

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CADENCE DESIGN SYSTEMS, INC.,

Petitioner,

v.

SEMICONDUCTOR DESIGN TECHNOLOGIES, LLC,

Patent Owner.

IPR2024-00024

U.S. Patent No. 7,971,167

PETITIONER’S OBJECTIONS TO EVIDENCE

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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)(1) and the Federal Rules of Evidence, Petitioner Cadence Design Systems, Inc. submits the following objection to evidence filed by Patent Owner. This objection is timely served pursuant to 37 C.F.R. § 42.64(b)(1) within ten business days of the April 25, 2024 institution of the inter partes review (Paper 9). The Federal Rules of Evidence (F.R.E.) apply to these proceedings according to 37 C.F.R. § 42.62(a), and these rules form the basis of the objection contained herein. Petitioner hereby provides notice to Patent Owner that Petitioner may move to exclude the Challenged Evidence (Exhibits 2001-2006) under 37 C.F.R. § 42.64(c).

Exhibit Number(s)	Objections
2001-2006	<u>Authentication.</u> F.R.E. 901(a). Patent Owner has not produced evidence sufficient to support a finding that these exhibits are what Patent Owner claims them to be. <u>Hearsay.</u> F.R.E. 801(c) and 802. The Patent Owner Preliminary Response (POPR) relies on these exhibits with out-of-court statements to prove the truth of matters asserted. <u>Relevance.</u> F.R.E. 401-403. These exhibits are not relevant and any probative value of this exhibit is substantially outweighed by unfair prejudice, confusing the issues, and/or wasting time, because the authenticity and publication date of these exhibits have not been established, and their purported publication date comes over 15 years after the obviousness date in this proceeding. Exhibits 2003-2005 are stamp marked with dates between January 23, 2024 and January 29, 2024. Citing to Exhibits 2001-2006, Patent Owner admits it “performed several searches on the current UCI CECS webpage.” (POPR, 24-25). These purported web-site screenshots purportedly describe webpages on the current UCI CECS website. While Patent Owner implicitly suggests that they depict the state of the UCI CECS website before 2007-2008 (POPR, 25), any probative value is

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	substantially outweighed by the confusion and waste of time in discerning whether the alleged current website has any relevance to the state of public accessibility of Shin before 2007-2008.

Respectfully submitted,

SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

/s/ Harper Batts

Harper Batts (Reg. No. 56,160)

Attorney for Petitioner

Date: May 9, 2024

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on May 9, 2024, a complete and entire copy of the foregoing **PETITIONER'S OBJECTIONS TO EVIDENCE**, was filed with the PTAB through its E2E system and served via email on attorneys of record for Semiconductor Design Technologies, LLC at the following address:

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Dated: May 9, 2024

By

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