

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CHARTER COMMUNICATIONS INC.,

Petitioners

v.

IARNACH TECHNOLOGIES LIMITED,

Patent Owner

Case IPR2024-01287

Patent 9,287,982

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(B)(1)**

I. Introduction

Under the Federal Rules of Evidence and 37 C.F.R. § 42.64, Iarnach Technologies Limited (“Patent Owner”) timely objects to evidence submitted by Charter Communications Inc. (“Petitioner”) with its Reply in this proceeding. Patent Owner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioner provides evidence curing the objections identified by Patent Owner below.

II. Specific Objections

A. Exhibit 1016 – Second Declaration of Paul Min

Patent Owner objects to Exhibit 1016 under Federal Rules of Evidence (“FRE”) 701-705 and 802 because Dr. Paul S. Min has not been made available for deposition, and Patent Owner reserves the right to raise any additional objections that become apparent from his deposition at that time if they are made available for deposition. Patent Owner further objects to Exhibit 1016 as improperly raising new theories of patentability.

B. Exhibit 1018 – Declaration of Kerry Litvin from *Iarnach Techs. Ltd. v. Charter Comms., Inc.*, No. 2:24-cv-00230 (E.D. Tex.)

Patent Owner objects to Exhibit 1018 under FRE 401/402/403 as irrelevant, misleading, and unduly prejudicial. Patent Owner further objects to Exhibit 1019 as improperly raising new theories of patentability.

C. Exhibit 1019 – DOCSIS 3.0

Patent Owner objects to Exhibit 1019 under FRE 901 because Petitioner has not produced any evidence “sufficient to support a finding that the item is what the proponent claims it is.” FRE 901(a). Patent Owner also objects to Exhibit 1019 under FRE 802 as containing hearsay that does not fall within any applicable exceptions. Patent Owner objects to Exhibit 1019 under FRE 401/402/403 as irrelevant, misleading, and unduly prejudicial. Patent Owner further objects to Exhibit 1019 as improperly raising new theories of patentability.

Dated: August 14, 2025

Respectfully submitted,

/Michael F. Heim/

Michael F. Heim (Reg. No. 32,702)

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IPR2024-01287
U.S. Pat. No. 9,287,982

Counsel for Patent Owner,
IARNACH TECHNOLOGIES LIMITED

CERTIFICATE OF SERVICE

The undersigned certifies that on the fourteenth day of August, 2025, a complete and entire copy of the foregoing “Patent Owner’s Objections To Petitioner’s Evidence Pursuant To 37 C.F.R. § 42.64(B)(1),” including exhibits, if any, was served on the following counsel of record via email per Petitioner’ consent to electronic service. *See* Paper 1 at 3:

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