

Filed on behalf of BeSang Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION,
Petitioner,

v.

BESANG INC.,
Patent Owner.

Case No. IPR2023-00991
U.S. Patent No. 7,378,702

PATENT OWNER'S OBJECTIONS TO EVIDENCE

I. INTRODUCTION

Pursuant to the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.64(b)(1), Patent Owner BeSang Inc. timely objects to the evidence submitted by Petitioner Intel Corporation (“Intel”) in this proceeding. Patent Owner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioner provides evidence curing the objections identified by Patent Owner below.

II. SPECIFIC OBJECTIONS

A. Exhibit 1003 – Declaration of Dr. Carl Sechen

Patent Owner objects to Exhibit 1003 under FRE 701-705 and 801-802 because Dr. Sechen has not been made available for deposition. Patent Owner reserves the right to raise any additional objections that become apparent from Dr. Sechen’s deposition at that time if he is made available for deposition.

B. Exhibit 1014 – Silicon Processing, Stanley Wolf, Vol. 1

Patent Owner objects to Exhibit 1014 under FRE 901 because Petitioner has not produced any evidence “sufficient to support a finding that the item is what the proponent claims it is.” FRE 901(a). Indeed, Petitioner does not even assert that the document is prior art or make any other factual assertions regarding Exhibit 1014.

Patent Owner further objects to Exhibit 1014 under FRE 106 because Petitioner only purports to provide an excerpt of the document and has not made available a full copy to Patent Owner.

C. Exhibit 1015 – Silicon Processing, Stanley Wolf, Vol. 4

Patent Owner objects to Exhibit 1015 under FRE 901 because Petitioner has not produced any evidence “sufficient to support a finding that the item is what the proponent claims it is.” FRE 901(a). Indeed, Petitioner does not even assert that the document is prior art or make any other factual assertions regarding Exhibit 1015.

Patent Owner further objects to Exhibit 1015 under FRE 106 because Petitioner only purports to provide an excerpt of the document and has not made available a full copy to Patent Owner.

D. Exhibit 1024 - Maleville

Patent Owner objects to Exhibit 1024 under FRE 901 because Petitioner has not produced any evidence “sufficient to support a finding that the item is what the proponent claims it is.” FRE 901(a). Indeed, Petitioner does not even assert that the document is prior art or make any other factual assertions regarding Exhibit 1024.

E. Exhibit 1028 – Declaration of J. Munford

Patent Owner objects to Exhibit 1028 under FRE 701-705 and 801-802 because Ms. Munford has not been made available for deposition. Patent Owner reserves the right to raise any additional objections that become apparent from Ms. Munford’s deposition at that time if she is made available for deposition.

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Patent No. 7,378,702 – IPR2023-00991

ARMOND WILSON LLP

Dated: December 28, 2023

By: /Michelle E. Armond/

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PATENT OWNER’S OBJECTIONS TO EVIDENCE** is being served electronically on December 28, 2023 to the following counsel for Petitioner to the following email addresses:

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ARMOND WILSON LLP

Dated: December 28, 2023 By: /Michelle E. Armond/
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