UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREEWHEEL MEDIA, INC.,

Petitioner,

v.

INTENT IQ, LLC,
Patent Owner.

IPR2024-00422
Patent 7,861,260 B2

PETITIONER'S OBJECTIONS TO EXHIBITS IN PATENT OWNER'S RESPONSE

FreeWheel Media, Inc. ("Petitioner") hereby makes the following objections pursuant to 37 C.F.R. § 42.64(b):

Exhibit No.	Section	Objections
2001	¶¶1-28	Petitioner objects to the indicated paragraphs under Fed. R. Evid. 401, 402, and 403 and under 37 C.F.R. § 42.61. Specifically, Patent Owner's response does not rely on or cite in any manner to these paragraphs. Accordingly, the paragraphs: (a) lack any tendency to make a material fact more or less probable than it would be without the paragraphs; (b) are irrelevant; and (c) could confuse the issues and cause unfair prejudice. See Fed. R. Evid. 401, 402 and 403. To the extent Patent Owner attempts to rely on these paragraphs in the future as evidence in support of new substantive positions, doing so would be untimely, in violation of the applicable rules governing this proceeding, and unfairly prejudicial to Petitioner (Fed. R. Evid. 403).
2001	¶¶31-33, 35, 38-42, 45-47, 53, 55, 57-59	Petitioner objects to these paragraphs under Fed. R. Evid. 702 and 703. Specifically, these paragraphs are

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		entirely conclusory and fail to properly allege that: (a) the expert's scientific, technical, or other specialized knowledge will help the trier of fact to understand the evidence or to determine a fact in issue; (b) the testimony is based on sufficient facts or data; (c) the testimony is the product of reliable principles and methods; and (d) the expert has reliably applied the principles and methods to the facts of the case. These paragraphs also fail to articulate facts or data in the case that the expert has been made aware of or personally observed. For example, Exhibit 2001 includes multiple paragraphs that wholly omit any citation to evidence that corroborates the expert's assertions or supports the expert's opinions (see, e.g., ¶¶ 31-33, 38, 47, and 57-59) and includes multiple paragraphs with opinions and assertions that do not cite to any corroborating or supporting evidence (see, e.g., ¶¶ 35, 39-42, 45-46, 53, and 55).

Dated: January 14, 2025

By: /Frederic M. Meeker/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that the foregoing PETITIONER'S OBJECTIONS TO EXHIBITS IN PATENT OWNER'S RESPONSE was served electronically via e-mail on January 14, 2025 on the following counsel of record for Patent Owner:

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Dated: January 14, 2025 By: /Carlos Goldie/

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