

Filed on behalf of Patent Owner Genentech, Inc. by:

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PFIZER, INC.,
Petitioner,

v.

GENENTECH, INC.,
Patent Owner.

Case IPR2017-01488
U.S. Patent 6,407,213

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

Pursuant to 37 C.F.R. § 42.64, Patent Owner Genentech, Inc. presents the following objections to evidence served with the Petition of Pfizer, Inc. (“Petitioner”).

Genentech objects to Exhibit 1003, Declaration of Jefferson Foote, Ph.D., in Support of Pfizer's Petition for *Inter Partes* Review of U.S. Patent No. 6,407,213. Genentech specifically objects to ¶¶ 29-32, 33-41, 48, 51-52, 56-57, 62, 65, 73, 80, 84-106, 108-120, 121, 125, 129-130, 134, 139, 143, 156-161, 163-164, 167-168, 170-172, 174-176, 179-186, 188, 190-191, 193-194, 196-199, 201-202, 204-212, 214, 216-222, 224-228, 230-240, 242-278, 280-291, 293-310, 312-316, 318-322, 324-327, 330-353 and all paragraphs that rely on those paragraphs as lacking a disclosed basis of sufficient facts or data (FRE 705; 37 C.F.R. § 42.65), not being based on sufficient facts or data, the product of reliable principles and methods, and/or a reliable application of the principles and methods to the facts (FRE 702, 703), and being misleading and/or confusing (FRE 403).

Genentech objects to Exhibit 1004, Declaration of Timothy Buss, in Support of Pfizer's Petition for *Inter Partes* Review of U.S. Patent No. 6,407,213. Genentech specifically objects to ¶¶ 15-16, 18, 30-33, 43-45, 53-55, 63, 67, 69-70 and all paragraphs that rely on those paragraphs as inadmissible hearsay (FRE 802), lacking a disclosed basis of sufficient facts or data (FRE 705; 37 C.F.R. § 42.65), not being based on sufficient facts or data, the product of reliable principles

and methods, and/or a reliable application of the principles and methods to the facts (FRE 702, 703), and being misleading and/or confusing (FRE 403).

Respectfully submitted,

Date: December 15, 2017

/David L. Cavanaugh/
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CERTIFICATE OF SERVICE

I hereby certify that, on December 15, 2017, I caused a true and correct copy of the following materials:

- Patent Owner's Objections to Evidence

to be served via electronic mail on the following attorneys of record:

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