F to the Hall-Ellis Declaration – IEEE Digital Library Page for Ali, <i>available at</i> https://www.computer.org/csdl/proceedings-article/wacv/2020/09093634/1jPbBO7T7ji
1024	Attachment 1G to the Hall-Ellis Declaration – ResearchGate Page for Ali, <i>available at</i> https://www.researchgate.net/publication/341400645_Real-time_vehicle_distance_estimation_using_single_view_geometry

Exhibit	Description
1025	Attachment 1H to the Hall-Ellis Declaration – SemanticScholar Page for Ali, <i>available at</i> https://www.semanticscholar.org/paper/Real-time-vehicle-distance-estimation-using-single-Ali-Hassan/1d48563e016ef0932c49a977944fafe61c4dea77
1026	Attachment 1I to the Hall-Ellis Declaration – SJSU Library Page for Ali, <i>available at</i> https://csu-sjsu.primo.exlibrisgroup.com/discovery/fulldisplay?docid=alma991072196389102901&context=L&vid=01CALS_SJO:01CALS_SJO&lang=en&search_scope=MyInst_and_CI&adaptor=Local%20Search%20Engine&tab=Everything&query=any,contains,2020%20IEEE%20Winter%20Conference%20on%20Applications%20of%20Computer%20Vision
1027	Attachment 1J to the Hall-Ellis Declaration – WorldCat for Ali, <i>available at</i> https://search.worldcat.org/title/1183029756
1028	Attachment 2A to the Hall-Ellis Declaration – MARC Record for He
1029	Attachment 2B to the Hall-Ellis Declaration – MARC Record for He
1030	Attachment 2C to the Hall-Ellis Declaration – IEEE Xplore Page for He, <i>available at</i> https://ieeexplore.ieee.org/document/8237584
1031	Attachment 2D to the Hall-Ellis Declaration – arXiv Page for He, <i>available at</i> https://arxiv.org/abs/1703.06870
1032	Attachment 2E to the Hall-Ellis Declaration – SJSU Library Page for Ali, <i>available at</i> https://csu-sjsu.primo.exlibrisgroup.com/discovery/fulldisplay?docid=alma991068786465502901&context=L&vid=01CALS_SJO:01CALS_SJO&lang=en&search_scope=MyInst_and_CI&adaptor=Local%20Search%20Engine&tab=Everything&query=any,contains,2017%20IEEE%20International%20Conference%20on%20Computer%20Vision%20Workshops
1033	Attachment 2F to the Hall-Ellis Declaration – WorldCat for He, <i>available at</i> https://search.worldcat.org/title/1048182166
1034	He <i>et al.</i> , “Mask R-CNN,” <i>available at</i> https://ieeexplore.ieee.org/document/8237584
1035	Attachment 3A to the Hall-Ellis Declaration – MARC Record for Khan

Exhibit	Description
1036	Attachment 3B to the Hall-Ellis Declaration – MARC Record for Khan
1037	Attachment 3C to the Hall-Ellis Declaration – IEEE Xplore Page for Khan, <i>available at</i> https://ieeexplore.ieee.org/document/9093296
1038	Attachment 3D to the Hall-Ellis Declaration – ResearchGate for Khan, <i>available at</i> https://www.researchgate.net/publication/341400531_Lane_detection_using_lane_boundary_marker_network_with_road_geometry_constraints
1039	Attachment 3E to the Hall-Ellis Declaration – SJSU Library Page for Khan, <i>available at</i> https://csu-sjsu.primo.exlibrisgroup.com/discovery/fulldisplay?docid=alma991072196389102901&context=L&vid=01CALS_SJO:01CALS_SJO&lang=en&search_scope=MyInst_and_CI&adaptor=Local%20Search%20Engine&tab=Everything&query=any,contains,2020%20IEEE%20Winter%20Conference%20on%20Applications%20of%20Computer%20Vision
1040	Attachment 3F to the Hall-Ellis Declaration – WorldCat for Khan, <i>available at</i> https://search.worldcat.org/title/1183029756
1041	Attachment 4A to the Hall-Ellis Declaration – MARC Record for Workman
1042	Attachment 4B to the Hall-Ellis Declaration – LOC Entry for Image Processing Congresses
1043	Attachment 4C to the Hall-Ellis Declaration – LOC Entry for Artificial Intelligence Congresses
1044	Attachment 4D to the Hall-Ellis Declaration – Collection of Abstracts from the British Machine Vision Conference 2016
1045	Attachment 4E to the Hall-Ellis Declaration – Proceedings of the British Machine Vision Conference 2016, <i>available at</i> https://bmva-archive.org.uk/bmvc/2016/toc.html
1046	Attachment 4F to the Hall-Ellis Declaration – Proceedings of the British Machine Vision Conference 2016 Foreword, <i>available at</i> https://bmva-archive.org.uk/bmvc/2016/index.html

Exhibit	Description
1047	Attachment 4G to the Hall-Ellis Declaration – British Machine Vision Conference 2016 Page for Workman, <i>available at</i> https://bmva-archive.org.uk/bmvc/2016/papers/paper020/index.html
1048	Attachment 4H to the Hall-Ellis Declaration – arXiv Page for Workman, <i>available at</i> https://arxiv.org/abs/1604.02129
1049	Attachment 4I to the Hall-Ellis Declaration – Multimodal Vision Research Laboratory Page for Workman, <i>available at</i> https://mvrl.cse.wustl.edu/datasets/hlw/
1050	Attachment 4J to the Hall-Ellis Declaration – ResearchGate Page for Workman, <i>available at</i> https://www.researchgate.net/publication/317193732_Horizon_Lines_in_the_Wild
1051	Attachment 4K to the Hall-Ellis Declaration – BMVC History and Description, <i>available at</i> https://www.bmva.org/bmvc
1052	Attachment 4L to the Hall-Ellis Declaration – WorldCat for Workman, <i>available at</i> https://search.worldcat.org/title/34231812
1053	Khan YouTube Video (Mar. 20, 2020), <i>available at</i> https://www.youtube.com/watch?v=Lj-FylnEboQ&t=3280s
1054	Khan YouTube Webpage (Mar. 20, 2020), <i>available at</i> https://www.youtube.com/watch?v=Lj-FylnEboQ&t=3280s
1055	Ali YouTube Video (Mar. 20, 2020), <i>available at</i> https://www.youtube.com/watch?v=0RYqfwR5YNk
1056	Ali YouTube Webpage (Mar. 20, 2020), <i>available at</i> https://www.youtube.com/watch?v=0RYqfwR5YNk
1057	U.S. Patent Application Publication No. 2019/0034740 to Kwant <i>et al.</i> (“Kwant1”)
1058	U.S. Patent Application Publication No. 2019/0102674 to Kwant <i>et al.</i> (“Kwant2”)
1059	Complaint, <i>Motive Technologies Inc. f/k/a Keep Truckin, Inc. v. Samsara Inc.</i> , Case No. 3:24-cv-00902 (N.D. Cal.), Dkt. 1, February 15, 2024
1060	Order, <i>Motive Technologies Inc. f/k/a Keep Truckin, Inc. v. Samsara Inc.</i> , Case No. 3:24-cv-00902 (N.D. Cal.), Dkt. 52, June 4, 2024

Exhibit	Description
1061	Transcript of the deposition of Scott Andrews
1062	IEEE Intelligent Vehicles Symposium, <i>available at</i> https://ieeetitss.org/conf/iv/
1063	Mobileye About, <i>available at</i> https://www.mobileye.com/about/ [Including PDF of webpages and screen shots for clarity]
1064	<i>Intel buys driverless car technology firm Mobileye</i> , BBC News (Mar. 13, 2017), <i>available at</i> https://www.bbc.co.uk/news/business-39253422
1065	<i>BMW Group, Intel and Mobileye Team Up to Bring Fully Autonomous Driving to Streets by 2021</i> , BMW Group (Jan. 7, 2016), <i>available at</i> https://www.press.bmwgroup.com/global/article/detail/T0261586EN/bmw-group-intel-and-mobileye-team-up-to-bring-fully-autonomous-driving-to-streets-by-2021
1066	<i>The Road to Autonomous Driving: How BMW and Mobileye are Crowdsourcing Real-Time Data</i> , fxis.ai (Sept. 6, 2014), <i>available at</i> https://fxis.ai/edu/the-road-to-autonomous-driving-how-bmw-and-mobileye-are-crowdsourcing-real-time-data/
1067	F. Wu et al., “Decentralized Vehicle Coordination: The Berkeley DeepDrive Drone Dataset and Consensus-Based Models,” 2025 IEEE International Conference on Robotics and Automation (ICRA), Atlanta, GA, USA, 2025, pp. 2438-2444, doi: 10.1109/ICRA55743.2025.11127341. (https://ieeexplore.ieee.org/abstract/document/11127341)
1068	Fisher Yu and Haofeng Chen and Xin Wang and Wenqi Xian and Yingying Chen and Fangchen Liu and Vashisht Madhavan and Trevor Darrell, “BDD100K: Images 100K Dataset,” (2020) <i>available at</i> https://datasetninja.com/bdd100k
1069	F. Yu et al., “BDD100K: A Diverse Driving Dataset for Heterogeneous Multitask Learning,” 2020 IEEE/CVF Conference on Computer Vision and Pattern Recognition (CVPR), Seattle, WA, USA, 2020, pp. 2633-2642, doi: 10.1109/CVPR42600.2020.00271.
1070	Vijay Govindarajan, “Adaptive Prediction and Planning for Safe and Effective Autonomous Vehicles,” EECS Department, University of

Exhibit	Description
	California, Berkeley, Technical Report No. UCB/EECS-2021-263, December 17, 2021, https://www2.eecs.berkeley.edu/Pubs/TechRpts/2021/EECS-2021-263.html
1071	Yang Gao and Trevor Darrell, “End to End Learning in Autonomous Driving Systems,” EECS Department, University of California, Berkeley, Technical Report No. UCB/EECS-2020-5, January 8, 2020, https://www2.eecs.berkeley.edu/Pubs/TechRpts/2020/EECS-2020-5.html
1072	NVIDIA Video (December 7, 2016), <i>available at</i> https://www.youtube.com/watch?v=eeR5xDaNCJ8&pp=ygUOdHJldm9yIGRhcnJlbGw%3D
1073	NVIDIA Webpage (December 7, 2016), <i>available at</i> https://www.youtube.com/watch?v=eeR5xDaNCJ8&pp=ygUOdHJldm9yIGRhcnJlbGw%3D
1074	2017 BEARS: Panel 1 Video (February 21, 2017), <i>available at</i> https://www.youtube.com/watch?v=ltbufoOON8Y
1075	2017 BEARS: Panel 1 Webpage (February 21, 2017), <i>available at</i> https://www.youtube.com/watch?v=ltbufoOON8Y
1076	Harris, Mark, <i>The AI Dashcam App That Wants to Rate Every Driver in the World</i> , IEEE Spectrum (Jun. 15, 2016), <i>available at</i> https://spectrum.ieee.org/the-ai-dashcam-app-that-wants-to-rate-every-driver-in-the-world
1077	Trevor Darrell – EECS at UC Berkeley, <i>available at</i> https://www2.eecs.berkeley.edu/Faculty/Homepages/darrell.html
1078	PATH Directory, https://path.berkeley.edu/people/path-directory/
1079	About Us – PATH, https://path.berkeley.edu/about-us/
1080	PATH – Institute of Transportation Studies, <i>available at</i> https://its.berkeley.edu/research-centers/path
1081	Berkeley DeepDrive, <i>available at</i> https://deepdrive.berkeley.edu/
1082	Berkeley DeepDrive – Institute of Transportation Studies, <i>available at</i> https://its.berkeley.edu/research-centers/berkeley-deepdrive

Exhibit	Description
1083	Mobileye Algorithms Developers, <i>available at</i> https://web.archive.org/web/20161228222811/http://careers.mobileye.com/Job-Search/R-D-Job-Description/Algorithms-Developers/28375.aspx [Including PDF of webpages and screen shots for clarity]
1084	Ahmed Elgammal, <i>CS534 – Computer Vision Camera Calibration</i> , Rutgers University, <i>available at</i> https://people.cs.rutgers.edu/~elgammal/classes/cs534/lectures/Calibration.pdf
1085	Declaration of Dr. Trevor Darrell in Support of Petitioner’s Reply
1086	Motive’s Opening Claim Construction Brief, <i>Motive Techs, Inc. v. Samsara Inc.</i> , Case No. 3:24-cv-00902 (NDCA March 12, 2026)
1087	Samsara’s Responsive Claim Construction Brief, <i>Motive Techs, Inc. v. Samsara Inc.</i> , Case No. 3:24-cv-00902 (NDCA March 26, 2026)
1088	Petitioner’s Oral Hearing Demonstratives

Respectfully submitted,

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

I certify that the above-captioned **PETITIONER'S UPDATED EXHIBIT LIST** and **EXHIBIT 1088** were served in their entireties on May 21, 2026 upon the following parties via electronic mail:

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