

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. IPR2022-01305

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

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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

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Cases

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805 F.3d 1064 (Fed. Cir. 2015)5

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Rules

Fed. R. Evid. 4025

Fed. R. Evid. 6115

Other Authorities

37 C.F.R.
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PETITIONER'S 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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