

Filed on behalf of Oxbo International Corporation

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**H&S MANUFACTURING COMPANY, INC.**

Petitioner,

v.

**OXBO INTERNATIONAL CORPORATION**

Patent Owner.

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Case IPR2016-00950  
Patent 8,166,739

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**PATENT OWNER'S OBJECTIONS TO PETITIONER'S  
DEMONSTRATIVES**

Patent Owner, Oxbo International Corporation, hereby submits this disclosure of its remaining objections to demonstratives. Patent Owner represents that demonstratives were timely exchanged and that counsel conferred regarding these demonstratives on July 26-27, 2017. These objections represent Patent Owner's remaining objections following discussion with counsel for Petitioner.

1. Patent Owner objects to Petitioner's Demonstrative Slide No. 5 because the title of the demonstrative incorrectly argues that Patent Owner argued against there being any claim construction issues, and as such, it is also a new argument not previously made in Petitioner's Petition or Reply.
2. Patent Owner objects to Petitioner's Demonstrative Slide No. 8 because it improperly raises a new claim construction argument for the term "material" and is not responsive to Patent Owner's Response.
3. Patent Owner objects to Petitioner's Demonstrative Slide No. 11 because it improperly takes Patent Owner's expert witness's statement out of context, as prohibited in IPR015-00780, Paper 48, p. 4.
4. Patent Owner objects to Petitioner's Demonstrative Slide No. 17 because it is a new argument alleging Patent Owner's arguments rely on "bodily incorporation," which was not made in the Petitioner's Petition or Reply; Petitioner's Reply merely quotes a legal statement from the Board's preliminary decision, but makes no argument about it.

5. Patent Owner reserves further objections pursuant to its pending Motion to Exclude.

Respectfully submitted,

MERCHANT & GOULD, P.C.

Date: July 27, 2017

/Andrew J. Lagatta/

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(Trial No. IPR2016-00950)

*ATTORNEYS FOR PATENT OWNER*

**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that “PATENT OWNER’S OBJECTIONS TO PETITIONER’S DEMONSTRATIVES” for the above-captioned matter was served in its entirety on July 27, 2017, upon the following parties via e-mail:

Brad D. Pederson (Reg. No. 32,432)  
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Respectfully submitted,  
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Date: July 27, 2017

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