

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CHARTER COMMUNICATIONS, INC.,
Petitioner,

v.

IARNACH TECHNOLOGIES LTD.,
Patent Owner.

Case IPR2024-01287
Patent 9,287,982

**PETITIONER’S OBJECTIONS TO EVIDENCE
UNDER 37 CFR § 42.64**

Pursuant to 37 CFR § 42.64(b)(1), Petitioner Charter Communications, Inc. submits the following objections to evidence Patent Owner served with its Response filed on May 15, 2025 (Paper 20):

Exhibit	Objections
2008	<i>Para. 17, 22-31:</i> The evidence constitutes/includes inadmissible hearsay. (FRE 801/802) The testimony is not based upon sufficient facts or data of the type an expert in the filed would reasonably rely, the testimony is not the product of reliable principles and methods, and/or the witness has not reliably applied the principles and methods to the facts of the case. (FRE 702/703). The witness has not been shown to be qualified an expert by knowledge, skill, experience, training, or education in the computerized DOCSIS systems of the prior art to which this testimony relates. (FRE 702) <i>Para. 37-38</i> To the extent that the testimony fails to rely upon a proper construction of the subject claims, the testimony is irrelevant (FRE 401/402). <i>Paras. 39-53, 55-62, 64-74, 76-80, 82-85:</i> To the extent that the testimony fails to rely upon a proper construction of the subject claims, the testimony is irrelevant (FRE 401/402). The testimony is said to be the witness's personal opinion, and not an opinion of the understandings of a person of ordinary skill in the art at the relevant time, and is, for at least that reason, irrelevant (FRE 401/402) The testimony fails to articulate the basis of the witness's opinion, is not based upon sufficient facts or data of the type an expert in the filed

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	would reasonably rely, the testimony is not the product of reliable principles and methods, and/or the witness has not reliably applied the principles and methods to the facts of the case. (FRE 702/703).
2009	To the extent that the testimony fails to rely upon a proper construction of the subject claims, the testimony is irrelevant (FRE 401/402).
2010	To the extent that the testimony fails to rely upon a proper construction of the subject claims, the testimony is irrelevant (FRE 401/402).
2011	The evidence constitutes inadmissible hearsay. (FRE 801/802) Insufficient evidence has been presented that the item is what the proponent claims it is. (FRE 901)
2012	The evidence constitutes inadmissible hearsay. (FRE 801/802) Insufficient evidence has been presented that the item is what the proponent claims it is. (FRE 901)

Respectfully submitted,

Date: May 22, 2025

/Raymond R. Ricordati III (Reg. No. 62,856)/
Raymond R. Ricordati, III (Reg. No. 62,856)
Lead Counsel for Petitioner

CERTIFICATE OF FILING AND SERVICE

The undersigned hereby certifies that, pursuant to 37 CFR § 42.6(e), a copy of the foregoing **“PETITIONER’S OBJECTIONS TO EVIDENCE UNDER 37 CFR § 42.64”** is being filed via the Patent Trial and Appeal Case Tracking Systems (P-TACTS) and is being served today, May 25, 2025, by electronic mail on counsel for the Patent Owner:

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