

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

THALES VISIONIX, INC.,
Patent Owner

U.S. PATENT NO. 6,922,632

Case No. IPR2022-01304

**PETITIONER'S REPLY TO PATENT OWNER'S OPPOSITION TO
MOTION TO EXCLUDE EVIDENCE**

TABLE OF CONTENTS

I. EXHIBIT 20101

 A. Petitioner Did Not Waive Its Objection1

 B. Patent Owner Delayed in Curing the Problem3

 C. Patent Owner Ignores the Board’s Ruling and Other Authority4

II. EXHIBIT 20175

TABLE OF AUTHORITIES

Page(s)

Cases

Belden Inc. v. Berk-Tek LLC,
805 F.3d 1064 (Fed. Cir. 2015)5

Trane U.S. Inc. v. SEMCO, LLC,
IPR2018-00514, Paper 36 (P.T.A.B. Apr. 17, 2019)5

ZTE (USA), Inc. v. Cywee Grp. Ltd.,
IPR2019-00143, Paper 87 (P.T.A.B. Feb. 17, 2021).....2, 3, 5

Rules

Fed. R. Evid. 6115

Fed. R. Evid. 9025

Other Authorities

37 C.F.R.
§ 42.53.....1, 2
§ 42.64.....2, 3, 4

PETITIONERS' UPDATED EXHIBIT LIST¹

Exhibit No.	Description	Previously Filed
1001	U.S. Patent No. 6,922,632	X
1002	File History of U.S. Patent No. 6,922,632	X
1003	U.S. Patent No. 7,725,253	X
1004	File History of U.S. Patent No. 7,725,253	X
1005	Declaration of Dr. Ulrich Neumann in Support of <i>Inter Partes Review</i> of U.S. Patent No. 6,922,632	X
1006	<i>Curriculum Vitae</i> of Dr. Ulrich Neumann	X
1007	Welch, G. et al., "High-Performance Wide-Area Optical Tracking" (2001)	X
1008	Welch, G. et al., "SCAAT: Incremental Tracking with Incomplete Information" (1997)	X
1009	Welch G. "SCAAT: Incremental Tracking with Incomplete Information" PhD Thesis, University of North Carolina (1996)	X
1010	U.S. Patent No. 5,615,132	X
1011	U.S. Patent No. 5,307,289	X
1012	Gentex's Amended Preliminary Infringement Contentions and corresponding Exhibits 4 and 5 ('632 and '253 infringement charts)	X
1013	Azuma, R. "Predictive Tracking for Augmented Reality" PhD Thesis, University of North Carolina (1995)	X

¹ All emphasis is added unless otherwise specified.

Exhibit No.	Description	Previously Filed
1014	You, S. and Neumann, U. "Orientation Tracking for Outdoor Augmented Reality Registration." (1999)	X
1015	Carlson, Neal A. and Berarducci, Michael P. "Federated Kalman Filter Simulation Results." Navigation. Vol. 41, Issue 3 at 297-322. (Fall 1994)	X
1016	Reitmayr, Gerhard and Schmalstieg. "An Open Software Architecture for Virtual Reality Interaction" VRST '01 (November 2001)	X
1017	Barfield, W. "Fundamentals of Wearable Computers and Augmented Reality" (2001)	X
1018	Declaration of Rachel J. Watters regarding Welch, G. et al., "High-Performance Wide-Area Optical Tracking" (2001)	X
1019	Declaration of Scott Delman regarding Welch, G. et al., "SCAAT: Incremental Tracking with Incomplete Information" (1997)	X
1020	Declaration of Dr. James L. Mullins regarding Welch G. "SCAAT: Incremental Tracking with Incomplete Information" PhD Thesis, University of North Carolina (1996)	X
1021	Declaration of Scott Delman regarding Reitmayr, Gerhard and Schmalstieg. "An Open Software Architecture for Virtual Reality Interaction" VRST '01 (November 2001)	X
1022	U.S. Patent No. 5,807,284	X
1023	U.S. Patent No. 5,991,085	X

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