

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY MOBILE COMMUNICATIONS AB, SONY MOBILE
COMMUNICATIONS, INC., SONY ELECTRONICS INC., and
SONY CORPORATION,
Petitioners,

v.

ANCORA TECHNOLOGIES, INC.,
Patent Owner.

IPR2020-01609¹
Patent 6,411,941 B1

**PETITIONERS' OBJECTIONS TO PATENT OWNER'S
EVIDENCE UNDER 37 C.F.R. § 42.64**

Petitioners Sony Mobile Communications AB, Sony Mobile
Communications, Inc., Sony Electronics Inc., and Sony Corporation (collectively
“Petitioners”) respectfully submit the following objections to exhibits filed by Patent

¹ Sony Mobile Communications AB, Sony Mobile Communications, Inc., Sony
Electronics Inc., and Sony Corporation, who filed a petition in IPR2021-00663, have
been joined with this proceeding.

Petitioners' Objections To Patent Owner's Evidence

Owner in connection with Patent Owner's Opposition to Petitioners' Motion for Joinder filed on April 15, 2021 (Paper 10) and Patent Owner's Preliminary Response to Petition for IPR filed on April 23, 2021. These objections are made within ten business days from institution of the trial on June 6, 2021 (Paper 17) pursuant to 37 C.F.R. § 42.64(b)(1). Petitioners reserve the right to present further objections to this or additional evidence submitted by Patent Owner as allowed by the applicable rules or other authority, including without limitation upon conclusion of cross-examination of Patent Owner's declarant(s).

The following chart lists Petitioners' objections to the admissibility of the documents identified below and the bases for the objections:

Exhibit	Objections
2002, 2003	FRE 401-403: irrelevant, prejudicial, confuses the issues, and misleading as including invalidity contentions and disclosures unrelated to the bases raised in this IPR
2004	FRE 401-403: irrelevant, prejudicial, confuses the issues, and misleading as including non-party's invalidity contentions and other contentions unrelated to bases raised in this IPR
	FRE 802: inadmissible hearsay evidence to the extent relied upon for the truth of the matters asserted

Exhibit	Objections
2007	FRE 401-403: irrelevant, prejudicial, confuses the issues, and misleading as relating to alleged infringement and other issues not related to this IPR FRE 802: inadmissible hearsay evidence to the extent relied upon for the truth of the matters asserted
2010	FRE 702: expert witness report of a third party in a district court case not being offered or relied upon by Petitioners or their expert FRE 802: inadmissible hearsay evidence of expert witness of a third party in a district court case not being offered or relied upon by Petitioners of their expert, to the extent relied upon for the truth of the matters asserted
2011	FRE 401-403: irrelevant, prejudicial, confuses the issues, and misleading as including opinions of expert of third party in a district court case not being offered or relied upon by Petitioners or their expert

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Petitioners' Objections To Patent Owner's Evidence

Exhibit	Objections
	FRE 802: inadmissible hearsay evidence of expert witness not being offered or relied upon by Petitioners or their expert, to the extent relied upon for the truth of the matters asserted
2015 ¶¶ 55-56	FRE 401-403: irrelevant, prejudicial, confuses the issues, and misleading as relating to 35 U.S.C. § 101

Respectfully submitted,

Date: June 24, 2021

/Gregory S. Gewirtz/

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Counsel for Petitioners

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Petitioners' Objections To Patent Owner's Evidence

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on this 24th day of June 2021, the foregoing **PETITIONERS' OBJECTIONS TO PATENT OWNER'S EVIDENCE UNDER 37 C.F.R. § 42.64** was filed via the PTAB's E2E system and served via electronic mail on the following counsel of record for Patent Owner:

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Date: June 24, 2021

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