

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PFIZER, INC. and
SAMSUNG BIOEPIS CO., LTD.,¹

Petitioners

v.

GENENTECH, INC.,
Patent Owner.

IPR2017-01488
Patent No. 6,407,213

**PETITIONERS' OBJECTIONS TO PATENT OWNER'S
DEMONSTRATIVE EXHIBITS**

¹ Samsung Bioepis Co., Ltd.'s IPR2017-02139 has been joined with this proceeding. (IPR2017-02139, Paper 42.)

Petitioners object to the following demonstrative exhibits served by PO:

1. **PODX2, 21-25, 27-31, 35, 38, 39, 43-44, 46-50, and 80**, which excerpt portions of lab notebooks (Exs. 2001-2009) omitting or obscuring the full signature block, and are therefore misleading and prejudicial (FRE 403).
2. **PODX2, 11, 12, 13, 16-52, 59, 80, and 108**, which excerpt, quote, and/or cite exhibits that are subject to Petitioners' Motion to Exclude (Paper 67).
3. **PODX3, 4, and 5**, which contain new argument and briefing on previously uncited portions of exhibits.
4. **PODX54, 56, and 62**, which contain new argument and briefing on a new and misleading claim construction position.
5. **PODX18, 20, 26, 32, 34, 37, 40, 42, 45, 51, and 59**, which contain previously undisclosed diagrams, with new and misleading characterizations of evidence.
6. **PODX11, 16-17, 19, 21, 49-50, 57, 71-72, 82, 96, 100-102, and 109**, which misstate and/or mischaracterize the evidence.

Per the Board's Order, the parties met and conferred in good faith to resolve these objections, and were unable to resolve the issues. Paper 69 at 3-4.

Date: July 13, 2018

Respectfully submitted,

/Amanda Hollis/
Attorney For Petitioner Pfizer, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objections was served on July 13, 2018 via electronic service on lead and back-up counsel:

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