

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION, SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG DISPLAY CO., LTD.

Petitioners

Patent No. 7,202,843

Issue Date: April 10, 2007

Title: DRIVING CIRCUIT OF A LIQUID CRYSTAL DISPLAY
PANEL AND RELATED DRIVING METHOD

PETITIONERS' OBJECTIONS TO EVIDENCE

FOR

INTER PARTES REVIEW OF U.S. PATENT NO. 7,202,843

No. IPR2015-00863

PETITIONERS' OBJECTIONS TO EVIDENCE

On October 28, 2015, during the deposition of Petitioners' expert, Thomas Credelle, Patent Owner's counsel Wayne Helge presented Mr. Credelle with a copy of U.S. Patent Application Publication No. 2008/0106540, which Mr. Helge marked as Exhibit A. Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners hereby submit their objections to Exhibit A. (Petitioners also stated their objection during the deposition of Mr. Credelle.)

Petitioners object to the admissibility of Exhibit A under Fed. R. Evid. 402 and 403. As testified by Mr. Credelle during his deposition, the filing date of Exhibit A is 2006, and, thus, the content of Exhibit A would not have been available to a person of ordinary skill in the art as of the 2003 claimed priority date of the U.S. Patent No. 7,202,843 (the "'843 patent"), and, therefore, would not have been within the knowledge base of such a person so as to form part of his or her level of skill as of 2003. Thus, Exhibit A is irrelevant. Moreover, even assuming for the sake of argument that Exhibit A might be considered relevant on some theory, whatever probative value it might have is substantially outweighed by a danger of unfair prejudice and confusion of the issues, since it did not exist until well after the claimed priority date of the '843 patent.

Petitioners further object to Exhibit A pursuant to 37 C.F.R. § 42.53(f)(3) as it was not properly served on Petitioners, and as being improperly numbered.

Dated: November 4, 2015

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on November 4, 2015, the foregoing Petitioners' Objections to Evidence is being served via electronic mail upon the following counsel of record for Patent Owner:

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