

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

Applicant:	Arling et al.	Universal Remote Control, Inc.
Case No.:	IPR2014-01084	v.
Filing Date:	September 19, 2003	Universal Electronics, Inc.
Patent No.:	7,126,468	Trial Paralegal: Amy Kattula
Title:	SYSTEM AND METHOD FOR MONITORING REMOTE CONTROL TRANSMISSION	Attorney Doc.: 059489.143800

**NOTICE OF OBJECTIONS TO EVIDENCE**

**Mail Stop PATENT BOARD**  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Universal Electronics, Inc. (“UEI”) hereby provides notice of its objections to Petitioner’s evidence, as follows:

Certificate of Filing: I hereby certify that this correspondence is being electronically filed with the USPTO on July 1, 2015.

Date: /Eric J. Meiers/

**OBJECTION #1: – Petitioner raises a new argument in its Reply that any component may perform the recited “updating” operations of Claims 27 and 35, whereas the Petition stated only that Monitor 34 of Cohen performed the “updating” operations.**

UEI objects to Petitioner’s new argument regarding which component may perform the “updating” operations of Claims 27 and 35 under 37 C.F.R. § 42.23(b). *See also Office Trial Practice Guide*, 77 Fed Reg. 48756, 48767 (August 14, 2012) (“A reply may only respond to arguments raised in the corresponding opposition. § 42.23. While replies can help crystalize issues for decision, a reply that raises a new issue or belatedly presents evidence will not be considered and may be returned.”) Specifically, Petitioner states: “Petitioner notes that neither claim 27 nor claim 35 requires any particular device to perform the recited ‘updating’ operations.” (Reply at 5.) In its Petition, Petitioner unequivocally stated that “When monitor 34 receives a signal from the remote control, *monitor 34 updates the state data* stored in its memory.” (Petition at 28, 32 (emphasis added).) Petitioner does not provide any citations to its Petition, or even Patent Owner’s Response, in support of its new Reply argument. (Reply at 5.) The Board should reject Petitioner’s new, untimely argument, as Patent Owner has not been provided a full and fair opportunity to respond.

IPR2014-01103

U.S. Patent No. 5,552,917

Respectfully Submitted,  
GREENBERG TRAURIG, LLP

Date: July 1, 2015

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the below date, I caused the foregoing to be served upon the following counsel of record via electronic mail (with counsel's agreement):

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