

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

SMART MOBILE TECHNOLOGIES LLC,
Patent Owner.

Case IPR2022-01249
Patent 9,019,946 B1

PETITIONER'S OBJECTIONS TO EVIDENCE

SUBMITTED WITH PATENT OWNER'S PRELIMINARY RESPONSE

Pursuant 37 C.F.R. § 42.64(b), Petitioner objects to evidence submitted by Patent Owner during the preliminary, pre-institution stage of this IPR, which was instituted on January 24, 2023. Specifically, Petitioner objects to the following exhibits submitted by Patent Owner for the bases noted below:

Exhibit	Objections
EX-2002 Declaration of Professor Todor V. Cooklev, Ph.D.	FRE 401/402/403/702: This exhibit is inadmissible because Dr. Cooklev's opinions are conclusory, are based on improper assumptions about the facts and legal conclusions in this IPR, do not disclose underlying facts or data in support of those opinions, and are unreliable. Further, it has not been shown that Dr. Cooklev is qualified to testify competently regarding the matters the opinions are said to address. In addition, the opinions in this Declaration are irrelevant, beyond the proper scope of the arguments, risk causing confusion or a waste of time, and of minimal probative value. Moreover, the Declaration references several portions of the exhibits objected below, and thus Petitioner objects to any portions of EX-2002 that reference or rely upon information contained in the exhibits objected to below and for the same bases articulated below.
EX-2006 ElectronicsTutorials, <i>The Multiplexer</i> , WWW.ELECTRONICS-TUTORIALS.WS, https://www.electronics-	FRE 901 (Authentication): 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>tutorials.ws/combo/combo_2.html (last visited Oct. 26, 2022)</p>	<p>FRE 801-802 (Hearsay): 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>FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p>EX-2007 TexasInstruments, 74HC153 Data Sheet, Dec. 1982, revised Feb. 2022, WWW.TI.COM, https://www.ti.com/lit/gpn/sn74hc153</p>	<p>FRE 901 (Authentication): 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>FRE 801-802 (Hearsay): 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>FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p>EX-2008 Lee Stanton, <i>What is the Difference Between a Landline and a Mobile Phone Number?</i>, WWW.ALPHR.COM, Feb. 22, 2022, https://www.alphr.com/difference-landline-mobile-phone-number/</p>	<p>FRE 901 (Authentication): 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>FRE 801-802 (Hearsay): 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>FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p>EX-2009 FOCUS LCDs, <i>Serial Vs. Parallel</i>, LCD RESOURCES, https://focuslcds.com/serial-vs-parallel/ (last visited Oct. 19, 2022)</p>	<p>FRE 901 (Authentication): 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>FRE 801-802 (Hearsay): 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>FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p>EX-2010 Techopedia, <i>Serial Interface</i>, WWW.TECHOPEDIA.COM, Nov. 4, 2014, https://www.techopedia.com/definition/9312/serial-interface</p>	<p>FRE 901 (Authentication): 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>FRE 801-802 (Hearsay): 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>FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p>
<p>EX-2011 Excerpts from The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition (2000)</p>	<p>FRE 901 (Authentication): 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>FRE 801-802 (Hearsay): 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>FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.</p> <p>FRE 106/1001: This exhibit is incomplete and is not a copy which accurately reproduces the original.</p>
<p>EX-2012 Jonathan Valvano et al., <i>Chapter 11: Serial Interfacing</i>, EMBEDDED SYSTEMS – SHAPE THE WORLD,</p>	<p>FRE 901 (Authentication): This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a</p>

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