UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.
Petitioner,

v.

HONGJIA WANG
Patent Owner.

Case IPR2023-00474
U.S. Patent No. 11,007,583

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits its notice of objections to certain evidence that Petitioner submitted in connection with IPR2023-00474.

Exhibit Number	Objections
2118	FRE 401, 402, 403: Portions of this exhibit are not relevant. To the extent this document is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore the document is inadmissible under Rule 403. FRE 611 and 37 C.F.R. § 42.53(d)(5)(ii): Petitioner additionally objects to this Exhibit to the extent reliance by Patent Owner is outside the scope of direct examination. FRE 801, 802: Petitioner additionally objects to this Exhibit to the extent it is hearsay. Petitioner reasserts and reserves all of its objections under 37 C.F.R. § 42.64(a) made during the February 16, 2024 deposition of Steven Schmid.
2119	FRE 401, 402, 403: Portions of this exhibit are not relevant. To the extent this document is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore the document is inadmissible under Rule 403. FRE 611 and 37 C.F.R. § 42.53(d)(5)(ii): Petitioner additionally objects to this Exhibit to the extent reliance by Patent Owner is outside the scope of direct examination. FRE 801, 802: Petitioner additionally objects to this Exhibit to the extent it is hearsay.

	Petitioner reasserts and reserves all of its objections under 37 C.F.R. § 42.64(a) made during the February 13, 2024 deposition of Taylor Fulk.

Respectfully submitted,

Date: March 19, 2024

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CERTIFICATE OF SERVICE

I certify that on March 19, 2024, I caused a true and correct copy of the foregoing **Petitioner's Objections to Evidence** to be served via electronic mail on the following:

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