

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Sony Corporation
Petitioner

v.

FUJIFILM Corporation
Patent Owner

Case IPR2018-00877
U.S. Patent No. 6,462,905

REPLY TO OPPOSITION TO MOTION TO EXCLUDE

As Petitioner admits in its Opposition, Petitioner does not rely on Exhibit 1034 in IPR Proceeding No. IPR2018-00877. *See* Petitioner’s Opposition to Patent Owner’s Motion to Exclude (Paper No. 30) (“Opposition”) at 1. Further, Sony agrees that Exhibit 1034 is irrelevant to this proceeding. *See* Opposition at 1-2. As discussed in Patent Owner’s Motion to Exclude, Exhibit 1034 was submitted for the first time along with Petitioner’s Reply, and was not cited in the Petition or Petitioner’s Reply. Because Exhibit 1034 cannot support Petitioner’s grounds submitted in the Petition, Exhibit 1034 is irrelevant under FRE 401-402, and should be excluded.

June 4, 2019

Respectfully,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on the 4th day of June 2019, a complete and entire copy of this Reply to Opposition to Motion to Exclude Evidence was filed with the PTAB through its E2E system and served via email on attorneys of record for Sony at the following address:

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Respectfully submitted,
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