

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner, v.

DDC TECHNOLOGY, LLC,

Patent Owner.

IPR2023-00708

U.S. Patent 9,811,184

**PATENT OWNER'S OBJECTIONS TO EVIDENCE
IN CONNECTION WITH PETITIONER'S REPLY**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner DDC Technology, LLC hereby submits its notice of objections to certain evidence that Petitioner Google LLC submitted with its Reply dated April 24, 2024, in connection with the above-captioned proceedings.

Patent Owner objects to the following items:

1. Patent Owner objects to Exhibit 1023 under FRE 401, FRE 106 and for lack of completeness because Petitioner did not file all exhibits to the deposition transcript and because Petitioner did not file the errata sheets submitted by Mr. Buckley in connection with the deposition transcript. Accordingly, to the extent Petitioner relies on Exhibit 1023, it is prejudicial, unreliable due to its lack of completeness, and irrelevant.

Conclusion

To the extent Petitioner does not expunge the evidence identified above as well as any reliance on and reference to that evidence from its papers, Patent Owner may file a motion to exclude under 37 C.F.R. § 42.64(c) and/or a motion to strike.

Dated: May 1, 2024

Respectfully submitted,

/Cortney S. Alexander/
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(a) and (b), I certify that on the date indicated below, a true and accurate copy of the foregoing document was served on the following counsel for Petitioner via e-mail, pursuant to Petitioner's consent to e-mail service:

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Dated: May 1, 2024

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