

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners,

v.

HANNIBAL IP LLC,

Patent Owner.

Case No. IPR2025-01187
U.S. Patent No. 11,057,896

PETITIONERS' OBJECTIONS TO PATENT OWNER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b), Petitioners Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., submit the following objections to Patent Owner Hannibal IP LLC's pre-institution Exhibits 2004 and 2007.

I. Exhibit 2004

Petitioners object to Exhibit 2004 under Federal Rule of Evidence 401 and 403 as not relevant, not having a tendency to make a fact more or less probable, lacking probative value that causes unfair prejudice, confuses issues, and is a waste of time. Exhibit 2004 purports to be an online version of the "3GPP Terms of Use" that bears the date "10/5/25" at its top-left corner. Exhibit 2004 is not contemporaneous with the filing date of the '896 Patent, not probative of "3GPP's publication practices ... in the relevant time frame of 2018" (Paper 10 at 6) or such practices at the filing date of the '896 Patent, and therefore not relevant under FRE 401 and 403.

II. Exhibit 2007

Petitioners object to Exhibit 2007 under Federal Rule of Evidence 401 and 403 as not relevant, not having a tendency to make a fact more or less probable, lacking probative value that causes unfair prejudice, confuses issues, and is a waste of time. Moreover, Petitioners object to Exhibit 2007 under Federal Rule of Evidence 801 and 802 as inadmissible hearsay because it is a declaration made in a different proceeding, and thus out-of-court testimony with respect to this proceeding,

which Patent Owner relies upon to prove that certain documents are not publicly accessible, thereby relying on it for the truth of the matter asserted therein. Exhibit 2007 purports to be a declaration by Susanna Kallio filed in *Nokia of America v. IPCOM, GmbH & Co. KG*, IPR2021-00533. Exhibit 2007 is about documents not at issue in this proceeding, and about documents different than those in this proceeding, thus undermining its probative value and making the exhibit not relevant under FRE 401 and 403. Exhibit 2007 is also a declaration from a witness not involved in this proceeding, submitted by an unrelated party in a completely different proceeding, and not available for cross-examination or deposition in this proceeding, and thus inadmissible hearsay under FRE 801 and 802.

Respectfully submitted,

Dated: January 26, 2026

By: / Joshua L. Goldberg /
Joshua L. Goldberg, Lead Counsel
Reg. No. 59,369

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioners' Objections to Patent Owner's Exhibits** was served on January 26, 2026, via email directed to counsel of record for the Patent Owner at the following:

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Patent Owner has consented to electronic service by email.

Dated: January 26, 2026

/ William Esper /
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