

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SCOUT ENERGY MANAGEMENT, LLC, and
CHEVRON U.S.A. INC.,
Petitioner

v.

PILOT INTELLECTUAL PROPERTY, LLC,
Patent Owner.

Case IPR2024-00385
Patent 8,505,332 B1

**PETITIONERS' OBJECTIONS TO
PATENT OWNER'S EXHIBITS**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners submit the following objections to exhibits served by Patent Owner in Case No. IPR2024-00385.

Petitioners' objections apply equally to Patent Owner's reliance on the exhibit in any subsequently filed documents. These objections are timely, having been served within five business days after service of the evidence by Patent Owner. 37 C.F.R. § 42.64(b)(1).

Exhibit 2029

Petitioners object to Exhibit 2029 under FRE 802 because it contains out of court statements (such as in paragraphs 34, 47, and 72-26) that Patent Owner relies on for their truth, thus constituting impermissible hearsay.

Petitioners also object to Exhibit 2029 under FRE 402 and 403 for failing to demonstrate the testimony is based on sufficient facts or data.

Petitioners also object to Exhibit 2029 under FRE 901 for failing to properly authenticate the exhibits and figures on which it relies.

Exhibits 2037, 2039, 2040, 2043, 2048, 2049, 2050, 2072, and 2073

Petitioners object to Exhibits 2037, 2039, 2040, 2043, 2048, 2049, 2050, 2072, and 2073 under FRE 901 because Patent Owner has not produced evidence sufficient to support a finding that the exhibits are what Patent Owner claims they are.

Petitioners also object to Exhibits 2037, 2039, 2040, 2043, 2048, 2049, 2050, 2072, and 2073 under FRE 802 to the extent that they are relying on the truth of the out of court statements contained in those documents, which are hearsay.

Exhibits 2074 and 2075

Petitioners object to Exhibits 2074 and 2075 under FRE 901 because Patent Owner has not produced evidence sufficient to support a finding that the exhibits are what Patent Owner claims they are.

Respectfully submitted,

Dated: December 2, 2024

By: /Brian W. Oaks/
Brian W. Oaks (Reg. No. 44,981)
Counsel for Petitioner

McDERMOTT WILL & EMERY LLP
303 Colorado Street, Suite 2200
Austin, TX 78701
TEL: 512-726-2600
FAX: 512-532-0002
boaks@mwe.com

*Attorneys for Petitioner,
Scout Energy Management, LLC.*

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2024, I caused a true and correct copy of the foregoing Petitioners' Objections to Patent Owner's Exhibits to be served by electronic mail on Patent Owner at the following correspondence address of record:

CRogers@conleyrose.com
TWarden@conleyrose.com

By: /Brian W. Oaks/
Brian W. Oaks (Reg. No. 44,981)
Counsel for Petitioner

MCDERMOTT WILL & EMERY LLP
303 Colorado Street, Suite 2200
Austin, TX 78701
TEL: 512-726-2600
FAX: 512-532-0002
boaks@mwe.com

*Attorneys for Petitioner,
Scout Energy Management, LLC.*