

Filed: May 4, 2018

Filed on behalf of:

Patent Owner Intellectual Ventures II LLC

By: John R. King

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MITSUBA CORPORATION AND
AMERICAN MITSUBA CORPORATION
Petitioners,

v.

INTELLECTUAL VENTURES II LLC,

Patent Owner.

Case No. IPR2018-00071

U.S. Patent No. 7,067,952

**PATENT OWNER OBJECTIONS TO THE ADMISSIBILITY OF
EVIDENCE SERVED WITH THE PETITION**

Pursuant to 37 C.F.R. § 42.64(b), Patent Owner objects as follows to the admissibility of evidence served with the Petition on October 13, 2017. Patent Owner reserves its rights to: (1) timely file a motion to exclude these exhibits or portions thereof; (2) challenge the credibility and/or weight that should be afforded to any of Petitioners' exhibits, whether or not Patent Owner objects to the exhibits or files a motion to exclude the exhibits; (3) challenge the sufficiency of the evidence to meet Petitioners' burden of proof on any issue, whether or not Patent Owner has objected to, or files a motion to exclude, the evidence; and (4) cross examine any Petitioner declarant within the scope of his or her direct testimony that is or relates to these exhibits, without regard to whether Patent Owner has objected to the testimony or related exhibits or whether the testimony or related exhibits are ultimately found to be inadmissible.

Evidence	Objections
Exhibit 1007	<p>FRE 402: The exhibit includes testimony and cites evidence that is not relevant to any of the grounds identified in the Petition.</p> <p>FRE 602: Patent Owner objects to the declarant's testimony to the extent that the evidence does not show that the declarant has personal knowledge of the subject matter of the testimony.</p> <p>FRE 701–703: Patent Owner objects to the declarant's testimony to the extent that it purports to express any opinion that is not a</p>

Evidence	Objections
	permissible lay opinion or for which the declarant is not a qualified expert witness. FRE 802: Patent Owner objects to the declarant's testimony to the extent that it relies on inadmissible hearsay.
Exhibit 1010	FRE 402: The exhibit is not relevant to any of the grounds identified in the Petition.
Exhibit 1011	FRE 402: The exhibit is not relevant to any of the grounds identified in the Petition.
Exhibit 1012	FRE 402: The exhibit is not relevant to any of the grounds identified in the Petition. FRE 901: The exhibit is not authenticated.
Exhibit 1013	FRE 402: The exhibit is not relevant to any of the grounds identified in the Petition. FRE 901: The exhibit is not authenticated.
Exhibit 1014	FRE 402: The exhibit is not relevant to any of the grounds identified in the Petition.
Exhibit 1015	FRE 402: The exhibit is not relevant to any of the grounds identified in the Petition.

IPR2018-00071

Mitsuba Corp., et al. v. Intellectual Ventures II

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: May 4, 2018

By: /Ted M. Cannon/

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Mitsuba Corp., et al. v. Intellectual Ventures II

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. § 42.6(e) and with the agreement of counsel for Petitioner, a true and correct copy of **PATENT OWNER OBJECTIONS TO THE ADMISSIBILITY OF EVIDENCE SERVED WITH THE PETITION** is being served electronically on May 4, 2018, to the email addresses below:

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