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Filed on behalf of Apple Inc.

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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.

BILLJCO LLC,  
Patent Owner

IPR2022-00131

**PETITIONER'S OBJECTIONS TO EVIDENCE**

Mail Stop **Patent Board**  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. §42.64(b), Petitioners submit the following objection to the admissibility of evidence served with the Patent Owner Response and the Declaration of Istvan Jonyer, which is Exhibit 2010 of the Patent Owner Response. Petitioner reserves their rights to: (1) timely file a motion to exclude Patent Owner's evidence, including evidence in the form of testimony or exhibits, or portions thereof; and (2) challenge the credibility and/or weight that should be afforded Patent Owner's evidence, whether or not Petitioner files a motion to exclude the evidence.

<b>Exhibit No.</b>	<b>Objections</b>
2014	<p>Petitioner objects to Exhibit 2014 pursuant to FRE 403 as being prejudicial. Exhibit 2014 includes several pages of definitions taken from various internet sources, such as Wikipedia, Techopedia, Cambridge Dictionary, Google, YourDictionary, and ComputerHope. The definitions provided in Exhibit 2014 are only considered in a vacuum and fail to take into account the context of the claim and specification. If admitted, their minimal probative value would be substantially outweighed by the unfair prejudice they would cause, the confusing and misleading nature of the materials, the undue delay upon these proceedings, and the waste of time that would ensue.</p> <p>Petitioner objects to Exhibit 2014 pursuant to FRE 602 as lacking foundation.</p> <p>Petitioner objects to Exhibit 2014 pursuant to FRE 901 as lacking authentication. Patent Owner has failed to provide evidence sufficient to support a finding that the select definitions and webpages including the select definitions are what the Patent Owner claims they are.</p>
2015	<p>Petitioner objects to Exhibit 2015 pursuant to FRE 401 as lacking relevance. Patent Owner's infringement contentions are</p>

	<p>irrelevant to the current proceeding. The PTAB does not determine issues of infringement.</p> <p>Petitioner objects to Exhibit 2015 pursuant to FRE 403 as being prejudicial. If admitted, their minimal probative value would be substantially outweighed by the unfair prejudice they would cause, the confusing and misleading nature of the materials, the undue delay upon these proceedings, and the waste of time that would ensue.</p> <p>Petitioner objects to Exhibit 2015 pursuant to FRE 802 as being hearsay.</p> <p>Petitioner objects to Exhibit 2015 pursuant to FRE 901 as lacking authentication. Patent Owner has failed to provide evidence sufficient to support a finding that the select exhibits in the amended complaint are what the Patent Owner claims they are.</p>
2016	<p>Petitioner objects to Exhibit 2016 pursuant to FRE 401 as lacking relevance. The license agreement is irrelevant to the current proceeding.</p> <p>Petitioner objects to Exhibit 2016 pursuant to FRE 403 as being prejudicial. If admitted, their minimal probative value would be substantially outweighed by the unfair prejudice they would cause, the confusing and misleading nature of the materials, the undue delay upon these proceedings, and the waste of time that would ensue.</p> <p>Petitioner objects to Exhibit 2016 pursuant to FRE 901 as lacking authentication. Patent Owner has failed to provide evidence sufficient to support a finding that the license agreement is what the Patent Owner claims it is.</p>
2017	<p>Petitioner objects to Exhibit 2017 pursuant to FRE 401 as lacking relevance. The license agreement is irrelevant to the current proceeding.</p>

	<p>Petitioner objects to Exhibit 2017 pursuant to FRE 403 as being prejudicial. If admitted, their minimal probative value would be substantially outweighed by the unfair prejudice they would cause, the confusing and misleading nature of the materials, the undue delay upon these proceedings, and the waste of time that would ensue.</p> <p>Petitioner objects to Exhibit 2017 pursuant to FRE 901 as lacking authentication. Patent Owner has failed to provide evidence sufficient to support a finding that the license agreement is what the Patent Owner claims it is.</p>
2018	<p>Petitioner objects to Exhibit 2018 pursuant to FRE 401 as lacking relevance. The license agreement is irrelevant to the current proceeding.</p> <p>Petitioner objects to Exhibit 2018 pursuant to FRE 403 as being prejudicial. If admitted, their minimal probative value would be substantially outweighed by the unfair prejudice they would cause, the con-fusing and misleading nature of the materials, the undue delay upon these proceedings, and the waste of time that would ensue.</p> <p>Petitioner objects to Exhibit 2018 pursuant to FRE 901 as lacking authentication. Patent Owner has failed to provide evidence sufficient to support a finding that the license agreement is what the Patent Owner claims it is.</p>
2019	<p>Petitioner objects to Exhibit 2019 pursuant to FRE 401. Information regarding Apple's privacy settings and Location Services is irrelevant to the current proceeding.</p>
2020	<p>Petitioner objects to Exhibit 2020 pursuant to FRE 401. Information regarding Apple's iBeacon is irrelevant to the current proceeding.</p> <p>Petitioner objects to Exhibit 2020 pursuant to FRE 901 as lacking authentication. Patent Owner has failed to provide evidence sufficient to support a finding that the overview is what the Patent Owner claims it is.</p>

Dated: August 24, 2022

Respectfully Submitted,

/Larissa S. Bifano/

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Registration Number 59,051

*Attorney for Petitioner*

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