

Paper No. _____
Filed: April 13, 2016

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC Corporation,
HTC America, Inc.,
LG Electronics, Inc.,
Samsung Electronics Co., Ltd., and
Samsung Electronics America, Inc.
Petitioner

v.

Parthenon Unified Memory Architecture LLC
Patent Owner

Case IPR2015-01502
Patent No. 7,542,045

Petitioner's Objections to Patent Owner's Exhibits

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner¹ submits the following objections to exhibits submitted by Patent Owner, Parthenon Unified Memory Architecture LLC. Petitioner's objections apply equally to Patent Owner's reliance on these exhibits in any subsequently-filed documents. These objections are timely, having been filed and served within five business days from when the exhibits were served on Petitioner.

Exhibit 2004

Petitioner objects to Exhibit 2004 under Rules 401-403 of the Federal Rules of Evidence on the ground that it is not relevant because Patent Owner never relied on this exhibit in its Patent Owner's Response.

Exhibit 2005

Petitioner objects to Exhibit 2005 under Rules 401-403 of the Federal Rules of Evidence. Patent Owner only cited one page of the several hundred pages of Exhibit 2005 in its Patent Owner's Response. As such, these uncited pages lack relevance.

Exhibit 2008

¹ "Petitioner" refers collectively to HTC Corporation, HTC America, Inc., LG Electronics, Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc.

Petitioner objects to Exhibit 2008 under Rule 802 of the Federal Rules of Evidence because the testimony and/or evidence in this exhibit constitutes inadmissible hearsay.

Respectfully submitted,

Dated: April 13, 2016

By: /Allan M. Soobert/
Allan M. Soobert
Reg. No. 36,284

Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that I caused to be served on counsel a true and correct copy of the foregoing Petitioner's Objections to Patent Owner's Exhibits by electronic means on the date below at the following address of record:

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Respectfully submitted,

Dated: April 13, 2016

By: /Allan M. Soobert/
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Counsel for Petitioner