

Filed on behalf of: VirnetX Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

VIRNETX INC.
Patent Owner

Case IPR2015-00870
Patent No. 8,560,705

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

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. IPR2015-00870. 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.

Exhibits 1066 and 1067

Patent Owner objects to Exhibits 1066 and 1067 under Rules 401-403 of the Federal Rules of Evidence to the extent that these exhibits contain testimony and/or evidence unrelated to the grounds of rejection on which the Board instituted *inter partes* review.

Exhibit 1071

Patent Owner objects to Exhibit 1071 under Rules 401-403 of the Federal Rules of Evidence because Petitioner never relied on this exhibit in its Petitioner’s Reply.

Dated: April 11, 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 11th day of April 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.:

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Dated: April 11, 2016

Respectfully submitted,

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