

Filed on behalf of TQ Delta, LLC

By: Peter J. McAndrews

Andrew B. Karp

McAndrews, Held & Malloy, Ltd.

500 W. Madison St., 34th Floor

Chicago, IL 60661

Tel: 312-775-8000

Fax: 312-775-8100

E-mail: pmcandrews@mcandrews-ip.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ERICSSON INC. AND TELEFONAKTIEBOLAGET LM ERICSSON
Petitioners

v.

INTELLECTUAL VENTURES I LLC
Patent Owner

Case IPR2018-00727

Patent No. 6,628,629

**PATENT OWNER'S OBJECTIONS TO EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

Patent Owner's Objections to Evidence

IPR2018-00727

U.S. Patent No. 6,628,629

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner files the following objections to evidence that Petitioners submitted with its Petition for *Inter Parties* Review of U.S. Patent No. 6,628,629. A chart listing Patent Owner's objections and its basis for the objections is provided below.

Exhibit	Objection
Ex. 1003 (Declaration of Zygmunt Haas), ¶¶ 38–49, 91, 136, and all other uncited portions	<p>Relevance: These portions of Ex. 1003 are not relied on by the Petition, and therefore not relevant under FRE 402. <i>See, e.g.</i>, 35 U.S.C. §§ 312(a)(3), (4); 37 C.F.R. §§ 42.104(b)(4), (5); 37 C.F.R. § 42.22(a)(2); 37 C.F.R. § 42.6(a)(3); <i>Cisco Sys., Inc. v. C-Cation Techs., LLC</i>, IPR2014-00454, Paper 12 (Aug. 29, 2014) (informative).</p> <p>Confusion, Delay, and Waste of Time: To the extent that this exhibit has any other relevance to the Petition, that relevance was not raised by the Petition, and any argument for raising it now would result in confusion, delay, and wasted time. <i>See</i> FRE 403.</p>
Ex. 1009 (PRMA/DA: A New Media Access Control Protocol for Wireless ATM)	<p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p>
Ex. 1012 (Computer Dictionary & Handbook)	<p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p> <p>Authenticity: The exhibit is not authenticated as required by FRE 901 and is not self-authenticating.</p>

Exhibit	Objection
Ex. 1014 (Computer Networks)	<p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p> <p>Authenticity: The exhibit is not authenticated as required by FRE 901 and is not self-authenticating.</p>
Ex. 1018 (SWAN: An Indoor Wireless ATM network)	<p>Relevance: This exhibit is not relied on by the Petition, and therefore not relevant under FRE 402.</p> <p>Confusion, Delay, and Waste of Time: To the extent that this exhibit has any other relevance to the Petition, that relevance was not raised by the Petition, and any argument for raising it now would result in confusion, delay, and wasted time. <i>See</i> FRE 403.</p> <p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p> <p>Authenticity: The exhibit is not authenticated as required by FRE 901 and is not self-authenticating.</p>
Ex. 1019 (Mobile Cellular Telecommunications: Analog and Digital Systems)	<p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p> <p>Authenticity: The exhibit is not authenticated as required by FRE 901 and is not self-authenticating.</p>
Ex. 1020 (NEC Combines High-Speed IP Packet Processing with ATM Switching,)	<p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p> <p>Authenticity: The exhibit is not authenticated as required by FRE 901 and is not self-authenticating.</p>

Patent Owner's Objections to Evidence

IPR2018-00727

U.S. Patent No. 6,628,629

Exhibit	Objection
Ex. 1021 (RFC 2063)	<p>Relevance: This exhibit is not relied on by the Petition, and therefore not relevant under FRE 402.</p> <p>Confusion, Delay, and Waste of Time: To the extent that this exhibit has any other relevance to the Petition, that relevance was not raised by the Petition, and any argument for raising it now would result in confusion, delay, and wasted time. <i>See</i> FRE 403.</p> <p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p> <p>Authenticity: The exhibit is not authenticated as required by FRE 901 and is not self-authenticating.</p>
Ex. 1022 (RFC 1483)	<p>Relevance: This exhibit is not relied on by the Petition, and therefore not relevant under FRE 402.</p> <p>Confusion, Delay, and Waste of Time: To the extent that this exhibit has any other relevance to the Petition, that relevance was not raised by the Petition, and any argument for raising it now would result in confusion, delay, and wasted time. <i>See</i> FRE 403.</p> <p>Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801-807. Additionally, Petitioner has provided no admissible evidence establishing the date of publication.</p> <p>Authenticity: The exhibit is not authenticated as required by FRE 901 and is not self-authenticating.</p>

Patent Owner's Objections to Evidence

IPR2018-00727

U.S. Patent No. 6,628,629

Dated: October 24, 2018

Respectfully submitted,

/Peter J. McAndrews/

Peter J. McAndrews

Registration No. 38,547

McAndrews, Held & Malloy, Ltd.

500 West Madison Street, 34th Floor

Chicago, Illinois 60661

Office: (312) 775-8000

Fax: (312) 775-8100

Email: pmcandrews@mcandrews-ip.com

Lead Counsel for Patent Owner

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