

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED
Petitioner¹

v.

NETWORK SYSTEM TECHNOLOGIES, LLC
Patent Owner

Case: IPR2024-00338
U.S. Patent No. 7,373,449 B2

**PETITIONER QUALCOMM INCORPORATED'S OBJECTIONS TO
EVIDENCE UNDER 37 C.F.R. § 42.64(b)(1)**

¹ Qualcomm Incorporated filed a petition and motion for joinder in IPR2024-01081 and has been joined as a petitioner in this proceeding.

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits objections to evidence filed by Patent Owner (“PO”) with its March 4, 2025 sur-reply brief.

Petitioner’s objections are timely under 37 C.F.R. § 42.64(b)(1).

Petitioner objects to Exhibit 2065, because it is not sufficiently relevant, and any relevance is outweighed by risk of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder, including that, for example, Exhibit 2065 does not appear to be cited in or relied upon by PO’s sur-reply brief.

Petitioner objects to Exhibit 2067, because it is not sufficiently relevant, and any relevance is outweighed by risk of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder, including that, for example, Exhibit 2067 does not appear to be cited in or relied upon by PO’s sur-reply brief.

Petitioner objects to Exhibit 2068, because it is not sufficiently relevant, and any relevance is outweighed by risk of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder, including that, for example, Exhibit 2068 does not appear to be cited in or relied upon by PO’s sur-reply brief.

Respectfully submitted,

Dated: March 5, 2025

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CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and the agreement of the parties, the undersigned certifies that on March 5, 2025 a true and correct copy of the foregoing Petitioner Qualcomm Incorporated's Objections to Evidence Under 37 C.F.R. § 42.64(b)(1) was served via electronic mail upon the following:

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