

Paper No. ____

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

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to evidence submitted with Petitioner's Reply to Patent Owner's Response in the instant proceeding. These objections have been timely filed and served within five business days of service of evidence to which the objections are directed.

I. EXHIBIT 1105

Patent Owner objects to EX1105, ¶¶7-8 as inadmissible under Fed. R. Evid. ("Rule") 702 as improper expert testimony, under Rule 402 as irrelevant, and under Rule 403 for unfair prejudice and confusion of issues because it asserts the knowledge of a POSA based on a publication that is not prior art, improperly bases opinion on speculation, and improperly bases opinion on mispresenting the record.

Patent Owner objects to EX1105, ¶13 as inadmissible under Rule 702 as improper expert testimony, under Rule 402 as irrelevant, and under Rule 403 for unfair prejudice and confusion of issues because it asserts the knowledge of a POSA based on a publication that is not prior art.

Patent Owner objects to EX1105, ¶¶14-22, 28-30 as inadmissible under Rule 402 as irrelevant, and under Rule 403 for unfair prejudice and confusion of issues.

Patent Owner objects to EX1105, ¶¶6-30, 35-36 as improper expert testimony because the testimony fails the requirements of Rule 702(a)-(d), under

Rule 402 as irrelevant, and under Rule 403 for unfair prejudice and confusion of issues.

Patent Owner objects to EX1105, ¶¶6-39 under Rules 701 and 602 as improper lay opinion for which the declarant has no personal knowledge.

Respectfully submitted,
GODO KAISHA IP BRIDGE I

Date: October 16, 2025

/Adam R. Wichman/
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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on October 16, 2025, a copy of the foregoing document, including any exhibits filed therewith, is being served via electronic mail, as previously consented to by Petitioner, upon the following:

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Date: October 16, 2025

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