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. IPR2024-01494
U.S. Patent No. 11,968,909

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 2007 - Hard disk Market

Petitioner objects to Exhibit 2007 under FRE 401-403 because Exhibit 2007 was not cited in the POPR, POR, or EX2053 and thus is not relevant to any issue in this IPR.

Petitioner further objects to Exhibit 2007 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

B. Exhibit 2010 – Wang

Petitioner objects to Exhibit 2010 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 2020 – Tsymbal

Petitioner objects to Exhibit 2020 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.

D. Exhibit 2024 – The 23rd (FY2022) Japan Society of Applied Physics Achievement Award Recipients

Petitioner objects to Exhibit 2024 under FRE 604 because EX2024 purports to be a certified translation from Japanese to English of "The 23rd (FY2022) Japan Society of Applied Physics Achievement Award Recipients" but the translator certification does not identify the name of the document purportedly translated. *See* EX2024 at 1.

Petitioner further objects to Exhibit 2024 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

Petitioner further objects to Exhibit 2024 under FRE 801-802 because it is offered for the truth of the matters asserted and is not subject to any hearsay exception. For example, Patent Owner relies on certain dates and statements of fact in Exhibit 2024 for the truth of the matters asserted. *See, e.g.*, POR at 26-27; EX2053 ¶ 158.

E. Exhibit 2025 – JSAP Outstanding Achievement Award Recipients

Petitioner objects to Exhibit 2025 under FRE 401-403 because Exhibit 2025 was not cited in the POPR, POR, or EX2053 and thus is not relevant to any issue in this IPR.

Petitioner further objects to Exhibit 2025 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

F. Exhibit 2026 – 2021 New Fellows

Petitioner objects to Exhibit 2026 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

Petitioner further objects to Exhibit 2026 under FRE 801-802 because it is offered for the truth of the matters asserted and is not subject to any hearsay exception. For example, Patent Owner relies on certain dates and statements of fact in Exhibit 2026 for the truth of the matters asserted. *See, e.g.*, EX2053 ¶ 158.

G. Exhibit 2027 – JST owned patent wins Future Creative Invention Prize

Petitioner objects to Exhibit 2027 under FRE 401-403 because Exhibit 2027 was not cited in the POPR, POR, or EX2053 and thus is not relevant to any issue in this IPR.

Petitioner further objects to Exhibit 2027 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

H. Exhibit 2028 – Dr. Shinji Yuasa profile

Petitioner objects to Exhibit 2028 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

Petitioner further objects to Exhibit 2028 under FRE 801-802 because it is offered for the truth of the matters asserted and is not subject to any hearsay exception. For example, Patent Owner relies on certain dates and statements of fact in Exhibit 2028 for the truth of the matters asserted. *See, e.g.*, EX2053 ¶ 161.

I. Exhibit 2029 – AIST wins three Science and Technology Awards in the 2016 Minister of Education, Culture, Sports, Science and Technology Commendation for Science and Technology

Petitioner objects to Exhibit 2029 under FRE 901 because Patent Owner 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 provided the following webpage address in connection with Exhibit 2029 (*see* POR at vii), but this address directs to a webpage in the Japanese language and Patent Owner did not provide a certified English translation: https://www.aist.go.jp/aist_j/news/prize/pr20160412_3.html.

Petitioner further objects to Exhibit 2029 under FRE 801-802 because it is offered for the truth of the matters asserted and is not subject to any hearsay exception. For example, Patent Owner relies on certain dates and statements of fact in Exhibit 2029 for the truth of the matters asserted. *See, e.g.*, POR at 26; EX2053 ¶ 159.

J. Exhibit 2031 – Shinji Yuasa – IEEE Magnetics Society

Petitioner objects to Exhibit 2031 under FRE 401-403 because Exhibit 2031 was not cited in the POPR, POR, or EX2053 and thus is not relevant to any issue in this IPR.

Petitioner further objects to Exhibit 2031 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

K. Exhibit 2032 – AIST: Winner of the 20th Tsukuba Award

Petitioner objects to Exhibit 2032 under FRE 901 because Patent Owner 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 provided the following webpage address in connection with Exhibit 2032 (*see* POR at viii), but this address directs to a webpage in the Japanese language and Patent Owner did not provide a certified English translation: https://www.aist.go.jp/aist_j/news/prize/itemid025-000077.html.

Petitioner further objects to Exhibit 2032 under FRE 801-802 because it is offered for the truth of the matters asserted and is not subject to any hearsay exception. For example, Patent Owner relies on certain dates and statements of fact in Exhibit 2032 for the truth of the matters asserted. *See, e.g.*, POR at 26; EX2053 ¶ 160.

L. Exhibit 2033 – Announcing the winners for "Tsukuba Prize," "Esaki Leona Prize," and "Tsukuba Encouragement Prize"

Petitioner objects to Exhibit 2033 under FRE 901 because Patent Owner has not produced any evidence "sufficient to support a finding that the item is what the proponent claims it is." FRE 901(a).

Petitioner further objects to Exhibit 2033 under FRE 801-802 because it is offered for the truth of the matters asserted and is not subject to any hearsay exception. For example, Patent Owner relies on certain dates and statements of fact in Exhibit 2033 for the truth of the matters asserted. *See, e.g.*, POR at 26; EX2053 ¶ 160.

M. Exhibit 2034 – AIST: 34th Inoue Harunari Prize

Petitioner objects to Exhibit 2034 under FRE 401-403 because Exhibit 2034 was not cited in the POPR, POR, or EX2053 and thus is not relevant to any issue in this IPR.

Petitioner further objects to Exhibit 2034 under FRE 901 because Patent Owner 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 provided the following webpage address in connection with Exhibit 2034 (*see* POR at viii), but this address directs to a webpage in the Japanese language and Patent Owner did not provide a certified English translation: https://www.aist.go.jp/aist_j/news/prize/itemid025-000082.html.

N. Exhibit 2038 – Maat

Petitioner objects to Exhibit 2038 under FRE 801-802 because it is offered for the truth of the matters asserted and is not subject to any hearsay exception. For example, Patent Owner relies on certain dates and statements of fact in Exhibit 2038 for the truth of the matters asserted. *See, e.g.*, POR at 27; EX2053 ¶ 163.

O. Exhibit 2040 - U.S. Patent Application Publication No. 2006/0003185 A1

Petitioner objects to Exhibit 2040 under FRE 401-403 because Exhibit 2040 was not cited in the POPR, POR, or EX2053 and thus is not relevant to any issue in this IPR.

P. Exhibit 2053 – Declaration of Caroline A. Ross, Ph.D.

Petitioner objects to Exhibit 2053 under FRE 701-705 and 801-802 because Dr. Ross has not been made available for deposition. Petitioner reserves the right to raise any additional objections that become apparent from Dr. Ross' declaration at that time if she is made available for deposition.

ARMOND WILSON LLP

Dated: July 23, 2025

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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 July 23, 2025 to the following counsel for Patent Owner to the following email addresses:

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