

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC., and APPLE INC.,  
Petitioner,

v.

SMART MOBILE TECHNOLOGIES LLC,  
Patent Owner.

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Case IPR2022-01004  
Patent 9,614,943

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**PETITIONER'S OBJECTIONS TO EVIDENCE**

Pursuant 37 C.F.R. § 42.64(b), Petitioner objects to evidence submitted by Patent Owner in its Patent Owner's Response filed April 5, 2023. Specifically, Petitioner objects to the following exhibits submitted by Patent Owner on the bases noted below:

Exhibit	Objections
<b>EX-2008</b> Report ITU-R M.2038	<b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.  <b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit.  <b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.
<b>EX-2009</b> Haas et al., The Design and Performance of Mobile TCP for Wireless Networks	<b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.  <b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable

	<p>hearsay exception for the statements in the exhibit.</p> <p><b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p><b>EX-2010</b>                  Havinga et al., Energy-Efficient Wireless Networking for Multimedia Applications</p>	<p><b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.</p> <p><b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit.</p> <p><b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p><b>EX-2011</b>                  Gesbert et al., From Theory to Practice: An Overview of MIMO Space–Time Coded Wireless Systems</p>	<p><b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.</p> <p><b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit.</p>

	<p><b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p><b>EX-2012</b> Satyanarayanan, Fundamental Challenges in Mobile Computing</p>	<p><b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.</p> <p><b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit.</p> <p><b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p><b>EX-2013</b> Hassibi et al., High-Rate Codes That Are Linear in Space and Time</p>	<p><b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.</p> <p><b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit.</p> <p><b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant</p>

	<p>because, among other things, it has not been shown to qualify as prior art.</p>
<p><b>EX-2014</b> Molisch, MIMO systems with antenna selection – an overview</p>	<p><b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.</p> <p><b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit.</p> <p><b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p><b>EX-2015</b> Yan, Mobile Digital Rights Management</p>	<p><b>FRE 901 (Authentication):</b> This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be.</p> <p><b>FRE 801-802 (Hearsay):</b> This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit.</p> <p><b>FRE 401/402/403 (Relevancy):</b> This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>

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