

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

SECURITY FIRST INNOVATIONS, LLC,
Patent Owner.

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

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits the following objections to evidence submitted in connection with the Patent Owner's Response (Paper 17) on September 12, 2024. These objections have been timely filed and served within five business days of service of the evidence to which the objections are directed.

I. EXHIBITS 2035-2041

Petitioner objects to each of Exhibits 2035-2041 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 2035-2041 as hearsay under FRE 801-802 to the extent statements therein are relied on for the truth of the matter asserted.

II. EXHIBIT 2033

Petitioner objects to any portions of Exhibit 2033 (Second Declaration of Aviel D. Rubin, Ph.D.) purporting to rely on any of Exhibits 2035-2041.

Respectfully submitted,
Google LLC

Date: September 19, 2024

/Elisabeth Hunt/

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

I certify that on September 19, 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:

Stephen J. Elliott
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Nathan Lowenstein
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Date: September 19, 2024

/Dara Del Rosario/
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