

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

GOOGLE LLC, ZTE (USA), INC., SAMSUNG ELECTRONICS CO., LTD.,  
LG ELECTRONICS INC., HUAWEI DEVICE USA, INC.,  
HUAWEI DEVICE CO. LTD., HUAWEI TECHNOLOGIES CO. LTD.,  
HUAWEI DEVICE (DONGGUAN) CO. LTD.,  
HUAWEI INVESTMENT & HOLDING CO. LTD.,  
HUAWEI TECH. INVESTMENT CO. LTD., and  
HUAWEI DEVICE (HONG KONG) CO. LTD.,

Petitioner

v.

Cywee Group Ltd.

(record) Patent Owner

IPR2018-01257

Patent No. 8,552,978

---

**PETITIONER GOOGLE'S OBJECTIONS TO EXHIBITS AND PAPERS  
FILED ON OR AROUND JULY 31, 2019.**

Petitioner Google LLC respectfully submits objections under 37 C.F.R.

§ 42.64(b)(1) to CyWee's filings made on or around July 31, 2019:

<b>Paper / Exhibit</b>	<b>Objections</b>
CyWee Sur-Reply to Petition	CyWee's Sur-Reply contains arguments that are not within the proper scope of reply arguments. Google additionally objects to discussion of the Bachmann Dissertation under 37 C.F.R. §42.6(c).
Ex. 2020 Ex. 2032	Google objects to these exhibits to the extent the witnesses do not appear for cross-examination under reasonable circumstances, or to the extent that CyWee impedes such cross-examination.
Ex. 2020	Google objects to this exhibit because the purported witness may lack personal knowledge of the contents of the exhibit under FRE 602 and 901. It is unclear whether the purported fact witness drafted, read, signed or understood the English-language exhibit. Google further objects under FRE 802 and 37 C.F.R. 42.53(a) because the exhibit is an alleged out-of-court statement of an

	individual that does not meet any hearsay exception and is not in the form of an affidavit.
--	--

Date: <u>Wednesday, August 7, 2019</u>	<u>/Matthew A. Smith/ (RN 49,003)</u> Matthew A. Smith SMITH BALUCH LLP 1100 Alma St., Ste 109 Menlo Park, CA (202) 669-6207 smith@smithbaluch.com  <i>Counsel for Petitioner Google LLC</i>
--	--

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the Petitioner Google LLC's Objections were served by electronic mail on Wednesday, August 7, 2019, on all counsel of record at the USPTO having the following addresses:

### Counsel for CyWee:

Jay Kesan            jay@jaykesan.com;  
Cecil Key            cecil@keyiplaw.com  
Ari Rafilson        arafilson@shorechan.com;  
Michael Shore      mshore@ShoreChan.com

### Counsel for ZTE:

James R. Sobieraj   jsobierah@brinksgilson.com  
Yeuzhong Feng     yfeng@brinksgilson.com  
Andrea Shoffstall   ashoffstall@brinksgilson.com  
                              ZTE\_CyweeIPRs@brinksgilson.com

### Counsel for Samsung:

Naveen Modi  
Chetan Bansal  
                              PH-Samsung-Cywee-IPR@paulhastings.com

### Counsel for LG:

Collin Park         collin.park@morganlewis.com  
Andrew Devkar     andrew.devkar@morganlewis.com  
Jeremy Peterson    jeremy.peterson@morganlewis.com  
Adam Brooke       adam.brooke@morganlewis.com  
                              [MLB\\_CyweevsLGE@morganlewis.com](mailto:MLB_CyweevsLGE@morganlewis.com)

### Counsel for Huawei:

Kristopher L. Reed  
Benjamin M. Kleinman  
Norris P. Boothe  
                              HuaweiCywee@kilpatricktownsend.com

Date: Wednesday, August 7, 2019

/Matthew A. Smith/ (RN 49,003)