

Filed on behalf of TQ Delta, LLC

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,
v.

TQ DELTA, LLC,
Patent Owner.

Case IPR2016-01466
Patent No. 8,611,404

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

Patent Owner's Objections to Evidence

IPR2016-01466

U.S. Patent No. 8,611,404

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner TQ Delta, LLC (“Patent Owner”) hereby files and serves the following objections to evidence that Petitioner Cisco Systems, Inc.’s (“Cisco”) submitted with its Reply. A chart listing Patent Owner’s objections and its basis for the objections is provided below.

Exhibit	Objection
Ex. 1012 (Declaration of Dr. Sayfe Kiaei)	<p>Relevance: ¶¶ 1-3, 8-16, 22, and 25 are not cited in the Reply and, therefore, are not relevant. F.R.E. 402; F.R.E. 403; 37 C.F.R. § 42.61.</p> <p>¶¶ 4-14 and 16- 24 are directed to new evidence going to the alleged invalidity of challenged claims. These sections are improperly introduced by the Reply. These sections are not relevant and improper. <i>See</i> F.R.E. 402; F.R.E 403; 37 C.F.R. § 42.23; 37 C.F.R. § 42.61; 77 Fed. Reg. 48,756, 48,767; 77 Fed. Reg. 48612, 48620.</p>

These objections are made, filed, and served within five business days of service of Petitioner’s Reply.

Patent Owner's Objections to Evidence
IPR2016-01466
U.S. Patent No. 8,611,404

Dated: August 30, 2017

Respectfully submitted,

/Peter J. McAndrews/

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Lead Counsel for Patent Owner

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Patent Owner's Objections To Evidence Pursuant To 37 C.F.R. 42.64(b)(1)** was served on August 30, 2017, via email to counsel for Petitioners at the following:

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