

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REFLEX USA LLC,
Petitioner,

v.

LONGYEAR TM, INC. and GLOBALTECH CORPORATION PTY LTD.,
Patent Owners.

IPR2023-00642
U.S. Patent 10,830,013

**PATENT OWNERS' OBJECTIONS TO EVIDENCE
FILED PRE-INSTITUTION**

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence ("FRE"), Patent Owners Longyear TM, Inc. and GlobalTech Corp. Pty Ltd. ("Patent Owner") hereby object to the following documents filed by Petitioner Reflex USA LLC ("Petitioner") with its Petition filed February 28, 2023. These objections are timely filed within 10 business days of the institution of trial.

A. Exhibit 1017

Patent Owner objects to Exhibit 1017 as not authenticated under FRE 901. Exhibit 1017 has not been shown to be self-authenticating, and Petitioner has not produced any evidence sufficient to support a finding that Exhibit 1017 is what Petitioner claims it is.

B. Exhibit 1019

Patent Owner objects to Exhibit 1019 as not authenticated under FRE 901. Exhibit 1019 has not been shown to be self-authenticating, and Petitioner has not produced any evidence sufficient to support a finding that Exhibit 1019 is what Petitioner claims it is.

C. Exhibit 1020

Patent Owner objects to Exhibit 1020 as not authenticated under FRE 901. Exhibit 1020 has not been shown to be self-authenticating, and Petitioner has not produced any evidence sufficient to support a finding that Exhibit 1020 is what Petitioner claims it is.

D. Exhibit 1021

Patent Owner objects to Exhibit 1021 as not authenticated under FRE 901. Exhibit 1021 has not been shown to be self-authenticating, and Petitioner has not produced any evidence sufficient to support a finding that Exhibit 1021 is what Petitioner claims it is.

Respectfully submitted,

Dated: October 10, 2023
HAYNES AND BOONE, LLP
2801 N. Harwood St., Suite 2300
Dallas, Texas 75201

/Scott T. Jarratt/
Scott T. Jarratt
Lead Counsel for Patent Owner
Registration No. 70,297

CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e),
service was made on Petitioner as detailed below.

Date of service October 10, 2023

Manner of service Electronic Service by E-mail: sweidenfeller@cov.com;
pchen@cov.com; Reflex-IPR-Covington@cov.com

Documents served **PATENT OWNERS' OBJECTIONS TO EVIDENCE
FILED PRE-INSTITUTION**

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