

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GENERAL ELECTRIC COMPANY,  
Petitioner,

v.

UNITED TECHNOLOGIES CORPORATION,  
Patent Owner.

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Case No. IPR2016-01289  
U.S. Patent No. 7,060,360

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

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Pursuant to 37 C.F.R. § 42.64(b), Petitioner General Electric Company, hereby objects as follows to the admissibility of evidence with Patent Owner United Technologies Corporation's Response to Petition for *Inter Partes* review of U.S. Patent No. 7,060,360 (IPR2016-01289).

Evidence	Objections
<p><b>UTC-2013</b></p>	<p><b>FRE 401-402:</b> The exhibit is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> 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 presenting cumulative evidence.</p> <p><b>FRE 602:</b> Paragraphs 5-48 of the exhibit include assertions for which evidence has not been introduced sufficient to show that the witness has personal knowledge of the matters asserted.</p> <p><b>FRE 701/702/703:</b> Paragraphs 5-48 of the exhibit include opinions that are not admissible under FRE 701, 702, and/or 703, or <i>Daubert v. Merrell Dow Pharms., Inc.</i>, 509</p>

Evidence	Objections
	<p>U.S. 579 (1993).</p> <p><b>FRE 705 / 37 C.F.R. § 42.65:</b> The exhibit includes expert testimony that does not disclose the underlying facts or data.</p> <p><b>FRE 801/802:</b> The exhibit includes inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p><b>FRE 1006:</b> The exhibit provides an improper summary of the evidence.</p>
<p><b>UTC-2014</b></p>	<p>Petitioner maintains its objections made during the deposition of Dr. Andreas M. Glaeser.</p> <p><b>FRE 401-402:</b> The exhibit is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> 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 presenting cumulative evidence.</p>
<p><b>UTC-2016</b></p>	<p><b>FRE 106:</b> The exhibit violates the rule of completeness.</p>

Evidence	Objections
	<p><b>FRE 401-402:</b> The exhibit is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> 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 presenting cumulative evidence.</p> <p><b>FRE 801/802:</b> The exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p>
<p><b>UTC-2017</b></p>	<p><b>FRE 106:</b> The exhibit violates the rule of completeness.</p> <p><b>FRE 401-402:</b> The exhibit is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> 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 presenting cumulative evidence.</p> <p><b>FRE 801/802:</b> The exhibit is inadmissible hearsay if</p>

<b>Evidence</b>	<b>Objections</b>
	offered to prove the truth of any matter allegedly asserted therein.
<b>UTC-2018</b>	<p><b>FRE 106:</b> The exhibit violates the rule of completeness.</p> <p><b>FRE 401-402:</b> The exhibit is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> 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 presenting cumulative evidence.</p> <p><b>FRE 801/802:</b> The exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p>
<b>UTC-2019</b>	<p><b>FRE 401-402:</b> The exhibit is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> 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 presenting</p>

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