Filed on behalf of: VirnetX Inc.

By:

Joseph E. Palys

Naveen Modi

Paul Hastings LLP

875 15th Street NW

875 15th Street NW

Washington, DC 20005 Washington, DC 20005
Telephone: (202) 551-1996 Telephone: (202) 551-1

Telephone: (202) 551-1996 Telephone: (202) 551-1990 Facsimile: (202) 551-0496 Facsimile: (202) 551-0490

## UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner

V.

VIRNETX INC. Patent Owner

Case IPR2015-00810 Patent No. 8,868,705

## PATENT OWNER'S OBJECTIONS TO PETITIONER'S EXHIBITS



Case IPR2015-00810 Patent No. 8,868,705

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner VirnetX Inc. submits the

following objections to certain exhibits served by Apple Inc. ("Petitioner") in Case

No. IPR2015-00810. Patent Owner's objections apply equally to Petitioner's

reliance on these exhibits in any subsequently-filed documents. These objections

are timely, having been served within five business days of service of the evidence

to which the objection is directed.

**Exhibit 1067** 

Patent Owner objects to Exhibit 1067 under Rules 401-403 of the Federal

Rules of Evidence to the extent that this exhibit contains testimony and/or evidence

unrelated to the grounds of rejection on which the Board instituted inter partes

review.

Exhibit 1068

Patent Owner objects to Exhibit 1068 under Rules 401-403 of the Federal

Rules of Evidence because Petitioner never relied on this exhibit in its Petitioner's

Reply.

Dated: March 25, 2016

Respectfully submitted,

/Joseph E. Palys/

Joseph E. Palys

Registration No. 46,508

Counsel for VirnetX Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of March 2016, a copy of the foregoing Patent Owner's Objections to Petitioner's Exhibits was served by electronic mail upon the following:

Counsel for Apple Inc.:

iprnotices@sidley.com Sidley Austin LLP 1501 K Street NW Washington, DC 20005

Dated: March 25, 2016 Respectfully submitted,

/Joseph E. Palys/
Joseph E. Palys
Registration No. 46,508

Counsel for VirnetX Inc.

