

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. AND SAMSUNG  
ELECTRONICS AMERICA, INC.  
Petitioners

v.

MANUFACTURING RESOURCES INTERNATIONAL, INC.  
Patent Owner

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Case IPR2023-00220  
Patent 9,173,322 B2

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**PATENT OWNER'S OBJECTIONS TO EVIDENCE  
FILED WITH THE PETITION**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Manufacturing Resources International, Inc. (“Patent Owner”) hereby objects to Petitioners’ Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Petitioners”) exhibits submitted with Petition for *Inter Partes* Review (Paper 9) as indicated below, as well as any reference thereto or reliance thereon, without limitation.

| <b>Exhibit Number and Description</b>                   | <b>Objections</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <b>Ex. 1002</b> - Declaration of Robert Smith-Gillespie | <p><b>37 C.F.R. § 42.65:</b> The exhibit contains expert testimony that does not disclose the underlying facts or data on which the opinion is based.</p> <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 702/703 (Unreliable expert testimony):</b> The exhibit contains statements and opinions that are not admissible under FRE 702 or 703. For example, the exhibit fails to identify facts or data supporting the witness’s conclusory testimony, and that testimony thus is not based on sufficient facts or data. Further, the testimony is not the product of reliable principles and methods, and the witness fails to</p> |

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|  | <p>reliably apply the principles and methods of the facts of the case.</p> <p>The exhibit contains opinions for which the factual bases have not been disclosed, including numerous broad and/or conclusory statements made without analysis or sufficient citation to evidence or explanation. <i>See also</i> Consolidated Trial Practice Guide, November 2019, at 36 (“Expert testimony, however, cannot take the place of a disclosure in a prior art reference, when that disclosure is required as part of the unpatentability analysis.”).</p> <p>The exhibit fails to reliably apply the correct legal standard to the facts of the case. For example, the witness fails to explain the differences between the claims and the prior art. <i>Graham v. John Deere Co.</i>, 383 U.S. 1, 17-18 (1966) (requiring that the obviousness analysis consider “differences between the claimed subject matter and the prior art.”).</p> <p>The exhibit may contain statements that are not Mr. Smith-Gillespie’s opinion, as large portions of the declaration are nearly identical to the Petition itself.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>37 C.F.R. § 42.51(b)(1)(ii):</b> Petitioners have not indicated any availability for deposition of the person certifying the translation, or even whether the person could be available for deposition.</p> |
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| <p><b>Ex. 1003</b> - Curriculum Vitae of Robert Smith-Gillespie</p>                                                                           | <p>Patent Owner objects to Mr. Smith-Gillespie's CV for the same reasons set forth above for his Declaration (Exhibit 1002).</p> <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted. Petitioners never cite or otherwise rely on this exhibit in the Petition. Petitioners' expert cites this exhibit in his expert report (Ex. 1002) without stating the exhibit's relevance or referring to any specific portion. <i>See</i> Ex. 1002 ¶ 15. <i>See also</i> 37 CFR § 42.104 ("The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.").</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> |
| <p><b>Ex. 1008</b> - Certified Translation of Japanese Unexamined Patent Application Publication No. H11-68363 to Takahashi ("Takahashi")</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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|                                                                                                                                   | <p>time, or needlessly presenting cumulative evidence.</p> <p><b>37 C.F.R. § 42.51(b)(1)(ii):</b> Petitioners have not indicated any availability for deposition of the person certifying the translation, or even whether the person could be available for deposition.</p> <p><b>37 C.F.R. § 42.63(b):</b> The affidavit fails to allege that the signatory has any knowledge of the subject language such that the signatory could attest to the accuracy of the translation or that the signatory was the individual that actually translated the subject text.</p>                                                                                                                                                                                                                                                                           |
| <p><b>Ex. 1010</b> - Certified Translation of Korean Published Unexamined Patent Application No. 10-2006-0016469 to Na (“Na”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>37 C.F.R. § 42.51(b)(1)(ii):</b> Petitioners have not indicated any availability for deposition of the person certifying the translation, or even whether the person could be available for deposition.</p> <p><b>37 C.F.R. § 42.63(b):</b> The affidavit fails to allege that the signatory has any knowledge of the subject language such that the signatory could attest to the accuracy of the translation or</p> |

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|                                                                                                                                  | that the signatory was the individual that actually translated the subject text.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Ex. 1013</b> - U.S. Patent No. 6,825,828 B2 to Burke, et al. (“Burke”)                                                        | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p> |
| <b>Ex. 1014</b> - E. Fred Schubert & Jong Kyu Kim, Solid-State Light Sources Getting Smart, 308 Science 1274 (2005) (“Schubert”) | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p>                                                                                                                                                                                                                                                                      |

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|                                                                                                  | <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><b>Ex. 1015</b> - U.S. Patent Application Publication No. 2004/0223299 to Ghosh (“Ghosh”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific</p> |

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|                                                                                                                                                     | portions of the evidence that support the challenge.”).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Ex. 1016</b> - Military Handbook: Reliability Prediction of Electronic Equipment, DEPARTMENT OF DEFENSE, MIL-HDBK-217F (1991) (“MIL-HDBK-217F”)  | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p> |
| <b>Ex. 1017</b> - Allan Webber, Calculating Useful Lifetimes of Embedded Processors, TEXAS INSTRUMENTS INCORPORATED, SPRABX4 (Nov. 2014) (“Webber”) | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| <p><b>Ex. 1018 - LIAN-TUU YEH &amp; RICHARD C. CHU, THERMAL MANAGEMENT OF MICROELECTRONIC EQUIPMENT: HEAT TRANSFER THEORY, ANALYSIS METHODS, AND DESIGN PRACTICES</b> (Dereje Agonafer ed., 2002) (“Yeh &amp; Chu”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p>                                                   |

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| <p><b>Ex. 1019 - ALLAN W. SCOTT, COOLING OF ELECTRONIC EQUIPMENT</b><br/>(John Wiley &amp; Sons, 1974)<br/> (“Scott”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p> |

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| <p><b>Ex. 1020</b> - DAVE S. STEINBERG, COOLING TECHNIQUES FOR ELECTRONIC EQUIPMENT (John Wiley &amp; Sons, 1980) (“Steinberg”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p> |
| <p><b>Ex. 1021</b> - U.S. Patent No. 5,748,269 to Harris, et al. (“Harris”)</p>                                                     | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| <p><b>Ex. 1022</b> - U.S. Patent Application Publication No. 2002/0122134 to Kalua (“Kalua”)</p>                                       | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p> |
| <p><b>Ex. 1023</b> - Custom Luxeon Design Guide, LUMILEDS FUTURE ELECTRONICS, Application Brief AB12 (Nov. 2004) (“Lumileds AB12”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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| <p><b>Ex. 1024</b> - Thermal Design Using: Luxeon Power Light Sources, PHILLIPS LUMILEDS LIGHTING COMPANY, Application Brief AB05 (June 2006) (“Lumileds AB05”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p>                                                   |

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| <b>Ex. 1026</b> - Certified Translation of Japanese Patent No. 2006-330196 to Tachikawa (“Tachikawa”) | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>37 C.F.R. § 42.51(b)(1)(ii):</b> Petitioners have not indicated any availability for deposition of the person certifying the translation, or even whether the person could be available for deposition.</p> <p><b>37 C.F.R. § 42.63(b):</b> The affidavit fails to allege that the signatory has any knowledge of the subject language such that the signatory could attest to the accuracy of the translation or that the signatory was the individual that actually translated the subject text.</p> |
| <b>Ex. 1028</b> - Certified Translation of Japanese Unexamined Patent Application Publication No.     | <b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| <p>10-2003-162228 to Kochiyama (“Kochiyama”)</p>                               | <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>37 C.F.R. § 42.51(b)(1)(ii):</b> Petitioners have not indicated any availability for deposition of the person certifying the translation, or even whether the person could be available for deposition.</p> <p><b>37 C.F.R. § 42.63(b):</b> The affidavit fails to allege that the signatory has any knowledge of the subject language such that the signatory could attest to the accuracy of the translation or that the signatory was the individual that actually translated the subject text.</p> |
| <p><b>Ex. 1030 - PEM BULLETIN,</b><br/>PennEngineering (1997)<br/> (“PEM”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p>                                                                                                                                     |

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| <p><b>Ex. 1031</b> - MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11th ed. 2007) (“Webster”)</p> | <p><b>FRE 106:</b> The exhibit constitutes only a portion of the document from which it was excerpted.</p> <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific</p> |

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|                                                                                                                | portions of the evidence that support the challenge.”).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Ex. 1032</b> - THE OXFORD ENGLISH DICTIONARY (J. A. Simpson & E. S. C. Weiner eds., 2d ed. 1989) (“Oxford”) | <p><b>FRE 106:</b> The exhibit constitutes only a portion of the document from which it was excerpted.</p> <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p> |
| <b>Ex. 1033</b> - RANDOM HOUSE WEBSTER’S COLLEGIATE DICTIONARY (2d ed. 2000) (“Random House”)                  | <b>FRE 106:</b> The exhibit constitutes only a portion of the document from which it was excerpted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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|                                                                                 | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit and statements included therein are inadmissible hearsay.</p> <p><b>FRE 901:</b> Petitioners have not produced evidence sufficient to support a finding that the exhibit is what Petitioners claim it is.</p> <p><b>35 USC § 321; 37 CFR § 42.104:</b> Petitioners do not cite this reference or otherwise explain its relevance in the Petition. <i>See also</i> 37 CFR § 42.104 (“The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.”).</p> |
| <p><b>Ex. 1035</b> - U.S. Patent No. 8,854,595, to Dunn (“the ’595 patent”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| <p><b>Ex. 1036</b> - U.S. Patent Application Publication No. 2008/0218446 to Yamanaka (“Yamanaka”)</p>       | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> |
| <p><b>Ex. 1037</b> - U.S. Patent No. 7,753,567 to Kang, et al. (“Kang”)</p>                                  | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> |
| <p><b>Ex. 1038</b> - U.S. Patent Application Publication No. 2009/0154096 to Iyengar, et al. (“Iyengar”)</p> | <p><b>FRE 402:</b> The exhibit includes information that is not relevant to any ground upon which trial was instituted.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> |

Dated: July 5, 2023

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date below a copy of this  
**PATENT OWNER MANUFACTURING RESOURCES**  
**INTERNATIONAL, INC.'S OBJECTIONS TO EVIDENCE FILED WITH**  
**THE PETITION** was served on Petitioner by filing through the P-TACTS  
System, as well as by delivering a copy via electronic mail to the following:

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