

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,
Petitioner,

v.

STA GROUP LLC,
Patent Owner.

Case IPR2023-01294
Patent 8,831,664 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. 19) 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 28, 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>Exhibit</u>	<u>Description</u>	<u>Objections</u>
2005	Declaration of Shmuel Shaffer, Ph.D.	37 C.F.R. § 42.53(d)(5)(ii) and FRE 106, 401-403: MSI objects to the contents of Exhibit 2005 to the extent that the declarant relies on Exhibit 2006 for the same reasons provided herein for Exhibit 2006. FRE 702 and 703: MSI objects to Exhibit 2005, including at least ¶¶ 22, 26, 27, 29-31, 59, 71-72, 80, 86-90, 94-100, 101-107, 108-118, 119-123, 124-133, 134-137, and 138-145 as improper testimony under FRE 702 and 703. The testimony is based on insufficient facts or data, 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.
2006	Deposition Transcript of David Williams dated June 12, 2024	FRE 401-403: MSI objects to the testimony from page 17, line 21 to page 21, line 4 and page 15, line 20 to page 16, line 19, for including information that is irrelevant. The cited portions involve lines of questioning by

<u>Exhibit</u>	<u>Description</u>	<u>Objections</u>
		STA's counsel that are related to Mr. Williams' practices with respect to unrelated proceedings before the Board. 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. 37 C.F.R. § 42.53(d)(5)(ii): MSI objects to the testimony from page 17, line 21 to page 21, line 4 and page 15, line 20 to page 16, line 19, as outside the scope of Mr. Williams' direct testimony.

Date: July 8, 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 8, 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

Dennis.Majewski@klgates.com

Date: July 8, 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.*