

Filed on behalf of Intellectual Pixels Limited

By: Douglas R. Wilson
Michelle E. Armond
Forrest M. McClellen
ARMOND WILSON LLP
895 Dove Street, Suite 300
Newport Beach, CA 92660
Telephone: (949) 932-0778
Email: litigation@armondwilson.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY INTERACTIVE ENTERTAINMENT LLC,
Petitioner,

v.

INTELLECTUAL PIXELS LIMITED,
Patent Owner.

Case No. IPR2021-00237
U.S. Patent No. 10,681,109

PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE

I. INTRODUCTION

Pursuant to the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.64(b)(1), Patent Owner Intellectual Pixels Limited (“IPL”) timely objects to the evidence submitted by Petitioner Sony Interactive Entertainment LLC (“Sony”) in this proceeding. Patent Owner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioner provides evidence curing the objections identified by Patent Owner below.

II. SPECIFIC OBJECTIONS

A. Exhibit 1002 – Declaration of Dr. Henry Fuchs

Patent Owner objects to Exhibit 1002 under FRE 701-705 and 802 because Dr. Fuchs has not been made available for deposition. Patent Owner reserves the right to raise any additional objections that become apparent from Dr. Fuchs’ deposition at that time if he is made available for deposition.

B. Exhibit 1003 – Declaration of Dr. Sylvia Hall-Ellis

Patent Owner objects to Exhibit 1003 under FRE 701-705 and 802 because Dr. Hall-Ellis has not been made available for deposition. Patent Owner reserves the right to raise any additional objections that become apparent from Dr. Hall-Ellis’ deposition at that time if she is made available for deposition.

Sony Interactive v. Intellectual Pixels
Patent No. 10,681,109 – IPR2021-00237

ARMOND WILSON LLP

Dated: June 23, 2021

By: /Douglas R. Wilson/

Douglas R. Wilson (Reg. No. 54,542)

Michelle E. Armond (Reg. No. 53,954)

Forrest M. McClellan (Reg. No. 76,553)

Attorneys for Intellectual Pixels Limited

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PATENT OWNER’S OBJECTIONS TO PETITIONER’S EVIDENCE**, is being served electronically on June 23, 2021 to the following lead and back-up counsel for Petitioner to the following email addresses:

Joseph F. Haag
joseph.haag@wilmerhale.com

Daniel V. Williams
daniel.williams@wilmerhale.com

James M. Dowd
james.dowd@wilmerhale.com

S. Dennis Wang
dennis.wang@wilmerhale.com

ARMOND WILSON LLP

Dated: June 23, 2021

By: /Douglas R. Wilson/
Douglas R. Wilson (Reg. No. 54,542)
Michelle E. Armond (Reg. No. 53,954)
Forrest M. McClellan (Reg. No. 76,553)
Attorneys for Intellectual Pixels Limited