

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,

Petitioner

v.

GRANITE VEHICLE VENTURES LLC,

Patent Owner

Inter Partes Review Case No. IPR2025-00943

OF U.S. PATENT NO. 11,597,402

DECLARATION OF CHRISTOPHER WILSON

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VIII. GROUND 1: CLAIMS 1 AND 3 ARE OBVIOUS OVER *ATTARD* AND *FRAZER*58

A. CLAIM 158

1. *Claim 1(Pre): “A computer program product for controlling a driving mode of a self-driving vehicle (SDV), the computer program product comprising a non-transitory computer readable storage medium having program code embodied therewith, the program code readable and executable by a processor to perform a method comprising:”58*
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