

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GENERAL ELECTRIC CO.,
Petitioner,

v.

UNITED TECHNOLOGIES CORP.,
Patent Owner.

Case No. IPR2016-00952
U.S. Patent No. 9,121,412

**PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE
SERVED WITH PATENT OWNER UNITED TECHNOLOGIES CORP.'S
PRELIMINARY RESPONSE TO PETITION FOR
INTER PARTES REVIEW**

Pursuant to 37 C.F.R. § 42.64(b), Petitioner General Electric Co., hereby objects as follows to the admissibility of evidence with Patent Owner United Technologies Corp.’s Preliminary Response to Petition for *Inter Partes* review of U.S. Patent No. 9,121,412 (IPR2016-00952).

Evidence	Objections
Exhibit UTC-2001	<p>Lack of Foundation: Patent Owner has not provided sufficient explanation of what the exhibit is or what it allegedly shows.</p> <p>FRE 402: the exhibit is not relevant to any ground upon which trial was instituted.</p> <p>FRE 403: the exhibit’s probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly cumulative evidence.</p> <p>FRE 802: the exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p>FRE 805: the exhibit contains improper hearsay within hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence sufficient to support a finding that the exhibit is what Patent Owner</p>

Evidence	Objections
	claims it is.
Exhibit UTC-2002	<p>Lack of Foundation: Patent Owner has not provided sufficient explanation of what the exhibit is or what it allegedly shows.</p> <p>FRE 402: the exhibit is not relevant to any ground upon which trial was instituted.</p> <p>FRE 403: the exhibit's probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly cumulative evidence.</p> <p>FRE 802: the exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p>FRE 805: the exhibit contains improper hearsay within hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
Exhibit UTC-2003	<p>Lack of Foundation: Patent Owner has not provided sufficient explanation of what the exhibit is or what it</p>

Evidence	Objections
	<p>allegedly shows.</p> <p>FRE 402: the exhibit is not relevant to any ground upon which trial was instituted.</p> <p>FRE 403: the exhibit’s probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly cumulative evidence.</p> <p>FRE 802: the exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p>FRE 805: the exhibit contains improper hearsay within hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
Exhibit UTC-2004	<p>Lack of Foundation: Patent Owner has not provided sufficient explanation of what the exhibit is or what it allegedly shows.</p> <p>FRE 402: the exhibit is not relevant to any ground upon which trial was instituted.</p>

Evidence	Objections
	<p>FRE 403: the exhibit's probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly cumulative evidence.</p> <p>FRE 802: the exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p>FRE 805: the exhibit contains improper hearsay within hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
Exhibit UTC-2005	<p>Lack of Foundation: Patent Owner has not provided sufficient explanation of what the exhibit is or what it allegedly shows.</p> <p>FRE 402: the exhibit is not relevant to any ground upon which trial was instituted.</p> <p>FRE 403: the exhibit's probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay,</p>

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