

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

MOTOROLA SOLUTIONS, INC.,  
Petitioner,

v.

STA GROUP LLC,  
Patent Owner.

---

Case IPR2023-01292  
Patent 7,324,802 B2

---

**PETITIONER'S OBJECTIONS TO EVIDENCE SUBMITTED  
WITH PATENT OWNER'S RESPONSE**

*Submitted Electronically*

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Motorola Solutions, Inc. (“MSI”) objects to the following exhibits filed by Patent Owner STA Group LLC (“STA”) with its Patent Owner Response (“POR,” Paper No. 18) based on the following Federal Rules of Evidence (“FRE”) and other provisions. These objections are timely, as they are being made within five business days of service of the evidence (June 26, 2024). The following chart lists MSI’s objections to the admissibility of certain evidence (identified below) that is included within or accompanies the POR and the basis for those objections.

| <u><b>Exhibit</b></u> | <u><b>Description</b></u>             | <u><b>Objections</b></u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2005                  | Deposition Transcript of Mr. Williams | <b>FRE 401-403:</b> MSI objects to the testimony from page 28, line 24 to page 31, line 2 and page 32, line 23 to page 37, line 19, for including information that is irrelevant. The cited portions involve lines of questioning by STA’s counsel that are related to Mr. Williams’ practices with respect to unrelated proceedings before the Board (28:24-31:2) and Mr. Williams’ declaration testimony in an unrelated proceeding involving an unrelated patent (32:23-37:19). This testimony thus lacks any tendency to make a fact that is of consequence in determining this action more or less probable than it would be without this testimony. To the extent this document has any probative value to any ground upon which trial was instituted, it is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. |

| <u>Exhibit</u> | <u>Description</u>                                                           | <u>Objections</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------|------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                |                                                                              | <p><b>37 C.F.R. § 42.53(d)(5)(ii):</b> MSI objects to the testimony from page 28, line 24 to page 31, line 2 and page 32, line 23 to page 37, line 19, as outside the scope of Mr. Williams’ direct testimony.</p> <p><b>FRE 106:</b> MSI objects to Exhibit 2005 because it is incomplete. During Mr. Williams’ deposition, counsel for STA introduced two new exhibits: (1) the Declaration of David Hilliard Williams in Support of Petition for Inter Partes Review of U.S. Patent No. 9,445,251 (marked as Exhibit 1 during Mr. Williams’ deposition); and (2) Motorola Solutions’ web page titled Dispatch Console Accessories (marked as Exhibit 2 during Mr. Williams’ deposition). STA did not file these documents as exhibits to its POR and these documents were not included with the as-filed version of Mr. Williams’ deposition transcript in Exhibit 2005.</p> |
| 2006           | Institution Decision, Case IPR2018-01083, Paper 10, Entered January 10, 2019 | <p><b>FRE 401-403:</b> MSI objects to Exhibit 2006 under FRE 401 and FRE 403 for including information that is irrelevant. This document is an institution decision from an unrelated proceeding involving an unrelated patent in which Mr. Williams provided declaration testimony. Exhibit 2006 thus lacks any tendency to make a fact that is of consequence in determining this action more or less probable than it would be without this document. To the extent this document has any probative value to any ground upon which trial was instituted, it is substantially outweighed by the danger of unfair prejudice, confusing the issues,</p>                                                                                                                                                                                                                         |

| <u><b>Exhibit</b></u> | <u><b>Description</b></u>     | <u><b>Objections</b></u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       |                               | <p>undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 801/802:</b> To the extent STA relies on the contents of Exhibit 2006 for the truth of the matter asserted, MSI objects to Exhibit 2006 as inadmissible hearsay under FRE 801 and 802 that does not fall under any exception.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2007                  | Declaration of Dr. Robert Akl | <p><b>37 C.F.R. § 42.53(d)(5)(ii) and FRE 106, 401-403:</b> MSI objects to the contents of Exhibit 2007 to the extent that the declarant relies on Exhibit 2005 for the same reasons provided herein for Exhibit 2005.</p> <p><b>FRE 401-403, 801/802:</b> MSI objects to the contents of Exhibit 2007 to the extent that the declarant relies on Exhibit 2006 for the same reasons provided herein for Exhibit 2006.</p> <p><b>FRE 602:</b> MSI objects to Exhibit 2007, including at least ¶¶53-54, 58-62, 83-85, and 92, because STA did not introduce sufficient evidence to establish that the witness has personal knowledge of the matters discussed.</p> <p><b>FRE 701:</b> MSI objects to Exhibit 2007, including at least ¶¶53-54, 58-62, 83-85, and 92, as improper testimony by a lay witness under FRE 701. STA has not established the declarant as an expert witness in the subject matter discussed in these paragraphs.</p> <p><b>FRE 702 and 703:</b> MSI objects to Exhibit 2007, including at least ¶¶ 33, 45, 46-48, 51-56, 58-67, 68-71, 72-73, 74-78, 79-81, 83-97, 98-114, 115, 116-120, and 121-122, as improper testimony under FRE 702 and 703. The testimony is based on insufficient facts or data,</p> |

| <u><b>Exhibit</b></u> | <u><b>Description</b></u> | <u><b>Objections</b></u>                                                                                                                                                                             |
|-----------------------|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       |                           | is not the product of reliable principles and methods, does not reliably apply the appropriate principles and methods to the fact of the case, and is not commensurate with the scope of the claims. |

Date: July 3, 2024

Respectfully Submitted,

/Eliot D. Williams/

Eliot D. Williams (Reg. No. 50,822)

BAKER BOTTS L.L.P.

700 K Street, N.W

Washington, D.C. 20001-5692

Tel: 202-639-1334

eliot.williams@bakerbotts.com

*Attorneys for Petitioner, Motorola Solutions,  
Inc.*

## **CERTIFICATE OF SERVICE**

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on July 3, 2024, a complete and entire copy of the **PETITIONER’S OBJECTIONS TO EVIDENCE SUBMITTED WITH PATENT OWNER’S RESPONSE** was served on Patent Owner via email at the following correspondence addresses:

Jason.Engel.PTAB@klgates.com

Kyle.Kantarek@klgates.com

Nolan.Hubbard@klgates.com

Date: July 3, 2024

/Eliot D. Williams/  
Eliot D. Williams (Reg. No. 50,822)  
BAKER BOTTS L.L.P.  
700 K Street, N.W  
Washington, D.C. 20001-5692  
Tel: 202-639-1334  
eliot.williams@bakerbotts.com

*Attorneys for Petitioner, Motorola Solutions,  
Inc.*