

Filed on behalf of Godo Kaisha IP Bridge 1

By: Neil F. Greenblum (ngreenblum@gbpatent.com)  
Greenblum & Bernstein, P.L.C.  
1950 Roland Clarke Place  
Reston, VA 20191  
Tel: 703-716-1191  
Fax: 703-716-1180

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LIMITED,  
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,  
Patent Owner.

---

Case IPR2016-01246<sup>1</sup>  
U.S. Patent No. 7,126,174 B2

---

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

Mail Stop PATENT BOARD, PTAB  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

---

<sup>1</sup> Case IPR2016-01247 has been consolidated with this proceeding.

I. Introduction

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Godo Kaisha IP Bridge 1 (“IP Bridge” or “Patent Owner”) files the following objections to evidence submitted by Petitioner which accompanies the Petition for *Inter Partes Review* of U.S. Patent No. 7,126,174 (“Petition”). These objections are timely presented, as they are filed within ten business days of the institution of trial on January 4, 2017. 37 C.F.R. § 42.64 (b)(1) (January 16 being a holiday). Patent Owner reserves the right to file a motion to exclude the evidence objected to and identified herein.

II. Petitioner Exhibits 1003, 1005, 1006, 1007, 1008, 1011, 1012, 1013, 1016, and 1018

Patent Owner objects to Exhibits 1003 (Shinoda et al.), 1005 (Appels et al.), 1006 (Nagasawa et al.), 1007 (Brand et al.), 1008 (Brandt et al.), 1011(Douglas), 1012 (Thompson et al.), 1013 (Chau et al.), 1016 (Mandelman et al.), 1018 (Iyer) (collectively, hereinafter “the objected-to exhibits”) under Federal Rule of Evidence 401-403. Each of the objected-to exhibits is not relevant to this proceeding. They are cursory and contain little or no discussion regarding their relevance.

The grounds instituted for trial rely only upon Exhibits 1001 (Segawa et al.), 1002 (Lee et al.), 1004 (Banerjee Declaration), 1009 (Schuegraf et al.), 1010 (Ogawa et al.), 1015 (Noble et al.), 1017 (Lowrey et al.).

Accordingly, any facts within Exhibits 1003, 1005, 1006, 1007, 1008, 1011, 1012, 1013, 1016, and 1018 are not “of consequence in determining the action,” as these exhibits are not part of any grounds instituted for trial, and were not referred to or cited by the Board in the Decision on Institution. Consequently, Patent Owner has no opportunity to specifically address the Board’s position as any of these Exhibits. FRE 401-403.

Patent Owner further objects to Exhibits 1003, 1005, 1006, 1007, 1008, 1011, 1012, 1013, 1016, and 1018 under Federal Rule of Evidence 401-403. Because these exhibits were only summarily discussed by Petitioner/Declarant, and no effort was made to specifically link any of them to their invalidity contentions, it is virtually impossible to discuss them and respond in a coherent manner. Each of the aforementioned Exhibits may thus result in unfair prejudice, confusing the issues, misleading the factfinder, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

The issues for trial are narrow, and the objected-to exhibits are cumulative at best, add nothing relevant to the grounds instituted for trial, and could cause confusion as to what evidence is available in the proceeding.

III. Specific Objections

Exhibit 1003: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1005: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1006: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1007: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1008: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1011: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1012: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1013: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1016: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

Exhibit 1018: Its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 401-403.

IV. Documents Dated After the Japanese Priority Date

Patent Owner objects to the following exhibits because they have filing dates after the '174 Patent's priority date of July 27, 1995.

Exhibit 1009: filing date of October 24, 1995

Exhibit 1013: filing date of December 29, 1995

Exhibit 1014: filing date of December 12, 1995

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.