UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TIK TOK INC.,
Petitioner,

v.

CELLSPIN SOFT, INC.,
Patent Owner

Case IPR2024-00759
Patent 8,862,757

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Tik Tok Inc. ("Petitioner"), hereby submits its notice of objections to certain evidence that Patent Owner filed on January 3, 2025, in connection with the Patent Owner's Response in IPR2024-00759.

No.	Objections
2003	**Irrelevant, Misleading, Improper Testimony, Hearsay (FRE 401-403, 702, 703, 802)** Petitioner objects to the admissibility of Exhibit 2003 under FRE 702 and 703, because it contains opinions that are conclusory, does not disclose supporting facts or data, and is based on unreliable facts, data, or methods. Petitioner objects to the admissibility of Exhibit 2003 under FRE 702-703 and 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2003 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403.
2004	**Irrelevant, Misleading, Improper Testimony, Hearsay (FRE 401-403, 702, 703, 802)** Petitioner objects to the admissibility of Exhibit 2004 under FRE 702 and 703, because it contains opinions that are conclusory, does not disclose supporting facts or data, and is based on unreliable facts, data, or methods. Petitioner objects to the admissibility of Exhibit 2004 under FRE 702-703 and 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2004 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403.

No.	Objections
2006	**Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901)** Petitioner objects to the admissibility of Exhibit 2006 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2006 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the document under FRE 901 because there is insufficient evidence establishing what the document purports to be.
2010	**Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 1002)** Petitioner objects to the admissibility of Exhibit 2010 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2010 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner objects to the admissibility of Exhibit 2010 under FRE 1002 for lack of completeness. Petitioner also objects to the exhibit under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.

No.	Objections
2012	**Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 1002)** Petitioner objects to the admissibility of Exhibit 2012 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2012 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner notes that Exhibit 2012 includes a purported Wikipedia page entry in addition to book excerpts. Petitioner objects to the admissibility of Exhibit 2012 under FRE 1002 for lack of completeness, lacking at least the copyright page and table of contents, as well as pages before and after the cited passages. Petitioner also objects to the exhibit under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.
2017	**Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 1002)** Petitioner objects to the admissibility of Exhibit 2017 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2017 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. The purported Myspace web article does not have a date on it. Petitioner objects to Exhibit 2017 under FRE 1002 for lack of completeness of the book excerpts, lacking at least the copyright page and table of contents, as well as pages before and after the cited passages, as well as the remaining portions of books. Petitioner also objects to the exhibit under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.

No.	Objections
2018	**Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901)** Petitioner objects to the admissibility of Exhibit 2018 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2018 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. The purported MIT article is dated after the alleged priority date of the challenged patents. Petitioner also objects to the exhibit under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.
2019	**Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901)** Petitioner objects to the admissibility of Exhibit 2019 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2019 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the exhibit under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.
2020	**Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901)** Petitioner objects to the admissibility of Exhibit 2020 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2020 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. The document is apparently copyrighted in 2012, which comes after the alleged priority date of the challenged patents. Petitioner also objects to the exhibit under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.

No.	Objections
2021	**Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901)** Petitioner objects to the admissibility of Exhibit 2021 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2021 as containing subject matter that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the exhibit under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.

Date: January 10, 2025

/Kim H. Leung/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e), the undersigned certifies that on January 10, 2025, a complete and entire copy of this Petitioner's Objections to Evidence were provided via email to the Patent Owner by serving the correspondence email address of record as follows:

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