

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VERIZON CONNECT INC.,
PETITIONER,

V.

OMEGA PATENTS, LLC
PATENT OWNER.

CASE IPR2023-01162
PATENT 8,032,278

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
DEMONSTRATIVE EXHIBITS**

Pursuant to the Board's Order Setting Oral Argument (Paper 26), the parties met and conferred regarding Patent Owner's Objections to Petitioner's Demonstrative Exhibits (Ex. 1044, individual pages identified below as "slides") but were unable to resolve the following objections:

Slides 15-19

Slides 15-19 argue that Patent Owner's reference to the cumulative nature of the references versus those in the past is an untimely 325(d) challenge. This is an argument not referenced by Petitioner in their Reply to the Institution Decision (Paper 24, filed August 21, 2024), making these arguments new, thus violating the "strict prohibition against the presentation of new evidence or arguments at the hearing" (Paper 27, p. 4).

Dated: November 19, 2024

Respectfully submitted,
Omega Patents, LLC

/s/ Ryan T. Santurri

Lead Counsel

Ryan T. Santurri, Reg No. 61,894

rsanturri@allendyer.com

Allen, Dyer, Doppelt + Gilchrist, P.A.

255 South Orange Avenue, Suite 1401

Post Office Box 3791

Orlando, Florida 32801-3791

Telephone: 407-841-2330

Facsimile: 407-841-2343

Back up Counsel

Christopher F. Regan, Reg No. 34,906

cregan@allendyer.com

David S. Carus, Reg No. 59,291

dcarus@allendyer.com

Allen, Dyer, Doppelt + Gilchrist, P.A.

1135 E. State Road 434, Suite 3001

Winter Springs, FL 32709

Telephone: 407-796-5051

Facsimile: 407-796-5065

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 19, 2024, true and correct copies of the foregoing PATENT OWNER'S OBJECTIONS TO PETITIONER'S DEMONSTRATIVES were served via electronic mail upon the following counsel for record for Petitioners:

Asheesh (Ashe) P. Puri, Esq. Nixon Peabody LLP 300 South Grand Avenue, Suite 4100 Los Angeles, CA 90071-3151 apuri@nixonpeabody.com	Sasha G. Rao, Esq. Nixon Peabody LLP One Embarcadero Center, 32nd Floor San Francisco, CA 94111 srao@nixonpeabody.com
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