

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
LG ELECTRONICS INC., and
ELECTRONICS U.S.A., INC.,
Petitioner,

v.

PARUS HOLDINGS INC.,
Patent Owner.

Case No. IPR2020-00846
Patent No. 7,076,431

**PETITIONERS' OBJECTIONS TO EVIDENCE SERVED WITH
PATENT OWNER RESPONSE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners submit the following objections to evidence served in connection with the Patent Owner's Response on January 13, 2021. These objections have been timely filed and served within five business days of service of the evidence to which the objections are directed.

Petitioners object to each of Exhibits 2021-2026 and 2029-2058 ("Objected-to Exhibits"), for the following reasons:

- Each of the Objected-to Exhibits is inadmissible because Patent Owner has failed to authenticate any of these exhibits in accordance with Fed. R. Evid. 901(a). Patent Owner has not explained what each document is, has not provided evidence regarding the origin or preservation of each document, has not established that each is a true and correct copy, and has not otherwise authenticated each document.
- The Patent Owner's Response does not cite with specificity any of the Objected-to Exhibits, nor does the Patent Owner's Response explain what information (if any) in each of the Objected-to Exhibits is purportedly relied on, nor for what purpose any such information is being offered. To the extent the Patent Owner is attempting to rely on any statement within the Objected-to Exhibits (including, *inter alia*, any date identified within the exhibits) as evidence to prove the truth

of the matter asserted, such statement is hearsay under Fed. R. Evid. 801 and therefore inadmissible under Fed. R. Evid. 802.

- Due to the above deficiencies, Patent Owner has failed to establish that the Objected-to Exhibits are relevant under Fed. R. Evid. 401, and therefore the exhibits are additionally inadmissible under Fed. R. Evid. 402.

Petitioners likewise object to any and all portions of the Patent Owner's Response (Paper 14), the Kurganov Declaration (Ex. 2020), the Kurganov claim charts (Exs. 2027-2028), the Occhiogrosso Declaration (Ex. 2059), and the Mulka Declaration (Ex. 2060) purporting to rely on any of the Objected-to Exhibits.

Respectfully submitted,
Google LLC et al.

Date: January 21, 2021

/Elisabeth Hunt/

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on January 21, 2021, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

Michael J. McNamara
Michael T. Renaud
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Date: January 21, 2021

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