

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VISA INC. and VISA U.S.A. INC.,  
Petitioners,

v.

UNIVERSAL SECURE REGISTRY LLC,  
Patent Owner.

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Case IPR2018-01350  
Patent No. 8,856,539

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**PETITIONER'S NOTICE OF OBJECTION TO EVIDENCE**

## **I. INTRODUCTION**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners Visa Inc. and Visa U.S.A. Inc., (together, “Visa”), submit the following objections to Patent Owner Universal Secure Registry LLC’s (“PO”) Exhibit 2001 and 2002. As required by 37 C.F.R. § 42.62, Visa’s objections below apply the Federal Rules of Evidence (“F.R.E.”).

## **II. OBJECTIONS**

### **A. Objections to Ex. 2001 and any Reference to/Reliance Thereon**

Evidence objected to: Ex. 2001.

Grounds for Objection: F.R.E. 401 (Test for Relevant Evidence); F.R.E. 402 (General Admissibility of Relevant Evidence); F.R.E. 403 (Excluding Relevant Evidence for Prejudice, Confusion, Waste of Time, or Other Reasons).

Exhibit 2001 has not been relied upon by PO in rebutting or addressing any instituted ground of challenge. Accordingly, this exhibit is not relevant to the proceeding. Further, to the extent this exhibit is deemed relevant admission of the exhibit would be unduly prejudicial, misleading, and a waste of time in view of the fact that it has not been relied upon by PO in rebutting or addressing any instituted ground of challenge.

### **B. Objections to Ex. 2002 and any Reference to/Reliance Thereon**

Evidence objected to: Ex. 2002.

Grounds for Objection: F.R.E. 401 (Test for Relevant Evidence); F.R.E. 402

(General Admissibility of Relevant Evidence); F.R.E. 403 (Excluding Relevant Evidence for Prejudice, Confusion, Waste of Time, or Other Reasons).

Exhibit 2002 has not been relied upon by PO in rebutting or addressing any instituted ground of challenge. Accordingly, this exhibit is not relevant to the proceeding. Further, to the extent this exhibit is deemed relevant admission of the exhibit would be unduly prejudicial, misleading, and a waste of time in view of the fact that it has not been relied upon by PO in rebutting or addressing any instituted ground of challenge.

### **III. CONCLUSION**

Exhibits 2001 and 2002 were served on November 13, 2018 and trial was instituted in this proceeding on February 11, 2019. These objections are made within ten business days of institution.

Respectfully submitted,

Date: February 26, 2019

/ Matthew A. Argenti /  
Matthew A. Argenti, Lead Counsel  
Reg. No. 61,836

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**CERTIFICATE OF SERVICE**

I certify that the foregoing Petitioner's Notice of Objection to Evidence was served on this 26<sup>th</sup> day of February, 2019, on the Patent Owner at the electronic correspondence address of the Patent Owner as follows:

James M. Glass  
Tigran Guledjian  
Christopher A. Matthews  
Nima Hefazi  
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Respectfully submitted,

Date: February 26, 2019

/ Matthew A. Argenti /  
Matthew A. Argenti, Lead Counsel  
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