

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC.,

Petitioner

v.

MOTION OFFENSE, LLC,

Patent Owner

IPR2024-00287
U.S. Patent No. 11,611,520

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
Submitted Electronically via PTAB E2E

Under the Federal Rules of Evidence and 37 C.F.R. § 42.64, Patent Owner Motion Offense, LLC (“Patent Owner”) timely objects to evidence submitted by Dropbox, Inc. (“Petitioner”) with its Reply in Inter Partes Review IPR2024-00287. Patent Owner serves Petitioner with these objections to provide notice that Patent Owner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioner cures the defects associated with the challenged exhibits identified below.

Ex. 1127 Second Declaration of Dr. Todd Mowry

Patent Owner objects to this exhibit under Fed. R. Evid. 702 and/or 802 as Dr. Mowry has not yet been made available for cross-examination on his Second Declaration during a deposition.

Patent Owner objects to Ex. 1127 as being irrelevant under Fed. R. Evid. 401 and thus inadmissible under Fed. R. Evid. 402, or as being confusing or a waste of time under Fed. R. Evid. 403 because Ex. 1127 is inadmissible as explained above.

Ex. 1129 Motion Offense, LLC v. Dropbox, Inc., WDTX-6:20-cv-00251, Judgment, August 29, 2024, Dkt. 439

Patent Owner objects to Ex. 1129 as being inadmissible because it was filed belatedly without proper authorization under 37 C.F.R. § 42.123(b).

Patent Owner objects to this document as being irrelevant under Fed. R. Evid. 401 and thus inadmissible under Fed. R. Evid. 402, or as being unfairly

prejudicial, confusing or a waste of time under Fed. R. Evid. 403. Patent Owner also objects to this document under Fed. R. Evid. 106 because the trial transcript and record involving the related patents must be considered at the same time.

Ex. 1130 Motion Offense, LLC v. Dropbox, Inc., WDTX-6:20-cv-00251, Trial Transcript, September 9, 2023, Dkt. 402

Patent Owner objects to Ex. 1130 as being inadmissible because it was filed belatedly without proper authorization under 37 C.F.R. § 42.123(b).

Patent Owner objects to this document as being irrelevant under Fed. R. Evid. 401 and thus inadmissible under Fed. R. Evid. 402, or as being unfairly prejudicial, confusing or a waste of time under Fed. R. Evid. 403. Patent Owner also objects to this document under Fed. R. Evid. 106 because the trial transcript and record involving the related patents must be considered at the same time.

Ex. 1131 U.S. Patent No. 10,021,052

Patent Owner objects to Ex. 1131 as being inadmissible because it was filed belatedly without proper authorization under 37 C.F.R. § 42.123(b).

Patent Owner objects to this document as being irrelevant under Fed. R. Evid. 401 and thus inadmissible under Fed. R. Evid. 402, or as being unfairly prejudicial, confusing or a waste of time under Fed. R. Evid. 403.

Ex. 1132 Patent Owner's Infringement Contentions

Patent Owner objects to Ex. 1132 as being inadmissible because it was filed belatedly without proper authorization under 37 C.F.R. § 42.123(b).

Patent Owner objects to this document as being irrelevant under Fed. R. Evid. 401 and thus inadmissible under Fed. R. Evid. 402, or as being unfairly prejudicial, confusing or a waste of time under Fed. R. Evid. 403.

Dated: January 31, 2025

DEVLIN LAW FIRM LLC

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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2025, I caused a true and correct copy of the foregoing materials to be served via the Patent Office electronic filing system, and electronic service via email to the following attorneys of record pursuant to Petitioner's consent.

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