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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CARDIOCOM, LLC
Petitioner

v.

ROBERT BOSCH HEALTHCARE SYSTEMS, INC.
Patent Owner

Case IPR2013-00468
Patent 7,516,192

JOINT OBJECTIONS TO DEMONSTRATIVES

The parties hereby submit this joint disclosure of objections to demonstratives. The parties met and conferred and could not reach agreement.

- 1) Petitioner objects to Patent Owner's Demonstrative Nos. 3, 4, and 37 as containing new legal arguments related to the never-before cited *Cyclobenziprine*, *Fritch*, and *Unigene* cases, respectively.
 - 2) Petitioner objects to Patent Owner's Demonstrative Nos. 51-52, 54-55, 57-58 and 61-69 because these demonstratives rely on objected-to evidence.
 - 3) Petitioner objects to Patent Owner's Demonstrative Nos. 54, 63, 66, 67 and 69 as displaying exhibits not specifically discussed in any papers.
 - 4) Petitioner objects to Patent Owner's Demonstratives, generally, as additional briefing because they are far too numerous for the limited oral argument.
- 1) Patent Owner objects that Petitioner's demonstrative nos. 25, 33, 40, and 45 improperly raise new arguments not set forth in Petitioner's Petition or Reply and nos. 38 and 42 improperly raise arguments not set forth in the Petition.
 - 2) Patent Owner further objects that demonstrative nos. 8, 22, 30, and 32 improperly included new evidence in the form of citations that were not included in Petitioner's Petition or Reply.
 - 3) Patent Owner further objects that demonstrative nos. 3, 12, and 17 misleadingly mischaracterize the parties' positions or the evidence.
 - 4) Patent Owner reserves its objections pursuant to its pending motion to exclude.

Respectfully submitted,

Date: September 5, 2014

/Daniel W. McDonald/

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/Don Daybell/

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Certification of Service

The undersigned hereby certifies that a copy of the foregoing **JOINT OBJECTIONS TO DEMONSTRATIVES** was served on September 5, 2014 by filing the document(s) through the Patent Review Processing System and delivering by email on counsel of record for the patent owner at the following name and address:

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