

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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TCT MOBILE (US), INC.; TCT MOBILE (US) HOLDINGS, INC.;  
HUIZHOU TCL MOBILE COMMUNICATION CO. LTD.; AND TCL  
COMMUNICATION, INC.,  
Petitioners

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,  
Patent Owner

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U.S. Patent No. 7,834,586  
Issue Date: November 16, 2010  
Title: MULTIFUNCTIONAL CHARGER SYSTEM AND METHOD  
Case No. IPR2021-00599

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**PETITIONERS' OBJECTIONS TO  
PATENT OWNER'S SUR-REPLY EVIDENCE**

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
PO Box 1450  
Alexandria, Virginia 22313-1450

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners TCT Mobile (US), Inc.; TCT Mobile (US) Holdings, Inc.; Huizhou TCL Mobile Communication Co. Ltd.; and TCL Communication, Inc. hereby object to the below exhibit, cited and relied upon in Patent Owner’s April 18, 2022 Sur-Reply, on the following grounds. For each objected-to exhibit, the pertinent Federal Rule of Evidence (“FRE”) or other rule that gives rise to the objection is provided, along with a brief summary of the basis for the objection.

**Exhibit 2030 – document purported to be excerpts from Dr. Baker’s district court report. Untimeliness and Beyond the Proper Scope for a Sur-Reply:** Exhibit 2030 is untimely and beyond the proper scope for a sur-reply. The 2019 Trial Practice Guide Update at 73-74 states that a “sur-reply may not be accompanied by new evidence other than deposition transcripts of the cross-examination of any reply witness.” Exhibit 2030 accompanies Patent Owner’s Sur-Reply and is not a deposition transcript of any reply witness.”

Dated: April 25, 2022

Respectfully submitted,

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## **CERTIFICATION OF SERVICE ON PATENT OWNER**

The undersigned certifies that on April 25, 2022, a copy of the foregoing was served in its entirety by filing through the Patent Trial and Appeal Board End to End System, as well as via electronic mail, upon the following attorneys of record for the Patent Owner:

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