UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,

Petitioner,

v.

PERCEPTIVE AUTOMATA LLC,

Patent Owner.

Case No. IPR2025-01574
Patent 11,126,889

PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE SUBMITTED WITH PATENT OWNER'S RESPONSE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Tesla, Inc. ("Petitioner") objects to the following exhibits filed by Patent Owner Perceptive Automata LLC ("Patent Owner") with its Patent Owner's Response (Paper No. 17).

Exhibit	**Objection(s)**
EX2041 – C. Aggarwal, "Neural Networks and Deep Learning", Springer ISBN 978-3-319-94462-3	**F.R.E. 401-403:** Petitioner objects to EX2041 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Patent Owner has not demonstrated that EX2041 is from the relevant time-period, i.e., prior to the subject patent's earliest priority date alleged by Patent Owner. Petitioner further objects to EX2041 as being irrelevant because Patent Owner has not cited EX2041 in its Response. **F.R.E. 801/802/901:** Petitioner further objects to EX2041 for containing hearsay and for lacking authenticity. For example, Patent Owner has neither authenticated this exhibit, nor laid the foundation for any hearsay exception. Petitioner further objects to this exhibit because Patent Owner has not shown that it is an original document or authentic duplicate.
EX2042 – Kooij JFP, Schneider N, Flohr F, Gavrila DM (2014) Context based pedestrian path prediction. In: Proceedings of the European Conference on Computer Vision (ECCV). Berlin: Springer, pp. 618–633	**F.R.E. 401-403:** Petitioner objects to EX2042 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Patent Owner has not demonstrated that EX2042 is from the relevant time-period, i.e., prior to the subject patent's earliest priority date alleged by Patent Owner. **F.R.E. 801/802/901:** Petitioner further objects to EX2042 for containing hearsay and for lacking authenticity. For example, Patent Owner has neither authenticated this exhibit, nor laid the foundation for any hearsay exception. Petitioner further objects to this exhibit because Patent Owner has not shown that it is an original document or authentic duplicate.

Exhibit	**Objection(s)**
EX2043 – A. Zyner, S. Worrall, J. Ward and E. Nebot, "Long short term memory for driver intent prediction," 2017 IEEE Intelligent Vehicles Symposium (IV), Los Angeles, CA, USA, 2017, pp. 1484-1489	**F.R.E. 401-403:** Petitioner objects to EX2043 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Patent Owner has not demonstrated that EX2043 is from the relevant time-period, i.e., prior to the subject patent's earliest priority date alleged by Patent Owner. **F.R.E. 801/802/901:** Petitioner further objects to EX2043 for containing hearsay and for lacking authenticity. For example, Patent Owner has neither authenticated this exhibit, nor laid the foundation for any hearsay exception. Petitioner further objects to this exhibit because Patent Owner has not shown that it is an original document or authentic duplicate.

Dated: July 6, 2026

/*Roger Fulghum*/
Roger Fulghum Reg. No. 39,678
Counsel for Petitioner Tesla, Inc.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 6th day of July 2026, **Petitioner's Objections to Patent Owner's Evidence Submitted With Patent Owner's Response** was served by email on the following counsel for Patent Owner:

Charles Austin Ginnings (austin@nelbum.com)

John P. Murphy (murphy@nelbum.com)

perceptive@nelbum.com

Date: July 6, 2026

/Roger Fulghum/
Roger Fulghum Reg. No. 39,678
Counsel for Petitioner Tesla, Inc.