

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
SUR-REPLY 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 Sur-Reply (Paper 62).

Exhibit	Objection(s)
2062	FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by EX2062 (Shoals BLA Powerpoint). 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: EX2062 (Shoals BLA Powerpoint) is inadmissible hearsay, to which no exception applies, 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 EX2062 (Shoals BLA Powerpoint) is authentic or what the Patent Owner claims it is.
2065	FRE 401/402/403 (Relevance; No probative value): Patent Owner has not identified any fact made more or less probable by EX2065 (SolarPro Magazine (July/August 2016)). 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: EX2065 (SolarPro Magazine (July/August 2016)) is inadmissible hearsay, to which no exception applies, if offered to prove the truth of any matter allegedly asserted therein.

Exhibit	Objection(s)
	FRE 901/902: Patent Owner has not produced evidence sufficient to support a finding that EX2065 (SolarPro Magazine (July/August 2016)) is authentic or what the Patent Owner claims it is.

Respectfully submitted,

Dated: December 10, 2024

/Kevin C. Amendt/
Kevin C. Amendt (Reg. No. 69,361)
Williams S. Dixon (Reg. No. 78,346)
Matthew S. Galica (*pro hac vice*)
Robert C. Sweeney (*pro hac vice*)
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.
One Financial Center
Boston, MA 02111
Telephone: 617-348-1793
Facsimile: 617-542-2241
E-mail: KCAmendt@mintz.com
WSDixon@mintz.com
MSGalica@mintz.com
RCSweeney@mintz.com

*Counsel to Petitioner Affordable Wire
Management, LLC*

CERTIFICATE OF SERVICE

I certify that a copy of Notice of Petitioner's Notice of Supplemental Evidence Pursuant to 37 C.F.R. § 42.64(b)(2) was served by electronic mail on the following counsel of record:

Daniel J. Melman
Eckert Seamans Cherin & Mellott LLC
10 Bank St.
Suite 700
White Plains, NY 10606
dmelman@eckertseamans.com
ESCMCAB-AWM@eckertseamans.com

Theodore Y. McDonough
Eckert Seamans Cherin & Mellott LLC
Gateway IV, Suite 401
100 Mulberry St.
Newark, NJ 07102
tmcdonough@eckertseamans.com
ESCMCAB-AWM@eckertseamans.com

Edward C. Flynn
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street
44th Floor
Pittsburg, PA 15219
eflynn@eckertseamans.com

Carson M. Shea
Trevin C. Schmidt
Eckert Seamans Cherin & Mellott, LLC
Two International Place
16th Floor
Boston, MA 02110
cshea@eckertseamans.com
tschmidt@eckertseamans.com

Dated: December 10, 2024

/Kevin C. Amendt/

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