

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC.
Petitioner

v.

TELEFONAKTIEBOLAGET LM ERICSSON,
Patent Owner

Case No. IPR2024-00702
Patent No. 10,425,817

**PATENT OWNER'S OBJECTION TO EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Telefonaktiebolaget LM Ericsson (“Ericsson” or “Patent Owner”) respectfully files and serves the following objections to evidence that Petitioner served on Patent Owner with its Reply to Patent Owner's Response. A chart listing Patent Owner’s objections and its bases for the objections is provided below.

<u>Exhibits</u>	<u>Objections</u>
Ex. 1019 (Reply Declaration of Harry V. Bims, Ph.D.)	<i>Relevance:</i> A number of paragraphs are not cited in the Petition and, therefore, are not relevant, such as ¶¶ 1-12, 22-24, 28, 30-35, 37, 40-42, 44-45, 52, 57, 59-60, 68-69. F.R.E. 402; F.R.E. 403; 37 C.F.R. § 42.61. The declaration also constitutes new evidence or argument in reply that it could have presented earlier, e.g. to make out a prima facie case of unpatentability, including addressing secondary considerations and arguments regarding the Nair, Forsberg, Togawa, and/or 5G-Ensure that Petitioner was aware of from the ITC proceedings.
Ex. 1021 (Deposition Transcript of Dr. Mark Mahon, February 12, 2025)	Patent Owner maintains its objections as reflected in the record.
Ex. 1022 (5G Standard Essential Patents: The Reality Behind the Numbers Presentation)	<i>Hearsay:</i> The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801–807. <i>Relevance:</i> The exhibit is not part of a proper ground or combination asserted in the Petition because, among other

<u>Exhibits</u>	<u>Objections</u>
	reasons, the exhibit is not incorporated by reference into the alleged prior art references relied upon by the Petition and is not asserted as prior art in any of the grounds. F.R.E. 402; F.R.E. 403; 37 C.F.R. § 42.61.
Ex. 1023 (Nkenyereye, L., et al., A secure billing protocol over attribute-based encryption in vehicular cloud computing (2016))	Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801–807. Relevance: The exhibit is not part of a proper ground or combination asserted in the Petition because, among other reasons, the exhibit is not incorporated by reference into the alleged prior art references relied upon by the Petition and is not asserted as prior art in any of the grounds. F.R.E. 402; F.R.E. 403; 37 C.F.R. § 42.61.
Ex. 1024 (Meddah, N., et al., Scalable Lightweight ABAC Scheme for Secure Sharing PHR in Cloud Computing (2018))	Hearsay: The exhibit constitutes inadmissible hearsay, and no hearsay exception applies. <i>See</i> FRE 801–807. Relevance: The exhibit is not part of a proper ground or combination asserted in the Petition because, among other reasons, the exhibit is not incorporated by reference into the alleged prior art references relied upon by the Petition and is not asserted as prior art in any of the grounds. F.R.E. 402; F.R.E. 403; 37 C.F.R. § 42.61.

Date: March 3, 2025

Respectfully submitted,

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the above-captioned **PATENT OWNER'S OBJECTION TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(B)(1)** is being served on counsel for petitioner via electronic mail on March 3, 2025, in its entirety on the following counsel of record for Respondent:

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