

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TESLA, INC.,

Petitioner

v.

GRANITE VEHICLE VENTURES LLC,

Patent Owner

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Case IPR2025-01035

Patent 12,037,004

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**DECLARATION OF BLAINE LARSON**

I, Blaine Larson, declare as follows:

1. I am over 21 years of age and competent to make this declaration. I make this declaration based on my own personal knowledge.

2. I am an attorney at Heim Payne & Chorush LLP, and I am counsel of record for Patent Owner Granite Vehicle Ventures LLC (“Patent Owner”) in *Tesla, Inc. v. Granite Vehicle Ventures LLC*, 2:24-cv-1007, currently pending in the Eastern District of Texas (the “Parallel Litigation”).

3. The parties have served 41 interrogatories in the Parallel Litigation, including 25 served by Patent Owner and 16 served by Tesla, Inc. (“Tesla”).

4. The parties have already taken 10 depositions, which were related to a venue dispute. Tesla took 2 depositions and Patent Owner took 8 depositions, respectively.

5. Pursuant to the Protective Order in the Parallel Litigation, Patent Owner designated a reviewer to have access to sensitive technical information (e.g., source code) of Tesla. This reviewer has completed 173 hours of reviewing defendants’ sensitive technical information.

6. Tesla served its invalidity contentions on June 4, 2025. Those contentions included, in part, a 91-page disclosure document. Exhibit 2009 is a true and correct copy of this disclosure document.

7. For each patent asserted in the Parallel Litigation, Tesla’s invalidity contentions also included multiple Exhibits, each containing claim charts

comparing a single primary reference (or, for some Exhibits, multiple secondary references) to the asserted claims of that particular patent. In total, there were 105 (3 of which were filed under seal) of these Exhibits to Tesla's invalidity contentions, containing more than 15,102 pages, including 35 charted references for each of the three patents.

8. Tesla served six third-party subpoenas. In response to one of these subpoenas, IBM served approximately 2,000 pages of documents. In response to another of these subpoenas, Mercedes-Benz served approximately 100 pages of documents.

9. The volume of documents produced by Tesla in the Parallel Litigation is about 160,000 pages.

10. The volume of documents produced by Patent Owner in the Parallel Litigation is about 25,000 pages.

11. On August 19, 2025, the district court entered a sealed order in the Parallel Litigation denying Tesla's Motion to Transfer Venue. A public, redacted version of the order has not yet been filed at the time this declaration was signed.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on August 25, 2025, in Houston, Texas.



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Blaine Larson