

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

V.

HANNIBAL IP LLC,
Patent Owner.

Case IPR2025-01190
Patent No. 11,641,661

PATENT OWNER'S OBJECTIONS TO PETITIONER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b), Patent Owner Hannibal IP LLC submits the following objections to Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.'s pre-institution Exhibits 1006, 1011, 1012, 1015-1027, and 1035.

I. Exhibit 1006

Patent Owner objects to Exhibit 1006 under Federal Rules of Evidence 402, 802 and 901. Exhibit 1006 purports to be a document available online through the 3GPP website. Petitioner cannot establish this exhibit as prior art and is therefore irrelevant to this proceeding. Further, it is an out of court statement being offered

for the truth of the matter asserted. Further still, Exhibit 1006 has not been properly authenticated.

I. Exhibit 1011

Patent Owner objects to Exhibit 1011 under Federal Rules of Evidence 402, 802 and 901. Exhibit 1011 purports to be a document available online through the 3GPP website. Petitioner cannot establish this exhibit as prior art and is therefore irrelevant to this proceeding. Further, it is an out of court statement being offered for the truth of the matter asserted. Further still, Exhibit 1011 has not been properly authenticated.

II. Exhibit 1012

Patent Owner objects to Exhibit 1012 under Federal Rules of Evidence 402, 802 and 901. Exhibit 1012 purports to be a document available online through the 3GPP website. Petitioner cannot establish this exhibit as prior art and is therefore irrelevant to this proceeding. Further, it is an out of court statement being offered for the truth of the matter asserted. Further still, Exhibit 1012 has not been properly authenticated.

III. Exhibit 1015 through 1027

Patent Owner objects to Exhibits 1015 through 1027 under Federal Rules of Evidence 402, 802 and 901. Exhibits 1015 through 1027 purport to be documents available online through the 3GPP website. Petitioner cannot establish these

exhibits as prior art and is therefore irrelevant to this proceeding. Further, they are out of court statements being offered for the truth of the matter asserted. Further still, Exhibits 1015 through 1027 have not been properly authenticated.

IV. Exhibit 1035

Patent Owner objects to Exhibit 1035 under Federal Rules of Evidence 402, 802 and 901. Exhibit 1035 purports to be a document available online through the 3GPP website. Petitioner cannot establish this exhibit as prior art and is therefore irrelevant to this proceeding. Further, it is an out of court statement being offered for the truth of the matter asserted. Further still, Exhibit 1035 has not been properly authenticated.

Dated: January 23, 2026

/s/ Brian A. Carpenter
Brian A. Carpenter
USPTO Reg. No. 37,109

CERTIFICATE OF SERVICE

I, Brian A. Carpenter, hereby certify that on the 23rd day of January 2026,
the foregoing PATENT OWNER'S OBJECTIONS TO PETITIONER'S
EXHIBITS was served on the following by email:

Joshua L. Goldberg
Timothy J. May
Nicholas A. Cerulli
Chen Zang
Kevin D. Rodkey
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
joshua.goldberg@finnegan.com
timothy.may@finnegan.com
nicholas.cerulli@finnegan.com
chen.zang@finnegan.com
kevin.rodkey@finnegan.com

/s/ Brian A. Carpenter
Brian A. Carpenter
USPTO Reg. No. 37,109
Vishal Patel
Admitted *Pro Hac Vice*
Cole Schotz P.C.
901 Main Street, Suite 4120
Dallas, TX 75202
469.557.9390
bcarpenter@coleschotz.com
vpatel@coleschotz.com

***Attorneys for Patent Owner
Hannibal IP LLC***