

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED,
Petitioner

v.

NETWORK SYSTEM TECHNOLOGIES, LLC,
Patent Owner

U.S. Patent No. 7,594,052

Inter Partes Review No. IPR2024-00343

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner hereby submits objections to evidence served by Petitioner on January 17, 2025 in support of its Reply (Paper 48). Patent Owner's objections are due within five business days of the service of the supplemental evidence, i.e., by January 27, 2025. Thus, Patent Owner's evidence objections are timely. As set forth herein, Patent Owner identifies the evidence objected to and summarizes the objections, including the Federal Rules of Evidence ("FRE") or other rules that form the basis for the objections.

1. Ex. 1030 – Reply Declaration of Dr. Marwan Hassoun

Patent Owner objects to Ex. 1030 to the extent it incorporates or references Ex. 1003, which Patent Owner previously objected to as inadmissible evidence. *See* Paper 13.

Patent Owner objects to Ex. 1030 as hearsay being offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807, 901-902. Patent Owner also objects to Ex. 1030 as lacking foundation, assuming facts not in evidence, containing testimony on matters as to which the witness lacks personal knowledge and as being conclusory. Ex. 1030 is objected to under FRE 702 for failing to demonstrate that the declarant is qualified as an expert in the relevant subject matter. Ex. 1030 is further objected to under FRE 702(b)-(d) as failing to be based upon sufficient facts or data, as the product of unreliable principles and methods and for failing to reliably apply sound principles and methods to the facts

of the case. Ex. 1030 is further objected because it is not sufficient relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

Patent Owner objects to paragraphs 9, 16, 18, 20, 55, 57, 58, 75-78, and 80-82 of Ex. 1030 under FRE 703, to the extent those paragraphs relying on Exhibits 1050, 1051, 1052, 1053, 1054, 1056, 1057, 1058, which Patent Owner objected to as inadmissible evidence.

2. Ex. 1031 – “Welcome to DATE ’04 messages”

Patent Owner objects to Ex. 1031 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1031 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1031 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1031 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

3. Ex. 1032 – “Dr. Luca Benini Homepage”

Patent Owner objects to Ex. 1032 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1032 as not authenticated and not self-authenticating. *See* FED. R.

EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1032 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1032 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

4. Ex. 1033 – “DATE ’04 Call for Papers”

Patent Owner objects to Ex. 1033 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1033 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1033 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1033 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

5. Ex. 1034 – “Third Amended Initial Disclosures by Network System Technologies, LLC, *Network System Technologies, LLC v. Qualcomm Inc. et al.*, 1:22-cv-01331 (W.D. Tex.)”

Patent Owner objects to Ex. 1034 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

6. Ex. 1035 – “IEEE Xplore Conference Proceedings Search”

Patent Owner objects to Ex. 1035 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1035 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1035 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1035 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

7. Ex. 1036 – “DATE Conference press release”

Patent Owner objects to Ex. 1036 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1036 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1036 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1036 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

8. Ex. 1038 – “Reply Declaration of Dr. Nikil Dutt”

Patent Owner objects to Ex. 1038 to the extent it incorporates or otherwise

references to Ex. 1012, which Patent Owner previously objected to as inadmissible evidence. *See* Paper 13.

Patent Owner objects to Ex. 1038 as hearsay being offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807, 901-902. To the extent Ex. 1038 purports to offer opinions on the accessibility of “Andrei Rădulescu et al., ‘*An Efficient On-Chip Network Interface Offering Guaranteed Services, Shared-Memory Abstraction, and Flexible Network Configuration*,’ Proceedings of the Design, Automation and Test in Europe Conference and Exhibition, 2004,” Patent Owner objects to Ex. 1038 as not being the product of reliable facts or data. Patent Owner further objects to Ex. 1038 as lacking foundation, assuming facts not in evidence, containing testimony on matters as to which the witness lacks personal knowledge, and as being conclusory. FED. R. EVID. 602, 701-703.

Patent Owner further objects to paragraphs 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 19, 20 of Ex. 1038, in which Dr. Dutt references “system on chip” or “SoC” and/or a “POSA,” which Petitioner defined as someone having work experience in the field of SoC design. Patent Owner deposed Dr. Dutt regarding his first declaration (Ex. 1012) on August 27, 2024 (Ex. 2067). During that deposition, Dr. Dutt refused to answer any questions about his knowledge of, or experience with, SoCs. *See, e.g.*, Ex. 2067 at 81:6-84:13. Dr. Dutt’s new declaration purporting to

provide testimony on the very topics he refused to testify about during his first deposition should be excluded.

Patent Owner further objects to paragraph 11 of Ex. 1038 in which Dr. Dutt's testimony is based on a discussion with an unidentified "librarian at the University of California-Irvine." FED. R. EVID. 602, 701-703.

9. Ex. 1039 – "Pasricha et al. 'Fast Exploration of Bus-based On-chip Communication Architectures.' CODES+ISSS '04: Proceedings of the 2nd IEEE/ACM/IFIP International Conference on Hardware/Software Codesign and System Synthesis, September 8-10, 2004"

Patent Owner objects to Ex. 1039 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1039 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Patent Owner objects to Ex. 1039 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1039 is cited nowhere in the Reply.

10. Ex. 1040 – "DATE Press Releases webpage and DATE06 PRESS SLIDES"

Patent Owner objects to Ex. 1040 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1040 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what

Ex. 1040 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1040 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1040 is cited nowhere in the Reply.

11. Ex. 1050 – “Deposition Transcript of Nader Bagherzadeh, dated December 12, 2024”

Patent Owner objects to the following portions of Ex. 1050 cited in Petitioner’s Reply:

Page(s) / Line(s)	Objection(s)
35:25-36:4	Vague and ambiguous, outside the scope of direct testimony. Dr. Bagherzadeh was asked whether he was “personally aware of any of these protocols to 2004.” Ex. 1050 at 35:25-36:4. The question was vague and ambiguous at least as to what the phrases “any of these,” “protocols,” “personally aware,” and “you.” <i>See</i> FED. R. EVID. 611(a), 403. This questioning was also outside the scope of Dr. Bagherzadeh’s direct testimony because it did not have a sufficient underling basis in a statement made by Dr. Bagherzadeh in his declaration. <i>See</i> FED. R. EVID. 611(b); 37 C.F.R. § 42.53(d)(5)(ii).

37:6-16	Vague and ambiguous, outside the scope of direct testimony. Dr. Bagherzadeh was asked whether “[e]ven if a POSITA didn’t actually know about one of these protocols prior to 2004, they would know prior to 2004 how to locate it and educate themselves on it.” Ex. 1050 at 35:25-36:4. The question was vague and ambiguous at least as to what the phrases “one of these,” “protocols,” “locate it,” and “educate themselves on it” referred to. <i>See</i> FED. R. EVID. 611(a), 403. This questioning was also outside the scope of Dr. Bagherzadeh’s direct testimony because it did not have a sufficient underling basis in a statement made by Dr. Bagherzadeh in his declaration. <i>See</i> FED. R. EVID. 611(b); 37 C.F.R. § 42.53(d)(5)(ii).
55:14-17	Vague and ambiguous, calls for legal conclusion. Dr. Bagherzadeh was asked whether it was his “opinion that the ’052 patent expressly defines what a hop is?” Ex. 1050 at 55:14-17. The question was vague and ambiguous as to what the phrase “expressly defines” referred to.
56:12-18	Vague and ambiguous. Dr. Bagherzadeh was asked whether in his “view, is that a definition of multi-hop?” Ex. 1050 at 56:12-

	18. The question was vague and ambiguous as to what the phrase “definition” referred to.
56:20-57:1	Vague and ambiguous. Dr. Bagherzadeh was asked “[s]o you don’t agree that that sentence describes multi-hop as a situation where communication modules are not directly connected but are separated by one or more network nodes?” Ex. 56:20-57:1. The question was vague and ambiguous at least as to what the phrases “so you don’t agree that,” “that sentence,” “a situation,” referred to.
57:3-11	Vague and ambiguous. Dr. Bagherzadeh was asked whether he “accept[s] that as a definition of multi-hop?” Ex. 1050 at 57:3-11. The question was vague and ambiguous as to what the phrase “definition” referred to.
60:19-61:3	Vague and ambiguous. Dr. Bagherzadeh was asked “were those cited to be a definitional sentence of what a network node is?” Ex. 1050 at 60:19-61:3. The question was vague and ambiguous at least as to what the phrases “those,” and “definitional sentence” referred to.
66:4-11	Vague and ambiguous. Dr. Bagherzadeh was asked where there is “a particular word in the claims that you are using to read in a

	requirement for packets into the claims.” Ex. 1050 at 66:4-11. The question was vague and ambiguous as to least as to what the phrases “particular word,” “you,” “read in a requirement,” “for packets,” and “into the claims” referred to.
66:16-19	Vague and ambiguous. Dr. Bagherzadeh was asked where there is “a particular word or phrase in the claims that you believe justifies reading a requirement for packets into the claims.” Ex. 1050 at 66:16-19. The question was vague and ambiguous at least as to what the phrases “particular word or phrase,” “you,” “believe,” “justifies,” “reading in a requirement,” “for packets,” and “into the claims” referred to.
67:9-15	Vague and ambiguous. Dr. Bagherzadeh was asked “whether -- if the world ‘interconnect means’ that are you are relying on to read the word ‘packet’ into the claims.” Ex. 1050 at 67:9-15. The entire question was vague and ambiguous.
68:2-11	Vague and ambiguous, mischaracterizes prior testimony. Dr. Bagherzadeh was asked “[s]o is it your opinion that the requirement for packets should be read into the claims through the word ‘interconnect means’?” Ex. 1050 at 68:2-11. The question was vague and ambiguous at least as to what the

	phrases “requirement for packets,” “read into the claims,” “through the word” referred to.
68:13-20	Vague and ambiguous, mischaracterizes prior testimony. Dr. Bagherzadeh was asked “Now let’s go back to where I think you started to head before, which is, is there a definition of interconnect means that uses the word ‘packets’ in the ’052 patents?” Ex. 1050 at 68:13-20. The question was vague and ambiguous at least as to what the phrases “definition,” “the word ‘packets’” referred to.
69:10-13	Vague and ambiguous. Dr. Bagherzadeh was asked “And to be clear, though, just -- this isn’t describing the embodiment of Figure 1; correct?” Ex. 1050 at 69:10-13. The question was vague and ambiguous at least as to what the phrase “this” referred to.
73:24-74:4	Vague and ambiguous. Dr. Bagherzadeh was asked “And do you rely on that sentence to -- to support the idea that packetization is a required element of the claims?” Ex. 1050 at 73:24-74:4. The question was vague and ambiguous at least as to what the phrases “that sentence” and “support the idea” referred to.

202:17-203:4	Vague and ambiguous and mischaracterizes prior testimony. Dr. Bagherzadeh was asked “I think we talked about this earlier; and I believe you indicated that if I had a very simple system that had two modules and a single router, that that could still practice the method of, say, claim 6 of the ’052 patent?” Ex. 1050 at 202:17-203:4. The question was vague and ambiguous at least as to what the phrases “earlier,” “believe you indicated,” “very simple system,” “that,” and “practice,” referred to.
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12. Ex. 1051 – “Horak, Ray (Ed/). *Webster’s New World Telecom Dictionary* (excerpts)”

Patent Owner objects to Ex. 1051 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1051 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1051 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1051 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

13. Ex. 1052 – “*The Authoritative Dictionary of IEE [sic] Standard Terms. Published by Standards Information Network IEEE Press, 7th ed. (excerpts)*”

Patent Owner objects to Ex. 1052 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1052 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1052 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1052 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1052 is cited nowhere in the Reply.

14. Ex. 1053 – “Tadaaki Yamauchi, et al., ‘The hierarchical multi-bank DRAM: a high-performance architecture for memory integrated with processors,’ *Proceedings Seventeenth Conference on Advanced Research in VLSI*, Ann Arbor, MI, USA, 1997, pp. 303-319”

Patent Owner objects to Ex. 1053 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1053 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1053 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1053 because it is not sufficiently relevant, and any relevance is outweighed by the

risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1053 is cited nowhere in the Reply.

15. Ex. 1054 – “TriCore™ 1.3 32-bit Unified Processor Core, *Architecture Overview Handbook, V 1.3.3* (May 2002)”

Patent Owner objects to Ex. 1054 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1054 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1054 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1054 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1054 is cited nowhere in the Reply.

16. Ex. 1055 – “TMS320C6000 Technical Brief (February 1999)”

Patent Owner objects to Ex. 1055 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1055 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1055 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1055 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1055 is cited nowhere in the Reply.

17. Ex. 1056 – “Harry K. Charles, et al., ‘Very Large Scale Integrated Circuitry,’ *Johns Hopkins APL Technical Digest*, Volume 7, Number 3 (1986)”

Patent Owner objects to Ex. 1056 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1056 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1056 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1056 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1056 is cited nowhere in the Reply.

18. Ex. 1057 – “F. Vahid and T. Givargis, ‘Platform tuning for embedded systems design’ *Computer*, vol. 34, no. 02, pp. 112-114, (March 2001)”

Patent Owner objects to Ex. 1057 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1057 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1057 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1057 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1057 is cited nowhere in the Reply.

19. Ex. 1058 – “The Microprocessor Today, *IEEE Micro*, pp. 32-44 (December 1996)”

Patent Owner objects to Ex. 1058 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1058 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1058 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1058 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1058 is cited nowhere in the Reply.

20. Ex. 1059 – “U.S. Copyright Office Public Catalog entry for 2004 Design, Automation and Test in Europe conference and exhibition: proceedings”

Patent Owner objects to Ex. 1059 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1059 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1059 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1059 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

21. Ex. 1060 – “Declaration of Sage Kruse”

Patent Owner objects to Ex. 1060 as hearsay being offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807, 901-902. Patent Owner further objects to Ex. 1060 as lacking foundation, assuming facts not in evidence, containing testimony on matters as to which the witness lacks personal knowledge, and as being conclusory. FED. R. EVID. 602, 701-703. To the extent Ex. 1060 purports to offer an expert opinion, Patent Owner objects to Ex. 1060 as not being the product of reliable facts or data.

22. Ex. 1061 – “IEEE Conference Proceedings ‘Metrics’ (compilation)”

Patent Owner objects to Ex. 1061 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1061 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Patent Owner objects to Ex. 1061 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

23. Ex. 1062 – “Kees Goossens’s Publications Page”

Patent Owner objects to Ex. 1062 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1062 as not authenticated and not self-authenticating. *See* FED. R.

EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1062 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1062 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

24. Ex. 1063 – “Kees Goossens’s BibTex Page”

Patent Owner objects to Ex. 1063 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1063 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1063 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1063 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

25. Ex. 1064 – “Kees Goossens’s Research Page”

Patent Owner objects to Ex. 1064 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1064 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1064 is, how it was acquired, or how it was made. Patent Owner objects to Ex.

1064 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

26. Ex. 1065 – “Design, Automation and Test in Europe DATE ’04, Proceedings (DATE Conference Archives, excerpts)”

Patent Owner objects to Ex. 1065 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1065 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Patent Owner objects to Ex. 1065 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

27. Ex. 1066 – “Design, Automation and Test in Europe DATE ’04, Proceedings Volume II (Library of Congress, excerpts)”

Patent Owner objects to Ex. 1066 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1066 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1066 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1066 because it is not sufficiently relevant, and any relevance is outweighed by the

risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

28. Ex. 1067 – “Design, Automation and Test in Europe DATE ’04, Proceedings (Table of Contents, IEEE Computer Society Digital Library)”

Patent Owner objects to Ex. 1067 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1067 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Petitioner provides no authenticating declaration explaining what Ex. 1067 is, how it was acquired, or how it was made. Patent Owner objects to Ex. 1067 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

29. Ex. 1068 – “Declaration of Sylvia D. Hall-Ellis, Ph.D”

Patent Owner objects to Ex. 1068 to the extent it incorporates or otherwise references to Ex. 1014, which Patent Owner previously objected to as inadmissible evidence. *See* Paper 13.

Patent Owner objects to Ex. 1068 as hearsay being offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807, 901-902. To the extent Ex. 1068 purports to offer opinions on the accessibility of “Design, Automation & Test in Europe Conference and Exhibition 2004:

Proceedings Volume II” or “Design, Automation & Test in Europe Conference & Exhibition, Fed. 16 2004 to Feb. 20 2004 [in] Paris, France” (¶¶19-25), Patent Owner objects to Ex. 1068 as not being the product of reliable facts or data. Patent Owner further objects to Ex. 1068 as lacking foundation, assuming facts not in evidence, containing testimony on matter as to which the witness lacks personal knowledge, and as being conclusory. FED. R. EVID. 602, 701-703.

30. Ex. 1069 – “IEEE Xplore Celebrates 15 years of Information Driving Innovation (April 14, 2005)”

Patent Owner objects to Ex. 1069 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1069 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Patent Owner objects to Ex. 1069 because it is not sufficiently relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403. Ex. 1069 is cited nowhere in the Reply.

31. Ex. 1070 – “Library of Congress Catalog Item Information, Design, Automation and Test in Europe Conference and Exhibition 2004; proceedings”

Patent Owner objects to Ex. 1070 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* FED. R. EVID. 801-807. Patent Owner objects to Ex. 1070 as not authenticated and not self-authenticating. *See* FED. R. EVID. 901-902. Patent Owner objects to Ex. 1070 because it is not sufficiently

relevant, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder. *See* FED. R. EVID. 401-403.

Respectfully submitted,

Dated: January 27, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Objections to Evidence was served on January 27, 2025, upon the following parties via electronic service:

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