

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

BIZLINK TECHNOLOGY, INC.,
Petitioner,

v.

ANDERSON POWER PRODUCTS, INC.,
Patent Owner.

Case No. IPR2024-00687
Patent No. 8,808,017

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Mail Stop PATENT BOARD
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Anderson Power Products, Inc. (“Patent Owner”) hereby objects to the admissibility of evidence submitted by Petitioner BizLink Technology, Inc. (“Petitioner”) with its Petition for *Inter Partes* Review of Claims 1-4 and 7-12 of U.S. Patent No. 8,808,017 (“the ‘017 Patent”), as set forth below. The following exhibits are inadmissible based on either the rules of these proceedings or the Federal Rules of Evidence (“FRE”).

Patent Owner objects to Exhibit 1003 (Declaration of Dr. Charles Eldering) to the extent it includes expert opinions for which the factual bases have not been disclosed, for which Dr. Eldering does not have personal knowledge (FRE 602), or to the extent that Dr. Eldering’s opinions constitute unreliable expert testimony, are conclusory, and/or lack sufficient explanation under FRE 702 and 703. Additionally, Petitioner objects to Exhibit 1003 because there has not been an adequate showing that Dr. Eldering’s testimony is the product of reliable facts or data, and there is no indication that the testimony will help the Board understand the evidence or determine a fact in issue. Petitioner also objects to Exhibit 1003 as hearsay under FRE 801-802 because Dr. Eldering’s testimony is at least partially based on documents which themselves are both unauthenticated and hearsay.

Patent Owner further objects to Exhibits 1008, 1010-1012, and 1018-1020 as hearsay under FRE 801-802 and as having not been properly authenticated or identified under FRE 901-903.

Patent Owner also objects to Exhibit 1009 to the extent that it includes information collected or prepared in connection with a proceeding with different rules, standards, and/or law, and thus is not relevant to this proceeding.

Patent Owner reserves the right to revise, modify, or assert additional or further objections.

Dated: December 6, 2024

Respectfully submitted,

/Benjamin P. Gilford/

Benjamin P. Gilford

Reg. No. 72,072

GREENBERG TRAURIG, LLP

77 West Wacker Drive, Suite 3100

Chicago, Illinois 60601

(312) 456-8400

(312) 456-8435

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the below date, I caused the forgoing to be served by electronic mail to the following:

Ming-Tao Yang
FINNEGAN, HENDERSON, FARABOW, GARRETT, & DUNNER LLP
3300 Hillview Ave.
Palo Alto, CA 94304-1203
ming.yang@finnegan.com

Joshua L. Goldberg
Kai Rajan
FINNEGAN, HENDERSON, FARABOW, GARRETT, & DUNNER LLP
901 New York Avenue, NW
Washington, DC 20001-4413
joshua.goldberg@finnegan.com
kai.rajan@finnegan.com

Date: December 6, 2024

/Benjamin P. Gilford/