

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics Co., Ltd., and
Samsung Electronics America, Inc.,
Petitioner

v.

Image Processing Technologies, LLC,
Patent Owner.

CASE IPR2017-01190
Patent No. 6,717,518

PAPER NO. 17

**PETITIONER'S OBJECTIONS TO
PATENT OWNER'S EVIDENCE**

Pursuant to 37 C.F.R. §42.64(b)(1), Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) objects to the admissibility of the following evidence submitted by Patent Owner on January 8, 2018. As used herein, “FRE” refers to the Federal Rules of Evidence.

Samsung objects to the following evidence:

1) Exhibit 2012 (Website printout, Parallel Computing Institute)

Samsung objects to Exhibit 2012 under FRE 901 because authenticating information has not been provided. Samsung also objects to Exhibit 2012 under FRE 402 (relevance) and FRE 403 (unfairly prejudicial, confusing, waste of time) at least because the document is not discussed or cited the Patent Owner Response.

2) Exhibit 2013 (Website printout, Computer Graphics Illinois)

Samsung objects to Exhibit 2013 under FRE 901 because authenticating information has not been provided. Samsung also objects to Exhibit 2013 under FRE 402 (relevance) and FRE 403 (unfairly prejudicial, confusing, waste of time) at least because the document is not discussed or cited the Patent Owner Response.

3) Exhibit 2014 (Hand-drawn Sketch)

Samsung objects to Exhibit 2014 under FRE 901 because authenticating information has not been provided. Samsung also objects to Exhibit 2014 under

FRE 402 (relevance) and FRE 403 (unfairly prejudicial, confusing, waste of time) at least because the document is not discussed or cited the Patent Owner Response.

4) Exhibit 2015 (Diagram of Eye)

Samsung objects to Exhibit 2015 under FRE 402 (relevance) FRE 403 (confusing and unfairly prejudicial), FRE 802 (hearsay), and FRE 901 (not authenticated), as it is apparently two diagrams Patent Owner downloaded from the Internet and is relying upon to show the anatomy of the eye.

5) Paper No. 15, pages 6-7 (Diagrams and Photograph of Eye)

Samsung objects to the diagrams and explanatory text at Paper No. 15, pages 6-7 under FRE 402 (relevance) FRE 403 (confusing and unfairly prejudicial), FRE 802 (hearsay), and FRE 901 (not authenticated), as it shows diagrams and a photograph Patent Owner apparently downloaded from the Internet and is relying upon to show the anatomy of the eye.

Respectfully Submitted,

/s/ John Kappos

John Kappos (Reg. No. 37,861)

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CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) and § 42.105 that on January 16, 2018, a true and correct copy of **PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE** was served via express mail on the Patent Owner at the following correspondence address of record:

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Copies were also sent to Patent Owner's litigation counsel via electronic mail:

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