

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY GROUP CORPORATION, SONY CORPORATION, SONY
CORPORATION OF AMERICA AND SONY ELECTRONICS, INC.

Petitioners

v.

INMUSIC BRANDS, INC.

(record) Patent Owner

IPR2023-00294
Patent No. 7,567,498

PETITIONERS' OBJECTIONS TO EVIDENCE

Petitioners hereby provide the following objections to evidence filed with the Patent Owner Response on November 9, 2023:

Exhibit	Objection
Ex. 2004, Zatkovich Decl.	Petitioners object to all declaration testimony to the extent Petitioners are prevented from cross-examining the declarant pursuant to 37 C.F.R. §42.51(b)(1)(ii).
Ex. 2004, Zatkovich Decl.	Petitioners object under Fed. R. Ev. 702 and <i>Kyocera Senco Indus. Tools v. Int'l Trade Comm'n</i> , 22 F.4th 1369 (Fed. Cir. 2022) because Dr. Zatkovich is not qualified as a person having ordinary skill in the art.
Ex. 2005-2006, 2008-2010	Petitioners object under Fed. R. Ev. 801-802 to these exhibits because they are cited in an attempt to prove the truth of the statements found therein and do not meet an exception.

To the extent any exhibit or portion of an exhibit is objectionable, Petitioners also object to all other exhibits and papers that rely on the objectionable portions, and specifically, portions of Ex. 2004 that rely on otherwise inadmissible exhibits.

Date: <u>November 15, 2023</u>	<u>/Matthew A. Smith/ (RN 49,003)</u> Matthew A. Smith SMITH BALUCH LLP 700 Pennsylvania Ave. SE, 2nd Floor Washington, DC 20003 (202) 669-6207 smith@smithbaluch.com <i>Counsel for Petitioners</i>
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Petitioners' Objections to Evidence were served by electronic mail on November 15, 2023, on the Patent Owner's counsel of record at the United States Patent & Trademark Office having the following addresses:

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Date: November 15, 2023

/Matthew A. Smith/ (RN 49,003)