

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 IPR2016-01362
U.S. Patent No. 9,083,850

**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 Petition for *Inter Partes* Review.

These objections are made within 10 business days from the January 9, 2017 filing of Institution Decision (Paper 11). Securus objects to and intends to seek the denial of the admission and consideration of the following documents:

Exhibit No.	Description
1008	“Remote Controlled DSP Based Image Capturing and Processing System Featuring Two-Axis Motion,” by Gotsopoulos et al. (“Gotsopoulos”)
1009	American Heritage Dictionary

Patent Owner’s specific objections are provided below.

Exhibit 1008 – Gotsopoulos

Patent Owner objects to Gotsopoulos 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 Gotsopoulos was actually published or publicly accessible before the priority date of the challenged patent claims.

Patent Owner objects to Gotsopoulos 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, Gotsopoulos is not prior art and it is highlighted in a confusing manner.

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

Patent Owner objects to Gotsopoulos 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 Gotsopoulos 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. For example, Gotsopoulos appears to be a compilation of at least three separate unrelated documents.

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

Exhibit 1009 – American Heritage Dictionary

Patent Owner objects to Exhibit 1009 under 35 U.S.C § 311(b) because it is not admissible as prior art under 35 U.S.C. §§ 102 or 103. For example, there is no admissible evidence demonstrating that Exhibit 1009 was actually published or publicly accessible before the priority date of the challenged patent claims.

Patent Owner objects to Exhibit 1009 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, Exhibit 1009 is not prior art, and Petitioner does not assert Exhibit 1009 in a ground of invalidity against the challenged patent claims, Exhibit 1009 was not discussed or referenced in the Board's institution decision, and Petitioner makes only a passing reference to Exhibit 1009 in the Petition.

Patent Owner objects to Exhibit 1009 as not properly authenticated under Federal Rule of Evidence 901. There is no evidence that Exhibit 1009 is authentic nor that the document is self-authenticating under Federal Rule of Evidence 902.

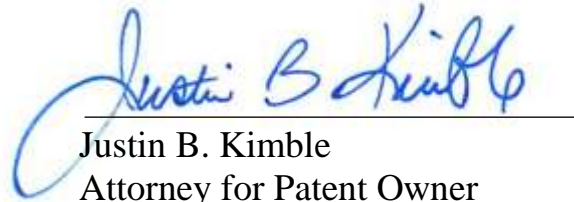
Patent Owner objects to Exhibit 1009 as inadmissible hearsay under Federal Rules of Evidence 801 and 802 that does not fall under any hearsay exception, including those of Federal Rules of Evidence 803, 804, 805, or 807.

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Patent Owner objects to Exhibit 1009 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.

Date: January 24, 2017

Respectfully submitted,



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