IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner

v.

WILDSEED MOBILE LLC,
Patent Owner

Case IPR2023-00248
U.S. Patent No. 7,376,414

PATENT OWNER WILDSEED MOBILE LLC'S OBJECTIONS TO EVIDENCE

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Wildseed Mobile LLC hereby objects in accordance with the Federal Rules of Evidence ("FRE") to the admissibility of Exhibit 1029, which Petitioner Google LLC filed on December 8, 2023.

Patent Owner timely objects under 37 C.F.R. § 42.64(b)(1) within five business days of service of evidence to which the objection is directed. Patent Owner files and serves Petitioner with these objections to provide notice that Patent Owner may move to exclude Exhibit 1029, or portions thereof, under 37 C.F.R. § 42.64(c).

Objections to Exhibit 1029

FRE 401, 402, and 403: Patent Owner objects to Exhibit 1029 for including information that is irrelevant or 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. This includes, for example, ¶¶ 1–8, 25, 28–29, and 56, which are not relied upon in Petitioner's Reply.

FRE 702 and 703 (and 37 C.F.R. § 42.65): Patent Owner objects to Exhibit 1029, including at least ¶¶ 9–56 because there has not been an adequate showing that Dr. Houh's testimony is based on sufficient facts or data, that the testimony is the product of reliable principles or methods, or that the testimony will help the

Board understand the evidence or determine a fact in issue. Further, it has not been shown that Dr. Houh is qualified to testify competently regarding the matters the opinions are said to address.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Steven M. Pappas/

Steven M. Pappas
Registration No. 73,904
Counsel for Patent Owner

Date: December 15, 2023

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PATENT OWNER WILDSEED MOBILE LLC'S OBJECTIONS TO EVIDENCE** was served in its entirety on December 15, 2023, upon the following parties via electronic mail:

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Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Steven M. Pappas/

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