

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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THE BOEING COMPANY  
Petitioner,

v.

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA  
Patent Owner.

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Case IPR2024-00761  
Patent 7,487,684

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits Patent Owner's Objections to Evidence in Petitioner's Reply, to the following among Exhibit Nos. 1038-1056, which were filed by Petitioner. These responses are being timely filed within five (5) business days from Petitioner's April 28, 2025 filing. Patent Owner further objects to Petitioner's Reply, to the extent it relies on the exhibits objected-to herein, and reserves the right to seek to strike or exclude from consideration such sections of the Reply.

| <b>Exhibit No.</b> | <b>Basis for<br/>Objection</b>           | <b>Objection</b>                                                                                                                                                       |
|--------------------|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1038 <sup>1</sup>  | FED. R. EVID. 401,<br>403, 701, 703, 901 | Lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; expert opinion by lay witness;<br>unreliable expert opinion; authentication. |
| 1039               | FED. R. EVID. 106,<br>401, 403, 901      | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,                                                                                     |

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<sup>1</sup> Petitioner has submitted two Ex. No. 1038. The first, submitted January 21, 2025 is entitled [REDACTED] Amended Declaration of Ms. LaTonya Morris. The second, submitted April 28, 2025 is entitled Supp. Declaration of Junlan Wang, Ph.D. These objections are directed toward the second Ex. 1038, the Supp. Declaration of Junlan Wang, Ph.D.

| <b>Exhibit No.</b> | <b>Basis for<br/>Objection</b>                            | <b>Objection</b>                                                                                                                                                                                               |
|--------------------|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    |                                                           | confusing the issues, undue delay,<br>cumulative; authentication.                                                                                                                                              |
| 1040               | FED. R. EVID. 401,<br>403, 602, 701, 801-<br>802, 901     | Lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; expert opinion by lay witness;<br>authentication.                                                                    |
| 1041               | FED. R. EVID. 401,<br>403, 602, 701, 703,<br>801-802, 901 | Lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>expert opinion by lay witness; unreliable<br>expert opinion; hearsay; authentication. |
| 1042               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901     | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication.                |

| Exhibit No. | Basis for<br>Objection                                | Objection                                                                                                                                                                                                       |
|-------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1043        | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br><br>lack of relevance; unfair prejudice,<br><br>confusing the issues, undue delay,<br><br>cumulative; lack of personal knowledge;<br><br>hearsay; authentication. |
| 1044        | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br><br>lack of relevance; unfair prejudice,<br><br>confusing the issues, undue delay,<br><br>cumulative; lack of personal knowledge;<br><br>hearsay; authentication. |
| 1045        | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br><br>lack of relevance; unfair prejudice,<br><br>confusing the issues, undue delay,<br><br>cumulative; lack of personal knowledge;<br><br>hearsay; authentication. |

| <b>Exhibit No.</b> | <b>Basis for<br/>Objection</b>                        | <b>Objection</b>                                                                                                                                                                                |
|--------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1046               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication. |
| 1047               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication. |
| 1048               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication. |

| <b>Exhibit No.</b> | <b>Basis for<br/>Objection</b>                        | <b>Objection</b>                                                                                                                                                                                |
|--------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1049               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication. |
| 1050               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication. |
| 1051               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication. |

| <b>Exhibit No.</b> | <b>Basis for<br/>Objection</b>                        | <b>Objection</b>                                                                                                                                                                                |
|--------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1052               | FED. R. EVID. 106,<br>401, 403, 602, 801-<br>802, 901 | Remainder of related writing not produced;<br>lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication. |
| 1053               | FED. R. EVID. 401,<br>403, 602, 701, 801-<br>802, 901 | Lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication.                                               |
| 1054               | FED. R. EVID. 401,<br>403, 602, 701, 801-<br>802, 901 | Lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication.                                               |
| 1055               | FED. R. EVID. 401,<br>403, 602, 701, 801-<br>802, 901 | Lack of relevance; unfair prejudice,<br>confusing the issues, undue delay,<br>cumulative; lack of personal knowledge;<br>hearsay; authentication.                                               |

| Exhibit No. | Basis for<br>Objection                                                                | Objection                                                                                                                                                        |
|-------------|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1056        | FED. R. EVID. 106,<br>403, 705, 801-802,<br>602, 901, 37 C.F.R.<br>§ 42.51(b)(1)(iii) | Remainder of related writing not produced;<br>confusing the issues, undue delay; hearsay;<br>authentication; failure to timely produce<br>inconsistent evidence. |

Respectfully Submitted,

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## CERTIFICATE OF SERVICE

The undersigned certifies that on May 5, 2025 a copy of the Patent Owner's Objections to Evidence in Petitioner's Reply was served by electronic mail on the following counsel of record:

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