

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

CM HK LIMITED,
Patent Owner.

Case IPR2025-01023
Patent No. 10,852,846

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64, Petitioner submits the following objections to evidence served with Patent Owner's Response and accompanying exhibits. Petitioner's objections apply equally to Patent Owner's reliance on these exhibits in any subsequently filed documents or concurrently filed documents (e.g., the Patent Owner's Response and Ex. 2040). These objections are timely, having been served within five business days after Patent Owner served its Response and accompanying exhibits on April 6, 2026.

Exhibits 2036 and 2037

Petitioner objects to Exhibits 2036 and 2037 under FRE 801 and 802 to the extent Patent Owner relies on prior-case expert reports, declarations, or other advocacy materials to prove the truth of technical or legal propositions asserted in other proceedings, including asserted prior claim-construction, noninfringement, and invalidity positions concerning "predicted axial accelerations." Petitioner further objects to these exhibits under FRE 702 to the extent Patent Owner seeks to rely on opinions from other proceedings as substantive expert testimony in this proceeding, absent an independent showing of admissibility on the record here. Petitioner further objects to these exhibits under FRE 401, 402, and 403 because they lack relevance and arise from different proceedings, records, and issues, and any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, misleading the Board, undue delay, and/or needlessly presenting cumulative

evidence. Furthermore, Petitioner objects to Exhibit 2036 under FRE 106 as being incomplete.

Exhibit 2039

Petitioner objects to Exhibit 2039 under FRE 901 for lacking authentication. Exhibit 2039 appears to be a compiled exhibit drawn from other proceedings and used here as substantive historical and technical background. Patent Owner has not produced evidence sufficient to support a finding that the exhibit is what Patent Owner claims it is. Petitioner further objects to Exhibit 2039 under FRE 801 and 802 to the extent Patent Owner relies on any constituent material contained in Exhibit 2039 to prove the truth of the matters asserted therein. Petitioner further objects to Exhibit 2039 under FRE 401, 402, and 403 because any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, misleading the Board, undue delay, and/or needlessly presenting cumulative evidence.

Exhibits 2041 and 2042

Petitioner further objects to Exhibits 2041 and 2042 under FRE 801 and 802 to the extent Patent Owner relies on any constituent material contained therein to prove the truth of the matters asserted therein. Petitioner further objects to these exhibits under FRE 401, 402, and 403 because any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, misleading the Board, undue delay, and/or needlessly presenting cumulative evidence.

Exhibits 2045 and 2046

Petitioner objects to Exhibits 2045 and 2046 under FRE 901 for lacking authentication. The exhibits consist of online news articles or webpage materials. Patent Owner has not produced evidence sufficient to support a finding that either exhibit is what Patent Owner claims it is. Patent Owner has not established when, where, or how either exhibit was published or captured. Petitioner further objects to Exhibits 2045 and 2046 under FRE 801 and 802 to the extent Patent Owner relies on them to prove the truth of the matters asserted therein. Petitioner further objects to Exhibits 2045 and 2046 under FRE 401, 402, and 403 because Patent Owner relies on these third-party news/webpage materials to support its asserted foreign-government real party-in-interest theory, and any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, misleading the Board, undue delay, and/or needlessly presenting cumulative evidence.

Respectfully submitted,

Dated: April 13, 2026

By: /Naveen Modi/
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Counsel for Petitioner

CERTIFICATE OF SERVICE

I certify that I caused to be served on the counsel identified below a true and correct copy of the foregoing Petitioner's Objections to Evidence by electronic means on April 13, 2026:

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