

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDIATEK, INC.,
Petitioner,

v.

MOSAID TECHNOLOGIES INC.,
Patent Owner

Case No. IPR2024-00599
Patent No. 7,224,563

**PATENT OWNER'S OBJECTIONS TO
PETITIONER'S EVIDENCE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner MOSAID Technologies Inc. objects to the admissibility of the following evidence submitted by Petitioner, MediaTek, Inc. with its Petition for *inter partes* review. These objections are made within ten (10) business days of the September 25, 2024 Institution Decision (Paper 8). Notwithstanding these objections, Patent Owner expressly reserves the right to rely on any proffered evidence Petitioner submitted, including on the ground that such evidence constitutes a party admission.

Exhibit	Objection
Ex. 1003 (Declaration of Paul Min, Ph.D.)	Patent Owner objects to Exhibit 1003 under F.R.E. 401, 402, and 403 to the extent the testimony of Dr. Min is not cited to or relied upon by the Petition. The uncited paragraphs have no tendency to make any fact more or less probable than it would be without the evidence and such testimony is of no consequence in determining any issue in this IPR. Any probative value is outweighed by other considerations including prejudice, confusion, and waste of time.
Exs. 1009-1014	Patent Owner objects to Exs. 1009-1014 and any argument(s) submitted on or about these exhibits, under FRE 401, 402, 403, 601, 602, 701, 702, and 703, as these technical references are not discussed by any technical expert. In the absence of any expert testimony from a qualified expert about these exhibits, any argument from counsel about the exhibits constitutes inadmissible opinion testimony. Further, such attorney argument would have

	no tendency to make any fact more or less probable than it would be without the evidence and such testimony is of no consequence in determining any issue in this IPR. Any probative value is outweighed by other considerations including prejudice, confusion, and waste of time. In addition, these exhibits lack relevance to the extent that these exhibits do not form a basis of any instituted grounds.
Ex. 1017 (Syllabus to ESE 232 Introduction to Electronic Circuits)	Patent Owner objects to this exhibit under F.R.E. 401, 402, and 403 as lacking relevance to any issue before the Board because it does not form a basis for any instituted grounds, because Petitioners have neither shown this exhibit qualifies as a prior art printed publication nor provided support to demonstrate common knowledge of the document at the time of the relevant priority date, and because this exhibit is not referenced or cited in the body of the Petition. This uncited exhibit does not make any fact more or less probable than it would be without the evidence. Any probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Patent Owner further objects to Ex. 1017 and any argument(s) submitted on or about this exhibit, under FRE 401, 402, 403, 601, 602, 701, 702, and 703, as these technical references are not discussed by any technical expert. In the absence of any expert testimony from a qualified expert about these exhibits, any argument from counsel about the exhibits constitutes inadmissible opinion testimony. Further, such attorney argument would have no tendency to make any fact more or less probable than it would be without the evidence

	and such testimony is of no consequence in determining any issue in this IPR. Any probative value is outweighed by other considerations including prejudice, confusion, and waste of time.
Ex. 1018 (Excerpts from Microelectronic Circuits, Fourth Edition, Sedra et al., Oxford University Press (1998))	Patent Owner objects to this exhibit and any discussion of it in Ex. 1003 under F.R.E. 401, 402, and 403 as lacking relevance to any issue before the Board because it does not form a basis for any instituted grounds and because this exhibit is not referenced or cited in the body of the Petition. This uncited exhibit does not make any fact more or less probable than it would be without the evidence. Any probative value is outweighed by other considerations including prejudice, confusion, and waste of time.

Dated: October 8, 2024

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I hereby certify that on October 8, 2024, I electronically filed the foregoing document and caused to be served a copy of the same on counsel for Petitioner at the following e-mail address, as authorized in the Petition:

IPR44508-0023IP2@fr.com

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Dated: October 8, 2024

By: David W. Higer
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