

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

V.

HANNIBAL IP LLC,
Patent Owner.

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

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
SUPPLEMENTAL EXHIBIT**

Pursuant to 37 C.F.R. § 42.64(b), Patent Owner Hannibal IP LLC submits the following objections to Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.'s post-institution Exhibit 1045.

I. Exhibit 1045

Patent Owner objects because Petitioners never requested authorization from the Board to serve a supplemental declaration. 37 C.F.R. § 42.123(a). Patent Owner objects to Exhibit 1045 because Mr. Rodermund's supplemental declaration introduces new arguments and evidence that could have been raised in the original Petition and in Mr. Rodermund's original declaration (Exhibit 1029), and so cannot

be considered as “supplemental information.” 37 C.F.R. § 42.123. Mr. Rodermund’s service of a supplemental declaration does not serve the interests of justice. 37 C.F.R. § 42.123. Therefore, Mr. Rodermund’s supplemental declaration cannot properly be considered as “supplemental information” under 37 C.F.R. § 42.123(a). Further, Patent Owner also objects to Exhibit 1045 as non-responsive to Patent Owner’s objections (see Paper 17) and, therefore, cannot properly be considered as “supplemental evidence” under 37 C.F.R. § 42.64(b)(2). Patent Owner further objects to Exhibit 1045 under Fed. R. Evid. 901 since Mr. Rodermund lacks personal knowledge regarding the information set forth in his supplemental declaration.

Dated: February 12, 2026

/s/ Brian A. Carpenter
Brian A. Carpenter
USPTO Reg. No. 37,109

CERTIFICATE OF SERVICE

I, Brian A. Carpenter, hereby certify that on the 12th day of February 2026,
the foregoing PATENT OWNER'S OBJECTIONS TO PETITIONER'S
SUPPLEMENTAL EXHIBIT was served on the following by email:

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