

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioners,

v.

NANOCO TECHNOLOGIES LIMITED,
Patent Owner.

IPR2021-00186 (Patent 8,524,365 B2)

**PETITIONERS' OBJECTIONS TO EVIDENCE SUBMITTED WITH
THE PATENT OWNER'S RESPONSE PURSUANT TO 37 C.F.R. § 42.120**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. object as follows to evidence submitted with Patent Owner Nanoco Technologies Ltd.’s Patent Owner’s Response pursuant to 37 C.F.R. § 42.120:

Exhibit	Objections
2030	FRE¹ 702: This item is inadmissible because the opinions therein were not formed by a witness who is qualified as an expert by knowledge, skill, experience, training, or education.
2032	FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.

¹ References to “FRE” are to the Federal Rules of Evidence.

2033	<p>FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p>
2034	<p>FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p>
2035	<p>FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the</p>

	<p>danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p>FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.</p> <p>Lack of Foundation: Patent Owner has not provided testimony to establish personal knowledge of this exhibit sufficient to prove the contents of this exhibit.</p>
2036	<p>FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p>

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