

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REOLINK INNOVATION INC. AND SHENZHEN REOLINK
TECHNOLOGY CO., LTD.,
Petitioner

v.

THROUGHTTEK CO., LTD.,
Patent Owner

Case IPR2024-00509
Patent RE47,842

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits the following objections to evidence filed with Patent Owner's Response of November 15, 2024. The following paragraphs are referenced herein by way of example, and not limitation, and the objections apply to the enumerated paragraphs and any other paragraph incorporating or referencing the following paragraphs.

Exhibit No.	Description
EX2001	FRE 402, 403: The Exclusivity Agreement is irrelevant and prejudicial at least because (i) the Agreement was not executed until after Lorex began publicly selling/marketing the Lorex Ping camera (having the QR code on the back); and (ii) the Agreement purportedly pertains to future “cloud connectivity services” as opposed to the end-user process for acquiring the camera ID using the QR code on the back of the camera as disclosed in the Lorex Guide and Lorex Manual. FRE 802: This exhibit includes statements that constitute inadmissible hearsay and the Patent Owner's Response relies

	upon these statements for the truth of the matter—for example, that the Agreement allegedly pertained to P2P solutions. Patent Owner has not demonstrated that any hearsay exception or exclusion applies. FRE 901: Patent Owner failed to authenticate this exhibit. Mr. Kao’s terse mention of the Agreement (at EX2005, ¶9) is insufficient to demonstrate that the Agreement submitted as EX2001 is authentic.
EX2004	FRE 402: Paragraphs 1-18 of this exhibit are irrelevant because these paragraphs were never cited or relied upon in the Patent Owner’s Response; thus, there is no explanation of their relevance or significance in the Patent Owner’s Response.
EX2005	FRE 402, 403: This exhibit includes statements that are irrelevant and prejudicial. For example, paragraphs 9-10 of this exhibit are irrelevant and prejudicial because the alleged meeting and agreement did not begin until after Lorex began

	publicly selling/marketing the Lorex Ping camera (having the QR code on the back), and there is no evidence that the alleged meeting or agreement pertains to an end-user process for acquiring the camera ID using the QR code on the back of the camera, as disclosed in the Lorex Guide and Lorex Manual. As another example, ¶¶ 6 and 31-36 of this exhibit are irrelevant because these paragraphs were never cited or relied upon in the Patent Owner's Response; thus, there is no explanation of their relevance or significance in the Patent Owner's Response.
EX2006	FRE 402, 403: This exhibit is irrelevant and prejudicial. Patent Owner appears to rely on this exhibit to allege that Mr. Kardashov engaged with ThroughTek. However, Patent Owner has not demonstrated that the photograph depicted in the exhibit—including both the annotated and non-annotated versions— show that Mr. Kardashov engaged with ThroughTek and there is no indication of when or where the photograph was taken.

	FRE 901: Patent Owner failed to provide any evidence to authenticate this exhibit. Mr. Kao's terse mention of the photograph (at EX2005, ¶9) is insufficient to demonstrate that the photographs are authentic.
--	--

For at least these reasons, Petitioner objects to Exhibits EX2001, EX2004, EX2005, and EX2006, and reserves the right to move to exclude these exhibits as inadmissible.

Respectfully submitted,

Dated: 11/22/2024

/Nicholas W. Stephens/
Nicholas Stephens, Reg. No. 74,320
Michael T. Hawkins, Reg. No. 57,867
Joseph W. Bauer, Reg. No. 81,218
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402

Attorneys for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on November 22, 2024, a complete and entire copy of this Petitioner's Objections to Evidence were provided by email to the Patent Owner by serving the correspondence address of record as follows:

Justin I. King, Registration No. 50,464
WPAT, P.C.
8230 Boone Blvd. Suite 405
Vienna, Virginia, 22182
Tel: (703) 639-0151x100
jking@wpat.com
service@wpat.com

Andrew C. Aitken, Registration No. 36,729
Aitken Law Offices
6701 Democracy Blvd
Bethesda, Maryland 20817
Tel: (301) 537-3299
acaitken@aitkenlawoffices.com

/Crena Pacheco/
Crena Pacheco
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
pacheco@fr.com