

Filed on behalf of: VirnetX Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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THE MANGROVE PARTNERS MASTER FUND, LTD. and APPLE INC.,  
Petitioner

v.

VIRNETX INC.,  
Patent Owner

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Case IPR2015-01046<sup>1</sup>  
Patent 6,502,135

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

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<sup>1</sup> Apple Inc., who filed a petition in IPR2016-00062, has been joined as a Petitioner in the instant proceeding.

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner VirnetX Inc. submits the following objections to certain exhibits served by The Mangrove Partners Master Fund, Ltd. and Apple Inc. (“Petitioners”) in Case No. IPR2015-01046. Patent Owner’s objections apply equally to Petitioners’ 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 1037, 1039-1042**

Patent Owner objects to Exhibits 1037 and 1039-1042 under Rule 802 of the Federal Rules of Evidence because these exhibits constitute inadmissible hearsay. Patent Owner further objects to Exhibits 1037 and 1039-1042 under Rule 901 of the Federal Rules of Evidence because these exhibits lack authentication. Patent Owner further objects to Exhibits 1040-1042 under Rules 401-403 of the Federal Rules of Evidence because Petitioners did not rely on these exhibits in their reply.

Dated: May 16, 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 16th day of May 2016, a copy of the foregoing Patent Owner's Objections to Petitioners' Exhibits was served by electronic mail upon the following:

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