UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC and MOTOROLA MOBILITY LLC,
Petitioner,

v.

MULTIFOLD INTERNATIONAL INCORPORATED PTE. LTD.,
Patent Owner.

Case IPR2025-00058
Patent No. 9,158,494

PETITIONERS' OBJECTIONS TO PATENT OWNER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners submit the following objections to exhibits served by Patent Owner in Case No. IPR2025-00058. Petitioners' objections apply equally to Patent Owner's reliance on the exhibit in any subsequently-filed documents. These objections are timely, having been served within ten business days after institution of trial. 37 C.F.R. § 42.64(b)(1).

Exhibits 2001–2003

Petitioners object to Exhibits 2001–2003 to the extent they rely on, discuss, or reference, any other objectionable exhibit. Petitioners further object to Exhibits 2001–2003 under FRE 802 to the extent that the statements therein rely on or were derived from a hearsay source, such as a hearsay in a document or the out-of-court statement of another person, thus constituting impermissible hearsay.

Exhibits 2006-2025 and 2031-2087

Petitioners object to Exhibits 2006-2025 and 2031-2087 under FRE 802 because they contain out of court statements that Patent Owner relies on for their truth, thus constituting impermissible hearsay. Petitioners object to Exhibits 2006-2025 and 2031-2087 as lacking authenticity under FRE 901. Petitioners object to Exhibits 2006-2025 and 2031-2087 as not relevant under FRE 401-402 and under FRE 403 because the probative value, if any, of the evidence is substantially outweighed by a danger of unfair prejudice, confusing the issues, and being misleading. *See, e.g.*, *Microsoft Corp. v. Surfcast, Inc.*, IPR2013-00292, Paper 93.

Respectfully submitted,

Dated: June 5, 2025

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2025, I caused a true and correct copy of the foregoing Petitioners' Objections to Patent Owner's Evidence to be served electronically on counsel for Patent Owner at the following addresses:

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