

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
Patent 9,007,420

**PETITIONER'S OBJECTIONS TO
PATENT OWNER'S DEMONSTRATIVE SLIDES**

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to the Order dated July 26, 2017 (Paper 25), Petitioner Global Tel*Link Corporation (“GTL”) hereby objects to certain demonstrative slides of Patent Owner Securus Technologies, Inc. (“Securus”).

GTL objects to the following Securus demonstrative slides as improperly advancing new and/or altered evidence and arguments that go beyond serving as visual aids. GTL objects to:

- Slides 11-12, 17, 22, 27, 38, 39, 47, and 49 because the positions Securus takes in these slides are not in the written record and represent an improper, unauthorized surreply; and
- Slides 23, 36, and 46 because these slides present new images not in evidence or the written record.

More specifically, GTL’s objections are as follows:

I. New arguments amounting to an improper and unauthorized surreply
Demonstrative Slides 11-12

GTL objects to demonstrative slides 11, because Securus advances a new argument in the left hand box that does not appear in the written record, presenting new arguments and amounting to an improper and unauthorized surreply.

Demonstrative Slide 17

GTL objects to demonstrative slide 17, because Securus cites new case law (*Modine* and *Canton Bio Med.*) that does not appear in the written record, presenting new case law not cited or relied upon in the Petition, Institution Decision, Patent Owner Response, or Petitioner's Reply, and amounting to an improper and unauthorized surreply.

Demonstrative Slides 22, 38-39, and 49

GTL objects to demonstratives slides 22, 38-39, and 49, because Securus advances new arguments in the top and bottom boxes with blue text that do not appear in the written record, presenting new arguments, and amounting to an improper and unauthorized surreply.

Demonstrative Slide 27

GTL objects to demonstrative slide 27, because Securus advances a new argument that does not appear in the written record, attempting to add attorney argument related to Dr. Kakadiaris' testimony, and amounting to an improper and unauthorized surreply.

Demonstrative Slide 47

GTL objects to demonstrative slide 47, because Securus advances a new argument in the red and blue text that does not appear in the written record, presenting new arguments to characterize GTL's position, and amounting to an improper and unauthorized surreply.

II. New images not found in the written record

Demonstrative Slide 23

GTL objects to demonstrative slide 23, because Securus introduces new images not present anywhere in the record, failing to cite the Patent Owner Response or any other paper where the images were present.

Demonstrative Slide 36

GTL objects to demonstrative slide 36, because Securus introduces a new image that is not present anywhere in the record, failing to cite the Patent Owner Response or any other paper where the image was present.

Demonstrative Slide 46

GTL objects to demonstrative slide 46, because Securus introduces a new image that is not present anywhere in the record, failing to cite the Patent Owner

Response or any other paper where the image was present.

These objections are made at least three business before the August 9, 2017
oral hearing.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

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