

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC.  
*Petitioner,*

v.

UNIVERSAL SECURE REGISTRY LLC  
*Patent Owner*

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Case CBM2018-00024  
U.S. Patent No. 8,577,813

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**PATENT OWNER'S OBJECTIONS TO EVIDENCE  
PURSUANT TO 37 C.F.R. § 42.64**

Pursuant to 37 C.F.R. § 42.64(b)(1), Universal Secure Registry LLC (“Patent Owner”) submits the following objections to evidence that Petitioner Apple, Inc. (“Petitioner”) served with its Petitioner’s Reply to Patent Owner’s Response (Paper 31). These objections are timely filed and served within five business days of service of the evidence.

Evidence	Objections
Exhibit 1225	<p>Patent Owner objects to this exhibit because it improperly introduces new theories, arguments, and evidence for the first time on Reply. For example, the following paragraphs in the Exhibit raise new theories, arguments and evidence for the first time on Reply: ¶¶28-31, 33-36, 37-40, 42-44, 46-48, and 54.</p> <p>Admissibility of such declaration would permit Petitioner to violate the requirement that it must include all its theories, arguments, and evidence with its Petition.</p> <p><b>FRE 401, 402, and 403:</b> Patent Owner objects to this exhibit because it does not rebut the arguments in Patent Owner's Response, it is irrelevant, and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, wasting time, and needlessly presenting cumulative evidence.</p>
Exhibit 1226	<p>Patent Owner objects to this exhibit because it improperly introduces new theories, arguments, and evidence for the first time on Reply. For example, the Exhibit raises new theories and arguments regarding the alleged encryption and combination functions disclosed by Jakobsson (¶¶37-40) and the manner in which Jakobsson allegedly discloses the patented “seed” (¶¶41-49). This declarant did not provide any testimony in support of the Petition. Admissibility of such declaration for use with Petitioner’s Reply would</p>

	<p>permit Petitioner to violate the requirement that it must include all its theories, arguments, and evidence with its Petition.</p> <p>Patent Owner objects to this exhibit because it includes information that is not discussed sufficiently in Petitioner's Reply to Patent Owner's Response (e.g., ¶¶28-36). Admissibility of such declaration would permit the use of declarations to circumvent page limits for a Reply.</p> <p><b>FRE 401, 402, and 403:</b> Patent Owner objects to this exhibit because it does not rebut the arguments in Patent Owner's Response, it is irrelevant, and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, wasting time, and needlessly presenting cumulative evidence.</p>
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Date: May 22, 2019

Respectfully Submitted,

/s/ James Glass

Registration No. 46,729

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certify that the  
PATENT OWNER'S OBJECTIONS TO EVIDENCE PURSUANT TO 37 C.F.R.

§ 42.64 was served on May 22, 2019 by e-mailing copies to:

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Respectfully submitted,

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