UNITED STATES PATENT AND TRADEMARK OFFIC	Έ
BEFORE THE PATENT TRIAL AND APPEAL BOARI	)
UMICORE AG & CO. KG, Petitioner	

v.

BASF Corporation, Patent Owner

Case IPR2015-01124
Patent Number: 8,404,203

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# PATENT OWNER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE SERVED WITH PETITIONER UMICORE AG & CO. KG'S PETITION FOR INTER PARTES REVIEW

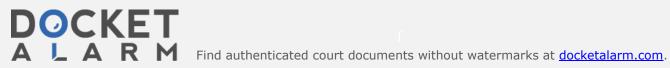


Pursuant to 37 C.F.R. § 42.64(b), Patent Owner BASF Corporation, hereby objects as follows to the admissibility of evidence with Petitioner Umicore AG & CO. KG's Petition for *Inter Partes* of U.S. Patent No. 8,404,203.

Evidence	Objections
Exhibit 1102	Lack of Foundation: Petitioner has not provided sufficient
	explanation of what the exhibit is or what it allegedly shows.
	FRE 802: the exhibit is inadmissible hearsay if offered to prove
	the truth of any matter allegedly asserted therein.
Exhibit 1103	Lack of Foundation: Petitioner has not provided sufficient
	explanation of what the exhibit is or what it allegedly shows.
	FRE 802: the exhibit is inadmissible hearsay if offered to prove
	the truth of any matter allegedly asserted therein.
Exhibit 1104	Lack of Foundation: Petitioner has not provided sufficient
	explanation of what the exhibit is or what it allegedly shows.
	<b>FRE 802</b> : the exhibit is inadmissible hearsay if offered to prove
	the truth of any matter allegedly asserted therein.
Exhibit 1105	Lack of Foundation: Petitioner has not provided sufficient
	explanation of what the exhibit is or what it allegedly shows.
	FRE 402: the exhibit is not relevant to any ground upon which



,404,203
trial was instituted.
FRE 802: the exhibit is inadmissible hearsay if offered to prove
the truth of any matter allegedly asserted therein.
Lack of Foundation: Petitioner has not provided sufficient
explanation of what the exhibit is or what it allegedly shows.
FRE 402: the exhibit is not relevant to any ground upon which
trial was instituted.
FRE 802: the exhibit is inadmissible hearsay if offered to prove
the truth of any matter allegedly asserted therein.
Lack of Foundation: Petitioner has not provided sufficient
explanation of what the exhibit is or what it allegedly shows.
FRE 802: the exhibit is inadmissible hearsay if offered to prove
the truth of any matter allegedly asserted therein.
FRE 901: Petitioner has not produced evidence sufficient to
support a finding that the exhibit is what Petitioner claims it is.
FRE 402: the exhibit contains paragraphs that are not relevant to
any ground upon which trial was instituted.
FRE 403: the exhibit's probative value to any ground upon
which trial was instituted is substantially outweighed by the



danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.

FRE 602: Paragraphs 20-34, 35-36, 37-64, 65-353, and 354-409 of the exhibit includes assertions for which evidence has not been introduced sufficient to show that the witness has personal knowledge of the matters asserted

**FRE 701/702/703:** Paragraphs 20-34, 35-36, 37-64, 65-353, and 354-409 of the exhibit include opinions that are not admissible under FRE 701, 702, or 703, or *Daubert v. Merrell Dow Pharms.*, *Inc.*, 509 U.S. 579 (1993).

**FRE 801/802:** Paragraphs 20-34, 35-36, 37-64, 65-353, and 354-409 of the exhibit includes statements that are inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.

**FRE 805:** the exhibit contains improper hearsay within hearsay. **FRE 1006:** the exhibit provides an improper summary of the evidence.

FRE 705 / 37 C.F.R. § 42.65: the exhibit includes expert testimony that does not disclose the underlying facts or data and improper discussion of patent law.



Exhibit 1109	FRE 901: Petitioner has not produced evidence sufficient to
	support a finding that the exhibit is what Petitioner claims it is.
Exhibit 1110	Lack of Foundation: Petitioner has not provided sufficient
	explanation of what the exhibit is or what it allegedly shows.
	FRE 402: the exhibit is not relevant to any ground upon which
	trial was instituted.
	FRE 403: the exhibit's probative value to any ground upon
	which trial was instituted is substantially outweighed by the
	danger of unfair prejudice, confusing the issues, undue delay,
	wasting time, or needlessly presenting cumulative evidence.
	FRE 802: the exhibit is inadmissible hearsay if offered to prove
	the truth of any matter allegedly asserted therein.
Exhibit 1111	Lack of Foundation: Petitioner has not provided sufficient
	explanation of what the exhibit is or what it allegedly shows.
	FRE 402: the exhibit is not relevant to any ground upon which
	trial was instituted.
	FRE 403: the exhibit's probative value to any ground upon
	which trial was instituted is substantially outweighed by the
	danger of unfair prejudice, confusing the issues, undue delay,



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