

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADVANCED MICRO DEVICES, INC.

Petitioner

v.

AQUILA INNOVATIONS INC.

Patent Owner

Case IPR2019-01525
Patent 6,239,614 B2

PATENT OWNER'S EVIDENTIARY OBJECTIONS

Pursuant to 37 C.F.R § 42.64(b)(1), Patent Owner Aquila Innovations Inc. (“Aquila”) objects to the admissibility of evidence served by Petitioner Advanced Micro Devices, Inc. (“AMD”) in connection with its petition filed on August 28, 2019.

Aquila objects, under FRE 402/403, to all references that do not form the basis of the instituted review.

Aquila additionally objects to Exhibit 1003 (Declaration of Douglas Holberg) to the extent it provides opinions that are irrelevant under FRE 402, or that their probative value is substantially outweighed by other consideration under FRE 403, including unfair prejudice, confusion of the issue and waste of time. Patent Owner further objects that Exhibit 1003 is hearsay not subject to any exceptions under FRE 802. Aquila objects to paragraphs 34 – 55 of Exhibit 1003 under FRE 402 and 403 to the extent they provide opinions related to purported references that do not form the basis for any instituted ground.

Aquila objects to Exhibit 1006 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1008 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1009 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1013 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1014 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1015 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila objects to Exhibit 1015 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1016 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila objects to Exhibit 1016 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1017 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila objects to Exhibit 1017 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1018 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila objects to Exhibit 1018 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1020 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1021 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1022 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1023 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1024 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1025 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila objects to Exhibit 1025 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1026 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila objects to Exhibit 1026 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1027 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila

objects to Exhibit 1027 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1028 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1032 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1033 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1034 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground. Aquila objects to Exhibit 1034 under FRE 802 because it is inadmissible hearsay not subject to any exceptions.

Aquila objects to Exhibit 1038 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1039 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1040 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

Aquila objects to Exhibit 1041 under FRE 402 and 403 because it is a purported reference that does not form the basis of any instituted ground.

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