

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 IPR2024-01012¹
U.S. Patent 10,608,282

PATENT OWNER'S OBJECTIONS TO EVIDENCE

¹ Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., which filed a petition in IPR2025-00358, have been joined as petitioners in this proceeding.

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.

<u>Evidence</u>	<u>Objections</u>
Exhibit LGES-1029	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1029, to the extent that such objections relate to portions of LGES-1029 that are cited in Petitioner's Reply to Patent Owner's Response.
Exhibit LGES-1031	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1031, to the extent that such objections relate to portions of LGES-1031 that are cited in Petitioner's Reply to Patent Owner's Response.
Exhibit LGES-1032	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1031, to the extent that such objections relate to portions of LGES-1032 that are cited in or referenced by Petitioner's Reply to Patent Owner's Response.
Exhibit LGES-1033	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1033, to the extent that such objections relate to portions of LGES-1033 that are cited in Petitioner's Reply to Patent Owner's Response.

For at least these reasons, Patent Owner Objects to Exhibits LGES-1029, LGES-1031, LGES-1032, and LGES-1033. Patent Owner reserves the right to move to exclude Exhibits LGES-1029, LGES-1031, LGES-1032, and LGES-1033.

Dated: July 21, 2025

Respectfully submitted,

/James A. Glenn/

James A. Glenn

Reg. No. 55,898

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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