UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
APPLE INC.,
Petitioner,
v.
CORE WIRELESS LICENSING S.A.R.L., Patent Owner.
Case IPR2015-01898
Patent 8,434,020 B2

PATENT OWNER'S OBJECTIONS TO PETITIONER'S REPLY EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)(1)



Patent Owner timely objects to the reply evidence of Petitioner filed and served on October 17, 2016 for the reasons set forth below:

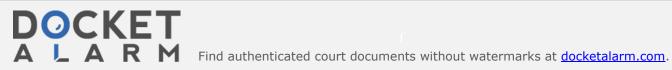
Identity of Exhibit	Portion to be Excluded	Objection	Grounds
1028	p. 6	FRE 402/403	Extrinsic dictionary definition of "function" is not relevant to any issue in this proceeding
1028	All	FRE 402/403, 801, 901	Exhibit is not authenticated by Petitioner's Ex. 1037, which is a declaration of an attorney having no personal knowledge of either the copyright date or the Ropes & Gray library logging date or logging procedures; exhibit contains hearsay (including alleged publication date) not subject to any exception; Exhibit is not established to be prior art and therefore is not relevant to any issue in this proceeding
1029	All	FRE 402/403	Exhibit is not relevant to any issue in this proceeding
1030	All	FRE 402/403	Exhibit is not relevant to any issue in this proceeding
1031	p. 5	FRE 402/403	Extrinsic dictionary definition of "program" is not relevant to any issue in this proceeding



Identity	Portion to	Objection	Grounds
of Exhibit	be Excluded		
1031	All	FRE 402/403, 801, 901	Exhibit is not authenticated by Petitioner's Ex. 1037, which is a declaration of an attorney having no personal knowledge of either the copyright date or the Texas A&M University Library receipt procedures; exhibit contains hearsay (including alleged publication date) not subject to any exception; Exhibit is not established to be prior art and therefore is not relevant to any issue in this proceeding
1032	All	FRE 402/403, 801, 901	Exhibit is not relevant to any issue in this proceeding; exhibit contains hearsay (including at least whether "mobile phones [were] using WindowsCE and web browsers" as Petitioner alleges) not subject to any exception; exhibit is not authenticated by declaration of Internet Archive manager having no personal knowledge of Ex. 1032 contents. See, e.g., Neste Oil Oyj v. Reg Synthetic Fuels, LLC, Case IPR2013-00578, slip op. at 3-4 (PTAB Mar. 12, 2015) (Paper 53) ("When offering a printout of a webpage into evidence to prove the website's contents, the proponent of the evidence must authenticate the information from the website itself, not merely the printout." (citing Victaulic Co. v. Tieman, 499 F.3d 227, 236 (3d Cir. 2007), as amended (Nov. 20, 2007) (citing United States v. Jackson, 208 F.3d 633, 638 (7th Cir. 2000)))).



Identity	Portion to	Objection	Grounds
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of Exhibit	Excluded		
1033	All	FRE 402/403, 801, 901	Extrinsic dictionary definition is not relevant to any issue in this proceeding; Exhibit is not authenticated by Petitioner's Ex. 1037, which is a declaration of an attorney having no personal knowledge of either the copyright date or the Ropes & Gray library logging date or logging procedures; exhibit contains hearsay (including alleged publication date) not subject to any exception; Exhibit is not established to be prior art and therefore is not relevant to any issue in this proceeding.
1034	All	FRE 402/403, 801, 901	Extrinsic dictionary definition is not relevant to any issue in this proceeding; Exhibit is not authenticated by Petitioner's Ex. 1037, which is a declaration of an attorney having no personal knowledge of either the copyright date or the Ropes & Gray library logging date or logging procedures; exhibit contains hearsay (including alleged publication date) not subject to any exception; Exhibit is not established to be prior art and therefore is not relevant to any issue in this proceeding



Identity	Portion to be	Objection	Grounds
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1035	All	FRE 402/403, 801, 901	Extrinsic dictionary definition is not relevant to any issue in this proceeding; Exhibit is not authenticated by Petitioner's Ex. 1037, which is a declaration of an attorney having no personal knowledge of either the copyright date or the Ropes & Gray library logging date or logging procedures; exhibit contains hearsay (including alleged publication date) not subject to any exception; Exhibit is not established to be prior art and therefore is not relevant to any issue in this proceeding
1038	¶¶ 7-8, 13, 32	FRE 402/403, 702/703, 801, 901	Opinions rely on unauthenticated exhibits that are not relevant to any issue in this proceeding, not established to be prior art and contain hearsay not subject to any exception; Dr. Myers fails to establish that these exhibits would have been relied upon by a POSITA in forming his/her opinions.



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