

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

Apple Inc., Google Inc. and Motorola Mobility LLC,

Petitioners,

v.

Arendi S.A.R.L.,

Patent Owner.

---

Case No. IPR2014-00208

Patent No. 7,917,843

---

PATENT OWNER ARENDI S.A.R.L.'S OBJECTIONS TO EVIDENCE

PURSUANT TO 37 C.F.R. § 42.64

Pursuant to 37 C.F.R. §42.64(b)(1), the undersigned, on behalf of Patent Owner Arendi S.A.R.L. (“Arendi” or “Patent Owner”) hereby submits the following objections to Exhibit 1013.

Exhibit 1013 is the Deposition of Daniel A. Menascé. He is petitioners’ expert declarant. Petitioners’ Reply makes absolutely no mention of and no reference to any testimony in Exhibit 1013. Patent Owner objects to the deposition on the grounds that it is not relevant to this IPR trial. To the extent, Menascé’s testimony constitutes supplemental information, it could have been submitted in a timely manner in the form of a declaration within one month of the date this trial was instituted. Petitioners did not file a motion to submit supplemental information. Moreover, in the absence of mention of the deposition in the Reply, it is confirmed that any information in the transcript is of little or no relevance and necessarily fails to meet the interests-of-justice standard for late submission.

These objections are being timely served within 5 business days of service of the Petitioners Reply and its associated exhibit.

Date: November 18, 2014

Respectfully submitted,

/Robert M. Asher, #30,445 /

---

Robert M. Asher  
Registration No. 30,445  
Bruce D. Sunstein  
Registration No. 27,234  
Dorothy Wu  
Registration No. 69,535  
Sunstein Kann Murphy & Timbers LLP  
125 Summer Street  
Boston, MA 02110  
Tel: (617) 443-9292  
Fax: (617) 443-0004

## CERTIFICATE OF SERVICE

It is certified that on November 18, 2014, copies of the PATENT OWNER ARENDI S.A.R.L.'s OBJECTIONS TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64 have been served on Petitioners as provided in 37 C.F.R. § 42.6(e) via electronic mail transmission addressed to the persons at the following addresses:

<p>LEAD COUNSEL FOR PETITIONER APPLE INC.</p> <p>DAVID L. FEHRMAN <a href="mailto:dfehrman@mofocom">dfehrman@mofocom</a> Registration No. 28,600 MORRISON &amp; FOERSTER LLP 707 Wilshire Blvd., Suite 6000 Los Angeles, CA 90017-3543 Tel: (213) 892-5601 Fax: (213) 892-5454</p>	<p>BACK-UP COUNSEL FOR PETITIONER APPLE INC.</p> <p>MEHRAN ARJOMAND <a href="mailto:marjomand@mofocom">marjomand@mofocom</a> Registration No. 48,231 MORRISON &amp; FOERSTER LLP 707 Wilshire Blvd., Suite 6000 Los Angeles, CA 90017-3543 Tel: (213) 892-5630 Fax: (213) 892-5454</p>
<p>LEAD COUNSEL FOR PETITIONERS MOTOROLA MOBILITY, LLC and GOOGLE INC.</p> <p>MATTHEW A. SMITH <a href="mailto:smith@turnerboyd.com">smith@turnerboyd.com</a> Registration No. 49,003 TURNER BOYD LLP 2570 W. El Camino Real, Suite 380 Mountain View, CA 94040 Tel: (650) 265-6109 Fax: (650) 521-5931</p>	<p>BACK-UP COUNSEL FOR PETITIONERS MOTOROLA MOBILITY, LLC and GOOGLE INC.</p> <p>ZHUANJIA GU <a href="mailto:gu@turnerboyd.com">gu@turnerboyd.com</a> Registration No. 51,758 TURNER BOYD LLP 2570 W. El Camino Real, Suite 380 Mountain View, CA 94040 Tel: (650) 265-6109 Fax: (650) 521-5931</p> <p>JULIE S. TURNER <a href="mailto:turner@turnerboyd.com">turner@turnerboyd.com</a> TURNER BOYD LLP 2570 W. El Camino Real, Suite 380 Mountain View, CA 94040 Tel: (650) 265-6109 Fax: (650) 521-5931 and <a href="mailto:kent@turnerboyd.com">kent@turnerboyd.com</a> <a href="mailto:docketing@turnerboyd.com">docketing@turnerboyd.com</a></p>

Date: November 18, 2014

/Robert M. Asher, #30,445 /

Robert M. Asher  
Registration No. 30,445  
Sunstein Kann Murphy & Timbers LLP  
125 Summer Street  
Boston, MA 02110  
Tel: (617) 443-9292  
Fax: (617) 443-0004