

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETFLIX, INC.,
Petitioner

v.

VL COLLECTIVE IP, LLC,
Patent Owner

Case IPR2023-00891
Patent 8,605,794

**PATENT OWNER'S OBJECTIONS TO EVIDENCE
UNDER 37 C.F.R. § 42.64(b)(1)**

Patent Owner, VL Collective IP, LLC, objects under the Federal Rules of Evidence (FRE) and 37 C.F.R. § 42.62 to the admissibility of the Exhibits 1025, 1026, and 1027.

I. Objections Under FRE

Patent Owner objects to Exhibits 1025, 1026, and 1027 as inadmissible hearsay under FRE 801-807, because they contain out of court statements that are offered for the truth of the matters asserted. Patent Owner further objects to Exhibits 1025, 1026, and 1027 as not authenticated under FRE 901, and the documents are not self-authenticating under FRE 902. Exhibits 1025, 1026, and 1027 are also objected to as irrelevant and inadmissible under FRE 401 and 402, and prejudicial under FRE 403.

II. Conclusion

These objections are timely presented, as they are submitted and served within five business days of service of evidence to which the objection is directed. 37 C.F.R. § 42.64(b)(1). Patent Owner reserves the right to file a motion to exclude the Exhibits 1025, 1026, and 1027 under 37 C.F.R. § 42.64(c).

Dated: August 8, 2024

Respectfully submitted,
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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on August 8, 2024
a copy of the foregoing document was served by email to counsel for Petitioner:

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