UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ENERGY SOLUTION, LTD.,
SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioner

v.

MOLECULAR REBAR DESIGN, LLC,
Patent Owner

Case IPR2024-01011[1]
U.S. Patent 8,896,924

PATENT OWNER'S CORRECTED OBJECTIONS TO EVIDENCE

[1] Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. were joined as parties to this proceeding via a Motion for Joinder in IPR2025-00357.

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner hereby submits the following objections to evidence filed with Petitioner's Reply to Patent Owner's Response of July 14, 2025.

Evidence	**Objections**
Exhibit LGES-1053	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1053, to the extent that such objections relate to portions of LGES-1053 that are cited in Petitioner's Reply to Patent Owner's Response.
Exhibit LGES-1054	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1054, to the extent that such objections relate to portions of LGES-1054 that are cited in Petitioner's Reply to Patent Owner's Response
Exhibit LGES-1055	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1055, to the extent that such objections relate to portions of LGES-1055 that are cited in Petitioner's Reply to Patent Owner's Response

For at least these reasons, Patent Owner Objects to Exhibits LGES-1053, LGES-1054, and LGS-1055. Patent Owner reserves the right to move to exclude based on these objections.

Dated: July 21, 2025

Respectfully submitted,

/Stephen D. Zinda/
Stephen D. Zinda
Reg. No. 67,272

Counsel for Molecular Rebar Design, LLC

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e)(4), the undersigned certifies that on July 21, 2025, the foregoing document was served via electronic mail on the following attorneys of record at the indicated e-mail address, which Petitioner has consented to electronic service for:

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