

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TIKTOK INC.,
Petitioner

v.

NTECH PROPERTIES, INC.,
Patent Owner

Case No. IPR2024-01342
U.S. Patent No. 8,886,753

PETITIONER'S NOTICE OF OBJECTIONS TO EVIDENCE

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner TikTok Inc. (“Petitioner”), submits the following objections to Patent Owner NTech Properties, Inc.’s (“Patent Owner”) exhibits. As required by 37 C.F.R. § 42.62, Petitioner’s objections below apply the Federal Rules of Evidence (“FRE”).

II. OBJECTIONS

A. Objections to Exhibit 2002 – Business Wire Article

Grounds for Objection: FRE 401-403, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2002 under FRE 401-403, 801-803, 901. Exhibit 2002 is not relevant to this proceeding. Further, to the extent the exhibit is deemed relevant, its admission would be unduly prejudicial, misleading, and a waste of time. Patent Owner has not established that this exhibit is an authentic copy. Petitioner further objects to this exhibit as hearsay.

B. Objections to Exhibit 2003 – National Television Academy Article

Grounds for Objection: FRE 401-403, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2003 under FRE 401-403, 801-803, 901. Exhibit 2003 is not relevant to this proceeding. Further, to the extent the exhibit is deemed relevant, its admission would be unduly

prejudicial, misleading, and a waste of time. Patent Owner has not established that this exhibit is an authentic copy. Petitioner further objects to this exhibit as hearsay.

C. Objections to Exhibit 2010 – Digital Ocean Article

Grounds for Objection: FRE 401-403, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2010 under FRE 401-403, 801-803, 901. Exhibit 2010 is not relevant to this proceeding. Further, to the extent the exhibit is deemed relevant, its admission would be unduly prejudicial, misleading, and a waste of time. Patent Owner has not established that this exhibit is an authentic copy. Petitioner further objects to this exhibit as hearsay.

D. Objections to Exhibit 2011 – M. Cheshire, et al. Article

Grounds for Objection: FRE 401-403, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2011 under FRE 401-403, 801-803, 901. Exhibit 2011 is not relevant to this proceeding. Further, to the extent the exhibit is deemed relevant, its admission would be unduly prejudicial, misleading, and a waste of time. Patent Owner has not established that this exhibit is an authentic copy. Petitioner further objects to this exhibit as hearsay.

**E. Objections to Exhibit 2012 – Amazon Web Services
Webpage**

Grounds for Objection: FRE 401-403, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2012 under FRE 401-403, 801-803, 901. Exhibit 2012 is not relevant to this proceeding. Further, to the extent the exhibit is deemed relevant, its admission would be unduly prejudicial, misleading, and a waste of time. Patent Owner has not established that this exhibit is an authentic copy. Petitioner further objects to this exhibit as hearsay.

Date: March 24, 2025

By: /s/ James Glass

James M. Glass (Reg. No. 46,729)
QUINN EMANUEL URQUHART &
SULLIVAN LLP
295 5th Avenue, 9th Floor
New York, NY 10016
Email: jimglass@quinnemanuel.com
Phone: 212-849-7142
Fax: 212-849-7100

Counsel for Petitioner

CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(E), 42.105(A))

The undersigned hereby certifies that the foregoing document was served in its entirety on March 24, 2025 upon the following parties via

Electronic Mail:

jhannah@kramerlevin.com
jprice@kramerlevin.com
kkastens@kramerlevin.com
jfuller@kramerlevin.com
svdocketing@kramerlevin.com

Date: March 24, 2025

By: /s/ James Glass

James M. Glass (Reg. No. 46,729)
QUINN EMANUEL URQUHART &
SULLIVAN LLP
295 5th Avenue, 9th Floor
New York, NY 10016
Email: jimglass@quinnemanuel.com
Phone: 212-849-7142
Fax: 212-849-7100

Counsel for Petitioner