UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,
Petitioner,

v.

PANTECH CORPORATION,
Patent Owner

Case: IPR2023-01267

U.S. Patent No. 9,313,809

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

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.64(b), Patent Owner respectfully asserts the following objections to the evidence proffered with Petitioner's Petition for *Inter Partes* Review ("Petition") and in subsequent preliminary proceedings regarding the claims of U.S. Patent No. 9,313,809 (the "'809 Patent"). The Federal Rules of Evidence ("FRE") apply to these proceedings according to the provisions of 37 C.F.R. § 42.62(a), and these rules, along with relevant case law and PTAB Rules, form the basis of objections contained herein. Patent Owner's objections apply equally to Petitioner's reliance on or citation to any objected evidence in its papers, including expert declarations. These objections are being served and filed within 10 business days from the institution of trial on April 25, 2024.

Evidence	**Description of Objection**
Exs. 1051-1056, 1058-1068, 1072-1075, 1083-1085, 1088-1089, 1093, and 1096-1101.	These exhibits purport to be printouts from the Internet Archive at web.archive.org. Yet they are submitted without authentication or guarantees of reliability. Accordingly, Patent Owner objects to these exhibits under F.R.E. 802 and 901 as unauthenticated hearsay. Ex. 1051 purports to be a "standard affidavit" for purposes of authentication, but it is unsigned and there are no exhibits attached as "Exhibit A." Accordingly, it can neither authenticate nor show the reliability of these exhibits.
Exs. 1200-1202, 1204-1266	These exhibits relate solely to Petitioner's withdrawn motion to disqualify counsel for Patent Owner, and have no probative value to any ground upon which this proceeding was instituted. Accordingly, Patent Owner objections to these exhibits under F.R.E. 402.
Exs. 1030, 1032, and 1300	These exhibits relate solely to possible discretionary denial of *inter partes* review, and have no probative value to any ground upon which this proceeding was instituted.

	Accordingly, Patent Owner objections to these exhibits under F.R.E. 402.

Dated: May 8, 2024

Respectfully submitted,

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Counsel for Pantech Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2024, a copy of the attached **PATENT OWNER'S OBJECTIONS TO EVIDENCE UNDER 37 C.F.R. § 42.64(b)** was served by electronic mail to the attorneys of record, at the following addresses:

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Respectfully submitted,

Date: May 8, 2024 By: /Amanda S. Bonner Reg. No. 65,224/
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