

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,

Petitioner,

v.

STA GROUP LLC,

Patent Owner.

IPR2023-01294

U.S. Patent No.: 8,831,664 B2

**PETITIONER’S OBJECTIONS TO EVIDENCE SUBMITTED
WITH PATENT OWNER’S PRELIMINARY RESPONSE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner objects to the following exhibits filed by Patent Owner (“PO”) with its Patent Owner Preliminary Response (“POPR,” Paper No. 8) based on the following Federal Rules of Evidence (“FRE”). These objections are timely, as they are being made within ten business days of the institution of trial (March 22, 2024). The following chart lists Petitioner’s objections to the admissibility of certain evidence (identified below) that is included within or accompanies the Patent Owner’s Preliminary Response and the basis for those objections.

<u>Exhibit</u>	<u>Description</u>	<u>Objections</u>
2001	International Pat. App. Pub. No. WO 2007/021586 (“Shaffer”)	FRE 401-403: Petitioner objects to Exhibit 2001 under FRE 401 and FRE 403 for including information that is irrelevant. PO relied on Exhibit 2001 to support its argument that the Board should exercise its discretion to deny institution under 35 U.S.C. § 325(d). <i>See, e.g.</i> , POPR at 17-25. The Board declined to exercise its discretion to deny institution under 35 U.S.C. § 325(d). <i>See</i> Paper 12 at 10-12. Accordingly, Exhibit 2001 lacks any tendency to make a fact that is of consequence in determining the action more or less probable than it would be without this document.
2002	U.S. Patent App. Pub. No. A1 2008/0037461 (“Biltz”)	FRE 401-403: Petitioner objects to Exhibit 2002 under FRE 401 and FRE 403 for including information that is irrelevant. PO relied on Exhibit 2002 to support its argument that the Board should exercise its discretion to deny institution under 35 U.S.C. § 325(d). <i>See, e.g.</i> , POPR at 17-25. The Board declined to exercise its discretion to deny institution under 35 U.S.C.

<u>Exhibit</u>	<u>Description</u>	<u>Objections</u>
		§ 325(d). See Paper 12 at 10-12. Accordingly, Exhibit 2002 lacks any tendency to make a fact that is of consequence in determining the action more or less probable than it would be without this document.

Respectfully Submitted,

Date: April 5, 2024

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CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on April 5, 2024, a complete and entire copy of the **PETITIONER'S OBJECTIONS TO EVIDENCE SUBMITTED WITH PATENT OWNER'S PRELIMINARY RESPONSE** was served on Patent Owner via email at the following correspondence addresses:

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