

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHARP CORPORATION, SHARP ELECTRONICS CORPORATION, and
SHARP ELECTRONICS MANUFACTURING
COMPANY OF AMERICA, INC.,
Petitioners

v.

SURPASS TECH INNOVATION LLC,
Patent Owner.

Case IPR2015-00913
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 Petitioner for the reasons

set forth below:

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1002	All	37 C.F.R. § 42.63(b)	Japanese language portion lacks a proper translation; certification is not an affidavit, and the person making the certification does not attest who performed the translation or basis for statement.
1003	All	FRE 402, 403	Shimada is not part of the trial. Paper No. 9 at 12-13.
1006	All	FRE 402, 403	Kim is not part of the trial. Paper No. 9 at 12-13.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1007	¶¶ 11, 49	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including statements of prior use; relies on hearsay and lacks proper basis for statements, including “common practice.”
1007	¶ 50	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including statements of prior use and Sekido; relies on hearsay and fails to disclose proper basis for opinions.
1007	¶ 74	FRE 702, 703	Fails to disclose basis for opinion.
1007	¶¶ 75-79, 94	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including statements of prior use; relies on hearsay and fails to disclose proper basis for opinions.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1007	¶¶ 98, 114-15, 142 (including headings)	FRE 402, 403	The question of anticipation by Sharp is not part of the trial. Paper No. 9 at 12-13.
1007	¶¶ 121-22	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including statements of prior use; relies on hearsay and fails to disclose proper basis for opinions.
1007	¶¶ 132-34	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including statements of prior use; relies on hearsay and fails to disclose proper basis for opinions.
1007	¶ 140	FRE 702, 703	Fails to disclose basis for opinions.
1007	¶¶ 152-54	FRE 702, 703	Fails to disclose basis for opinions.
1007	¶¶ 162-209	FRE 402, 403	Shimada is not part of the trial. Paper No. 9 at 12-13.

Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1007	¶¶ 179-80	FRE 402, 403, 702, 703, 802	References to materials outside of instituted basis for trial, including statements of prior use; relies on hearsay and fails to disclose proper basis for opinions.
1009	All	FRE 402, 403	Sekido is not part of the trial. Paper No. 9 at 12-13.

Dated: September 23, 2015

Respectfully submitted,

By: /s/ Wayne M. Helge

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