

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners,

v.

HANNIBAL IP LLC,

Patent Owner.

Case No. IPR2025-01189
U.S. Patent No. 11,368,911

PETITIONERS' OBJECTIONS TO PATENT OWNER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b), Petitioners Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., submit the following objections to Patent Owner Hannibal IP LLC's pre-institution Exhibits 2008-2010.

I. Exhibit 2008

Petitioners object to Exhibit 2008 under Federal Rule of Evidence 401 and 403 as not relevant, not having a tendency to make a fact more or less probable, lacking probative value that causes unfair prejudice, confuses issues, and is a waste of time. Exhibit 2008 purports to be an online dictionary definition from Merriam-Webster from October 2025 that was "Last Updated: 16 Oct 2025" and is not contemporaneous with the filing date of the '911 Patent, not probative of a definition at the filing date of the '911 Patent, and therefore not relevant under FRE 401 and 403.

II. Exhibit 2009

Petitioners object to Exhibit 2009 under Federal Rule of Evidence 401 and 403 as not relevant, not having a tendency to make a fact more or less probable, lacking probative value that causes unfair prejudice, confuses issues, and is a waste of time. Exhibit 2009 purports to be an online dictionary definition from Cambridge Dictionary from October 2025 and is not contemporaneous with the filing date of the '911 Patent, not probative of a definition at the filing date of the '911 Patent, and therefore not relevant under FRE 401 and 403.

III. Exhibit 2010

Petitioners object to Exhibit 2010 under Federal Rule of Evidence 401 and 403 as not relevant, not having a tendency to make a fact more or less probable, lacking probative value that causes unfair prejudice, confuses issues, and is a waste of time. Exhibit 2010 purports to be an online dictionary definition from Dictionary.com from October 2025 and is not contemporaneous with the filing date of the '911 Patent, not probative of a definition at the filing date of the '911 Patent, and therefore not relevant under FRE 401 and 403.

Date: January 12, 2026

Respectfully submitted,

/Kevin D. Rodkey/

Kevin D. Rodkey
Backup Counsel
Reg. No. 65,506

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioners’ Objections to Patent Owner’s Exhibits** was served on January 12, 2026, via email directed to counsel of record for the Patent Owner at the following:

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Patent Owner has consented to electronic service by email.

Dated: January 12, 2026

/ William Esper /

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