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VIA EMAIL AND U.S. MAIL

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Re: *ABB, Inc. v. Roy-G-Biv Corporation*
IPR2013-00062
IPR2013-00074

Mr. McLeod:

Pursuant to 37 CFR § 42.64(b)(1), Patent Owner Roy-G-Biv Corporation serves its objections to Petitioner ABB's Reply to Patent Owner Response, including the following exhibits thereto, filed in each of the above-identified matters.

Patent Owner objects to the entirety of each of Petitioner's Replies, including the attached declarations, to the extent they rely upon newly-disclosed alleged prior art and new theories that should have been raised in the Petition. RGB's understanding is that the Board does not wish to engage in separating appropriate reply evidence from inappropriate reply evidence material. *See Berk-Tek LLC v. Belden Technologies Inc.*, IPR2013-00057, Paper 29 (stating "that a trial within a trial will not be held, complete with respective briefings, on whether [Petitioner's] Reply is improper for including information it should have submitted in its Petition.")

Patent Owner also objects to the following particular Reply exhibits on the following additional particular grounds:

ROY-G-BIV CORPORATION
EXHIBIT 2015
ABB v ROY-G-BIV
TRIAL IPR2013-00062

Ex. No.	Exhibit Identity	Objection
1100	Gertz, Matt, <i>Chimera 3.2 FAQ</i> , October 14, 1994.	UNTIMELY NOT ASSERTED AS PRIOR ART IN PETITION BOARD DID NOT INSTITUTE IPR BASED UPON THIS DOCUMENT FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1101	Stewart, David B., <i>The Chimera Methodology: Designing Dynamically Reconfigurable Real-Time Software using Port-Based Objects</i> , October 1994.	UNTIMELY NOT ASSERTED AS PRIOR ART IN PETITION BOARD DID NOT INSTITUTE IPR BASED UPON THIS DOCUMENT FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1102	Stewart, David B., <i>CHIMERA II: A Real-Time UNIX-Compatible Multiprocessor Operating System for Sensor-based Control Applications</i> , September 1989.	UNTIMELY NOT ASSERTED AS PRIOR ART IN PETITION BOARD DID NOT INSTITUTE IPR BASED UPON THIS DOCUMENT FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1103	Stewart, David B., <i>Chimera 3.2, The Real-Time Operating System for Reconfigurable Sensor-Based Control Systems</i> , February 8, 1995.	UNTIMELY NOT ASSERTED AS PRIOR ART IN PETITION BOARD DID NOT INSTITUTE IPR BASED UPON THIS DOCUMENT FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)

Ex. No.	Exhibit Identity	Objection
1110	[Protective Order Material] David Brown, Weekly Status Report, 5-15-1995 to 5-19-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1111	[Protective Order Material] David Brown, Weekly Status Report, 5-08-1995 to 5-12-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1112	[Protective Order Material] David Brown, Weekly Status Report, 4-24-1995 to 4-28-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1113	[Protective Order Material] David Brown, Weekly Status Report, 4-17-1995 to 4-21-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1114	[Protective Order Material] David Brown, Weekly Status Report, 4-10-1995 to 4-14-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)

Ex. No.	Exhibit Identity	Objection
1115	[Protective Order Material] David Brown, Weekly Status Report, 11-21-1994 to 11-25-1994	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1116	[Protective Order Material] David Brown, Weekly Status Report, 3-20-1995 to 3-24-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1120	[Protective Order Material] RGB Officer Meeting, June 27, 1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1122	[Protective Order Material] David Brown, Weekly Status Report, 3-06-1995 to 3-10-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1123	[Protective Order Material] David Brown, Weekly Status Report, 2-26-1995 to 3-03-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)

Ex. No.	Exhibit Identity	Objection
1124	[Protective Order Material] David Brown, Weekly Status Report, 2-20-1995 to 2-25-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1125	[Protective Order Material] David Brown, Weekly Status Report, 2-06-1995 to 2-10-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1126	[Protective Order Material] David Brown, Weekly Status Report, 1-16-1995 to 1-20-1995	UNTIMELY NOT INCONSISTENT WITH RGB POSITIONS FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY)
1131	Morrow, James Daniel, <i>Sensorimotor Skills for Programming Robotic Assembly Skills</i> , Ph. D. Thesis, May 1997.	UNTIMELY NOT ASSERTED AS PRIOR ART IN PETITION BOARD DID NOT INSTITUTE IPR BASED UPON THIS DOCUMENT FRE RULE 403 (PREJUDICE, CONFUSION, WASTE OF TIME, MISLEADING, UNDUE DELAY,)

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