

IPR2018-00067  
Patent 8,577,813

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

UNIFIED PATENTS INC.  
Petitioner

v.

UNIVERSAL SECURE REGISTRY LLC  
Patent Owner

---

IPR2018-00067  
Patent 8,577,813

---

**PETITIONER UNIFIED PATENTS INC.'S OBJECTIONS  
TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Unified Patents Inc.

(“Petitioner”) submits the following objections to evidence that Universal Secure Registry LLC (“Patent Owner”) served in its Patent Owner Response. These objections are timely filed and served within five business days of Patent Owner’s August 30, 2018 Patent Owner Response.

<b>Evidence</b>	<b>Objections</b>
Exhibit 2007	<p><b>FRE 901:</b> Petitioner objects to this exhibit as being an unauthenticated document that is not self-authenticating under FRE 902.</p> <p><b>FRE 801 &amp; 802:</b> Petitioner objects to this exhibit as constituting hearsay under FRE 801 that is inadmissible under FRE 802.</p> <p><b>FRE 401, 402, &amp; 403:</b> Petitioner objects to this exhibit as irrelevant and because its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, and wasting time, given that Patent Owner has not provided any foundation for what this exhibit is, how it was maintained, whether it is accurate, whether any date printed thereon is accurate, and whether it was ever actually published or publicly available.</p>
Exhibit 2008	<p><b>FRE 901:</b> Petitioner objects to this exhibit as being an unauthenticated document that is not self-authenticating under FRE 902.</p> <p><b>FRE 801 &amp; 802:</b> Petitioner objects to this exhibit as constituting hearsay under FRE 801 that is inadmissible under FRE 802.</p>

	<p><b>FRE 401, 402, &amp; 403:</b> Petitioner objects to this exhibit as irrelevant and because its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, and wasting time, given that Patent Owner has not provided any foundation for what this exhibit is, how it was maintained, whether it is accurate, whether any date printed thereon is accurate, and whether it was ever actually published or publicly available.</p>
Exhibit 2009	<p><b>FRE 901:</b> Petitioner objects to this exhibit as being an unauthenticated document that is not self-authenticating under FRE 902.</p> <p><b>FRE 801 &amp; 802:</b> Petitioner objects to this exhibit as constituting hearsay under FRE 801 that is inadmissible under FRE 802.</p> <p><b>FRE 401, 402, &amp; 403:</b> Petitioner objects to this exhibit as irrelevant and because its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, and wasting time, given that Patent Owner has not provided any foundation for what this exhibit is, how it was maintained, whether it is accurate, whether any date printed thereon is accurate, and whether it was ever actually published or publicly available.</p>

Dated: September 7, 2018

*BY: /s/ Jason R. Mudd*

Jason R. Mudd, Reg. No. 57,700

Roshan Mansinghani, Reg. No. 62,429

Eric A. Buresh, Reg. No. 50,394

Jonathan Stroud, Reg. No. 72,518

*ATTORNEYS FOR PETITIONER*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that this PETITIONER UNIFIED PATENTS INC.'S OBJECTIONS TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)(1) was served on September 7, 2018 on counsel for Patent Owner by e-mailing to counsel of record for Patent Owner, including:

- [jimglass@quinnemanuel.com](mailto:jimglass@quinnemanuel.com)
- [nimahefazi@quinnemanuel.com](mailto:nimahefazi@quinnemanuel.com)
- [tigranguledjian@quinnemanuel.com](mailto:tigranguledjian@quinnemanuel.com)
- [qe-usr-ipr@quinnemanuel.com](mailto:qe-usr-ipr@quinnemanuel.com)

Dated: September 7, 2018

By: /s/ Jason R. Mudd  
Attorney for Petitioner