

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD.
Petitioner

v.

SURPASS TECH INNOVATION LLC
Patent Owner

Case IPR2015-00885
Patent 7,202,843

**PATENT OWNER SURPASS TECH INNOVATION LLC'S
OBJECTIONS TO PETITIONER'S EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

Patent Owner Surpass objects to the evidence of Petitioner for the reasons

set forth below:

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1002	All	FRE 402, 403, 35 U.S.C. § 311(b)	A district court complaint is not relevant to the instituted basis for trial; reliance on materials that are not patents or printed publications.
1003	All	FRE 402, 403, 35 U.S.C. § 311(b)	A district court complaint is not relevant to the instituted basis for trial; reliance on materials that are not patents or printed publications.
1004	All	FRE 402, 403, 802, 35 U.S.C. § 311(b)	A prior petition is not relevant to the instituted basis for trial; the petition contains hearsay, and it is not a patent or printed publication.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1006	All	37 C.F.R. § 42.63(b); FRE 802; 35 U.S.C. § 311(b)	The document contains portions in a foreign language without a proper translation; the document contains hearsay; and it is not a patent or printed publication.
1007	All	37 C.F.R. § 42.63(b); FRE 802; 35 U.S.C. § 311(b)	Certifications do not provide basis for statements, such as the person making the certification does not attest who performed the translation. Translation fails to comply with 42.63(b). The document itself contains hearsay; and it is not a patent or printed publication.
1008	All	FRE 402, 403	Jinda is not part of the trial. Paper No. 9 at 11-12.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1009	All	FRE 402, 403, 802; 37 C.F.R. § 42.63(b)	Miyai is not part of the trial. Paper No. 9 at 11-12. Certification does not provide basis for statements, such as the person making the certification does not attest who performed the translation; contains hearsay.
1010	All	37 C.F.R. § 42.63(b); FRE 802	Translation fails to comply with 42.63(b). Certification does not provide basis for statements, such as the person making the certification does not attest who performed the translation; contains hearsay.
1011	¶¶ 26-31	FRE 402, 403	References to materials and issues outside of trial, including obviousness.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1011	¶ 51	FRE 402, 403	References to materials outside of trial, including Jinda and Miyai.
1011	¶¶ 53-77	37 C.F.R. § 42.63(b); FRE 802	Discussion of Lee without a proper translation; contains and relies upon hearsay.
1011	¶¶ 56-67	FRE 402, 403	References to materials outside of instituted basis for trial, i.e. claim 1.
1011	¶¶ 58, 61, 64-65, 70, 73, 76	FRE 702, 703	Fails to disclose basis for opinion.
1011	¶¶ 78-121	FRE 402, 403, 802; ; 37 C.F.R. § 42.63(b); FRE 802	References to materials outside of instituted basis for trial, i.e. claim 1, Jinda, Miyai. Discussion of Miyai without a proper translation; contains and relies upon hearsay.

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