

Filed on behalf of Western Digital Technologies, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WESTERN DIGITAL TECHNOLOGIES, INC.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case No. IPR2024-01447

U.S. Patent No. 8,405,134

PETITIONER'S OBJECTIONS TO EVIDENCE

I. INTRODUCTION

Pursuant to the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.64(b)(1), Petitioner Western Digital Technologies, Inc. timely objects to the evidence submitted by Patent Owner in this proceeding. Petitioner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Patent Owner provides evidence curing the objections identified by Petitioner below.

II. SPECIFIC OBJECTIONS

A. Exhibit 2001 – Kittel

Petitioner objects to Exhibit 2001 under FRE 106 because Patent Owner only purports to provide an excerpt of the document and has not made available a full copy to Petitioner.

B. Exhibit 2002 – Duke

Petitioner objects to Exhibit 2002 under FRE 106 because Patent Owner only purports to provide an excerpt of the document and has not made available a full copy to Petitioner.

C. Exhibit 2005 – Zhu

Petitioner objects to Exhibit 2005 under FRE 401-403 because Exhibit 2005 is dated after the asserted earliest filing date of the ’134 Patent and thus is not relevant to any issue in the IPR.

D. Exhibit 2009 – Callister

Petitioner objects to Exhibit 2009 under FRE 106 because Patent Owner only purports to provide an excerpt of the document and has not made available a full copy to Petitioner.

Petitioner further objects to Exhibit 2009 under FRE 401-403 because Exhibit 2009 is dated after the asserted earliest filing date of the '134 Patent and thus is not relevant to any issue in the IPR.

ARMOND WILSON LLP

Dated: May 5, 2025

By: /Michelle E. Armond/

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PETITIONER’S OBJECTIONS TO EVIDENCE** is being served electronically on May 5, 2025 to the following counsel for Patent Owner to the following email addresses:

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