

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC.  
Petitioner,

v.

ATI TECHNOLOGIES ULC  
Patent Owner.

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Case IPR2015-00321  
Patent 7,095,945

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**PATENT OWNER'S OBJECTIONS TO EVIDENCE PRESENTED  
WITH PETITIONERS' REPLY**

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner, ATI TECHNOLOGIES ULC (“Patent Owner”), objects to Exhibit No. 1012, which accompanies Petitioners’ Reply (Paper No. 29) as filed January 28, 2016.

Patent Owner timely files these objections within five business days of Petitioners’ Reply, and hereby provides notice that Patent Owner may move to exclude under 37 C.F.R. § 42.64(c).

**FRE 702 (Improper Expert Testimony)**

Patent Owner objects to Ex. 1012 as improper expert testimony. The testimony is not based on sufficient facts or data, is not the product of reliable principles and methods, or the expert has not reliably applied the appropriate principles and methods to the facts of the case.

**CONCLUSION**

Exhibit 1012 is objectionable for the reasons detailed above. In view of Patent Owner's Objections herein, Patent Owner may file one or more motions to exclude this portion of the exhibit under 37 C.F.R. § 42.64(c).

Respectfully submitted,  
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Michael B. Ray/

Michael B. Ray  
Registration No. 33,997  
Attorney for Patent Owner

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## CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S OBJECTIONS TO EVIDENCE PRESENTED WITH PETITIONERS' REPLY** was served electronically via email on February 4, 2016 in their entirety on Petitioner LG Electronics:

<p>Robert G. Pluta (Lead Counsel) Amanda K. Streff (Backup Counsel) MAYER BROWN, LLP 71 S. Wacker Drive Chicago, IL 60606 rpluta@mayerbrown.com astreff@mayerbrown.com AMDIPR@mayerbrown.com</p>	<p>Jamie B. Beaver (Backup Counsel) MAYER BROWN, LLP 1999 K Street NW Washington, D.C. 20006 jbeaver@mayerbrown.com</p>
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Date: February 4, 2016

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