

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYDRITE CHEMICAL CO.,
Petitioner,

v.

SOLENIS TECHNOLOGIES, L.P.,
Patent Owner.

Case IPR2015-01592
Patent No. 8,962,059

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. §§ 42.64(b)(1), Patent Owner, Solenis Technologies, L.P. (“Solenis” or “Patent Owner”), objects to evidence filed by Petitioner, Hydrite Chemical Co., (“Hydrite” or “Petitioner”) on August 22, 2016, for the following reasons:

1. Solenis objects to Hydrite’s Ex. 1031 under FRE 801 because it is hearsay and contains hearsay. For example, Hydrite relies on Ex. 1031 for the truth of the matter asserted, *i.e.*, that Ex. 1022 was created by Mr. Copa. Solenis also objects to Ex. 1031 under FRE 401-403 because this document is irrelevant to the issues in the proceeding. As set forth in Solenis’s previous objections with respect to Ex. 1022 (the CVEC slides), it contains new argument and issues improperly set forth for the first time in reply in violation of 37 C.F.R. § 42.23(b). Because Ex. 1022 exceeds the permissible scope of reply, it is irrelevant to any issue in the case and allowing it would be prejudicial. For the same reasons, Ex. 1031, purporting to authenticate Ex. 1022, is also irrelevant to any issue in this case and its admission would be prejudicial.

Solenis reserves the right to object to the admissibility of any exhibit offered by Hydrite at the time such exhibit is offered in view of the specific context in which such exhibit is offered or for any other reason, as set forth in the Code of

Federal Regulations, the Federal Rules of Evidence, or any other applicable principle of law.

These objections have been filed and served within five (5) business days of the filing of the objectionable supplemental evidence on August 22, 2016.

Respectfully submitted,

Dated: August 29, 2016

/Joseph Lucci/
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CERTIFICATE OF SERVICE

I, David N. Farsiou, hereby certify that on this 29th day of August, the foregoing PATENT OWNER'S OBJECTION TO EVIDENCE was served electronically via e-mail on the following:

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