

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RIOT GAMES, INC.,
Petitioner,

v.

PALTALK HOLDINGS, INC.,
Patent Owner.

Case IPR2018-00132
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>
1017	John D. Day et al., <i>The USI Reference Model</i> , 71-12	Unauthenticated evidence (Fed. R. Evid. 901 and 902).

	Proceedings of the IEEE 1334 (1983)	
1018	Protocol Standard for a NetBIOS Service on a TCP/UDP Transport: Concepts and Methods, RFC 1001	<p>Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1);</p> <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>
1019	Martin W. Sachs et al., <i>LAN and I/O Convergence: A Survey of the Issues</i> , IEEE Computer (1994).	<p>Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1); and</p> <p>Unauthenticated evidence (Fed. R. Evid. 901 and 902).</p>
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)	Unauthenticated evidence (Fed. R. Evid. 901 and 902).
1021	The Internet Standards Process – Revision 2, RFC 1602	<p>Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1);</p> <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>

1022	Internet Official Protocol Standards, RFC 1720	<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>
1025	Internet Relay Chat Protocol, RFC 1459	<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>
1026	Declaration of Dave Crocker	<p>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</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, as the Declaration offers statements from the RFC documents to prove their publication dates, e.g., paras. 29, 31, 34, 39, 43).</p>
1028	The Internet Standards Process, RFC 1310	<p>Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1);</p> <p>Unauthenticated evidence (Fed. R. Evid. 901 and 902); and</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).
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).
1031	U.S. Patent No. 5,041,963 (Ebersole)	Irrelevant (Fed. R. Evid. 401) (at least to the extent not cited in the Petition, Paper No. 1).
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).

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