

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INFINEON TECHNOLOGIES AMERICAS CORP.,
Petitioner

v.

MOSAID TECHNOLOGIES INC.,
Patent Owner

Case IPR2025-01171
Patent 7,051,306

PATENT OWNER'S OBJECTIONS PURSUANT TO 37 C.F.R. § 42.64(b)(1)

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence (“FRE”), Patent Owner MOSAID Technologies Inc. hereby objects to the following documents submitted by Petitioner Infineon Technologies Americas Corp.

Nothing in this paper should be construed as an admission that any rights of Patent Owner would have been waived or forfeited had the paper or any objection herein not been filed, or that 37 C.F.R. § 42.64(b) applies to any of the objections herein if § 42.64(b) would not otherwise apply. The objections herein are premised upon § 42.64 potentially being determined to apply to the document in question, and are submitted solely to preserve the rights of Patent Owner should § 42.64(b) be determined to apply.

1. Exhibit 1002

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original.

2. Exhibit 1003

Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 401/402/403/702, this document

includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/705 and 37 C.F.R. § 42.65, this document includes testimony on patent law and practice.

3. Exhibit 1004

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data.

4. Exhibit 1005

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or

methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 401/402/403/702 and 37 C.F.R. § 42.65, this document is inadmissible to the extent that it is conclusory and does not disclose bases for the opinions offered therein. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document includes testimony on patent law and practice.

5. Exhibit 1016

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is

a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

6. Exhibit 1017

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

7. Exhibit 1018

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other

considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

8. Exhibit 1019

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is

a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

9. Exhibit 1020

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

10. Exhibit 1021

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other

considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

11. Exhibit 1022

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is

a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

12. Exhibit 1023

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

13. Exhibit 1024

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document or documents are inadmissible as irrelevant because, among other things, they do not form a basis of the instituted grounds, and their probative value is outweighed by other considerations including prejudice, confusion and waste of

time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

14. Exhibit 1025

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C.

§ 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

15. Exhibit 1026

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

16. Exhibit 1028

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 801/802, this document constitutes and

contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

17. Exhibit 1029

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is

outweighed by other considerations including prejudice, confusion and waste of time.

18. Exhibit 1030

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

19. Exhibit 1031

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of

the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

20. Exhibit 1032

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

21. Exhibit 1036

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original.

22. Exhibit 1037

Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

23. Exhibit 1038

Under FRE 1002 and 37 C.F.R. § 42.63, this document is not shown to be filed with the purportedly translated document and is not shown to be certified. Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

24. Exhibit 1039

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

25. Exhibit 1040

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

26. Exhibit 1041

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

27. Exhibit 1042

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

28. Exhibit 1043

Under FRE 801/802, this document constitutes and contains inadmissible hearsay. Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

29. Exhibit 1044

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

30. Exhibit 1045

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

31. Exhibit 1046

Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 401/402/403/702 and 37 C.F.R. § 42.65, this document is inadmissible to the extent that it is conclusory and does not disclose bases for the opinions offered therein. Under FRE 401/705 and 37 C.F.R. § 42.65, this document includes testimony on patent law and practice.

32. Exhibit 1047

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

33. Exhibit 1048

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

34. Exhibit 1049

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

35. Exhibit 1050

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

36. Exhibit 1051

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

37. Exhibit 1052

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

38. Exhibit 1053

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

39. Exhibit 1054

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

40. Exhibit 1055

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

41. Exhibit 1056

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

42. Exhibit 1057

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

43. Exhibit 1058

Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 401/402/403/702 and 37 C.F.R. § 42.65, this document is inadmissible to the extent that it is conclusory and does not disclose bases for the opinions offered therein. Under FRE 401/705 and 37 C.F.R. § 42.65, this document or documents include testimony on patent law and practice.

Respectfully submitted,

/ Kenneth J. Weatherwax /
Kenneth J. Weatherwax (Reg. No. 54,528)
Lowenstein & Weatherwax LLP

Date: December 15, 2025

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), I hereby certify that on December 15, 2025, I electronically filed the following documents:

PATENT OWNER'S OBJECTIONS PURSUANT TO 37 C.F.R. § 42.64(b)(1)

and served a copy of the same on counsel for Petitioner at the following e-mail address, as authorized in the Petition:

IPR60246-0006IP1@fr.com

Kenneth Wayne Darby Jr., Reg. No. 65,068 FISH & RICHARDSON P.C. 60 South Sixth Street Minneapolis, MN 55402 Tel: 202-783-5070 Fax: 877-769-7945 Email: IPR60246-0006IP1@fr.com	David M. Hoffman, Reg. No. 54,174 FISH & RICHARDSON P.C. 60 South Sixth Street Minneapolis, MN 55402 Tel: 202-783-5070 Fax: 877-769-7945 Email: IPR60246-0006IP1@fr.com
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Respectfully submitted,

/ Michael Cosley /

Date: December 15, 2025