

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,

Petitioner,

v.

PERCEPTIVE AUTOMATA LLC,

Patent Owner.

Case No. IPR2025-01577

Patent 11,520,346

**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. 18).

<u>Exhibit</u>	<u>Objection(s)</u>
EX2050 - Guo, Z.; Huang, Y.; Hu, X.; Wei, H.; Zhao, B. A Survey on Deep Learning Based Approaches for Scene Understanding in Autonomous Driving. <i>Electronics</i> 2021	F.R.E. 401-403: Petitioner objects to EX2050 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Patent Owner has not demonstrated that EX2050 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 EX2050 as being irrelevant because Patent Owner has not cited EX2050 in its Response. F.R.E. 801/802/901: Petitioner further objects to EX2050 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.
EX2051 – Kooij JFP, Schneider N, Flohr F, Gavril 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 EX2051 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Patent Owner has not demonstrated that EX2051 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 EX2051 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.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2052– 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 EX2052 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Patent Owner has not demonstrated that EX2052 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 EX2052 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.
EX2053 – C. Aggarwal, “Neural Networks and Deep Learning”, Springer ISBN 978-3-319-94462-3	F.R.E. 401-403: Petitioner objects to EX2053 as being irrelevant, misleading, and confusing, and its probative value, if any, is outweighed by prejudice. Patent Owner has not demonstrated that EX2053 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 EX2053 as being irrelevant because Patent Owner has not cited EX2053 in its Response. F.R.E. 801/802/901: Petitioner further objects to EX2053 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 15, 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 15th 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 15, 2026

/Roger Fulghum/
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