

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION,
Petitioner,

v.

MASAHIRO IIDA,
Patent Owner.

Case No. IPR2023-00864
U.S. Patent No. 6,812,737

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64**

Pursuant to 37 C.F.R. §42.64(b)(1), Petitioner objects to the admissibility of the following evidence submitted by Patent Owner Masahiro Iida. These objections are made within 10 business days of the institution of the trial in this matter.

I. EXHIBITS 2001–2004

Petitioner objects to each of Exhibits 2001, 2002, 2003, and 2004 as inadmissible hearsay under FRE 801 and 802 that does not fall under any exceptions, including those of FRE 803, 804, 805, or 807.

Petitioner also objects to each of Exhibits 2001, 2002, 2003, and 2004 under FRE 901 because Patent Owner has not presented evidence sufficient to support a finding that the documents in question are what Patent Owner claims they are. Exhibits 2001, 2002, 2003, and 2004 also are not self-authenticating under FRE 902.

II. EXHIBIT 1033

Petitioner objects under FRE 801 and 802 to Patent Owner's reliance on paragraphs 18–25 and 55 of Exhibit 1033 (Declaration of Dr. Marwan Hassoun in support of Professor Masahiro Iida's Claim Construction Brief in *Iida v. Intel Corp.*, No. 6:22-cv-00662-ADA (W.D. Tex.)), which are cited in Patent Owner's Preliminary Response (Paper 7), as offering hearsay to prove the truth of the matters asserted. Petitioner further objects to Patent Owner's reliance on paragraphs 18–25 and 55 of Exhibit 1033 as inadmissible hearsay under FRE 801

and 802 to the extent Petitioner is prevented from cross-examining the declarant pursuant to 37 C.F.R. §42.51(b)(1)(ii).

Dated: December 7, 2023

Respectfully submitted,

/s/ Heather E. Takahashi

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. §42.6(e)(4)

I hereby certify that on December 7, 2023, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

Joshua R. Slavitt
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Dated: December 7, 2023

Respectfully submitted,

/s/ Heather E. Takahashi

Heather E. Takahashi (Reg. No. 78,418)

Counsel for Petitioner