

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG DISPLAY CO., LTD;
AND SONY CORPORATION,
Petitioners

v.

SURPASS TECH INNOVATION LLC,
Patent Owner.

Case IPR2015-00887
Patent 7,420,550

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

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

set forth below:

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1003	All	FRE 402, 403	Janssen '190 is not part of the trial. Paper No. 9 at 15-16.
1006, 1007	All	37 C.F.R. § 42.63(b); FRE 802.	Certification of translation does not comply with § 42.63(b), is not an affidavit, and the person making the certification does not attest who performed the translation or the basis for the certification.
1008	All	FRE 402, 403	Lewis is not part of the trial. Paper No. 9 at 15-16.
1010	All	FRE 402, 403	Joshi is not part of the trial. Paper No. 9 at 15-16.
1011	All	FRE 402, 403	Ruckmongathan is not part of the trial. Paper No. 9 at 15-16.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1012	All	FRE 402, 403	Brown is not part of the trial. Paper No. 9 at 15-16.
1013	¶ 2	FRE 402, 403	References to materials outside of trial, including 2(b), (f), (h), (i), (j), and (k).
1013	¶ 21	FRE 702, 703	Failure to provide basis for opinion.
1013	¶ 25	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including Lewis; failure to provide basis for opinion within instituted basis for trial; contains and relies on hearsay regarding POSA knowledge.
1013	¶ 27	FRE 702, 703	Failure to provide basis for opinion.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1013	¶¶ 29-31	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including Lewis; failure to provide basis for opinion within instituted basis for trial; contains and relies on hearsay regarding POSA knowledge.
1013	¶ 36	FRE 702, 703	Failure to provide basis for opinion.
1013	¶ 41	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including Ruckmongathan; failure to provide basis for opinion within instituted basis for trial; contains and relies on hearsay regarding POSA knowledge.
1013	¶¶ 48-56	FRE 402, 403	Janssen ' 190 is not part of the trial. Paper No. 9 at 15-16.
1013	¶ 60	FRE 702, 703	Failure to provide basis for opinion.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1013	¶ 63	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including Joshi; failure to provide basis for opinion within instituted basis for trial; contains and relies on hearsay regarding POSA knowledge.
1013	¶ 64	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including Lewis; failure to provide basis for opinion within instituted basis for trial; contains and relies on hearsay regarding POSA knowledge.
1013	¶ 65	FRE 702, 703, 802	Failure to provide basis for opinion within instituted basis for trial; contains and relies on hearsay regarding POSA knowledge.

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