UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

TVNGO LTD.,
Patent Owner

IPR2026-00213
U.S. Patent No. RE50,328

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 TVnGO Ltd. ("TVnGO" or "Patent Owner") hereby objects to the following evidence submitted by Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Petitioner" or "Samsung") in connection with the Petition (Paper 1).

Nothing in this paper should be construed as an admission that any rights of Patent Owner would have been waived or forfeited had this 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. GENERAL OBJECTIONS

Patent Owner objects under FRE 401/402/403 to all references and documents that do not form the basis of any instituted ground of unpatentability. Patent Owner further objects under FRE 602/701/801/802 and 37 C.F.R. § 42.61, as inadmissible hearsay, to the extent Petitioner relies on any document for the truth of the matters asserted therein.

2. Exhibit 1033

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 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 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. <u>Exhibit 1003</u>

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it concerns a different patent and does not form a basis of any instituted ground of unpatentability, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent Petitioner relies on any expert opinions contained therein, Patent Owner further

objects under FRE 401/402/403/702, FRE 602/701/801/802, and 37 C.F.R. §§ 42.61 and 42.65.

4. <u>Exhibit 1020</u>

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of any instituted ground of unpatentability, 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. Under FRE 801/802, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of the matters asserted therein. To the extent this 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, it 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.

5. <u>Exhibit 1026</u>

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of any instituted ground of unpatentability, 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. Under

FRE 801/802, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of the matters asserted therein. To the extent this 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, it 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. <u>Exhibit 1028</u>

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of any instituted ground of unpatentability, 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. Under FRE 801/802, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of the matters asserted therein. To the extent this 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, it 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. <u>Exhibit 1029</u>

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of any instituted ground of unpatentability, 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. Under FRE 801/802, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of the matters asserted therein. To the extent this 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, it 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.

Date: August 20, 2026

Respectfully submitted,

<u>/s/ David L. Hecht</u>
David L. Hecht (Lead Counsel)
(Reg. No. 61,618)
dhecht@hechtpartners.com
HECHT PARTNERS LLP
125 Park Avenue, 25th Floor
New York, NY 10017
P: (212) 851-6821

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

The undersigned hereby certifies that the following documents were served by electronic service on the date signed below:

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

The names and addresses of the parties being served are as follows:

James M. Heintz	jim.heintz@us.dlapiper.com
Michael Saulnier	michael.Saulnier@us.dlapiper.com
Peter D. VandeVort	peter.vandevort@us.dlapiper.com
Sangwon Sung	sangwon.sung@us.dlapiper.com
	DLA-SamsungIPR-TVnGO@us.dlapiper.com

Date: August 20, 2026

/s/ David L. Hecht
David L. Hecht (Lead Counsel)
(Reg. No. 61,618)
dhecht@hechtpartners.com
HECHT PARTNERS LLP
125 Park Avenue, 25th Floor
New York, NY 10017
P: (212) 851-6821