

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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META PLATFORMS, INC.,  
Petitioner

v.

THALES VISIONIX, INC.,  
Patent Owner

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

IPR2022-01304

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**PATENT OWNER'S OBJECTIONS TO  
PETITIONER'S DEMONSTRATIVE EXHIBITS**

December 5, 2023

Pursuant to the Order Setting Oral Argument, Paper No. 40, Patent Owner Thales Visionix, Inc. (“Patent Owner”) objects as follows to the demonstrative exhibits filed by Petitioner Meta Platforms, Inc. (“Petitioner”), Ex. 1041.

- **Slide 26**: Patent Owner objects to Petitioner’s demonstrative slide 26 as improper new argument because Petitioner’s annotated figure is not present in any of the Papers in the record, and the slide incorrectly represents this new annotated figure as a figure provided in the Petition and referred to by Patent Owner in Patent Owner’s Response.
- **Slides 51-52**: Patent Owner objects to Petitioner’s demonstrative slides 51-52 as improper new argument because Petitioner did not discuss LED selection as applied to claims 12-13 of the ’632 patent in any Papers; the discussion of LED selection in the cited Papers applies to claim 11.
- **Slide 54**: Patent Owner objects to Petitioner’s demonstrative slide 54 as improper new evidence and argument because Petitioner did not cite to the “i” entry in Table 1 in any of the Papers in connection with claim 2 of the ’632 patent, and did not advance any argument about two “Table 1” and “Table 4” software modules.
- **Slide 56**: Patent Owner objects to Petitioner’s demonstrative slide 56 as improper new evidence because the cited portion of the patent was not referenced in any Papers.

- **Slides 62-63**: Patent Owner objects to Petitioner’s demonstrative slides 62-63 as improper new argument, because Petitioner did not rely on a “HiBall Trigger” in any of the Papers.

Copies of the objected-to slides are attached.

Date: December 5, 2023

Respectfully submitted,

/s/ D. Shayon Ghosh

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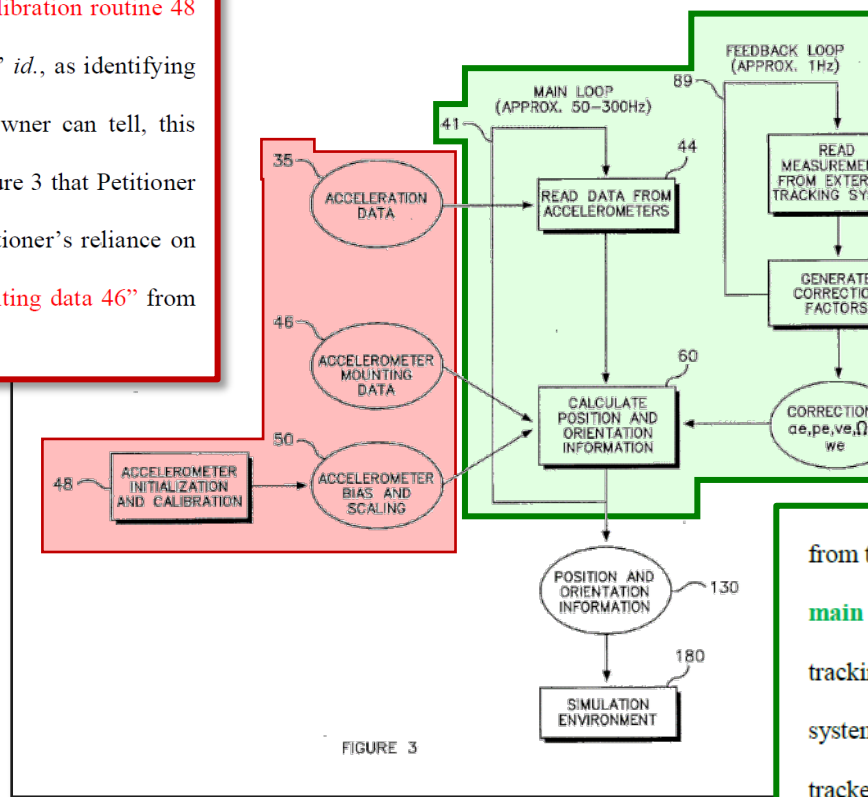
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# The Petition Identified Two Separate “Subsystem

The Petition never expressly states which particular parts of the Horton system constitute the claimed “**sensor subsystem**.” See *id.*, 60. The Institution Decision, however, credited the Petition’s contention that “Horton discloses that the tracking system includes **accelerometers 1-6** that are initialized using **calibration routine 48** and provide **acceleration data 35** to the estimation subsystem,” *id.*, as identifying the “sensor subsystem,” Paper 10, 30. As best as Patent Owner can tell, this appears to correspond with the red annotation of Horton’s Figure 3 that Petitioner provides on page 59 of the Petition. See also *id.* (noting Petitioner’s reliance on “**accelerometer bias and scaling 50**” and “**accelerometer mounting data 46**” from Figure 3); Baillot, ¶¶414-416.



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