

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 IPR2024-01013¹

U.S. Patent 10,153,483

PATENT OWNER'S OBJECTIONS TO EVIDENCE

¹ Samsung Electronics Corporation, Ltd. and Samsung Electronics America, Inc. were joined as petitioners in this proceeding based on a petition and motion for joinder filed in IPR2025-00359, which was granted.

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-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 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 Patent Owner's Response.
Exhibit LGES-1058	Patent Owner incorporates the real-time objections made by Patent Owner's counsel reflected in LGES-1058, to the extent that such objections relate to portions of LGES-1058 that are cited in Patent Owner's Response.

For at least these reasons, Patent Owner Objects to Exhibits LGES-1054, LGES-1055, and LGS-1058. 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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