

Filed on behalf of Nidec Motor Corporation

IPR2014-01121

By: Scott R. Brown  
Matthew B. Walters  
HOVEY WILLIAMS LLP  
10801 Mastin Blvd., Suite 1000  
Overland Park, Kansas 66210  
Tel: (913) 647-9050  
Fax: (913) 647-9057

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ZHONGSHAN BROAD OCEAN MOTOR CO., LTD.; BROAD  
OCEAN MOTOR, LLC; AND BROAD OCEAN TECHNOLOGIES,  
LLC  
Petitioners

v.

NIDEC MOTOR CORPORATION  
Patent Owner

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Case No. IPR2014-01121  
U.S. Patent No. 7,626,349

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**PATENT OWNER'S OBJECTIONS TO  
PETITIONER'S EXHIBITS 1013-1017, 1020, 1022-1026, 1028,  
1031-1032, 1034-1036, AND 1038**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Nidec Motor Corporation submits the following objections to Exhibits 1013-1017, 1020, 1022-1026, 1028, 1031-1032, 1034-1036, and 1038 submitted by Petitioners:

**EXHIBIT 1013**: Patent Owner objects to this exhibit under Rule(s):

- Rule 106 of the Federal Rules of Evidence and Rule 32(a)(6) of the Federal Rules of Civil Procedure on the grounds that it lacks completeness.

**Exhibit 1014**: Patent Owner objects to this exhibit under Rule(s):

- 401-403 of the Federal Rules of Evidence on the grounds that it is irrelevant and a waste of time.
- 602 and 701 of the Federal Rules of Evidence because the declarant lacks personal knowledge and speculates about the subject matter about which he testifies;
- 702 and 37 C.F.R. 42.65(b) because the declarant does not explain the data, testing, and procedures used to arrive at the testimony about which he testifies; and
- 801–802 of the Federal Rules of Evidence because it constitutes and contains hearsay (e.g., ¶¶ 20, 22, 28, 34, 36) and no exclusion or exception therefore has been established under Rules 801–807.

**EXHIBIT 1015**: Patent Owner objects to this exhibit under Rule(s):

- 106 of the Federal Rules of Evidence and Rule 32(a)(6) of the Federal Rules of Civil Procedure on the grounds that it lacks completeness.

**EXHIBIT 1016**: Patent Owner objects to this exhibit under Rule(s):

- 106 of the Federal Rules of Evidence and Rule 32(a)(6) of the Federal Rules of Civil Procedure on the grounds that it lacks completeness.

**Exhibit 1017**: Patent Owner objects to this exhibit under Rule(s):

- 901-902 of the Federal Rules of Evidence because it lacks foundation and no proper basis for establishing its authenticity has been provided; and
- 801–802 of the Federal Rules of Evidence because it constitutes and contains hearsay and no exclusion or exception therefore has been established under Rules 801–807.

**Exhibit 1020**: Patent Owner objects to this exhibit under Rule(s):

- 401-403 of the Federal Rules of Evidence on the grounds that it is irrelevant and a waste of time (e.g., ¶ 6).
- 602 and 701 of the Federal Rules of Evidence because the declarant lacks

personal knowledge and speculates about the subject matter about which he testifies (e.g., ¶¶ 3, 4, 5, 7, 8, 10, 11, 12);

- 702 and 37 C.F.R. 42.65(b) because the declarant does not explain the data, testing, and procedures used to arrive at the testimony about which he testifies (e.g., ¶¶ 9); and
- 801–802 of the Federal Rules of Evidence because it constitutes and contains hearsay (e.g., ¶¶ 3, 4, 5, 7, 9, 11) and no exclusion or exception therefore has been established under Rules 801–807.

**Exhibit 1022**: Patent Owner objects to this exhibit under Rule(s):

- 106 of the Federal Rules of Evidence and Rule 32(a)(6) of the Federal Rules of Civil Procedure on the grounds that it lacks completeness; and
- 30(f) of the Federal Rules of Civil Procedure because the excerpted deposition testimony originates from a non-certified deposition transcript.

**Exhibit 1023**: Patent Owner objects to this exhibit under Rule(s):

- 106 of the Federal Rules of Evidence and Rule 32(a)(6) of the Federal Rules of Civil Procedure on the grounds that it lacks completeness; and
- 30(f) of the Federal Rules of Civil Procedure because the excerpted deposition testimony originates from a non-certified deposition transcript.

**Exhibit 1024**: Patent Owner objects to this exhibit under Rule(s):

- 901-902 of the Federal Rules of Evidence because it lacks foundation and no proper basis for establishing its authenticity has been provided; and
- 801–802 of the Federal Rules of Evidence because it constitutes and contains hearsay and no exclusion or exception therefore has been established under Rules 801–807.

**Exhibit 1025**: Patent Owner objects to this exhibit under Rule(s):

- 901-902 of the Federal Rules of Evidence because it lacks foundation and no proper basis for establishing its authenticity has been provided; and
- 801–802 of the Federal Rules of Evidence because it constitutes and contains hearsay and no exclusion or exception therefore has been established under Rules 801–807.

**Exhibit 1026**: Patent Owner objects to this exhibit under Rule(s):

- 37 C.F.R. 42.65(b) because the document does not explain the data, testing, and procedures used to arrive at the information contained within the exhibit;
- 901-902 of the Federal Rules of Evidence because it lacks foundation and

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