

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE, INC.,

Petitioner,

v.

GUI GLOBAL PRODUCTS, LTD.,

Patent Owner.

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Case IPR2021-00470

U.S. Patent No. 10,259,020

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**Patent Owner's Objections to Evidence Submitted With the Petition for Inter  
Partes Review of U.S. Patent No. 10,259,020**

Pursuant to 37 C.F.R. § 42.64(b), Patent Owner hereby objects to the following evidence submitted by Petitioners with their Petition filed in IPR2021-00470. These objections are timely filed pursuant to 37 C.F.R. § 42.64(b)(1).

Evidence	Objections
Exhibit 1004 Certified English Translation of French Patent Publication No. FR2912858 to Bohbot	<b>37 CFR § 42.63(b):</b> The Declaration does not comply with 37 CFR § 42.63(b). It does not state that the translation is in fact true, full and accurate. It merely alleges such matters “to the best of my knowledge.”  <b>FRE 602:</b> For the reasons stated above, the Declaration does not sufficiently show that the witness has personal knowledge of the matters stated therein.
Exhibit 1006 Certified English Translation of Chinese Patent Publication No. CN201114710Y to Li et al.	<b>37 CFR § 42.63(b):</b> The Declaration does not comply with 37 CFR § 42.63(b). It does not state that the translation is in fact true, full and accurate. It merely alleges such matters “to the best of my knowledge.” Further, the declarant alleges translation of a “French document.”  <b>FRE 602:</b> For the reasons stated above, the Declaration does not sufficiently show that the witness has personal knowledge of the matters stated therein.
Exhibit 1020 Certified English Translation of European Patent Publication No. EP2037661 to Ponticelli et al.	<b>37 CFR § 42.63(b):</b> The Declaration does not comply with 37 CFR § 42.63(b). It does not state that the translation is in fact true, full and accurate. It merely alleges such matters “to the best of my knowledge.”

Evidence	Objections
	<b>FRE 602:</b> For the reasons stated above, the Declaration does not sufficiently show that the witness has personal knowledge of the matters stated therein.
Exhibit 1034 AUDIO/VIDEO REMOTE CONTROL PROFILE (Version 1.0 Adopted), Bluetooth Audio Video Working Group	<b>FRE 901, 902:</b> This Exhibit is not self-authenticating under FRE 902, and Petitioners have not produced evidence sufficient to support a finding that it is what Petitioners say it is.  <b>FRE 401, 402, 403:</b> As applied by Petitioners, this Exhibit is not relevant to this proceeding. Further, any probative value associated with this Exhibit is substantially outweighed by a danger of confusing the issues.  <b>FRE 802:</b> Petitioners are apparently attempting to use Exhibit for the truth of the matters asserted therein. Exhibit 1028 is thus hearsay, and as no hearsay exception applies, it is inadmissible.
Exhibit 1038 Voyager 855 Bluetooth Headset— User Guide, Plantronics Sound Innovation	<b>FRE 901, 902:</b> This Exhibit is not self-authenticating under FRE 902, and Petitioners have not produced evidence sufficient to support a finding that it is what Petitioners say it is.
Exhibit 1039 Jabra Sport—User Manual, Jabra	<b>FRE 901, 902:</b> This Exhibit is not self-authenticating under FRE 902, and Petitioners have not produced evidence sufficient to support a finding that it is what Petitioners say it is.
Exhibit 1045 Advantages and Weaknesses of LED Application, LEDinside, <a href="https://web.archive.org...">https://web.archive.org....</a>	<b>FRE 901, 902:</b> This Exhibit is not self-authenticating under FRE 902, and Petitioners have not produced evidence sufficient to support a finding that it is what Petitioners say it is.

Evidence	Objections
	<p><b>FRE 401, 402, 403:</b> As applied by Petitioners, this Exhibit is not relevant to this proceeding. Further, any probative value associated with this Exhibit is substantially outweighed by a danger of confusing the issues.</p> <p><b>FRE 802:</b> Petitioners are apparently attempting to use Exhibit for the truth of the matters asserted therein. Exhibit 1028 is thus hearsay, and as no hearsay exception applies, it is inadmissible.</p>
Exhibit 1051 Next-Generation Stereo Bluetooth Headsets, TechHive, <a href="https://www.techhive.com...">https://www.techhive.com...</a>	<p><b>FRE 901, 902:</b> This Exhibit is not self-authenticating under FRE 902, and Petitioners have not produced evidence sufficient to support a finding that it is what Petitioners say it is.</p> <p><b>FRE 401, 402, 403:</b> As applied by Petitioners, this Exhibit is not relevant to this proceeding. Further, any probative value associated with this Exhibit is substantially outweighed by a danger of confusing the issues.</p> <p><b>FRE 802:</b> Petitioners are apparently attempting to use Exhibit for the truth of the matters asserted therein. Exhibit 1028 is thus hearsay, and as no hearsay exception applies, it is inadmissible.</p>
Exhibit 1066 Plugfones.com, <a href="https://web.archive.org/web...">https://web.archive.org/web...</a>	<p><b>FRE 901, 902:</b> This Exhibit is not self-authenticating under FRE 902, and Petitioners have not produced evidence sufficient to support a finding that it is what Petitioners say it is.</p>

Evidence	Objections
Exhibit 1067 CES: Hands On with the Klear Wireless Earbuds, Gadget Lab   WIRED, <a href="https://web.archive.org...">https://web.archive.org...</a>	<b>FRE 901, 902:</b> This Exhibit is not self-authenticating under FRE 902, and Petitioners have not produced evidence sufficient to support a finding that it is what Petitioners say it is.

Date: August 27, 2021

Respectfully submitted,

/ John J. Edmonds /  
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