

Filed on behalf of Securus Technologies, Inc.
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL*LINK CORPORATION,
Petitioner,

v.

SECURUS TECHNOLOGIES, INC.,
Patent Owner.

Case IPR2016-01220
U.S. Patent No. 9,007,420

**PATENT OWNER'S OBJECTIONS TO EVIDENCE
UNDER 37 C.F.R. § 42.64(B)(1)**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

Patent Owner Securus Technologies, Inc. (“Securus”) hereby files the following objections to evidence under the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.62(b)(1) to the admissibility of the following evidence submitted by Global Tel*Link Corporation (“Petitioner”) in support of its Petitioner’s Reply (Paper 19).

Securus objects to and may seek the exclusion of the following documents:

Exhibit No.	Description
1021	Toderici <i>et al.</i> , “Bidirectional relighting for 3D-aided 2D Face Recognition,” Proceedings from IEEE Computer Vision and Pattern Recognition, 13-18 June 2010, San Francisco, CA (“Toderici ”)

Exhibit 1021 – Toderici

Patent Owner objects to Toderici under 35 U.S.C. § 311(b) because it does not appear to be admissible as prior art under 35 U.S.C. § 102 or 103. For example, there is no admissible evidence demonstrating that Toderici was actually published or publicly accessible before the priority date of the challenged patent claims.

Patent Owner objects to Toderici as not properly authenticated under Federal Rule of Evidence 901. There is no evidence that Toderici is authentic nor that the document is self-authenticating under Federal Rule of Evidence 902.

Patent Owner objects to Toderici under Federal Rules of Evidence 401-403 because its probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, unduly delay, wasting time, or needlessly

presenting cumulative evidence. For example, Toderici is not prior art and it is highlighted in a confusing manner.

Patent Owner objects to Toderici as inadmissible hearsay under Federal Rules of Evidence 801 and 802 that does not fall under any hearsay exception, including those of Federal Rules of Evidence 803, 804, 805, or 807.

Patent Owner objects to Toderici as not being an original document under Federal Rule of Evidence 1002, an authentic duplicate under Federal Rule of Evidence 1003, nor a document that falls under any exceptions to the original-document requirement, including those of Federal Rule of Evidence 1004.

Patent Owner objects to Toderici because it does not comply with the marking requirements under 37 CFR § 42.63(d)(2)(i).

Respectfully submitted,

Date: June 29, 2017

/Nicholas Kliewer/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that document was served via electronic mail on June 29, 2017, to Petitioner via counsel, mspecht-PTAB@skgf.com, jmutsche-PTAB@skgf.com, and PTAB@skgf.com, pursuant to Petitioner's consent in its Petition at page 60.

/Nicholas Kliewer/

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