

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RIOT GAMES, INC.,
Petitioner,

v.

PALTALK HOLDINGS, INC.,
Patent Owner.

Case IPR2018-00131
Patent 6,226,686

**PATENT OWNER'S OBJECTIONS TO EVIDENCE SUBMITTED IN
PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO.
6,226,686**

Patent Owner Paltalk Holdings, Inc. (“Patent Owner”) objects to the following evidence submitted by Petitioner Riot Games, Inc. (“Petitioner”) during the preliminary phase of this *inter partes* review proceeding.

Exhibit No.	Petitioner’s Evidence	Patent Owner’s Objections
1007	Declaration of Dr. Steve R. White	<p>Competency to Testify (Fed. R. Evid. 601 and 602) (at least to the extent Dr. White lacks personal knowledge of the publication dates of RFC 1692 and other RFC documents); and</p> <p>Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least with respect to the statements made concerning the publication dates of RFC 1692 and other RFC documents, e.g., paras. 68, 69, 70, 86).</p>
1010	Transport Multiplexing Protocol (TMux), RFC 1692	<p>Unauthenticated evidence (Fed. R. Evid. 901 and 902); and</p> <p>Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to prove the publication date).</p>
1011	Internet Protocol, RFC 791	<p>Unauthenticated evidence (Fed. R. Evid. 901 and 902); and</p> <p>Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to prove the publication date).</p>
1014	U.S. Patent No. 5,307,413 (Denzer)	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition,

		Paper No. 1).
1017	John D. Day et al., <i>The USI Reference Model</i> , 71-12 Proceedings of the IEEE 1334 (1983)	Unauthenticated evidence (Fed. R. Evid. 901 and 902).
1018	Protocol Standard for a NetBIOS Service on a TCP/UDP Transport: Concepts and Methods, RFC 1001	Unauthenticated evidence (Fed. R. Evid. 901 and 902); and Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to prove the publication date).
1019	Martin W. Sachs et al., <i>LAN and I/O Convergence: A Survey of the Issues</i> , IEEE Computer (1994).	Unauthenticated evidence (Fed. R. Evid. 901 and 902).
1020	Enrico Y. P. Hsu et al., <i>Management Gaming on a Computer Mediated Conferencing System: A Case of Collaborative Learning through Computer Conference</i> , IEEE (1991)	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1); and Unauthenticated evidence (Fed. R. Evid. 901 and 902).
1021	The Internet Standards Process – Revision 2, RFC 1602	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1); Unauthenticated evidence (Fed. R. Evid. 901 and 902); and Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to prove the publication date).
1022	Internet Official Protocol Standards, RFC 1720	Unauthenticated evidence (Fed. R. Evid. 901 and 902); and Inadmissible hearsay (Fed. R. Evid. 801

		and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to prove the publication date).
1025	Internet Relay Chat Protocol, RFC 1459	Unauthenticated evidence (Fed. R. Evid. 901 and 902); and Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to prove the publication date).
1026	Declaration of Dave Crocker	Competency to Testify (Fed. R. Evid. 601 and 602) (at least to the extent Mr. Crocker lacks personal knowledge of the publication dates of RFC 1692 and other RFC documents, and because Mr. Crocker is not being presented as an expert); and Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least with respect to the statements made concerning the publication dates of RFC 1692 and other RFC documents, as the Declaration offers statements from the RFC documents to prove their publication dates, e.g., paras. 29, 31, 34, 39, 43).
1028	The Internet Standards Process, RFC 1310	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1); Unauthenticated evidence (Fed. R. Evid. 901 and 902); and Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to

		prove the publication date).
1029	The Internet Standards Process – Revision 3, RFC 2026	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1); Unauthenticated evidence (Fed. R. Evid. 901 and 902); and Inadmissible hearsay (Fed. R. Evid. 801 and 802) (at least to the extent the date listed in the top right corner of the document is offered as evidence to prove the publication date).
1034	Song et al., <i>A Distributed Simulation System for Team Decisionmaking</i> , IEEE (1994)	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1); and Unauthenticated evidence (Fed. R. Evid. 901 and 902).
1035	Weaver et al., <i>Networked Simulations: New Paradigms for Team Performance Research</i> , 27(1), BEHAV. RES. METHODS, INSTRUMENTS, & COMPUTERS, 12-24 (1995)	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1); and Unauthenticated evidence (Fed. R. Evid. 901 and 902).

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.