

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. 7,725,253

IPR2022-01308

**PATENT OWNER'S OPPOSITION TO
MOTION TO EXCLUDE**

November 21, 2023

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OTHER AUTHORITIES

Wright & Miller, 8A Fed. Prac. & Proc. Civ. § 2150 (3d ed., Apr. 2023
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75 Am. Jur. 2d Trial § 314 (Oct. 2023 update)10

LIST OF EXHIBITS

Exhibit	Title
1001	U.S. Patent No. 6,922,632
1002	File History of U.S. Patent No. 6,922,632
1003	U.S. Patent No. 7,725,253
1004	File History of U.S. Patent No. 7,725,253
1005	Declaration of Dr. Ulrich Neumann in Support of <i>Inter Partes</i> Review of U.S. Patent No. 6,922,632
1006	<i>Curriculum Vitae</i> of Dr. Ulrich Neumann
1007	Welch, G. et al., “High-Performance Wide-Area Optical Tracking” (2001)
1008	Welch, G. et al., “SCAAT: Incremental Tracking with Incomplete Information” (1997)
1009	Welch G., “SCAAT: Incremental Tracking with Incomplete Information,” PhD Thesis, University of North Carolina (1996)
1010	U.S. Patent No. 5,615,132
1011	U.S. Patent No. 5,307,289
1012	Gentex’s Amended Preliminary Infringement Contentions and corresponding Exhibits 4 and 5 (’632 and ’253 infringement charts)
1013	Azuma, R., “Predictive Tracking for Augmented Reality,” PhD Thesis, University of North Carolina (1995)
1014	You, S. and Neumann, U., “Orientation Tracking for Outdoor Augmented Reality Registration,” (1999)

Exhibit	Title
1015	Carlson, Neal A. and Berarducci, Michael P. "Federated Kalman Filter Simulation Results," Navigation. Vol. 41, Issue 3 (Fall 1994)
1016	Reitmayr, Gerhard and Schmalstieg, "An Open Software Architecture for Virtual Reality Interaction," VRST '01 (November 2001)
1017	Barfield, W., "Fundamentals of Wearable Computers and Augmented Reality" (2001)
1018	Declaration of Rachel J. Watters regarding Welch, G. et al., "High- Performance Wide-Area Optical Tracking" (2001)
1019	Declaration of Scott Delman regarding Welch, G. et al., "SCAAT: Incremental Tracking with Incomplete Information" (1997)
1020	Declaration of Dr. James L. Mullins regarding Welch G., "SCAAT: Incremental Tracking with Incomplete Information," PhD Thesis, University of North Carolina (1996)
1021	Declaration of Scott Delman regarding Reitmayr, Gerhard and Schmalstieg, "An Open Software Architecture for Virtual Reality Interaction," VRST '01 (November 2001)
1022	U.S. Patent No. 5,807,284
1023	U.S. Patent No. 5,991,085
1024	Chen, Steven C. and Lee, Kang, "A mixed-mode smart transducer interface for sensors and actuators," Sound & Vibration, 32(4) (April 1998)
1025	Hoff, William and Vincent, Tyrone, "Analysis of Head Pose Accuracy in Augmented Reality", IEEE Transactions on Visualization and Computer Graphics, Vol. 6, Issue 4, October – December 2000.

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