

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

TCL ELECTRONICS HOLDINGS LTD. (f/k/a TCL MULTIMEDIA
TECHNOLOGY HOLDINGS, LTD.)

Petitioner,

v.

MAXELL, LTD.,
Patent Owner

Case: IPR2025-00120

U.S. Patent No. 10,375,341

**PATENT OWNER'S OBJECTIONS TO EVIDENCE
UNDER 37 C.F.R. § 42.64(B)(1)**

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

PATENT OWNER'S EXHIBIT LIST

Description	Exhibit #
'895 Application File History	2001
Claim Construction Order	2002
Docket Control Order	2003
First Amended Docket Control Order	2004
Invalidity Contentions	2005
Robbins (U.S. Patent Publication No. 2010/0157978)	2006
U.S. Patent No. 9,924,124	2007

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence ("F.R.E."), the undersigned counsel, on behalf of Patent Owner, hereby serves and submits the following objections to evidence submitted by Petitioner accompanying Petitioner's Petition for *Inter Partes* Review. These objections are timely because they are filed within ten business days of institution.

II. OBJECTIONS

A. Ex. 1003

Patent Owner objects to Exhibit 1003, for example, ¶¶34-36, and ¶78, and any reference to or reliance on this exhibit, on the following grounds:

37 C.F.R. § 42.61 (Admissibility of evidence): This exhibit is not admissible under any applicable rule of the Patent Trial and Appeal Board.

F.R.E. 401/402 (Relevance): This exhibit is not relevant to any ground upon which trial was instituted. This exhibit, particularly ¶¶34-36, and ¶78, has no bearing on whether the challenged claims are patentable under 35 U.S.C. § 103, the grounds of institution in this proceeding.

F.R.E. 801/802/805 (Hearsay): This exhibit includes inadmissible hearsay and/or double hearsay with no applicable exceptions.

B. Ex. 1007

Patent Owner objects to Exhibit 1007, and any reference to or reliance on this exhibit, on the following grounds:

37 C.F.R. § 42.61 (Admissibility of evidence): This exhibit is not admissible under any applicable rule of the Patent Trial and Appeal Board.

F.R.E. 106 (Completeness): Exhibit 1007 is inadmissible because it is incomplete.

F.R.E. 401/402 (Relevance): This exhibit is not relevant to any ground upon which trial was instituted. This exhibit has no bearing on whether the challenged claims are patentable under 35 U.S.C. § 103, the grounds of institution in this proceeding.

F.R.E. 403 (Excluding evidence for prejudice, confusion, waste of time, or for other reasons): This exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.

F.R.E. 801/802/805 (Hearsay): This exhibit includes inadmissible hearsay and/or double hearsay with no applicable exceptions. For example, this exhibit is inadmissible hearsay as to the date of publication or the date when the document was publicly accessible or publicly available.

F.R.E. 901/902 (Authentication): This exhibit is inadmissible because it is not properly authenticated.

C. Ex. 1008

Patent Owner objects to Exhibit 1008, and any reference to or reliance on this exhibit, on the following grounds:

37 C.F.R. § 42.61 (Admissibility of evidence): This exhibit is not admissible under any applicable rule of the Patent Trial and Appeal Board.

F.R.E. 401/402 (Relevance): This exhibit is not relevant to any ground upon which trial was instituted. This exhibit has no bearing on whether the challenged claims are patentable under 35 U.S.C. § 103, the grounds of institution in this proceeding.

F.R.E. 403 (Excluding evidence for prejudice, confusion, waste of time, or for other reasons): This exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.

F.R.E. 801/802/805 (Hearsay): This exhibit includes inadmissible hearsay and/or double hearsay with no applicable exceptions. For example, this exhibit is inadmissible hearsay as to the date of publication or the date when the documents contained therein were publicly accessible or publicly available.

F.R.E. 901/902 (Authentication): This exhibit and the documents contained therein are inadmissible because they are not properly authenticated.

III. CONCLUSION

For at least the foregoing reasons, Patent Owner objects to Exhibits 1003, 1007, and 1008.

Dated: June 3, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of June, 2025, a copy of the attached **Patent Owner Objections to Evidence**, was served by electronic mail to the attorneys of record, at the following addresses:

Douglas A. Robinson (Reg. No. 59,703)
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Respectfully submitted,

Date: June 3, 2025

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