

UNITED STATES PATENT AND TRADEMARK OFFICE

PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,
Petitioner,

v.

STA GROUP LLC,
Patent Owner.

Case IPR2023-01292
U.S. Patent No. 7,324,802

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE
FILED WITH PETITIONER'S REPLY**

Patent Owner, STA Group LLC (“Patent Owner”), pursuant to 37 C.F.R. § 42.64(b)(1), submits the following objections to the evidence Petitioner Motorola Solutions, Inc. (“Petitioner”) filed with the Petitioner’s Reply dated September 25, 2024 (Paper 22). Patent Owner’s objections apply equally to Petitioner’s reliance on these Exhibits, including in any subsequently-filed documents in this proceeding. These objections are being filed within five business days of service.

Exhibit 1031

Patent Owner objects to Exhibit 1031 under Rules 401-402 of the Federal Rules of Evidence as being irrelevant.

Patent Owner further objects to Exhibit 1031 under 37 C.F.R. § 42.23 as new evidence improperly submitted in reply.

Exhibit 1032

Patent Owner objects to Exhibit 1032 under Rules 401-402 of the Federal Rules of Evidence as being irrelevant.

Patent Owner further objects to Exhibit 1032 under 37 C.F.R. § 42.23 as new evidence improperly submitted in reply.

Exhibit 1035

Patent Owner objects to Exhibit 1035, including at least ¶¶ 178, 191, and 210-215, under Rules 401-402 of the Federal Rules of Evidence as being irrelevant.

Patent Owner further objects to Exhibit 1035, including at least ¶¶ 178, 191, and 210-215, under 37 C.F.R. § 42.23 as new evidence improperly submitted in reply.

Patent Owner further objects to Exhibit 1035 under Rule 106 of the Federal Rules of Evidence as being an incomplete statement.

Dated: October 2, 2024

Respectfully submitted,

By: /Jason A. Engel/
Jason A. Engel
Reg. No. 51,654
K&L GATES LLP
70 W. Madison Street, Suite 3100
Chicago, IL 60602
Jason.Engel.PTAB@klgates.com
T: (312) 807-4236
F: (312) 827-8145

Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2024, a true and correct copy of the foregoing was caused to be served electronically on the following counsel of record for Petitioner at the following email addresses:

Eliot D. Williams
Katharine Burke
BAKER BOTTS L.L.P.
700 K Street, N.W.
Washington, D.C. 20001
eliot.williams@bakerbotts.com
katharine.burke@bakerbotts.com
dlbbstamsiiprs@bakerbotts.com

Michael Knierim
Matthew Thompson
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112
michael.knierim@bakerbotts.com
matthew.thompson@bakerbotts.com

Clarke W. Stavinoha
BAKER BOTTS L.L.P.
2001 Ross Avenue, Suite 900
Dallas, TX 75201
clarke.stavinoha@bakerbotts.com

By: /Jason A. Engel/
Jason A. Engel
Reg. No. 51,654