

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION,

Petitioner

v.

TELEFONAKTIEBOLAGET L M ERICSSON (publ),

Patent Owner

Case No. IPR2024-00728
Patent No. 7,151,430 B2

Before Daveina B. Williams, *Trial Paralegal*

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

Pursuant to 37 C.F.R. § 42.64(b), and the Federal Rules of Evidence (“F.R.E.”), Patent Owner, Telefonaktiebolaget L M Ericsson (publ), (“Ericsson”) objects as follows to the admissibility of evidence submitted by Petitioner, Intel Corporation (“Intel”) with its Reply (Paper 19). Ericsson objects to any effort by Intel to submit new evidence or argument in reply to these objections or otherwise that it could have presented earlier, *e.g.*, to support Intel’s case alleging unpatentability. The F.R.E. apply and form the bases of the stated objections. 37 C.F.R. § 42.62(a).

EVIDENCE	OBJECTIONS
EX1043 Supplemental Declaration of Manos Tentzeris, ¶¶ 6-36, 41, 53,	<i>Hulu, LLC v. Sound View Innovations, LLC</i> , 2019 Pat.App. LEXIS 11904, * 7, IPR2018-01039, Paper 29 (PTAB 2019) (precedential) FRE 402: The exhibit includes information that is not relevant to any ground upon which trial was instituted. FRE 403: The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.

EVIDENCE	OBJECTIONS
EX1045 “Antenna Theory” by Constantine Balanis (2nd Ed. 1997); EX1046 U.S. Patent 5,070,317 to Bhagat (“Bhagat”); EX1047 “Advanced Silicon IC Interconnect Technology and Design: Pre-sent Trends and RF Wireless Implications” by Ronald J. Gutmann, IEEE Transactions on Microwave Theory and Techniques, Vol. 47, No. 6 (June 1999); EX1048 “Interconnect Technology and Design Implications for Future ASIC and System-on-a-Chip (SOC) Implementations” by Ronald J. Gutmann et al., 10th Annual IEEE/SEMI Advanced Semiconductor Manufacturing Conference, ASMC 99 Proceedings (Cat. No.99CH36295) (1999); EX1049 “Core Design and System-on-a-Chip Integration” by Ann Marie Rincon, et al., IEEE Design and Test of Computers (October-December 1997); EX1050 WO 03/015110 to Tiemeijer (“Tiemeijer”); EX1051 Prucnal Ex. 1, ITC-337-TA-1300, CXM-0035, Declaration of Paul R. Prucnal, Ph.D. in Support of Complainant’s Claim Construction	Relevance. F.R.E. 401-403. These exhibits are not relevant to any issue, and any probative value of the exhibit is substantially outweighed by unfair prejudice, confusing the issues. It has not been established that these exhibits have any relevance to the interpretation of any terms in the Challenged Claims as of the time of the invention or the validity of any of the Challenged Claims.

EVIDENCE	OBJECTIONS
Brief; and EX1052 U.S. Patent Publication 2003/0186674 to Keeney ("Keeney")	

Date: April 21, 2025

Respectfully submitted,

/Alastair J. Warr/

Alastair J. Warr, Reg. #47,166
FisherBroyles, LLP
203 North LaSalle Street, Suite 2100,
Chicago, IL 60601
Tel: 317.407.5270
alastair.warr@FisherBroyles.com

Bryan A. Santarelli, Reg. #37,560
FisherBroyles, LLP
701 Fifth Avenue, Suite 400
Seattle, WA 98104
Tel.: 206.338.8792
Bryan.santarelli@fisherbroyles.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 21, 2025 a copy of the foregoing Patent Owner Objections to Evidence was served via email on the following attorneys for the Petitioner:

Lori A. Gordon
Sanjeet K. Dutta
Christie L. Larochelle
Filippos Papadatos
Goodwin Procter LLP
gordon-ptab@goodwinlaw.com
sdutta@goodwinlaw.com
clarochelle@goodwinlaw.com
fpapadatos@goodwinlaw.com

Date: April 21, 2025

Respectfully submitted,

FisherBroyles, LLP

/s/Alastair J. Warr

Alastair J. Warr

Reg. No. 47,166