

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AFFORDABLE WIRE MANAGEMENT, LLC,
Petitioner,

v.

CAMBRIA COUNTY ASSOCIATION FOR THE BLIND AND
HANDICAPPED, INC.,
Patent Owner.

Case No. IPR2024-00178
U.S. Patent No. 11,349,291 B2

PETITIONER'S OBJECTIONS TO PATENT OWNER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Affordable Wire Management, LLC (“AWM”) objects to the following exhibits filed by Patent Owner Cambria County Association for the Blind and Handicapped, Inc. (“CAB”) with its Patent Owner’s Response (Paper 31).

Exhibit	Objection(s)
2005	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner’s omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.
2006	FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 602/701: Petitioner objects to the declarant’s lay witness testimony as not rationally based on their own personal and percipient knowledge.

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	FRE 702/703: This item is inadmissible because the opinions therein were not formed by a witness who is qualified as an expert by knowledge, skill, experience, training, or education, and the opinions therein were not based on facts or data that the expert has been made aware of or personally observed, nor are the opinions based on the kinds of facts or data that experts in the particular field would reasonably rely.
2007	FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.
2008	FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein. FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.
2009	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time.

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2010	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner’s omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein. FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.
2011	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the

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2012	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.

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2014	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair

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2015	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein. FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.
2016	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time.

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2017	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner’s omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein. FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.
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2019	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.

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2021	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein. FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.

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	relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein. FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.
2054	FRE 106 (Incomplete writing): This item is inadmissible because Patent Owner has produced only excerpts of the relied upon document. Petitioner objects to the extent that Patent Owner's omission of relevant material from these documents prevents the introduction of any other part — or any other statement — that in fairness ought to be considered at the same time. FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.

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	FRE 602/701: Petitioner objects to the declarant's lay witness testimony as not rationally based on their own personal and percipient knowledge. FRE 702/703: This item is inadmissible because the opinions therein were not formed by a witness who is qualified as an expert by knowledge, skill, experience, training, or education, and the opinions therein were not based on facts or data that the expert has been made aware of or personally observed, nor are the opinions based on the kinds of facts or data that experts in the particular field would reasonably rely.
2060	FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by this exhibit. Any probative value of this exhibit is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence. FRE 801/802: This item is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein. FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that the item is what the Patent Owner claims it is.

Dated: August 1, 2024

/Kevin C. Amendt/

Kevin C. Amendt (Reg. No. 69,361)

Williams S. Dixon (Reg. No. 78,346)

Matthew S. Galica (*pro hac vice*
pending)

Robert C. Sweeney (*pro hac vice*)

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*Counsel to Petitioner Affordable Wire
Management, LLC*

CERTIFICATE OF SERVICE

I certify that a copy of Petitioner's Objections to Patent Owner's Exhibits was served by electronic mail on the following counsel of record:

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Dated: August 1, 2024

/Kevin C. Amendt/

Kevin C. Amendt (Reg. No. 69,361)