

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC., and
GOOGLE LLC

Petitioners

v.

EYESMATCH LTD.

Patent Owner

IPR2024-00810
U.S. PATENT NO. 8,982,110

**PETITIONERS' OBJECTIONS UNDER 37 C.F.R. § 42.64 TO
PATENT OWNER'S EVIDENCE SUBMITTED WITH
PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,982,110**

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Google LLC (collectively, “Petitioners”), respectfully submit the following objections to exhibits filed by Patent Owner on August 29, 2024, as cited in its Patent Owner Preliminary Response to Petitioner’s request for *Inter Partes* Review of U.S. Patent No. 8,982,110 (“the ’110 Patent”). These objections are made within ten business days from Institution Decision, which was issued on November 26, 2024.

Objected to Exhibit	Basis for Objection
Ex. 2004	FRE 401-403: This exhibit should be excluded at least because it is irrelevant to any fact in issue in the instant Petition. This exhibit makes no mention of the ’110 Patent. Further, this exhibit does not relate to the instant Petition and is substantially prejudicial relative to any marginal probative value. Nor would this exhibit help the trier of fact understand the evidence. FRE 802: This exhibit contains hearsay to the extent that Patent Owner attempts to use any of the statements contained therein for the truth of the matter asserted without regard to the underlying assumptions that form the basis for said statements.

Objected to Exhibit	Basis for Objection
Ex. 2005	FRE 401-403: This exhibit should be excluded at least because it is irrelevant to any fact in issue in the instant Petition. Further, this exhibit does not relate to the instant Petition and is substantially prejudicial relative to any marginal probative value. Nor would this exhibit help the trier of fact understand the evidence.
Ex. 2006	FRE 401-403: This exhibit should be excluded at least because it is irrelevant to any fact in issue in the instant Petition. Further, this exhibit does not relate to the instant Petition and is substantially prejudicial relative to any marginal probative value. Nor would this exhibit help the trier of fact understand the evidence.
Ex. 2007	FRE 401-403: This exhibit should be excluded at least because it is irrelevant to any fact in issue in the instant Petition. Further, this exhibit does not relate to the instant Petition and is substantially prejudicial relative to any marginal probative value. Nor would this exhibit help the trier of fact understand the evidence.

Date: December 11, 2024

/ Eliot D. Williams /

Eliot D. Williams

Reg. No. 50,822

BAKER BOTTS L.L.P.

700 K Street, N.W., Suite 900

Washington, DC 20001

T: (202) 639-7700

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on December 11, 2024, a complete and entire copy of these objections was provided via email to the Patent Owner by serving the correspondence email addresses of record as follows:

John Pierce
john.pierce@tensegritylawgroup.com

Matthew D. Powers
matthew.powers@tensegritylawgroup.com

William P. Nelson
william.nelson@tensegritylawgroup.com

Natasha M. Saputo
natasha.saputo@tensegritylawgroup.com

eyesmatch_team@tensegritylawgroup.com

Date: December 11, 2024

/ Eliot D. Williams /

Eliot D. Williams
Reg. No. 50,822