Paper No. __

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC,
Petitioner,

v.

SECURITY FIRST INNOVATIONS, LLC,
Patent Owner.

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Case No. IPR2024-00212
Patent No. 11,178,116

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PETITIONER'S OBJECTIONS TO EVIDENCE SERVED WITH PATENT OWNER'S PRELIMINARY RESPONSE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits the following objections to evidence submitted during a preliminary proceeding in connection with the Patent Owner's Preliminary Response (Paper 10) on March 28, 2024. These objections have been timely filed and served within ten business days of the May 23, 2024, institution of the trial:

I. EXHIBITS 2005-2010, 2014, 2021, 2025-2027

Petitioner objects to each of Exhibits 2005-2010, 2014, 2021, and 2025-2027 as not properly authenticated under Federal Rules of Evidence ("FRE") 901-902 because Patent Owner has not presented evidence sufficient to support a finding that the document in question is what Patent Owner claims it is.

Petitioner objects to each of Exhibits 2005-2010, 2014, 2021, and 2025-2027 as hearsay under FRE 801-802 to the extent statements therein are relied on for the truth of the matter asserted.

Petitioner objects to each of Exhibits 2007, 2009, 2010, and 2026 under FRE 106 because the document is incomplete, as pages of the document are omitted from the exhibit.

II. EXHIBIT 2003

Petitioner objects to any portions of Exhibit 2003 (Declaration of Aviel D. Rubin, Ph.D.) purporting to rely on any of Exhibits 2005-2010, 2014, 2021, and 2025-2027.

Respectfully submitted,
Google LLC

Date: June 7, 2024

/Elisabeth Hunt/

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on June 7, 2024, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

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Date: June 7, 2024

/MacAulay Rush/
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