

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

Pursuant 37 C.F.R. § 42.64(b), Petitioner objects to evidence submitted by Patent Owner in their Patent Owner's Response filed May 26, 2023. Specifically, Petitioner objects to the following exhibits submitted by Patent Owner for the bases noted below:

Exhibit	Objections
<p>EX-2023 Additional Excerpts from The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition (2000) [IEEE-Dictionary]</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 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 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>EX-2024 Benj Edwards, The Golden Age of PDAs, PC Magazine, Nov. 20, 2018, https://www.pcmag.com/news/the-golden-age-of-pdas [PCMagazine]</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 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 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>EX-2025 Jeremy Reimer, Remembering Apple's Newton, 30 Years On, Ars Technica, June 1, 2022, https://arstechnica.com/gadgets/2022/06/remembering-applesnewton-30-years-on/ [Ars-Technica]</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 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 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>EX-2027 Excerpts from Newton's Telecom Dictionary, 16th Edition (2000) [Newton's-Telecom-Dictionary]</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 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 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>EX-2031 Microsoft Computer Dictionary [Microsoft Computer Dictionary] (3rd ed. 1997)</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 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 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>EX-2032 Newton's Telecom Dictionary [Newton's Telecom Dictionary] (12th ed. 1997)</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 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 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>EX-2033 Todor Cooklev, et al., Modern Communication Systems, Ch. 2-7.</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 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 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 106/1001: This exhibit is incomplete and is not a copy which accurately reproduces the original.</p>

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