

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC. AND MICROSOFT CORPORATION,
Petitioners,

v.

DATANET, LLC,
Patent Owner.

IPR2024-00078
U.S. Patent No. 8,473,478

PETITIONERS' OBJECTION TO PATENT OWNER'S EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b), Petitioners Dropbox, Inc. and Microsoft Corporation (“Petitioners”) hereby submit the following objections to the evidence Patent Owner filed with its Preliminary Response dated February 29, 2024 (Paper 7). Petitioners’ objections apply equally to Patent Owner’s reliance on this evidence in any subsequently filed documents in this proceeding.

Petitioners object as follows to the admissibility of the following evidence submitted prior to institution.

Evidence	Objections
Exhibit 2001 (Declaration of Zaydoon (“Jay”) Jawadi in support of Patent Owner’s Preliminary Response)	Lack of relevance, confusion of the issues, and unfair prejudice under FRE 401-403: Each paragraph in Exhibit 2001 lacks relevance, confuses the issues, and risks unfair prejudice to the extent not cited in support of an argument made in the patent owner response in this proceeding.
Exhibit 2002 (Curriculum Vitae of Zaydoon (“Jay”) Jawadi)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2003 (Computer Busses, Bill Buchanan, CRC Press, 2000, pp. 139-143)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.

Exhibit 2004 (The Multi-boot Configuration Handbook, Roderick W. Smith, Que, 2000)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2005 (Encyclopedia of Microcomputers, Volume 2 - Authoring Systems for Interactive Video to Compiler Design; Allen Kent, James G. Williams, and Rosalind Kent; Taylor & Francis; 1988)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2006 (PhoenixBIOS 4.0 Revision 6 User's Manual; Phoenix Technologies Ltd.; June 22, 2000)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2007 (Forensic Computing: A Practitioner's Guide; A. J. Sammes, Brian Jenkinson; Springer Science & Business Media; 2000)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2008 (Introduction to Software Engineering; Ronald J. Leach; CRC-Press; 2000)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2009 (PC Interrupts: A Programmer's Reference to BIOS, DOS, and Third-	Lack of authentication under FRE 901: The exhibit is not authenticated.

party Calls; Ralf Brown, James Kyle; Addison-Wesley; 1991)	Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2010 (Hard Disk Controller: the Disk Drive's Brain and Body; James Jeppesen, Walt Allen, Steve Anderson, Michael Pils; Infineon Technologies; 2001)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2011 (SCSI-2 Standard; ANSI; 1994)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2012 (ATA Draft Standard; ANSI)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2013 (Newton's Telecom Dictionary: The Official Dictionary of Telecommunications Networking and Internet; 16th Edition; Harry Newton, Ray Horak; Cmp Books; 2000)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2014 (U.S. Patent Publication No. 2009/0254594 to Laurion D. Burchall)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.

Exhibit 2016 (U.S. Patent Publication No. US20070226436 to Cheng et al.)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2017 (U.S. Patent Publication No. US20040003103 to Witt et al.)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2018 (Foundations of Computer Technology; A. John Anderson; 1994; Taylor & Francis)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2019 (Redline comparing Pet., 19-25 with EX1003, ¶¶49-58)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.

Respectfully submitted,

May 22, 2024

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**CERTIFICATE OF SERVICE
IN COMPLIANCE WITH 37 C.F.R. § 42.6 (E)(4)**

The undersigned certifies that on May 22, 2024, **PETITIONERS’
OBJECTION TO PATENT OWNER’S EVIDENCE** was served on counsel for
the Patent Owner via electronic mail as follows:

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