

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED

Petitioner¹

v.

NETWORK SYSTEM TECHNOLOGIES, LLC,

Patent Owner

U.S. Patent No. 7,373,449

Inter Partes Review No. IPR2024-00338

JOINT LIST OF OBJECTIONS TO DEMONSTRATIVE EXHIBITS

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 the Board’s Order Granting Requests for Oral Argument (Paper 52 (“Order”) at 4-5), the parties hereby jointly file objections to demonstrative exhibits. The parties met and conferred on March 17, 2025, but were unable to resolve the following objections.

1. Patent Owner’s Objections to Petitioner’s Demonstrative Exhibits

Slide No.	Objection
Slide 46	Slide 46 shows and cites Ex. 2088 (Dr. Mowry’s second deposition) at 43:14-44:3, 45:1-15, but this testimony is not cited in any paper. Order at 4-5; <i>CBS Interactive Inc. v. Helfrich Patent Licensing, LLC</i> , IPR2013-00033, Paper 118 at 4-5 (PTAB Oct. 23, 2013).
Slide 12	Exhibits 1014, 1008, 1009, 1013, and 1015 shown and cited on slide 12 were not cited in any paper. Order at 4-5; <i>St. Jude Medical v. The Bd. of Regents of the Univ. of Mich.</i> , IPR2013-00041, Paper 65 at 2-3 (PTAB Jan. 27, 2014) (demonstratives cannot “rely on evidence that, although it is in the record, was never specifically discussed in any paper”).

2. Petitioner’s Objections to Petitioner’s Demonstrative Exhibits

None.

This paper is being filed by counsel for Patent Owner with counsel for
Petitioner's approval.

Respectfully submitted,

Dated: March 17, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Joint List of Objections to Demonstrative Exhibits was served on March 17, 2025, upon the following parties via electronic service:

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