

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case Nos. IPR2017-01841¹
Patent No. 7,893,501

PATENT OWNER'S OBJECTIONS TO EVIDENCE

¹ Case IPR2017-01842 has been consolidated with this proceeding.

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to evidence served in connection with the Petition for *Inter Partes* Review filed on July 26, 2017. These objections are timely filed and served within ten business days of the institution of the trial in this matter.

I. EXHIBITS FROM IPR2017-01841

Patent Owner objects to each of Exhibits 1008, 1010, 1011, 1014, and 1015 for the following reasons:

- Petitioner objects under Fed. R. Evid. 901 as Petitioner has failed to authenticate the exhibits; more specifically, Petitioner has failed to establish that the exhibits are what Petitioner says they are, and has failed to establish the date by which the exhibits were published;
- To the extent Petitioner attempts to rely on the copyright date or other date identified in any of the exhibits to establish the publication date, the copyright date or other date is hearsay under Fed. R. Evid. 801 and the exhibit is inadmissible under Fed. R. Evid. 802;
- Due to the above deficiencies, Petitioner has failed to establish that the exhibits are relevant under Fed. R. Evid. 401, and therefore the exhibits are inadmissible under Fed. R. Evid. 402.

Patent Owner likewise objects to any portion of the Petition and the Shanfield Declaration (Exhibit 1002) purporting to rely on these exhibits.

II. EXHIBITS FROM IPR2017-01842

Patent Owner objects to each of Exhibits 1106, 1110, 1111, 1115, 1116, 1117, 1119, 1120, 1121, 1126, 1127, and 1128 for the following reasons:

- Petitioner objects under Fed. R. Evid. 901 as Petitioner has failed to authenticate the exhibits; more specifically, Petitioner has failed to establish that the exhibits are what Petitioner says they are, and has failed to establish the date by which the exhibits were published;
- To the extent Petitioner attempts to rely on the copyright date or other date identified in any of the exhibits to establish the publication date, the copyright date or other date is hearsay under Fed. R. Evid. 801 and the exhibit is inadmissible under Fed. R. Evid. 802;
- Due to the above deficiencies, Petitioner has failed to establish that the exhibits are relevant under Fed. R. Evid. 401, and therefore the exhibits are inadmissible under Fed. R. Evid. 402.

Patent Owner likewise objects to any portion of the Petition and the Shanfield Declaration (Exhibit 1102) purporting to rely on these exhibits.

Dated: 2/20/2018

Respectfully submitted,
Godo Kaisha IP Bridge 1

By /s Gerald B. Hrycyszyn /
Gerald B. Hrycyszyn, Registration No. 50,474
Richard F. Giunta, Registration No. 36,149
Edmund J. Walsh, Registration No. 32,950
WOLF GREENFIELD & SACKS, P.C.
600 Atlantic Ave.
Boston, MA 02210-2206
Tel: 617-646-8000/Fax: 617-646-8646

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

I certify that on February 20, 2018, I will cause a copy of the foregoing document, including any exhibits or appendices referred to therein, to be served via electronic mail, as previously consented to by Petitioner, upon the following:

David L. Cavanaugh	David.Cavanaugh@wilmerhale.com
Dominic E. Massa	Dominic.Massa@wilmerhale.com
Michael H. Smith	MichaelH.Smith@wilmerhale.com

Date: February 20, 2018

/s Lisa Woodbury/
Lisa Woodbury
Litigation Paralegal
WOLF GREENFIELD & SACKS, P.C.