

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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AMX, LLC and Dell Inc.,  
Petitioner,

v.

ChriMar Systems, Inc.,  
Patent Owner.

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Case IPR2016-00574  
Patent 8,902,760 B2

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Before KARL D. EASTHOM, GREGG I. ANDERSON, and  
ROBERT J. WEINSCHENK, *Administrative Patent Judges*.

PETITIONER'S OBJECTIONS UNDER 37 C.F.R. § 42.64(b)(1)  
TO PATENT OWNER'S EXHIBITS 2001-2015 & 2017-2019

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner objects to the admissibility of Patent Owner's exhibits 2001-2015 and 2017-2019 as follows.

#### EXHIBITS 2001-2014

Petitioner objects to the admissibility of Exhibits 2001 to 2014 under FED. R. EVID. 401 and 402. Patent Owner submitted Exhibits 2001 to 2014 in support of its motion for additional discovery (Paper 9). Because the Board denied Patent Owner's motion (Paper 16), Exhibits 2001 to 2014 are not relevant to any issue in this proceeding.

In addition, Petitioner objects to the admissibility of Exhibits 2011 to 2014 under FED. R. EVID. 802. These exhibits incorporate or convey inadmissible hearsay that is offered to prove the truth of any matter allegedly asserted therein.

#### EXHIBIT 2015

Petitioner objects to the admissibility of Exhibit 2015 under FED. R. EVID. 401, 402, and 403. The declarant's testimony in paragraphs 46 to 58 of Exhibit 2015 is not relevant to the proper obviousness analysis or any other issue in this proceeding. Any probative value of this testimony is substantially outweighed by a danger of confusing the issues.

#### EXHIBITS 2017-2019

Petitioner objects to the admissibility of Exhibits 2017 to 2019 under FED. R. EVID. 401 and 402. These district court opinions are not relevant to any issue in this

Case IPR2016-00574  
Patent 8,902,760 B2

proceeding; they relate to a patent that is not at issue in the present proceeding.

August 24, 2016

Respectfully submitted,

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Case IPR2016-00574  
Patent 8,902,760 B2

### CERTIFICATE OF SERVICE

I certify that I sent a copy of the foregoing PETITIONER'S OBJECTIONS UNDER 37 C.F.R. § 42.64(B)(1) TO PATENT OWNER'S EXHIBITS 2001-2015 & 2017-2019 on August 24, 2016 by electronic mail to the attorneys of record for the Patent Owner at the following e-mail addresses:

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/Hersh H. Mehta/  
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