

Served January 21, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEBASTO ROOF SYSTEMS, INC.
Petitioner,

v.

UUSI, LLC
Patent Owner.

Case IPR2014-00650
Patent 7,579,802

**PETITIONER'S OBJECTIONS TO EVIDENCE SUBMITTED
WITH PATENT OWNER'S RESPONSE TO THE PETITION**

Attorney Docket: 130163.231151

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Webasto Roof Systems, Inc. (“WRSI”) objects to the evidence submitted by Patent Owner UUSI, LLC with Patent Owner’s Response to the Petition.

Petitioner objects to paragraphs 6, 18–21, 23–26, 41–45, 47-50, 51-53, 55-59, 61-73, 75, 77-79, 81-255 of the Declaration of Dr. Mark Ehsani in Support of Patent Owner’s Response, Ex. 2001, because this testimony fails to meet the standards of admissibility under Fed. R. Evid. 702, *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), and 37 C.F.R. § 42.65.

Petitioner also objects to the following exhibits on the bases set forth below.

Exhibit	Objection(s)
2004	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is not relied on in Patent Owner’s Response or in Patent Owner’s expert’s Declaration of Dr. Mark Ehsani in Support of Patent Owner’s Response and is therefore not a proper exhibit.
2005	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is not relied on in Patent Owner’s Response or in Patent Owner’s expert’s Declaration of Dr. Mark Ehsani in Support of Patent Owner’s Response and is therefore not a proper exhibit.
2006	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is not relied on in Patent Owner’s Response or in Patent Owner’s expert’s Declaration of Dr. Mark Ehsani in Support of Patent Owner’s Response and is therefore not a proper exhibit.

Exhibit	Objection(s)
2007	<p>Exhibit is irrelevant to the unpatentability of the claims at issue.</p> <p>Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.</p> <p>Exhibit is inadmissible hearsay.</p>
2008	<p>Exhibit is irrelevant to the unpatentability of the claims at issue.</p> <p>Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.</p> <p>Exhibit is inadmissible hearsay.</p>
2009	<p>Exhibit is irrelevant to the unpatentability of the claims at issue.</p> <p>Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.</p>
2010	<p>Exhibit is irrelevant to the unpatentability of the claims at issue.</p>
2011	<p>Exhibit is irrelevant to the unpatentability of the claims at issue.</p> <p>Exhibit contains hearsay.</p>
2012	<p>Exhibit is irrelevant to the unpatentability of the claims at issue.</p>
2013	<p>Exhibit is irrelevant to the unpatentability of the claims at issue.</p> <p>Exhibit is not authenticated or adequately described.</p> <p>Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.</p>

Exhibit	Objection(s)
2014	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is not authenticated or adequately described. Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.
2015	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is inadmissible hearsay.
2016	Exhibit is irrelevant to the unpatentability of the claims at issue.
2017	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is incomplete.
2018	Exhibit is not evidence and is therefore not a proper exhibit. Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.
2019	Exhibit is irrelevant to the unpatentability of the claims at issue.
2020	Exhibit is irrelevant to the unpatentability of the claims at issue.
2021	Exhibit is irrelevant to the unpatentability of the claims at issue.
2022	Exhibit is irrelevant to the unpatentability of the claims at issue.
2023	Exhibit is irrelevant to the unpatentability of the claims at issue.
2024	Exhibit is irrelevant to the unpatentability of the claims at issue.
2025	Exhibit is irrelevant to the unpatentability of the claims at issue.
2026	Exhibit is irrelevant to the unpatentability of the claims at issue.
2027	Exhibit is irrelevant to the unpatentability of the claims at issue.

Exhibit	Objection(s)
2028	Exhibit is irrelevant to the unpatentability of the claims at issue.
2029	Exhibit is irrelevant to the unpatentability of the claims at issue.
2030	Exhibit is irrelevant to the unpatentability of the claims at issue.
2032	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.
2033	Exhibit is irrelevant to the unpatentability of the claims at issue. Exhibit is not relied on in Patent Owner's Response or in Patent Owner's expert's Declaration of Dr. Mark Ehsani in Support of Patent Owner's Response and is therefore not a proper exhibit.

Dated: January 21, 2015

Respectfully submitted,

/s/ Charles H. Sanders

Charles H. Sanders

Reg. No. 47,053

Counsel for Petitioner

Webasto Roof Systems, Inc.

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