

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC.,
Petitioner,

v.

CENTRIPETAL NETWORKS, INC.,
Patent Owner.

Case IPR2022-00182
U.S. Patent No. 9,917,856

PATENT OWNER'S OBJECTIONS TO EVIDENCE

I. INTRODUCTION

Patent Owner, Centripetal Networks, Inc. (“Patent Owner” or “Centripetal”) objects under the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.64(b)(1) to the admissibility of the following documents submitted by Palo Alto Networks, Inc. (“Petitioner” or “PAN”) with Petitioner’s Reply (Paper 29).

The Petitioner’s Reply and its accompanying exhibits were filed on November 18, 2022. *See generally* Paper 29. Thus, Patent Owner’s objections are timely under 37 C.F.R. § 42.64(b)(1). Patent Owner serves Petitioner with these objections to provide notice that Patent Owner will move to exclude these exhibits as improper evidence.

II. EXHIBIT 1051

Patent Owner objects to ICAP Request for Comment (Ex. 1051) for at least the following reasons: (1) Ex. 1051 is irrelevant under FRE 401, 402, and 403 because Petitioner mischaracterizes Ex. 1051; and (2) untimely because Petitioner should have introduced it in its Petition, *see* 37 C.F.R. § 42.104(b); 37 C.F.R. § 42.23(b).

III. EXHIBIT 1052

Patent Owner objects to Michael T. Goodrich & Roberto Tamassia, INTRODUCTION TO COMPUTER SECURITY (Ex. 1052) for at least the following reasons: (1) Ex. 1052 is irrelevant under FRE 401, 402, and 403 because

Petitioner mischaracterizes Ex. 1052; (2) untimely because Petitioner should have introduced it in its Petition, *see* 37 C.F.R. § 42.104(b); 37 C.F.R. § 42.23(b); and (3) Ex. 1052 is hearsay under FRE 801, and does not fall within a hearsay exception under FRE 802 and 803.

IV. CONCLUSION

Therefore, Patent Owner reserves its right to file motions to exclude these evidence and exhibits under 37 C.F.R. § 42.64(c).

Respectfully submitted,

Dated: November 28, 2022

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(Case No. IPR2022-00182)

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) constitutes electronic service, service was made on Petitioner as detailed below.

<i>Date of service</i>	November 28, 2022
<i>Manner of service</i>	Electronic Filing with the Board
<i>Documents served</i>	PATENT OWNER'S OBJECTIONS TO EVIDENCE
<i>Persons served</i>	ROPES & GRAY LLP Scott A. McKeown Mark D. Rowland James Batchelder Andrew Radsch Keyna Chow

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