

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

RESONANT SYSTEMS, INC.,
Patent Owner.

Case IPR2024-00806
Patent No. 9,941,830

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits the following objections to evidence filed with Patent Owner's Response of February 7, 2025.

<u>Evidence</u>	<u>Objections</u>
Exhibit 2009 Declaration of Keith W. Goossen, Ph.D.	FRE 401/402/403 (Relevancy): Petitioner objects to paragraphs of Exhibit 2009 not cited in support of any argument made in the Patent Owner Response, and thus irrelevant and more prejudicial than probative.
Exhibit 2014 Excerpt of CRC Handbook of Chemistry and Physics (52 nd Ed. 1964)	FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art. FRE 106/1001: This exhibit is incomplete and is not a copy which accurately reproduces the original.
Exhibit 2015 “Why do ferromagnetic materials channel magnetic field lines?,” Physics Stack Exchange, <i>available at</i> https://physics.stackexchange.com/questions/129782/why-do-ferromagnetic-materials-channel-magnetic-field-lines	FRE 901 (Authentication): This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be. FRE 801-802 (Hearsay): This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit. FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not

	been shown to qualify as prior art.
Exhibit 2016 “Quality Factor (Q)” in Smith, J.O., <i>Introduction to Digital Filters with Audio Applications</i> , available at http://ccrma.stanford.edu/~jos/filters/ Partial_Fraction_Expansion.htm	FRE 901 (Authentication): This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be. FRE 801-802 (Hearsay): This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit. FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not been shown to qualify as prior art.
Exhibit 2017 Texas Instruments Precision Designs: Verified Design SLAU508, “Analog Pulse Width Modulation,” by John Caldwell	FRE 901 (Authentication): This exhibit is inadmissible for lack of proper authentication. Patent Owner has not presented evidence sufficient to support a finding that the exhibit is what it is purported to be. FRE 801-802 (Hearsay): This exhibit contains inadmissible hearsay cited for the truth of the statements contained therein. Patent Owner has identified no applicable hearsay exception for the statements in the exhibit. FRE 401/402/403 (Relevancy): This exhibit is inadmissible as irrelevant because, among other things, it has not

	been shown to qualify as prior art.
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For at least these reasons, Petitioner objects to Exhibits 2014-2017.

Petitioner reserves the right to move to exclude Exhibits 2014-2017.

Respectfully submitted,

Dated: February 14, 2025

/Craig A. Deutsch/
W. Karl Renner, Reg. No. 41,265
Craig Deutsch, Reg. No. 69,264
Sangki Park, Reg. No. 77,261
Thomas Rozylowicz, Reg. No. 50 620
Fish & Richardson P.C.
60 South Sixth Street
Minneapolis, MN 55402
T: 202-783-5553

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4)(i) *et seq.*, the undersigned certifies that on February 14, 2025, a complete and entire copy of this Petitioner's Objections to Evidence was provided by electronic mail to the Patent Owner by serving the correspondence e-mail address of record as follows:

Reza Mirzaie (Reg. No. 69,138)
Qi (Peter) Tong (Reg. No. 74,292)
Kristopher Davis (Reg. No. 62,063)
Neil A. Rubin (Reg. No. 67,030)
Paul A. Kroeger (*Pro Hac Vice*)
Christian W. Conkle (*Pro Hac Vice*)
RUSS AUGUST & KABAT

rmirzaie@raklaw.com
rak_revelhmi@raklaw.com
ptong@raklaw.com
kdavis@raklaw.com
nrubin@raklaw.com
pkroeger@raklaw.com
cconkle@raklaw.com

/Crena Pacheco/

Crena Pacheco
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
pacheco@fr.com